STANDBY GENERATOR UST SYSTEMS

WHAT IS A STANDBY GENERATOR UST SYSTEM?

A standby generator UST system, also called an emergency power generator UST system, is a UST system that stores fuel solely for use by standby power generators. These UST systems contain unique features that are uncharacteristic of UST systems installed at conventional UST sites such as gas stations and convenience stores. These features include return product piping, day tanks, sub-base tanks also called belly tanks, and a power generator. Because these systems were previously deferred, many were installed without consideration for meeting UST system release detection requirements.

NEW CHANGES – EFFECTIVE JULY 6, 2020

Previously:

- UST systems that store fuel solely for use by standby power generators were previously deferred from the release detection requirement.
- They were, however, subject to similar standards of construction, as well as the same release reporting and financial responsibility as non-excluded USTs.
- These systems often were in remote areas and visited infrequently, which made monthly monitoring difficult.

Now:

- Release detection technologies have advanced, so the rationale for deferral no longer applies.
- Newly installed standby generator UST systems of this type are required to meet the same release detection guidelines as regular USTs.
- Systems installed on or before July 6, 2020, shall meet requirements on or before Oct. 13, 2021.
- USTs within standby generator systems are exempt from inventory control requirements.

RELEASE DETECTION REQUIREMENTS

Can be met through use of any of the following methods:

Automatic tank gauge

- ATGs test for leaks by continuously checking the level of product in a tank and looking for loss.
- Installation of an ATG must be performed by a Kansas licensed contractor.

Statistical inventory reconciliation

- SIR relies on analyzing inventory control records and therefore is not recommended for standby generator USTs, as inventory control is not required.
- SIR must be performed by an approved SIR vendor.

Interstitial monitoring

- Interstitial monitoring detects product inside the secondary containment of the tank system, including the tank, piping and containment sumps.
- Detection can be accomplished through a sensor that continuously monitors or through a simple manual test.
- A whole system must have release detection, so interstitial monitoring only satisfies the requirement if the tank, any containment sumps and all piping runs are monitored this way.
- Installation of an interstitial monitoring system must be performed by a Kansas licensed contractor.

Manual tank gauging (also known as "sticking" a tank)

- ONLY meets requirement for tanks with a capacity of 1,000 gallons or less, and so long as a tank-tightness test is conducted no less than every three years by a Kansas licensed contractor.

TESTING REQUIREMENTS (MUST BE PERFORMED BY AN APPROVED CONTRACTOR)

- **Overfill prevention** must be tested at least once every three years and within 30 days of a repair.
- **Release detection tests** must be performed every 30 days.
- **All release detection equipment** must be tested for proper operation at least once a year.
- **Spill buckets** must be tested at least once every three years (unless double-walled and inspected no less frequently than every 30 days as required by the walkthrough inspection) and within 30 days of repair.
- **Interstitial monitoring** must be tested annually. If secondary-containment areas of tanks, piping or containment sumps need repair, they must be tightness-tested within the following 30 days.
- **Containment sumps** must be tested at least once every three years and within 30 days of repair.
- **Cathodic protection** must be tested at least once every three years and must be tested for proper operation within six months of installation as well as during the six months following any repairs.

MOST USTS VS. USTS IN STANDBY GENERATOR SYSTEMS

Requirement	Most USTs	USTs in standby generator systems
Operating permit	Required	
Secondary containment	Required for tanks installed on or after July 1, 2013	Required for tanks installed on or after July 6, 2020
Spill bucket	Required. See testing requirements above	
Corrosion protection	Required for tanks and for piping constructed of metal	
Overfill protection	Required	
Release detection	Required	**Required** (previously deferred)
Interstitial monitoring	Required for tanks installed on or after July 1, 2013	Required for tanks installed on or after July 6, 2020
Testing requirements	Must be performed by a licensed contractor. See "Testing Requirements" section above.	
Walkthrough inspections	Monthly and annual checks required	
Inventory control	Required	**Exempt**
Operator training	A/B Operator training is required	
Release reporting	Required reporting to KDHE for any aboveground release of 25 gallons or more and any underground release, whether suspected or confirmed.	
Installs/repairs/closure/ removals/abandonments	Must be performed by a Kansas licensed contractor, and in most cases, advance notice is required by KDHE. Other requirements are in place for these operations.	
KEIMS	Online submittal required to renew permits for all USTs	

Emergency generators are subject to Federal Regulations, 40 CFR Part 63 Subpart ZZZZ, and 40 CFR Part 60 Subpart JJJJ or IIII, and require an Air Permit. KDHE Bureau of Air offers an expedited permit application in KEIMS for emergency generators.

SBEAP is available to help and can provide assistance on-site or over the phone. SBEAP services are free and confidential. For more information, call 800-578-8898, email sbeap@k-state.edu or visit www.sbeap.org.

More resources for USTs are available, including a user manual and information on KEIMS.

Scan the QR code or visit www.sbeap.org/storage-tanks.

KANSAS SBEAP Small Business Environmental Assistance Program

Kansas Department of Health and Environment