Standard Operating Procedures (SOPs) for Oil Tanks at UNM & Health Sciences

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SOPs for Oil Tanks

THE UNIVERSITY OF NEW MEXICO (UNM)
DEPARTMENT OF ENVIRONMENTAL HEALTH & SAFETY (EHS)

Casey Hall
Director

Melissa Terry
Chemical Hygiene Officer

Viktor Gough
Unit Administrator I

Kolt H. Vaughn
EHS Specialist

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**UNM’s Commitment to Safety**

Safety is a core value of the University of New Mexico. UNM is committed to creating and fostering a culture of safety within the community. To learn more visit [https://ehs.unm.edu/culture-of-safety.html](https://ehs.unm.edu/culture-of-safety.html).

**Acronyms & Definitions**

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<tr>
<td>20.5 NMAC</td>
<td>New Mexico Administrative Code, Chapter 20, Section 5 “Petroleum Storage Tanks”</td>
</tr>
<tr>
<td>40 CFR 112</td>
<td>U.S. Code of Federal Regulations, Chapter 40, Section 112 “Oil Pollution Prevention”</td>
</tr>
<tr>
<td>ABCWUA’s Sewer Use Ordinance (SUO § 3)</td>
<td>Albuquerque Bernalillo County Water Utility Authority’s Section (§) 3 “Sewer Use &amp; Wastewater Control Ordinance”</td>
</tr>
</tbody>
</table>
| Fats, Oils, & Grease (F.O.G.)                     | • Animal, fish, & marine mammal oils, or  
  • Vegetable oils from seeds, nuts, fruits, & kernels.                                                                                     |
| Oil                                               | • Oil of any kind or in any form,  
  • Petroleum & petroleum-based substances, or  
  • Fats, Oils, & Grease (F.O.G.).                                                                                                           |
| Petroleum Storage Tank (PST) Program              | The UNM & Health Sciences program to manage PSTs in accordance with 20.5 NMAC.                                                            |
| Pollution Prevention (P2) Program                 | The UNM & Health Sciences program to maintain compliance with the Memorandum of Understanding (MOU) with the ABCWUA’s Sewer Use Ordinance (SUO). |
| Spill Prevention, Control, & Countermeasure Plan  | The document required by 40 CFR 112 that details the equipment, workforce, procedures, and steps that UNM & Health Sciences must implement to prevent, control, and provide adequate countermeasures to an oil spill or discharge. |
| (SPCC Plan)                                       |                                                                                                                                 |
| Tank (as generally used in this document)         | • Any drum, barrel, cistern, container, etc., equal to or greater than fifty-five gallons that is filled with oil, or  
  • Any size F.O.G. trap or interceptor discharging from a Food Service Establishment (FSE) to the wastewater sewer. |
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1. INTRODUCTION

1.1. PURPOSE

To establish and clarify responsibilities, rules, and procedures relating to oil tanks for departments across the University of New Mexico (UNM) and Health Sciences.

1.2. APPLICABILITY

Generally, all UNM and Health Sciences owned or operated oil tanks equal to or greater than fifty-five gallons (≥ 55 gals), including any size F.O.G. trap or interceptor, are subject to this SOP. Furthermore, this SOP applies to all campuses, including Branch Campuses.

UNM Hospital (UNMH) tanks are not subject to this SOP unless they are partially or entirely owned or operated by UNM or Health Sciences.

1.3. SCOPE

Procuring, designing, installing, operating, inspecting, maintaining, repairing, storing, or decommissioning tanks (≥ 55 gal) are within the scope of this SOP.

1.4. AUTHORITY

UNM and Health Sciences delegate authority to the Environmental Health & Safety (EHS) department to administer the UNM Pollution Prevention (P2) Program, UNM Petroleum Storage Tank (PST) Program, and UNM Oil Spill Prevention, Control, and Countermeasure Plan (SPCC Plan). Therefore, EHS writes this SOP and enforces it to:

(1) Achieve compliance with regulations (e.g., U.S. Code of Federal Regulations (CFRs), New Mexico Administrative Code (NMAC), ABCWUA’s Sewer Use Ordinance (SUO));

(2) Implement industry standards (e.g., national and international safety guidelines); and

(3) Engage in best practices (e.g., expert knowledge).

1.5. DOCUMENT MAINTENANCE

To aid the campus community, EHS maintains this SOP and revises it to incorporate novel topics that arise. Feedback, comments, or recommendations are accepted year-round by emailing EHSweb-L@list.UNM.edu.
2. RESPONSIBILITIES OF DEPARTMENTS ACROSS UNM & HEALTH SCIENCES

2.1. RESPONSIBILITIES OF ENVIRONMENTAL HEALTH & SAFETY (EHS)

EHS must ensure compliance with § 3 “Sewer Use Ordinance,” 20.5 NMAC “Petroleum Storage Tanks,” and 40 CFR 112 “Oil Pollution Prevention” by:

1. Inventorying oil tanks across UNM and Health Sciences campuses,
2. Evaluating tanks for regulatory applicability,
3. Updating the PST Operation & Maintenance Plans and the UNM SPCC Plan per the regulations,
4. Preventing oil spills and leaks through the implementation and maintenance of this SOP, the UNM P2 Program, UNM PST Program, and the SPCC Plan, &
5. Controlling and implementing countermeasures for oil spill incidents.

2.2. RESPONSIBILITIES OF ALL UNM DEPARTMENTS

All stakeholders have the right to stop work if an unsafe condition arises within the work environment.

2.2.1. Basic Tank Requirements

Before procuring, designing, installing, operating, inspecting, maintaining, repairing, or storing tanks on campus, all UNM departments must ensure compliance with Section 3 below.

2.2.2. Notification Requirements

Additionally, all UNM Departments must immediately notify EHS of:

1. Observed spills or leaks from tanks.
2. Plans to decommission, sell, discard, or otherwise relinquish ownership or operation of tanks.
3. Plans to procure tanks.
4. Tank’s recently placed on campus, including the following details:
   a. Location (i.e., latitude & longitude) of the permanent or temporary storage site,
   b. Status of installation (permanent or temporary; if temporary, provide removal date),
   c. Maximum capacity in gallons,
   d. Contents (e.g., motor oil; transmission fluid; diesel; gasoline; industrial kitchen Fats, Oils, & Grease (F.O.G)),
   e. Tank manufacturer’s specification sheet and operations and maintenance guides (required if available from the manufacturer).
3. RULES FOR OIL TANKS: DESIGN, INSTALLATION, OPERATION, INSPECTION, MAINTENANCE, & REPAIRS

UNM is required to comply with applicable local, state, and federal regulations for tank design. UNM also adopts the best-available industry standards as rules for the proper installation and operation of all tanks on campus. For all standards and codes listed in this section, click the links or contact EHS (EHSweb-L@list.UNM.edu) to obtain copies.

3.1. TANK DESIGN & INSTALLATION

3.1.1. Prohibited Underground Storage Tanks (USTs)

USTs (defined at 20.5.101.7.U.4. NMAC) storing 110 gallons or more of petroleum products are strictly prohibited from installation across UNM and Health Sciences. Those USTs smaller than 110 gallons are permitted so long as all other requirements outlined in Section 3 are met.

3.1.2. Design Requirements for Tanks Holding Oils

Tanks installed on campus are required to comply with 40 CFR 112.8 unless they:

1. Can store 1,320 gallons or more of petroleum products and sit aboveground (or within an underground concrete vault) [see Section 3.1.3. below] or
2. Hold Fats, Oils, & Grease (F.O.G.) [see Section 3.1.4. below].

3.1.3. Design & Installation Requirements for Aboveground Storage Tanks (ASTs) ≥ 1,320 Gallons of Petroleum Products

ASTs, including those sited in underground concrete vaults, that store 1,320 gallons or more of petroleum products must be designed and installed per 20.5 NMAC.

Otherwise, “pop-up” leak gauges are UNM’s and Health Sciences’ preferred method of interstitial leak detection, as opposed to electronic Automatic Tank Gauges (ATGs). For example, Krueger Sentry Gauge offers the Type K Interstitial Leak Gauge Monitor, and Morrison Bros. Co. offers the 724 Leak Indicator. While UNM and Health Sciences do not endorse these companies, these leak detection methods are currently in use across the Albuquerque campus and highly recommended.

3.1.4. Design & Installation Requirements for Tanks Holding Fats, Oils, & Grease (F.O.G.)

F.O.G. includes animal, fish, and marine mammal oils and vegetable oils from seeds, nuts, fruits, and kernels. F.O.G. tank design and installation must comply with 40 CFR 112.12 and the ABCWUA’s Sewer Use Ordinance (SUO § 3).

3.1.5. Industry Standards for Tank Installation

Based on applicability, tanks smaller than 1,320 gallons that are constructed of steel must be designed and installed according to the Steel Tank Institute’s standards:

- (R912) Installation Instructions for Shop Fabricated Aboveground Storage Tanks for Flammable, Combustible Liquids,
3.2. Tank Operation & Inspection

ASTs, including those sited in underground concrete vaults, that store 1,320 gallons or more of petroleum products must be operated and inspected only by qualified EHS personnel or their designees and according to 20.5 NMAC.

F.O.G. tanks must be inspected by EHS’s 3rd-party vendor as a requirement of EHS’s contractual obligations and the UNM P2 Program and in compliance with ABCWUA’s Sewer Use Ordinance (SUO § 3).

Otherwise, based on applicability, tanks constructed of steel must be operated and inspected according to the Steel Tank Institute’s standards:

- (SP001) Standard for the Inspection of Aboveground Storage Tanks

3.3. Tank Maintenance & Repair

ASTs, including those sited in underground concrete vaults, that store 1,320 gallons or more of petroleum products must be maintained and repaired by Petroleum Storage Tank Bureau (PSTB)-qualified personnel only, and according to 20.5 NMAC.

Otherwise, based on applicability, tanks constructed of steel must be maintained and repaired according to the Steel Tank Institute’s standards:

- (R111) Storage Tank Maintenance Standard, and
- (SP031) Standard for Repair of Shop Fabricated Aboveground Tanks.

3.4. Tank Decommissioning

Tanks may be decommissioned for various reasons, including non-compliance or non-use.

ASTs, including those sited in underground concrete vaults, that store 1,320 gallons or more of petroleum products must be decommissioned only by qualified EHS personnel or their designees and according to 20.5 NMAC.

Otherwise, tanks previously containing flammable or hazardous substances must be chemically inerted or neutralized before shipment.

UNM Surplus Property will pick up qualified items for disposal after approval of a Request. Otherwise, EHS can help coordinate a contractor to recycle or dispose of the tank.
4. **Administrative Procedures for UNM Tanks**

4.1. **Tank Inventories**

Upon receiving notice from other UNM departments (as described in [Section 2.2.2.](#) above), EHS will collect the tank specification and add it to the SPCC Plan’s inventory and register it with the PSTB or ABCWUA if it meets regulatory applicability (see [Section 4.4.](#) below). Otherwise, EHS will conduct field surveys and participate in campus planning efforts to identify tanks that must be added to the SPCC Plan and registered with PSTB or ABCWUA.

4.2. **Administering the SPCC Plan**

EHS is solely responsible for updating the UNM’s SPCC Plan. The Plan will be reviewed and evaluated at least once every five years and will be amended within six months of the review to include any changes. Any such amendments will also be implemented within six months following the amendment. The SPCC Plan will also be reviewed and amended within six months of any changes in the facility design, construction, operation, or maintenance that materially affects its potential for a spill or discharge.

4.3. **Administering the PST Program**

EHS administers the Petroleum Storage Tank (PST) Program for all of UNM and Health Sciences to ensure compliance with 20.5 NMAC. However, EHS may delegate select operational costs and authorities to other departments and their personnel at its discretion, which may require paying annual tank fees to the PSTB or certifying personnel as A/B/C Operators, among other requirements. Otherwise, all PST Program duties are the sole responsibility of EHS.

4.4. **Administering the P2 Program**

EHS administers the Pollution Prevention (P2) Program for all of UNM and Health Sciences to ensure compliance with ABCWUA’s § 3 “Sewer Use & Wastewater Control Ordinance.” EHS is also responsible for ensuring compliance with ABCWUA’s Memorandum of Understanding with UNM. Therefore, EHS may delegate select operational costs and authorities to other departments and their personnel at its discretion to ensure compliance. Otherwise, all P2 Program duties are the sole responsibility of EHS.
4.5. DETERMINING REGULATORY APPLICABILITY FOR OIL TANKS

Use this form to initially determine if a tank may be subject to regulations. If it is expected to be regulated, contact EHS (EHSweb-L@list.UNM.edu) for a final evaluation & next steps.

### PSTB-Regulated Tanks

**General Regulation**
20.5 NMAC

**Regulated Substances**
Petroleum & petroleum-based substances (see 20.5.101.7.R.4. NMAC).

**Applicability Based on Max Capacity**
Underground Storage Tanks (UST), which are generally prohibited across UNM & Health Sciences:
- ≥ 110 gals

Aboveground Storage Tanks (AST), including tanks in underground, concrete vaults:
- ≥ 1,320 gals

### SPCC-Regulated Tanks

**General Regulation**
40 CFR 112

**Regulated Substances**
Oil of any kind or in any form (see 40 CFR 112.2 “Oil”).

**Regulated Equipment**
Oil-Filled Operational Equipment (OFOE) in which the oil is present solely to support the function of the equipment.

**Applicability Based on Max Capacity**
of the Tank or Equipment
- ≥ 55 gals

### ABCWUA-Regulated Tanks

**General Regulation**
§ 3 "Sewer Use & Wastewater Control Ordinance"

**Regulated Substances**
Fats, Oils, & Grease (F.O.G.), which includes animal, fish, & marine mammal oils, plus vegetable oils from seeds, nuts, fruits, & kernels (see § 3.1-4 "Definitions”).

**Applicability Based on Max Capacity**
Any size grease trap discharging from a Food Service Establishment (FSE) to the wastewater sewer.

When to Notify EHS:
- Before procuring, designing, installing, operating, inspecting, maintaining, repairing, or storing regulated tanks on campus.
- Before decommissioning, selling, discarding, or otherwise relinquishing ownership or operation of regulated tanks.
- Immediately when spills or leaks from regulated tanks are discovered. Call 505-951-0194 or visit goto.unm.edu/spill.

**Acronyms:**
- **PSTB** - New Mexico Environment Dept., Petroleum Storage Tank Bureau
- **SPCC** - The Spill Prevention, Control, & Countermeasure Plan for UNM & Health Sciences
- **ABCWUA** - Albuquerque Bernalillo County Water Utility Authority

More details at ehs.UNM.edu
4.6. OIL SPILL RESPONSE & REPORTING

4.6.1. Responding to an Oil Spill
If leaks or spills are observed, UNM employees should take the following emergency actions and must notify EHS or other personnel listed in the contact table below:

- Ensure safety of personnel in area.
- Eliminate sources of ignition if spill is flammable.
- Stop flow at the source, if safe to do so.
- Notify supervisor, EHS, and designated emergency responder of the spill (see the contact table below).
- Contain spill if safe to do so.
  - Small spills can be cleaned up using a nearby spill kit
    - Utilize items from the spill kit (e.g., pads or absorbent material)
    - Contain spill to prevent migration to water bodies, wastewater drains, storm drains, and/or soils.
  - For large volume spills, UNM EHS will contact an emergency response contractor.
    Otherwise, EHS will manage the spill.
- Assist with spill response as directed.

4.6.2. Contact Table for Reporting Oil Spills (required when spill is ≥ 25 gals.)

<table>
<thead>
<tr>
<th>Agency / Individual</th>
<th>Address</th>
<th>Phone Number(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Agencies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Response Center (NRC)</td>
<td>1200 Pennsylvania Ave. NW (MC 5104A)</td>
<td>(800) 424-8802&lt;br&gt;(202) 267-2675</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency (EPA) Region 6</td>
<td>1201 Elm Street (Suite 500) Dallas, TX 75270</td>
<td>(800) 887-6063&lt;br&gt;(214) 665-2760</td>
</tr>
<tr>
<td>State and Local Agencies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB)</td>
<td>1190 St. Francis Drive (Suite N4050) Santa Fe, NM 87505</td>
<td>Emergency: (505) 827-9329&lt;br&gt;Non-emergency: (866) 428-6535</td>
</tr>
<tr>
<td>Albuquerque Fire Rescue</td>
<td>11500 Sunset Gardens SW, Albuquerque, NM 87121</td>
<td>(505) 768-9300</td>
</tr>
<tr>
<td>Albuquerque Fire Marshal’s Office</td>
<td>724 Silver Avenue SW, Albuquerque, NM 87102</td>
<td>(505) 764-6300</td>
</tr>
<tr>
<td>Albuquerque Police Department</td>
<td>400 Roma Avenue NW, Albuquerque, NM 87102</td>
<td>(505) 768-2200</td>
</tr>
<tr>
<td>Albuquerque Bernalillo County Water Utility Authority (ABCWUA)</td>
<td>1441 Mission Avenue NE, Albuquerque, NM 87113</td>
<td>(505) 842-9287</td>
</tr>
</tbody>
</table>
## UNM Facility Contacts

<table>
<thead>
<tr>
<th>UNM Facility Contacts</th>
<th>Address</th>
<th>Contact Information</th>
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</thead>
</table>
| UNM Environmental Health and Safety (EHS)                   | 1801 Tucker Ave. NE (Bldg. 233)              | Office: (505) 277-2753  
24/7 Officer: (505) 951-0194  
goto.unm.edu/spill |
| UNM Facilities Management (FM)                              | See UNM FM Area Managers Below.              | Office: (505) 277-2421                                                             |
| UNM Police Department (PD)                                 | 2500 Campus Blvd NE (Bldg. 58)               | (505) 277-2241  
Emergency: Call 911                                                             |
| Casey B. Hall, *Director* UNM EHS                          | 1801 Tucker Ave. NE (Bldg. 233)              | Cell: (315) 885-8683  
Office: (505) 277-0305                                                            |
| Melissa Terry, *Chemical Hygiene Officer* UNM EHS           | Same as above.                               | Cell: (415) 797-2223  
Office: (505) 277-1058                                                            |
| Kolt H. Vaughn, *EHS Specialist* UNM EHS                   | Same as above.                               | Cell: (405) 567-5188  
Office: (505) 277-0972                                                            |
| Tommy Evans, *EHS Technician III* UNM EHS                   | Same as above.                               | Cell: (505) 553-0433  
Office: (505) 277-1692                                                            |
| Gonzalo (Gonzo) Orona, *EHS Technician II* UNM EHS         | Same as above.                               | Cell: (575) 499-4004                                                            |
| Katelin Fisher, *Volunteer* UNM Spill Response Team        | 210 University Blvd. NE (Bldg. 112)          | Cell: (765) 413-8219                                                             |
| Mark Hofheins, *Volunteer* UNM Spill Response Team         | 800 Bradbury Dr. SE, STE 175 (Bldg. 341)     | Office: (505) 272-7506  
Cell: (505) 259-9278                                                             |
| Edwin Trujillo, *FM Area 1 Manager* UNM FM                  | 1818 Camino Del Servicio N.E. (Bldg. 204)    | Office: (505) 277-0100  
Cell: (505) 269-9291                                                             |
| Leo Lucero, *FM Area 2 Manager* UNM FM                      | 2425 Camino De Salud N.E. (Bldg. 211)        | Office: (505) 272-9002  
Cell: (505) 252-8459                                                             |
| Steven Dussart, *FM Area 3 Manager* UNM FM                  | 302 Cornell Dr. N.E. (Bldg. 56)              | Office: (505) 277-6798  
Cell: (505) 362-3932                                                             |
| Joseph Lopez, *FM Area 4 Manager* UNM FM                    | 201 Terrace St. N.E. (Bldg. 2)               | Office: (505) 277-3777  
Cell: (505) 321-5619                                                             |

## UNM Emergency Response Contractors

<table>
<thead>
<tr>
<th>UNM Emergency Response Contractors</th>
<th>Address</th>
<th>Contact Information</th>
</tr>
</thead>
</table>
| Advanced Environmental Solutions                           | 2318 Roldan Drive, Belen, NM 87002           | (505) 861-1700  
Dial 7                                                        |
| Advanced Chemical Transport                                | 6137 Edith Blvd NE, Albuquerque, NM 87107   | (505) 998-4300     |
| Clean Harbors                                              | 2720 Girard Blvd NE, Albuquerque, NM 87107  | (505) 884-2277     |
"SOP for Oil Tanks at UNM & Health Sciences" History

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