



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

Updated 12/12/2023

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



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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>.

ACRONYMS & DEFINITIONS

20.5 NMAC	New Mexico Administrative Code, Chapter 20, Section 5 “Petroleum Storage Tanks”
40 CFR 112	U.S. Code of Federal Regulations, Chapter 40, Section 112 “Oil Pollution Prevention”
ABCWUA's Sewer Use Ordinance (SUO § 3)	Albuquerque Bernalillo County Water Utility Authority's Section (§) 3 “Sewer Use & Wastewater Control Ordinance”
Fats, Oils, & Grease (F.O.G.)	<ul style="list-style-type: none"> • Animal, fish, & marine mammal oils, or • Vegetable oils from seeds, nuts, fruits, & kernels.
Oil	<ul style="list-style-type: none"> • 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 (SPCC 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.
Tank <i>(as generally used in this document)</i>	<ul style="list-style-type: none"> • 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,](#)

- [\(R821\) Cathodically Protected Underground Storage Tank Installation Instructions](#),
- [\(R011\) Recommended Practice for Anchoring of Steel Underground Storage Tanks](#),
- [\(R971\) Urethane Coated Steel Underground Storage Tank Installation Instructions](#),
- [\(R913\) FRP Composite Steel Underground Storage Tank Installation Instructions](#),
- [\(R923\) FRP Jacketed Steel Underground Storage Tank Installation Instructions](#), or
- [Installation Instructions for Aquasweep™ Underground Oil Water Separators](#).

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.)

Agency / Individual	Address	Phone Number(s)
Federal Agencies		
National Response Center (NRC)	1200 Pennsylvania Ave. NW (MC 5104A) Washington, DC 20460	(800) 424-8802 (202) 267-2675
U.S. Environmental Protection Agency (EPA) Region 6	1201 Elm Street (Suite 500) Dallas, TX 75270	(800) 887-6063 (214) 665-2760
State and Local Agencies		
New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB)	1190 St. Francis Drive (Suite N4050) Santa Fe, NM 87505	Emergency: (505) 827-9329 Non-emergency: (866) 428-6535
Albuquerque Fire Rescue	11500 Sunset Gardens SW, Albuquerque, NM 87121	(505) 768-9300
Albuquerque Fire Marshal's Office	724 Silver Avenue SW, Albuquerque, NM 87102	(505) 764-6300
Albuquerque Police Department	400 Roma Avenue NW, Albuquerque, NM 87102	(505) 768-2200
Albuquerque Bernalillo County Water Utility Authority (ABCWUA)	1441 Mission Avenue NE, Albuquerque, NM 87113	(505) 842-9287

UNM Facility Contacts		
UNM Environmental Health and Safety (EHS)	1801 Tucker Ave. NE (Bldg. 233) Albuquerque, NM 87131	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) Albuquerque, NM 87131	(505) 277-2241 Emergency: Call 911
Casey B. Hall, <i>Director</i> UNM EHS	1801 Tucker Ave. NE (Bldg. 233) Albuquerque, NM 87131	Cell: (315) 885-8683 Office: (505) 277-0305
Melissa Terry, <i>Chemical Hygiene Officer</i> UNM EHS	Same as above.	Cell: (415) 797-2223 Office: (505) 277-1058
Tommy Evans, <i>Safety Specialist</i> UNM EHS	Same as above.	Cell: (505) 553-0433 Office: (505) 277-1692
Gonzalo (Gonzo) Orona, <i>EHS Technician II</i> UNM EHS	Same as above.	Cell: (505) 800-8950
Thanatos VonFox, <i>Unit Administrator</i> UNM EHS	Same as above.	Cell: (626) 644-8911
Edwin Trujillo, <i>FM Area 1 Manager</i> UNM FM	1818 Camino Del Servicio N.E. (Bldg. 204) Albuquerque, NM 87131	Office: (505) 277-0100 Cell: (505) 269-9291
Mark Russell, <i>FM Area 2 Manager</i> UNM FM	2425 Camino De Salud N.E. (Bldg. 211) Albuquerque, NM 87131	Office: (505) 272-9002 Cell: (505) 403-3643
Steven Dussart, <i>FM Area 3 Manager</i> UNM FM	302 Cornell Dr. N.E. (Bldg. 56) Albuquerque, NM 87131	Office: (505) 277-6798 Cell: (505) 362-3932
Joseph Lopez, <i>FM Area 4 Manager</i> UNM FM	201 Terrace St. N.E. (Bldg. 2) Albuquerque, NM 87131	Office: (505) 277-3777 Cell: (505) 321-5619
UNM Emergency Response Contractors		
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 - R1

Final Audit Report

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