



November 2, 2018

Tank Owners and Operators,

The use of ethanol is increasing and this letter serves to notify you of what you can do to ensure your UST equipment is compatible and in compliance with state and federal regulations.

All of the equipment in your UST systems are built by different manufacturers and with different technologies. It is very important to know **before** switching fuels in your tanks if your system is compatible with the higher levels of ethanol. The best way to ensure this is to have your tank installation paperwork, along with the serial numbers of your tanks on site. You can then contact the manufacturer of that tank, who will provide paperwork stating whether the tank is compatible or non-compatible with the fuel you want to store.

For all other parts and equipment, Underwriters Laboratories (UL) is a great resource. You may also go to the following website <https://cleancities.energy.gov/blog/key-considerations-for-e85-and-other-ethanol-blend-infrastructure>. The U.S Department of Energy has a handbook that walks you through handling, storing, and dispensing of E85 and other ethanol-gasoline blends. They have UL listings for most of the parts within the system, including tanks. If you are storing higher grades of ethanol, you will be asked by State Fire Marshal Deputies to provide paperwork that proves your UST system is compatible with those higher ethanol blends.

If you have any question please give our office a call at 402-471-9465.

Sincerely,

A handwritten signature in black ink that reads "David Levering".

David Levering, Chief Deputy  
Fuels Division

□ MAIN OFFICE  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-2027

□ DISTRICT A OFFICE  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-2590

□ DISTRICT B/C OFFICE  
438 West Market  
Albion, NE 68620-1241  
Office (402) 395-2164

□ FUELS DIVISION  
□ FLST □ Pipeline Safety  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-9465

□ TRAINING DIVISION  
3347 W Capital Ave  
Grand Island, NE 68801  
Office (308) 385-6892

# NEBRASKA

Good Life. Great Safety.

STATE FIRE MARSHAL AGENCY



Pete Ricketts, Governor

Below you will find a quick reference list of all the required documents that owners/operators are required to have on site. It is important that there are many differences between facilities. Therefore, it is very important to know what you have as an Underground Storage Tank (UST) system. If you have any questions as to what you have for a UST, system please give our office a call at (402) 471-9465. Note: All records must be kept on site and available upon request from the State Fire Marshal.

ATG- Automatic tank gauge

S.I.R- Statistical Inventory Reconciliation

GPH- Gallon per hour

I.M. Interstitial monitoring

CP-Cathodic Protection

### Release Detection to be kept for five years

- Accurate daily inventory with monthly reconciliation. **Title 159 Chapter 7.001**
- Approved monthly monitoring of the tanks i.e.( .2 gph ATG test, S.I.R, I.M, manual tank gauging) **Title 159 Chapter 7.001**
- Approved testing of piping i.e. (.1 gph annually, or .2 gph monthly, or I.M. monthly) note: SIR is not an accepted method of release detection for piping. **Title 159, Chapter 7.002**
- Annual testing of all release detection equipment including ( ATG, sump sensors, and leak detectors) **Title 159 Chapter 7.006.03**

### Release Prevention

- If tanks or piping are made of metal they must be protected from corrosion using galvanic or impressed current cathodic protection systems. **Title 159 Chapter 4.003**
- Galvanic CP test must be completed every three years. The last two test must be on site for inspection. **Title 159 Chapter 6.002.02A and 002.04B**
- Impressed current cathodic protection systems need to be tested annually. The last two test must be on site for inspection. **Title 159 Chapter 6.002.02A1 and 002.04B**
- Impressed current cathodic protection systems must also be inspected every 60. The last three inspections shall be kept on site for inspection. **Title 159 Chapter 6.002.04A**
- Overfill protection for each tank must be in place before operating UST system. i.e.( drop tube shut off, 90 percent alarm, or existing ball float) **Title 159 Chapter 4.004.08B**

**Repair records shall be kept for all of the above for the life of the system. Title 159 Chapter 6 004.06**

□ MAIN OFFICE  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-2027

□ DISTRICT A OFFICE  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-2590

□ DISTRICT B/C OFFICE  
438 West Market  
Albion, NE 68620-1241  
Office (402) 395-2164

□ FUELS DIVISION  
□ FLST □ Pipeline Safety  
246 South 14<sup>th</sup> Street  
Lincoln, NE 68508-1804  
Office (402) 471-9465

□ TRAINING DIVISION  
3347 W Capital Ave  
Grand Island, NE 68801  
Office (308) 385-6892

### **Compatibility**

- Owners and operators must have documentation to demonstrate the UST system is compatible with the product being stored. i.e. ( manufacture's letter of approval with UL listing)  
**Title 159 Chapter 6.003**
- It is recommended owners and operators notify the State Fire Marshal in writing within 30 days before changing product to be stored in each tank. (new regulation coming in 2019)

### **Upgrading Records for UST Systems**

- All upgrading records for UST systems installed before January 1, 1989 must be on site to demonstrate UST system is in compliance with **Title 159 Chapter 5**. i.e. (tank lining or cathodic protection)

### **Operator Training Record Keeping**

- Certification of completion of class A/B and C operator training. **Title 159 Chapter 13.008**

### **Operating Permit**

- Owners/operators shall have operating permit posted in prominent place. Operating permits are obtained after an inspection is approved by the State Fire Marshal Deputy. Note: Operating permits are good until the next inspection. **Title 159 Chapter 2.002.01**

**All Installation permits, closure permits and supporting documentation shall be kept on site available for inspection. i.e. (permits, as built drawing's, closure assessment reports. Title 159 Chapter 6.006 and Chapter 10.006**