

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

In The Matter Of:)	
)	
BLAKE LEASING COMPANY, LLC -)	
REAL ESTATE SERIES as owner)	
of KIRKLAND QUICK STOP)	
Petitioner,)	
v.)	PCB 2018-26
)	(Water Well Setback Exception)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY, VILLAGE)	
OF KIRKLAND, and SOO LINE)	
RAILROAD COMPANY,)	
Respondents.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an AGENCY RESPONSE TO PETITION FOR WATER WELL SETBACK EXCEPTION, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: Stephanie Flowers
Stephanie Flowers

Assistant Counsel
Division of Legal Counsel

DATE: December 6, 2017
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AGENCY RESPONSE TO PETITION FOR WATER WELL SETBACK EXCEPTION

NOW COMES the Illinois Environmental Protection Agency ("Agency"), by and through one of its attorneys, Stephanie Flowers, and respectfully submits its AGENCY RESPONSE TO PETITION FOR WATER WELL SETBACK EXCEPTION ("Response") according to 35 Ill. Adm. Code 106.306(a). This Response is in reply to the Petition filed with the Illinois Pollution Control Board ("Board") on November 7, 2017, by Petitioner BLAKE LEASING COMPANY, LLC – REAL ESTATE SERIES ("Blake Leasing") requesting a Water Well Setback Exception pursuant to Section 14.2 of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/14.2.

INTRODUCTION

1. Section 14.2 of the Act establishes a minimum setback zone for the location of each new potential source or new potential route with Section 14.2(c) of the Act providing a

process by which the owner of a potential route or a potential source may petition the Board for an exception to the minimum setback zone prohibitions of Section 14.2 of the Act. Section 14.2(c) states the required information that must be included in an exception petition, and the demonstrations that a petitioner is required to make in order for the Board to grant an exception. Section 14.2(c) requires the petitioner to file a petition with both the Board and the Agency. The petitioner is also required to show proof that all water supplies affected by the proposed exception have been notified and provided a copy of the petition. The petition must also contain a general description of the potential impacts of the potential source or potential route on groundwater and the potable well, and an explanation of the applicable technology that will be used to minimize risk. The Act states that the Board shall grant an exception upon presentation of adequate proof that: compliance with the setback zone would pose an arbitrary and unreasonable hardship; petitioner will use best available technology; the maximum feasible setback zone will be utilized; and the location of the potential source or route does not constitute a significant hazard to the potable water supply well.

PETITION

2. Blake Leasing filed a petition with the Board for a setback exception from the requirements of Section 14.2(d) of the Act on November 7, 2017 to operate three (3) underground storage tanks (“USTs”) that are within the 400-foot minimum setback zone of a Village of Kirkland community water supply well. The Agency received the Petition for Water Well Setback Exception on November 14, 2017.

3. Section 14.2 of the Act, in pertinent part, states:

Sec. 14.2. New potential source or route; minimum setback zone. A minimum setback zone is established for the location of each new potential source or new potential route as follows:

(d) Except as provided in subsections (c) and (h) of this Section and Section 14.5, no new potential route or potential primary source or potential secondary source may be placed within 400 feet of any existing or permitted community water supply well deriving water from an unconfined shallow fractured or highly permeable bedrock formation or from an unconsolidated and unconfined sand and gravel formation. The Agency shall notify the owner and operator of each well which is afforded this setback protection and shall maintain a directory of all community water supply wells to which the 400-foot minimum setback zone applies.

In August 1988, the Agency assigned to Village of Kirkland Wells 11424 and 11425 a 400-foot minimum setback zone, based on best available information. That setback zone determination was further supported by enriched tritium analysis completed April 3, 2014, at Well 11425. Enriched tritium analysis uses tritium (a hydrogen isotope) released into the atmosphere during above ground nuclear testing in the 1950's and 1960's to indicate a relative age of groundwater. Groundwater containing 1.0 tritium unit ("TU") or less is considered ancient water, and is not believed to have any recharge contribution from modern surface water. The tritium analysis of Well 11425 conducted in April 2014 reported 2.3, +/- 0.4 TU (see attached EXHIBIT A). Therefore, the Agency considers Well 11425 to be receiving recharge of some modern water and is not considered to be utilizing a confined aquifer system. Therefore, pursuant to Section 14.2(d) of the Act, a minimum setback zone of 400 feet is appropriate for Well 11425. Given the proximity of Wells 11425 and 11424 (approximately 350 feet apart), the Agency does not consider Well 11424 to utilize a confined aquifer system and therefore finds a 400-foot minimum setback zone for Well 11424 is appropriate. Maps provided by Blake Leasing demonstrate that the three USTs are within the minimum setback zone of Well 11424. Though Well 11424 is referred to as an emergency backup well, Village of Kirkland operates the well at least monthly to obtain bacteriological samples and performs routine chemical monitoring for compliance with

the Safe Drinking Water Act. Well 11424 meets these requirements, so water from Well 11424 could be pumped to Village of Kirkland's drinking water treatment system in the event it is needed. Therefore, Well 11424, as an emergency backup well, is afforded the same setback protections as any other community water supply well. The Agency notes that the Village of Kirkland has taken the additional protective measure of adopting a maximum setback zone for both Wells 11424 and 11425, indicating the Village's desire to protect both wells equally.

4. Section 3.355 of the Act, in pertinent part, defines a potential secondary source as:

Sec. 3.355. Potential secondary source. "Potential secondary source" means any unit at a facility or a site not currently subject to a removal or remedial action, other than a potential primary source, which: (3) stores or accumulates at any time more than 25,000 gallons above ground or more than 500 gallon below ground of petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance.

Section 3.355 further defines a "new potential secondary source" as follows:

A new potential secondary source is:

- (i) a potential secondary source which is not in existence or for which construction has not commenced at its location as of July 1, 1988; or
- (ii) a potential secondary source which expands laterally beyond the currently permitted boundary, or if the secondary source is not permitted, the boundary in existence as of July 1, 1988, other than an expansion for handling of livestock waste or for treating domestic wastewaters; or
- (iii) a potential secondary source which is part of a facility that undergoes major reconstruction. Such reconstruction shall be deemed to have taken place where the fixed capital cost of the new components constructed within a 2-year period exceed 50% of the fixed capital cost of a comparable entirely new facility.

Information contained in the petition indicates installation of the three USTs took place between October 8th and 15th, 1993. One of the USTs has two compartments and is therefore considered two tanks by the Office of the Illinois State Fire Marshall. The USTs are identified as

tanks 11, 12, 13 and 14, with tanks 12 and 14 being the double compartment tank. All of the USTs have a capacity of greater than 500 gallons. The petition further indicates that in Spring 2003 Blake Leasing performed significant upgrades to the facility at a cost of \$834,737.00, which is nearly double the cost of the original purchase price of \$420,000.00. Based on the above definitions and the information provided in the petition, the USTs are new potential secondary sources. The petition does not dispute that the subject USTs are potential secondary sources.

5. No exception was granted by the Board to the Petitioner for tank installation in 1993 which was discussed in PCB 16-100. Section 14.2(d) of the Act prohibits the installation of a new potential secondary source within the 400-foot minimum setback zone of an existing or permitted community water supply well, unless an exception is granted by the Board pursuant to Section 14.2(c) of the Act. Lack of an exception pursuant to Section 14.2(c) of the Act appears to the Agency to represent a violation of the Act by Blake Leasing. However, while the Agency believes that the installation of the subject USTs in 1993 represents an on-going violation of the Act pursuant to Section 14.2(d) of the Act each day the subject USTs are present without an exception from the Board, the Agency believes the Board does not have a limited timeframe in which to grant an exception pursuant to Section 14.2(c) of the Act. Therefore, in lieu of the Agency issuing a potential violation notice to Blake Leasing, the Agency accepts the remedy of Blake Leasing filing this petition with the Board and Agency pursuant to Section 14.2(c) of the Act to request the water-well setback exception from the Board for the three USTs. The Agency believes this petition action is a better use of State and Petitioner resources than initiation of enforcement action that ends with the same result. However, the Agency views the installation

of the subject USTs without an exception as an on-going violation, therefore, if the Board does not grant the exception, the Agency would still have the authority to pursue enforcement.

NOTIFICATION OF WATER SUPPLY

6. A Proof of Service affidavit was included with the petition stating that the Village of Kirkland and CT Corporation System, as registered agent for Soo Line Railroad, have been provided with a copy of the petition. Soo Line Railroad owns Well 11424, which is leased to Village of Kirkland. The Petitioner confirmed the absence of additional affected setback zones. The Agency believes the Petitioner has adequately addressed this requirement.

GENERAL DESCRIPTION OF POTENTIAL IMPACTS

7. Due primarily to the long history of site remediation, which is still on-going, the Blake Leasing site has an abundance of geologic, hydrogeologic and groundwater quality data available for review. Additionally, lack of detected impacts to Well 11424, when there is widespread groundwater contamination in the up-gradient direction does indicate a limited potential for impact to the affected well. However, the existing data also demonstrates that a release from the subject USTs would move quickly through the upper groundwater system. While a great abundance of data is provided, the petition does not contain a section that specifically addresses this aspect of the exception as required in Section 14.2(c) of the Act. Therefore, the Agency does not believe the petition, as submitted, adequately describes the potential impact to groundwater and the affected well.

ARBITRARY AND UNREASONABLE HARDSHIP

8. The Petitioner has provided information regarding their costs of property acquisition and upgrades, and the loss of revenue that would be experienced by various taxing bodies if the facility is not operational. No breakdown is provided that differentiates between sales tax for gas versus sales tax for other items. Since sales tax represents only a relatively small percentage of the profit generated by the facility it is apparent that the current operation generates significant income. The Petitioner has indicated that without gas sales the facility is not a viable venture, therefore it can be anticipated that the facility's profitability would certainly be reduced, thereby also reducing its value, creating a financial hardship. Therefore, the Agency believes the petition, as filed, adequately demonstrates an arbitrary and unreasonable hardship.

BEST AVAILABLE TECHNOLOGY CONTROLS

9. The Petitioner provides a list of the technological controls used as part of the UST installation when the tanks were installed in 1993. The Petitioner upgraded those technological controls in 2003 with the addition of double walled piping and an improved inventory monitoring system, along with other facility enhancements. The Agency believes these upgrades to the subject USTs demonstrate Blake Leasing's commitment to prevent new fuel releases. However, an internet literature search revealed multiple articles regarding fiberglass tank technology and the potential for degradation, two of those articles are included as exhibits. The articles indicate that single walled fiberglass tanks are no longer best available technology ("BAT"). Double walled fiberglass tanks with interstitial monitoring are now generally the BAT for fuel storage, with triple walled tanks available for ultra-sensitive areas (see attached

EXHIBIT B). Fiberglass tanks more than 20 years old may be subject to degradation from fuel additives such as ethanol (see attached EXHIBIT C). The subject USTs have been in service for 24 years. Given this information, the Agency does not believe the petition, as submitted, adequately demonstrates the use of BAT at the Blake Leasing site.

10. The Agency therefore recommends as BAT for the subject tanks:

- 1) A visual inspection of the interior of each of the subject USTs, either by camera or physical entry, to check for observable degradation;
- 2) Inspection of fuel filters for fibers and other materials when the fuel filters are changed should be added to the facility's "Underground Storage Tank Operations and Maintenance Plan Template" as an additional activity;
- 3) Blake Leasing should commit to the replacement of any of the subject tanks displaying degradation with tank(s) and fixtures that represent current BAT.

MAXIMUM FEASIBLE ALTERNATIVE SETBACK

11. Typically, in the setback zone exception process, the maximum feasible setback is considered to assure that the greatest possible distance between a potential source or potential route, and a potable well is maintained. Increased distance is proportional to the time it takes a contaminant to move through groundwater from its source to a well. However, distance from the well is not the only consideration. Tank placement also requires that consideration be given to traffic patterns so that fuel deliveries may be made with the safety of both customers and delivery personnel in mind, during arrival, off-loading and departure. Further complicating the Blake Leasing site were former USTs that have now been removed and on-site monitoring and

remedial wells that must continue to operate. Given these considerations the Agency believes the petition, as filed, adequately demonstrates that the maximum feasible setback is being used.

**ENVIRONMENTAL IMPACT/SIGNIFICANT HAZARD TO THE POTABLE WATER
SUPPLY WELL**

12. As presented in the petition, former USTs at the Blake Leasing site were shown to be leaking in 1989 when monitoring wells were installed. Given the sites long history (Circa 1930) as a fuel service station, it seems likely that tank leakage and some degree of incidental spillage of product occurred well before 1989. Over the last 28 years, since the discovery of petroleum constituents in groundwater, various rounds of remedial activities have taken place and continue to be implemented. In spite of the many years that have passed with known contaminants in groundwater, no petroleum constituents have been detected in Well 11424. Therefore, the subject USTs, even though they no longer represent BAT, should not, with proper monitoring and maintenance represent a significant hazard. However, the Petitioner did not propose steps to detect tank degradation prior to tank failure. Given the lack of preventive monitoring, the Agency does not believe the petition, as filed, adequately demonstrates that there is no significant hazard.

CONCLUSION

13. The Agency recommends that the Board not grant the exception to the Petitioner until such time that the Petitioner appropriately amends the petition to provide the following information and commitments:

- 1) A section in the petition that discusses the potential impacts to groundwater and the affected well;
- 2) A physical inspection of the interior of each of the subject USTs to determine if degradation is taking place;
- 3) On-going monitoring during regular maintenance to observe for signs of degradation of the subject tanks; and
- 4) A commitment to replace any of the subject USTs that are found to be degraded, with USTs that meet current BAT.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: *Stephanie Flowers*
Stephanie Flowers
Assistant Counsel
Division of Legal Counsel

Dated: *December 6, 2017*
ILLINOIS ENVIRONMENTAL
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217/782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

CERTIFICATE OF SERVICE

I, STEPHANIE FLOWERS, an attorney, do certify that I filed electronically with the Office of the Clerk of the Illinois Pollution Control Board the AGENCY RESPONSE TO PETITION FOR WATER WELL SETBACK EXCEPTION and will cause the same to be served upon the persons listed on the Service List, by electronic service on December 6, 2017 or by placing a true and correct copy of each in a properly addressed envelope and mailing it with sufficient postage affixed by First Class Mail from Springfield, Illinois on December 6, 2017.


STEPHANIE FLOWERS

DATED: 12-6-2017
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Springfield, Illinois 62794-9276
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EXHIBIT A

Village of Kirkland

815 522-9839

p.1

Client: Naugle
Village of Kirkland

ISO# 2014130
Location:
2 for E3H

Environmental Isotope Lab
4/3/2014
1 of 1

#	Sample	Lab#	E3H	Result	± 1σ	Repeat	± 1σ
1	Well 2 Kirkland	11425	323695	X	2.3	0.4	
2	Well 3 Kirkland	01613	323696	X	<0.8	0.4	

Conductivity

Tritium is reported in Tritium Units.
1TU = 3.221 Picocuries/L per IAEA, 2000 Report.
1TU = 0.11919 Becquerels/L per IAEA, 2000 Report.

ATTN RYAN BENNETT

To Contact uwEILAB:
519 888 4732

Rick Heemskerk
uwEILAB Manager
rkhmskrk@uwaterloo.ca
519 888 4567 ext 3583B

EXHIBIT B

Fiberglass Underground Petroleum Storage Tanks & Piping 50+ Year History

Sullivan D. Curran P.E.,
Fiberglass Tank & Pipe Institute

50+ Year History: For more than 50 years, fiberglass underground petroleum storage tanks and piping have established an outstanding reputation for corrosion resistant, product compatible storage and distribution of motor fuels, including today's generation of biofuels, chemicals, and various petroleum products.

30 Year Limited Warranty: Institute tank and piping manufacturer's warranty their petroleum tanks and piping for 30 years based on their confidence, which can only stem from a long history of success, and knowledge that properly installed UL Listed fiberglass tanks and piping will last for decades with little or no maintenance.

1960s: In the very early 1960s Owens Corning, a major glass fiber manufacturer, began manufacturing lightweight reinforced plastic underground storage tanks with ribs and hemispherical end caps designed to handle common burial site and loading conditions. Similarly, lightweight fiberglass pipe was developed that was designed for shipment to the job site in lengths up to 40 foot, easily installed with leak free joints, corrosion resistant, and able to withstand high pressures with a low friction flow rates. The tanks and piping were tested and listed by Underwriters Laboratories (UL) Standards 1316, "Glass Reinforced Plastic Underground Storage Tanks for Petroleum Products, Alcohols, and Alcohol Gasoline Mixtures" and 971 "Standard for Nonmetallic Underground Piping for Flammable Liquids", and Factory Mutual for the underground storage of flammable and combustible liquids.

1970s: In the early 1970's the major manufacturers of fiberglass tanks (Owens Corning, now Containment Solutions Inc. and Xerxes Corporation) and major manufacturers of fiberglass piping (Ameron and Smith Fiberglass, now NOV Fiber Glass Systems) trained major oil company personnel and their contractors to properly install fiberglass underground tanks and piping at vehicle refueling facilities and other industrial locations. Witnessing the early installation and performance success of fiberglass tanks and piping, state and local building officials recognized the corrosion resistant advantages of properly installed underground storage tanks and piping. This, in turn, prompted model building and fire code organizations (e.g. National Fire Protection Association, Uniform Fire Code, Standard Fire Protection Code) to recognize and include fiberglass tanks, piping and their proper installation in their model codes.

1980's and 1990's: By 1980 certain major oil companies required UL listed tanks to be compatible with fuels with up to 100% ethanol and methanol. In 1983, the Underwriters Laboratories Listing UL 1316 was revised and a new listing was included for the storage of fuels with up to 100% ethanol and methanol. In 1988, the UL 971 Listing for fiberglass piping was also changed to include up to 100% ethanol and methanol.

2015: On July 15, 2015 the Environmental Protection Agency's (EPA's) updated Underground Storage Tank Regulations (including piping) were published in the *Federal Register*. The updated regulations adds secondary containment release and detection requirements for new and replaced tanks and piping.

- Double Wall: Today's regulated (petroleum and chemical) fiberglass tanks and piping are both double walled with the ability to monitor the interstitial space for integrity, either hydraulically or with sensors.
- Triple wall underground fiberglass tanks and piping systems are also available with two interstitial spaces for integrity monitoring and are typically used for large volume storage in ultra-sensitive environments.
- Multi-compartment fiberglass tanks are being used more extensively today to store multiple products in the same tanks rather than storing different products separately in smaller tanks. Multi-compartment tanks reduce installation and other multiple storage tank operating costs.
- Tank sizes: Underground fiberglass tank sizes range from 4 foot diameter with 600 gallons capacity to 12 foot diameter with 50,000 gallons capacity. Today, most fuel applications utilize 10 foot diameter single and multi-compartment tank capacities ranging from 25,000 to 50,000 gallons. Large tanks capacities are also typically used for water and wastewater treatment applications.
- Piping sizes: Underground double wall fiberglass pressure piping and fittings are UL 971 listed materials for underground tank installations ranging from 2 through 6 inch diameters.
- Limited Warranty: Fiberglass Tank & Pipe Institute manufacturers of the foregoing described UL listed fiberglass tanks, piping and fittings include a 30-year Limited Warranty.

EXHIBIT C



Home

My Blog

Degradation of Fiberglass Underground Storage Tanks

Rebecca Watkins: Posted on Monday, May 04, 2015 9:27 AM



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It is a common assumption that fiberglass Underground Storage Tanks (USTs) are impervious to corrosion which is often seen in steel USTs, but recently fiberglass USTs have been shown to fail and the cause is interior tank degradation. These tank failures can result in catastrophic releases of fuel into the environment if problems with tank interiors are not detected early. A report published in 2013 by the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) explains that increased concentrations of ethanol and biodiesel fuel blends can have a detrimental effect on the life expectancy of a fiberglass UST. It is important to understand that not all tanks or their components will be compatible with these new fuel blends.



How can a fuel with a higher ethanol concentration degrade a fiberglass UST? Biofuels have different chemical properties than conventional gasoline or diesel which can lead to compatibility issues. Biofuels are more soluble and can degrade, soften, and seep through hoses, gaskets, seals, elastomers, glues, and plastics. Biofuels are more conductive, which directly leads to corrosion in steel USTs. Biofuels have the capacity to absorb more water than conventional fuels, this causes the water to become suspended in the fuel to a greater extent than is normally seen. The presence of water creates a habitat for microbial growth while hydrocarbon fuel is a food source for many types of bacteria.

Water management is one of the main ways to protect your UST from degradation. Water intrusion into the UST can create a habitat for bacterial growth, which can waste product and result in tank or tank component failures. Many types of bacteria use hydrocarbons (gasoline or diesel) as a food source and once they consume the fuel they excrete byproducts that can degrade tank linings. Other types of bacteria can use the resin holding the fibers together in a fiberglass tank as a food source, which makes tanks vulnerable to failure. Tank components, especially those made of metal, can be degraded by bacteria as well; leak detectors, fill tubes, turbines, tank linings, elastomeric seals and hoses, low points in the piping, turbine pump components, filters and valves.

Because fiberglass USTs are not immune to degradation as previously assumed, it is a good practice to inspect for evidence of interior degradation and microbial contamination. Signs of microbial contamination in USTs include plugged fuel filters (< 6 month intervals between fuel filter changes), plugged fuel lines, erratic gauges, rotten-egg odor, and frequent replacement of valves, rubber seals, and hoses. Direct signs of tank degradation include white "hair-like" fiber debris and black coffee ground-like debris. These are typically found in used fuel filters. If you are experiencing any of

these problems you should contact us about possible microbial contamination or tank degradation. If your tanks are over 20 years old you are at a higher risk for tank degradation and you should pay extra attention to this matter.

What we recommend you do:

- **Implement Good Water Management Practices:** Water intrusion can occur from leaky riser joints, leaky tank top fittings, faulty spill bucket drains, or careless operators that drain spill bucket liquid back into the tank. Protect your tank from water intrusion.
- **Monitor Water in your Tank:** New ATG probes can measure water in various fuel types including alcohol based fuel. Another method includes using a tank gauging stick and water finding paste.
- **Inspect your Filters:** If your fuel filters need to be changed frequently (< 6 month intervals), then check to see if there are white "hair-like" fibers present or black substances that look like coffee grounds. These are signs of fiberglass degradation. If you suspect degradation, have your filters analyzed by a laboratory.
- **Keep Records of Replaced Components:** Keep track of how often you need to replace valves, rubber seals, and hoses for each of your tanks. Frequent replacement of these items is a sign of bacterial growth in the tank.
- **Tank Interior Inspection:** If you suspect bacterial growth in your tank arrange for your tank interior to be inspected. If your tank is still under warranty and is over 20 years old, we recommend having the interior inspected before the warranty on the tank expires. Tank interiors can be inspected using a camera which can determine if your tank is at risk of failure.

If you have any specific concerns or questions related to the tanks at your facility, please contact our staff so that we can further assist you.

share

