



Petroleum Storage & Wash Water Compliance for Dealers

Thursday, September 17, 2026

Regional Dealer Breakfast Meetings



REGIONAL MEETINGS

GNYADA.COM

NYC | Mid & Lower Hudson Valley

October 7, 2026 | 8:30 am

Westchester Marriott

Long Island

October 8, 2026 | 8:30 am

Melville Marriott



**SCAN TO
REGISTER!**





Petroleum Bulk Storage (PBS) Regulations & Operator Responsibilities

Presented by Adam Robus
Metro Environmental Services





About Us

- Full-Service Compliance, Maintenance, Construction & Environmental Services Company
- Highly Experienced and Trained Personnel
 - Average of 20 Years of Experience
- Fully Licensed and Insured
- Personnel
 - Maintenance and Service Technicians
 - Compliance Inspectors / Specialists
 - Compliance Testing Technicians
 - Monitoring and Sampling Technicians
 - Construction Crews





Experience

- Compliance Tank Testing
- Compliance & Inspections
- Pump & Tank Construction - Repairs & Upgrades
- Fuel Facility Maintenance
- Vac Truck Services
- Environmental Remediation
- Sampling / Monitoring / O&M



Why This Matters?



Protects groundwater and the environment



Avoids costly spills and violations



Ensures compliance with NYSDEC and EPA requirements



Keeps operations running smoothly with fewer interruptions





Who Regulates tanks in NY?

Environmental Protection Agency (EPA)

Federal Law – RCRA Subtitle I

- Created in 1984 as part of the Resource Conservation and Recovery Act
- Governs **Underground Storage Tanks (USTs)** only
- Implemented through:
 - **40 CFR Part 280** – UST technical standards, leak detection, corrective action
 - **40 CFR Part 281** – Approval process for state UST programs

Department of Environmental Conservations (NYSDEC)

New York State Law – Title 10, ECL Article 17

- New York's Petroleum Bulk Storage (**PBS**) law
- Covers **both USTs and ASTs** (aboveground tanks) ≥ 185 gallons
- Implemented through
 - **6 NYCRR Part 613**

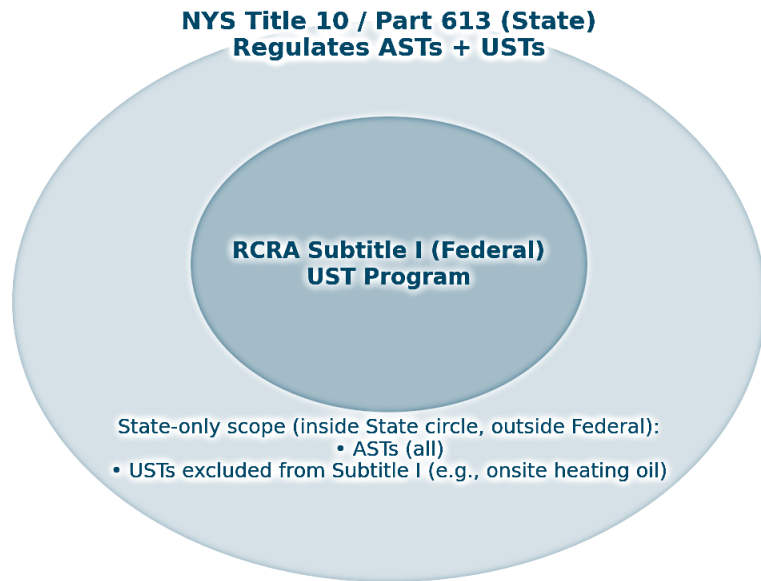
Honorable mention:

California Air Resource Board (CARB)
National Fire Protection Association (NFPA)





Relationship of Federal (Subtitle I) to NYSDEC Title 10 / Part 613



Tank System Types

- **USTs (Underground Storage Tanks):**
Motor fuel for fleet vehicles, landscaping equipment
- **ASTs (Aboveground Storage Tanks):**
Diesel/gasoline for mowers, loaders, trucks
- Tanks may be:
 - Single-wall with containment (dikes, vaults)
 - Double-wall (integral secondary containment)





Financial Responsibility

- Owners/operators must maintain insurance, bonds, or financial assurance to cover cleanup and third-party damages from leaks/spills.

Operator Training

- Class A, B & C operators

Walkthrough Inspections

- Monthly and Annual preventative maintenance inspections

Three-Year Integrity Testing

- Spill buckets, containment sump used form interstitial monitoring (IM) & Overfill Prevention Device (OPD) certification

Annual ATG Certification

- Operational testing by mimicking alarm conditions

EPA “Big 5” UST Requirements (2015 Rule Update)



UST Requirements (Subpart 613-2 & 613-3)

Lays out the regulatory expectations for design, installation, operation and maintenance.

- Registration with NYSDEC
- Spill & overfill prevention (spill buckets, alarms, shutoffs)
- Leak detection (ATG, SIR, interstitial, etc.)
- Annual and periodic testing (ATG, line tests, UDC/spill/containment)
- Operator training & certification



Operator Responsibilities



Daily / Weekly:

Check gauges and alarms
Look for leaks, spills, staining around tanks/dispensers



Monthly:

Formal visual inspection (documented) of tanks, containment, piping



Annual/3 Year:

ATG certification
Leak detector, shear valve, vent line, and product line testing
Overfill prevention device testing (if applicable)
Containment Integrity
Walk Through Inspection



Every 10–20 years:

Formal SP001 tank inspection (ASTs) with UT as required





Annual UST Testing Requirements

ATG Certification

Verify tank gauge, probes, and sensors detect fuel, water, and alarms correctly

Line Leak Detector (LLD) Testing

Confirm line leak detectors function at required thresholds

Shear Valve Testing

Ensure dispenser shear valves trip and shut off flow in case of impact

Federal Stage I Vapor Recovery Test

Pressure decay testing to verify tank system integrity during fuel deliveries

Pressure/Vacuum Vent Valve Testing

Confirm PV vent valves open/close at proper set points to control emissions and prevent over-pressurization

Annual Walkthrough Inspection

Inspect release detection equipment, hand-held devices, and containment sumps; document results

Operator Note: All results must be documented and kept on file for DEC inspections (minimum 3 years).





3-Year UST / PBS Testing Requirements

Spill Bucket Integrity Testing

Confirm spill buckets are liquid-tight and free of cracks or leaks

Containment Sump Integrity Testing

Test tank top, transition, and under-dispenser containment (UDCs) for liquid-tightness

Overfill Prevention Device Testing

Verify alarms, shutoffs, or ball floats activate at correct levels (90% alarm / 95% shutoff)

Operator Note: Failures must be repaired and retested before equipment is returned to service. Documentation must be maintained for DEC review.



Testing	Regulator Agency	Frequency
ATG Certification	EPA/NYSDEC	Annually
Line Leak Detector Test	NYSDEC	Annually
Shear Valve	NYSDEC/NFPA	Annually
Spill/Containment/UDC Integrity	EPA/NYSDEC	3 Year
Overfill Prevention Device Certification	EPA/NYSDEC	3 Year
Federal Stage I (Pressure Decay)	CARB	Annually
Vent Cap Testing	CARB	Annually





- Visual inspection (documented)
- Secondary containment (dike, vault, double wall) maintained
- Overfill prevention device required (alarms/shutoffs)
- Formal inspections per SP001 standard
- Testing after repair or change of service

AST Requirements (Subpart 613-4)

Lays out the regulatory expectations for design, installation, operation and maintenance.





- **Class A Operator:** overall responsibility (management level)
- **Class B Operator:** day-to-day compliance (often facilities/grounds staff)
- **Class C Operator:** on-site responders (equipment operators, attendants) All facilities must designate and train operators

Operator Training (Subpart 613-5)

NYSDEC online Class A/B Operator

*Test is a web-based exam that verifies operators' knowledge of petroleum bulk storage (PBS) regulations, tank system components, release detection, spill/overflow prevention, and recordkeeping requirements to ensure compliance with **6 NYCRR Part 613**.*





Enforcement & Penalties

DEC can issue NOVs, red-tag tanks, or order shutdown

Civil penalties: up to \$37,500/day

Potential liability for cleanup and remediation

Risk to cemetery operations and public trust



Best Practices

Standardize

Standardize inspection checklists (align with Part 613 + SP001)

Keep

Keep a compliance binder for each facility

Train

Train staff on alarm response and monthly inspections

Schedule

Schedule annual testing proactively (avoid last-minute scramble)

Partner

Partner with a qualified contractor for testing and SP001 inspections





How MES Supports Compliance – Full-Service Programs

AB Operator Services / PBS registration assistance

Monthly/annual inspection services

UST testing (ATG, leak detectors, shear, vent, lines, containment)

AST SP001 inspections & overfill prevention testing

Documentation support for DEC inspections



Questions or Support?

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