



Underground Storage Tanks – Overview

MAFMA Presentation – August 11, 2022



Introductions

DCAMM Environmental Services Team

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- Lori Anderson presenter
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- Jonathan Moore



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- Inventory Control and Leak Detection
- Spill Prevention



UST Overview

Lori Anderson



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What is an Underground Storage Tank system?

- UST is a storage tank and associated piping that has <u>at least 10%</u> of its combined volume underground.
 - Exception Tank in a basement or parking garage is considered an aboveground storage tank (AST) if above the floor surface



- UST systems have 3 basic parts:
 - Tank
 - Pipe network
 - Ancillary equipment (control panel, leak detection system, etc.)





Regulatory Definition

MassDEP's UST Regulations: 310 CMR 80.00

<u>Underground Storage Tank (UST) System</u> means any one or combination of tanks including, without limitation, underground pipes connected thereto, and any containment system that is or was used to contain regulated substance, or is temporarily out-of-service, and the volume of which, including the volume of underground pipes connected thereto, is 10% or more beneath the surface of the ground. <u>Underground Storage Tank (UST) System</u> shall not include any of the following tanks or any pipes connected to any of the following:

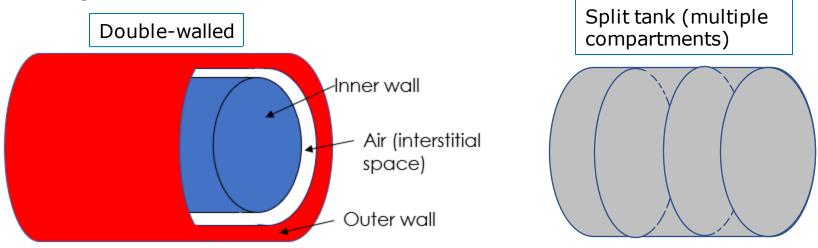
- (a) Any septic tank;
- (b) Any pipeline facility, including gathering lines, which is regulated under 49 U.S.C. c. 601; or
- (c) Any surface impoundment, pit, pond, or lagoon; or
- (d) Any storm water or waste-water collection system; or
- (e) Any flow through process tank; or
- (f) Any liquid trap or associated gathering lines directly related to oil or gas production and gathering operations; or

(g) Any storage tank situated in an underground area including, without limitation, a basement, cellar, or mineworking drift, shaft or tunnel, if the storage tank is situated upon or above the surface of the floor, and all sides of the tank are accessible and visible.



Different Types of Tanks

- Size/capacity Range from 100 gallons to 100,000 gallons
 - Most commercial tanks are 10,000 to 30,000 gallons
- Tank and piping construction material
 - Steel
 - Fiberglass
 - Composite
 - Concrete
- Single-walled or double-walled tanks





Operation – Suction or Pressurized

"European" or "Safe" Suction System

- Does not require leak detection
- Like a straw, if a hole develops, the fuel stops flowing and falls back into the tank

"American" Suction System

Requires leak detection system

Pressurized System

- Requires Automatic Line Leak Detection (ALLD), in addition to other leak detection requirements
- Due to the pressure, large volumes of product can be released to the environment quickly if there is a leak in the piping





Other Differences Between USTs

- Leak detection systems for tank and piping
- Overfill/spill containment and prevention
 - Overfill prevention devices
 - Spill buckets
 - Sumps
- Fuel type
- Fuel usage





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Fuels

Bureau of Undergro	husetts Department of Environmental Protection f Air & Waste und Storage Tank (UST) Program - Tank, Piping & Component Registration	UST Facility Name UST Facility ID #
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Fuel types

Contents/regulated substance (check one):	e.
Gasoline	
Diesel/Biodiesel	
E 85	
Heating Oil	
Kerosene	
Jet Fuel	
Aviation Gasoline	
Virgin Motor Oil	
Waste Oil	
Hazardous Material(s)*	
Unregulated Contents	

<u>Fuel Usage</u>

f. If storing gasoline or diesel, what is its use? (check all that apply): Motor Vehicle Marine Aircraft Manufacturing/Material Storage Emergency Engine-Driven Pump Emergency Power Generation Unregulated Use

<u>Consumptive Use</u> – Storing fuel oil (not waste oil) exclusively for area heating and/or the heating of domestic water on the premises where stored.



Spills vs. Leaks – What's the Difference?

- Both involve the release of product to the environment
- Both spills and leaks are problematic, and we need to understand why they occur so we can prevent them
 - <u>Spills</u> One-time event, usually a higher quantity of fuel released over a short period of time
 - <u>Leaks</u> Fuel slowly seeping into the environment over an extended period





Why is it Important to Prevent Leaks and Spills?

- Environmental and health impacts
- System downtime and disruption to operations
- Poor public image
- Financial
 - Loss of product
 - Expensive cleanups
 - Regulatory fines





Why Spills Occur

Most common reasons

- Human error during fuel delivery
 - Delivery person is distracted
 - Hose not attached correctly
- Overfill alarm is ignored or is not working properly
 - Tanks have an alarm that should activate when the tank is either 90% full or within one minute of overflowing
 - People sometimes disable or ignore this alarm so they can schedule fewer fuel deliveries
 - The alarms can malfunction make sure the alarm is on an independent electrical circuit that is always active and cannot be accidentally turned off

Other reasons

- Over pressurization of tank caused by ice blockage or animal/insect nests in vent lines
- Equipment damaged by snowplows or construction equipment











Why Spills Occur

Tank punctured or ruptured during construction activities

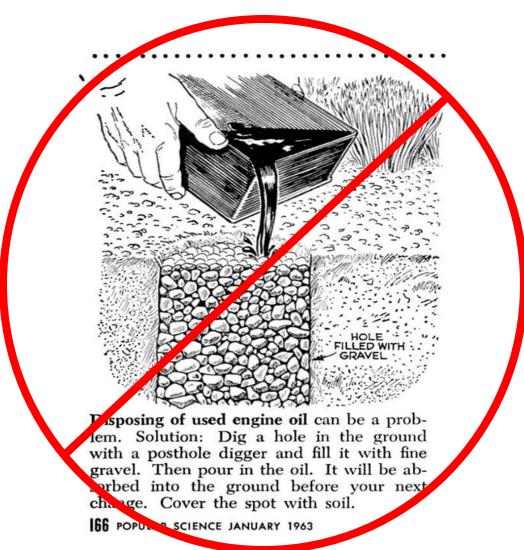




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1963 article about "proper" disposal of used oil





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Spills – Prevention and Mitigation

- Inspect equipment routinely, especially prior to fuel deliveries
- Make sure all equipment and alarms are in good working order
- Have a staff member observe fuel deliveries
- Do not disable or ignore overfill alarms (the headache and cost of a spill cleanup is bigger than the headache of a few extra fuel deliveries!)
- · Spill kits in locations where spills may occur
- Staff training



- During construction:
 - Call DigSafe at least 72 business hours
 prior to excavating
 - Use tools such as ground penetrating radar (GPR) to locate tanks/pipes
 - Hand dig or use a suction/vacuum excavator when digging near tanks and utilities



Why Leaks Occur

Most common reasons

- UST system failure due to age
- Inoperable leak detection systems or faulty alarm systems
- Lack of corrosion protection on metal tanks or piping
- Single-Walled Steel Tanks (SWSTs)
 - Especially prone to rusting, developing holes, and leaking
 - Banned in Massachusetts August 7, 2017







Leaks – Prevention and Mitigation

- Replace old tanks
 - Average life expectancy 20 30 years (varies, check manufacturer recommendation)
 - Cost to install a new tank will probably be less than clean-up costs
 - Single-walled steel USTs should have already been replaced
- Make sure leak detection systems are in good working order
- Secondary containment
- Training





Leak or Spill – Now What?

- First priority: Stop the spill/leak!
- Second priority: Contain the fuel and prevent it from spreading further
- Prevent fuel from entering storm drains, floor drains, and the environment:
 - Wetlands,
 - Lakes,
 - Streams,
 - Grassy areas, and
 - Bare ground.



- Spill kits Speedy Dry, absorbent socks, cushions, and pads
 - If near a waterbody, spill kits should also include booms







Leak or Spill – Now What?

- If a leak is detected in a tank, the Owner/Operator is required to empty the tank as soon as possible, but within:
 - 24 hours, if fuel has been released to the environment, or
 - 72 hours, if fuel has entered the sump, interstitial space, or other parts of the UST system where it should not be located.
- If a leak is detected in the piping, the Owner or Operator shall empty and isolate the section of piping that had the release until it can be repaired or replaced
- Notification:
 - Follow your agency's notification procedures
 - May need to notify MassDEP

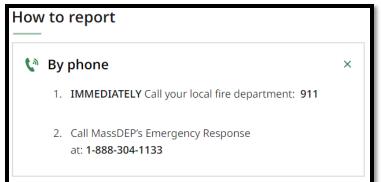


 DCAMM Environmental can provide guidance notification requirements and next steps



MassDEP Notification Requirements

- Reportable quantity is <u>10 gallons</u> for many common products stored in USTs, including gasoline, diesel fuel, fuel oils (#2, #4, #5, and #6), lubricating oil, and waste oil.
- Notification timeline within 2 hours, 72 hours, or 120 days <u>https://www.mass.gov/how-to/report-a-spill-or-environmental-emergency</u>
- Notifications can be retracted
- Online look-up tool for "reportable quantities" for various chemicals (3,339 entries): <u>http://eeaonline.eea.state.ma.us/DEP/MOMHL/hazmat.aspx</u>
- See 310 CMR 40.0310: "Releases and Threats of Release Which Require Notification"
 How to report
 - Part of the Massachusetts Contingency Plan (MCP) Regulations







Laws and Regulations

Zhanna Davidovitz



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UST Regulations

MassDEP Regulations 310 CMR 80.00 (previously 527 CMR 9.00)

Exempt

- Hazardous waste
- Operational purposes
- Capacity ≤ 110 gallons
- Stormwater
- Consumptive use tanks ≤ 1,100 gallons





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UST Regulations

- UST System Specifications
- Leak Detection Requirements
- Sump Requirements
- Spill Bucket and Overfill Prevention Requirements
- Corrosion Protection Requirements
- Emergency Response Requirements
- Compatibility Requirements
- Repair and Replacement Requirements
- Closure Requirements



UST Regulations

- Employ at least one MassDEP-certified Class A, B and C Operator for every UST system
- Monthly inspections
- Submit a Compliance Self-Certification to MassDEP every three years
- Make sure that all UST systems and components are inspected every three years by a MassDEP-certified Third-Party Inspector
- Recordkeeping



Compliance Deadlines

By October 13, 2022, the UST regulations require:

- Integrity testing of turbine, intermediate, and dispenser sumps; and
- Testing of spill buckets and overflow prevention equipment.
- 310 CMR 80.27(7) and 80.28(2)(f)



Operator Classes & Qualifications

- Class A Operator owner/operator or a contractor with general knowledge and understanding of the UST system(s), as well as the federal and state regulatory requirements that apply to the system(s).
- Class B Operator owner/operator, or a contractor with in-depth knowledge and understanding of the UST system(s), and ability to operate and maintain the system(s), as well as the federal and state regulatory requirements that apply to the system(s).
- Class C Operator is an on-site employee who is trained by a Class A or B Operator on UST system(s), emergency procedures, and response to alarms at the facility.



PRF77

PRF77 - Statewide Contract for Professional Environmental and Consulting Services

- Class A & B operator
- 3rd party inspections (TPI)
- LSP services





Monthly UST Inspection Report	Staple Liquid Status Report here			
Inspector Name:	Operator ID#:		Inspection Date/Time:	
Inspector Type: Class A Operator	Class B O		a Class A, B or A/B Operator	
Name of Class A, B or A/B Operator directing inspection:			Operator ID#:	
 Electronic Monitoring Equipment (as applicable: interstitial space monitoring, in-tank monitoring, liqui sensors monitoring sumps and spill buckets, and impressed current cathodic protection rectifiers) 	d Re	sult	If "No", why and suggested repair	Date repaired
a. Is all electronic monitoring equipment "on"?	Yes	No		
 Is all electronic monitoring equipment "operating properly"? 	Yes	No		
2. Spill Buckets, Covers and Sensors				
a. Are all spill buckets clean and free of solid and liquid material?	Yes	□ No		
b. Do spill buckets and covers show signs of corrosion, breakage or wear, including visible cracks and holes?	Yes	□ No		
c. If the spill bucket(s) contains sensors, are all spill bucket sensors positioned in accordance with manufacturer's specifications?	all spill bucket sensors positioned in accordance with manufacturer's			
	□ No			
2 Fill cover color coding		·		
3. Fill cover color-coding				
Are all grade-level fill covers color-coded in compliance with API RP 1637?		/es No		



UST Annual Compliance Activities Tracking Sheet

Facility Name			Facilit	ty ID#
Applicable Pe	riod			
Annual Leak Detection System Testing (Type)	Annual Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		Pass Fail		
Annual Automatic Line Leak Detection Test	Annual Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		Pass Fail		
1/2/2017 Sump Testing Requirement	Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		Pass Fail		
Annual Sump Sensor Testing	Annual Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		Pass Fail		
1/2/2017 Spill Bucket Testing Requirement (and every 5 years thereafter)	Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		Pass Fail		



UST Annual Compliance Activities Tracking Sheet

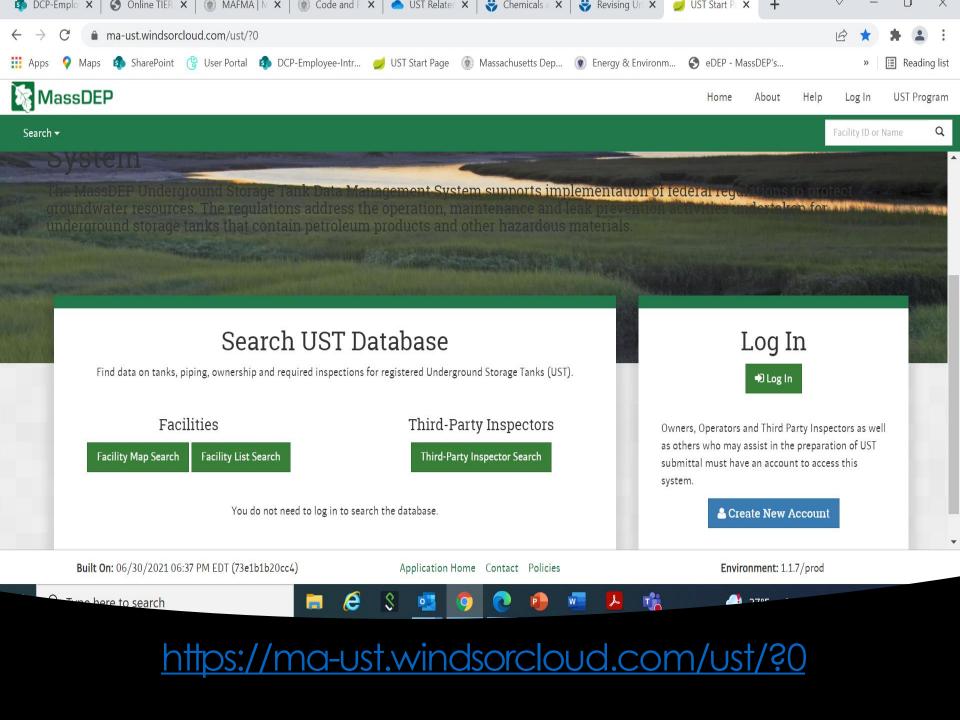
	_			
Annual Overfill Prevention Equipment Inspection & Test	Annual Inspection & Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		□ Pass □ Fail		
			lf Angligghta	
			If Applicable	
Annual Impressed Current Cathodic Protection System Testing	Annual Test Date	Result (Attached)	Repair and Date Completed (if applicable)	Passing Re-Test Date (Results Attached)
		□ Pass □ Fail		
			1	
Financial Responsibility Mechanism Annual Renewal (Type)	FR Term (Start date – End Date)	Complete Current FR Mechanism <u>Attached</u>	Certification of FR Current and complete	FR Registration in UST DMS is current and complete
		□ ^{Yes} □ No	□ No □ Yes	□ ^{Yes} □ No

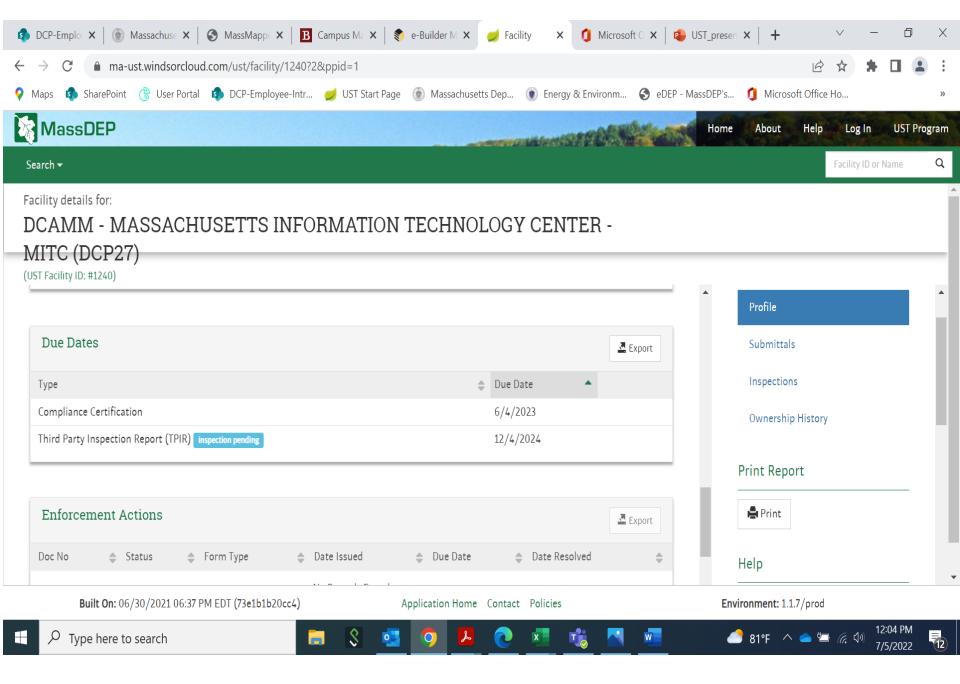
Operating Requirements

Register via UST Data Management System

https://ma-ust.windsorcloud.com/ust/?0







Operating Requirements

- Leak detection & monitoring monthly
- Spill buckets monthly
- Corrosion Protection annual
- Spill buckets testing every 5 years
- Tank tightness testing



UST Closure / Removal

- Tank, piping, and dispensers
- Permitting with local fire prevention office and/or building and health departments
- Abutters notification
- Engineering controls dust and/or odors
- Product Removal
 - Waste Management and disposal
- UST inert (dry ice to displace vapors)
- UST system removal
- Cutting a tank and piping precautions needed for vapors – Complaints, health, volatility
- Licensed tank dismantling facility



Other Regulations

- EPA regulations
 - 40 CFR 280 and 281
 USTs
 - 40 CFR 112 Oil Pollution Prevention
 - 40 CFR 302 Right-to-Know
- Fire Department
 - 527 CMR 1.00 Fire Safety







SPCC – Spill Prevention Control and Countermeasures



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Oil Pollution Prevention Regulations

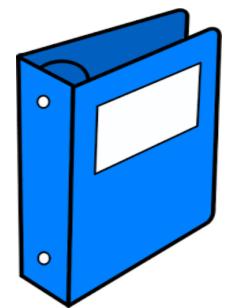
- Regulations to prevent oil releases to the navigable waters of the United States
- Facilities storing 42,000 gallons underground or 1,320 gallons aboveground require Spill Prevention Control and Countermeasures (SPCC) Plan





SPCC Plan

- Certified by a Registered Professional Engineer (PE)
- Reviewed, and re-certified, Every Five Years, unless significant changes in operation





SPCC Plan Overview

- Oil Inventory: Amounts and types of oil stored at specific locations ≥55 gallons
- Spill Pathways: The likely path oil would follow if there were a spill at a given location
- Controls in Place: Protection measures to prevent spilled oil from reaching the environment in each location
- Spill Response Procedures: Steps to be taken in the event of a spill
- Roles and Responsibilities: Who is responsible in the event of a spill
- Reporting Procedures



SPCC Categories





Respond





Prevent

- Store oil away from floor drains
- Inspect storage regularly to detect leaks
- Clean up spills and repair leaks as soon as possible
- Secure storage areas
- Keep inventory current





Prepare

- Set up secondary containment if potential for spill exists
- Plug floor drains or equip with a collar
- Spill Materials





Respond

- Response Procedures
- Regulatory Agency Contacts





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Emergency Planning and Community Right-to-Know (EPCRA)



Right to Know

- Emergency Planning and Community Right-to-Know (EPCRA)
- Created to help communities plan for and respond to chemical emergencies
- Facilities storing 10,000 pounds or 500
 pounds of Extremely Hazardous Substance (EHS)
 submit Tier2 forms to State Emergency Response Commission (SERC)
 and Local Emergency Planning Committee (LEPC)



Underground Storage Tank (UST) Systems Management

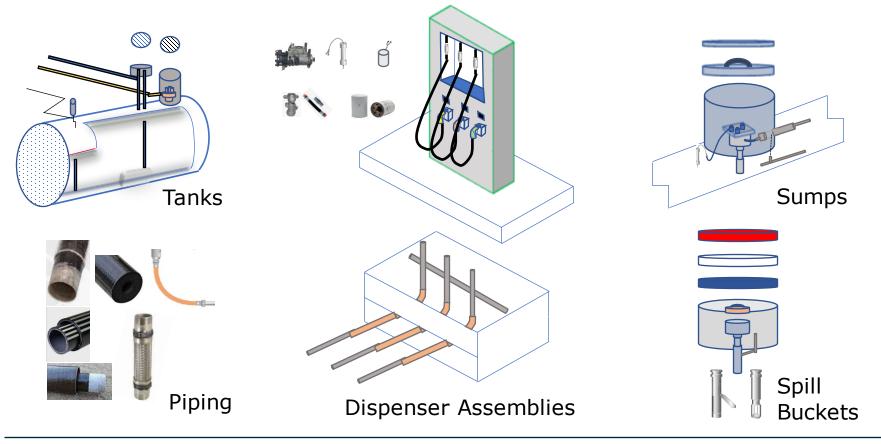
Kenneth Sanderson



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What is the purpose of a UST Systems?

UST systems are commonly used to store and dispense petroleum fuel for industrial, commercial, and consumptive purposes. They are also designed for inventory control, leak detection, and spill prevention.





UST Systems Commonly Contain Petroleum Fuel

Petroleum is:

- Mixture of organic compounds that are naturally occurring in porous rock strata that is extracted and refined to produce fuels.
- Commonly used to produce thermal (heat), electrical, and mechanical energy.
- Easily ignited (burns).
- Is a contaminate (pollutant) in the environment.
- Fuel.



Management of UST Systems

- Petroleum Storage Equipment
- Inventory Control
- Spill Prevention Leak Detection and Monitoring
- Spills and Leaks Assess, Report, Contain, Stabilize, and Cleanup



Petroleum Storage – Equipment

- Tanks
- Dispenser Assembly
- Sump
- Piping
- Vent Lines
- Spill Bucket and Fill Line
- Inventory Control and Leak Detection



Tanks

ENV has observed many different tanks during excavation activities.



- Many Sizes and Shapes
- Different Construction
- Different Equipment
- Different Installation Dates





Tanks

Common single and double walled tank construction materials:

- Steel
- Fiberglass
- Fiberglass wrapped steel
- Composite
- Concrete

Tanks can be used to store petroleum fuels such as:

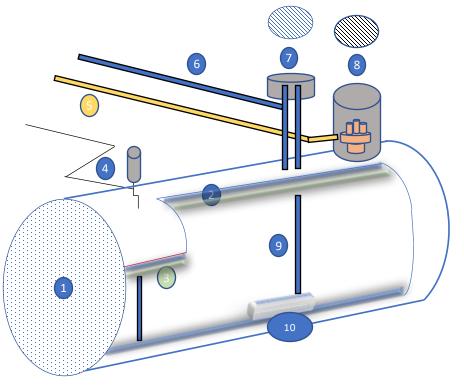
- Gasoline
- Diesel fuel
- Heating oil
- Bunker oil
- Kerosene
- Jet A fuel
- Other fuels



Common Tank Construction

Tanks are used to store fuels and prevent spills and leaks.

- 1. Outer Wall
- 2. Polyethylene Liner
- 3. Inner wall
- 4. Vacuum line and gauge
- 5. Fuel line
- 6. Vent line
- 7. Fill pipe and Spill Bucket
- 8. Sump with ATG and Pump
- 9. Drop tube
- 10.Striker plate

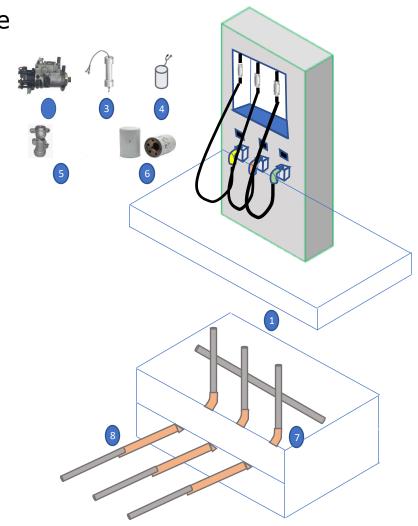




Dispenser Assembly

Dispenser assemblies are used to provide fuels to vehicles and containers and prevent spills and leaks.

- 1. Fuel Dispenser Assembly, Island, and Sump
- 2. Vacuum pumps
- 3. Leak Detection Assembly
- 4. Corrosion Protection Anode
- 5. Break-away and Shear Valves
- 6. Fuel Filter
- 7. Flex Piping Connector
- 8. Primary and Secondary Containment Piping
- 9. Hoses and Nozzles





Sump

Sumps are used for inventory control and spill and leak prevention. They contain:

- Leak detection equipment
- Vacuum monitoring devices
- Secondary pipe containment vacuum monitoring
- Cathodic protection devices
- 1. Automatic Tank Gauging
- 2. Double Walled Piping
- 3. Flex Connector
- 4. Fuel Sump Pump
- 5. Sump Assembly Interface with UST
- 6. Sump Access Cover
- 7. Sump Containment Cover
- 8. Test Boot
- 9. UST





Piping

Piping is used for inventory control, spill prevention, and to deliver fuel.

- 1. Fiberglass Coaxial Double Walled
- 2. Semi-Rigid Double Walled
- 3. Open Interstice Double Walled Fiberglass
- 4. Closed Interstice Double Walled Fiberglass
- 5. Flex Pipe with Shear Valve
- 6. Swing Joint Steel with Shear Valve





Vent Lines

Vent lines prevent spills and UST system over-pressurization.

During fuel delivery, petroleum vapor in the tank is displaced by the delivered fuel. Vapors are displaced through the vent lines to prevent over-pressurization of the UST system.





Spill Bucket and Fill Line

Spill buckets and fill lines are used for fuel delivery, contain small spills, spill prevention, and pressure relief.

- 1. Fill Containment Bucket
- 2. Spill Bucket Caps
- 3. Fill Pipe with Cap
- 4. Release Valve
- 5. Overfill Devices







Inventory Control and Leak Detection

Inventory control is UST system fuel inventory tracking and leak detection.

- Automatic and manual tank gauging
- Ground water monitoring
- Interstice monitoring
- Petroleum indicator
- Rectifier operating
- Soil vapor detection
- Vacuum monitoring
- Water indicator
- Others









Some Common Causes of Spills and Leaks

Spills:

- UST system overfill during fuel delivery
- Ruptured UST system equipment
- Human errors
- Lack of UST system monitoring
- Poor maintenance
- Vandalism
- Others

Leaks:

- Faulty piping such as flex connectors
- Holes in tanks from corrosion
- Lack of UST system monitoring
- Poor maintenance/operator errors
- Vandalism
- Others



Spill Prevention

Spill prevention is leak detection, inventory control, and UST system monitoring.

- Absence of soil and other debris in equipment
- Automatic and manual tank gauging
- Connected shear valves
- Cracked hoses
- Evidence of spills
- Inspection check lists
- Integrity checks of secondary containment
- Lack of petroleum odors
- Missing caps/covers on tank pad
- Observations in monitoring wells sheens, non-aqueous phase liquid
- Observations of water
- Operable liquid sensors
- Presence of containment cover
- Working submersible pump(s)
- Many others...









Spill Prevention

You can contribute to spill prevention by **NOT** obstructing nozzle handles with items such as wallets and cell phones.



Stay with your vehicle and observe dispensing fuel.



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Spills

Assess, report, contain, stabilize, and cleanup.

- Absorbent Boom
- Absorbent Pads
- Drain Covers
- Drain Plugs
- Hard Boom
- Sand and soil
- Snare
- Speedi-dry
- Sweep
- Vacuum
- Many others...



FAC110 – Hazardous/Universal, Medical, Electronic Waste Disposal and Emergency Response



Spill Scenario

An excavator ruptures a UST with a heating fuel release in excess of 10 gallons that spilled to pavement and impacted public utilities and surface water.

Some obligations include:

- Calling the fire department
- 2 hours to report to MassDEP
- Immediate cleanup
- 24 hours or less to pump remaining product from UST
- Proper management, transport, and disposal of wastes





Assessment

- Conduct visual observations of pavement, soil, surface water, and utilities.
- Assess affected utilities for fuel and fuel vapors.





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Containment

Contain the spill by applying absorbent boom, pads, and speedi-dry as needed.



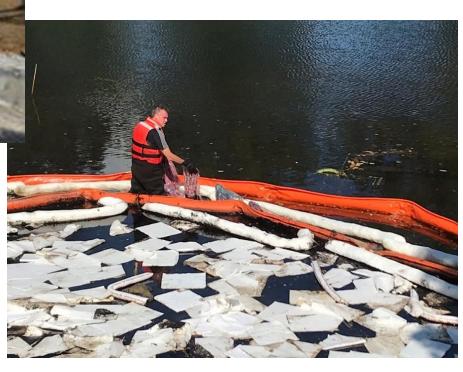


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Stabilize and Cleanup



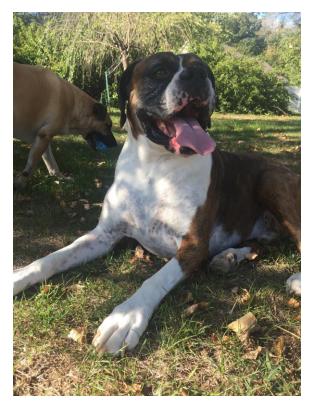
- Vacuum/recover product fuel affected utilities and surface water
- Contain fuel extent in surface water
- Remove and dispose of used absorbents and monitor





Cleanup Results:

Protection of public health, safety and a healthier environment





Resources

Massachusetts Regulations

- 310 CMR 80.00 Underground Storage Tank (UST) Systems: <u>https://www.mass.gov/doc/310-cmr-8000-underground-storage-tank-ust-systems/download</u>
- 310 CMR 40.0000 Massachusetts Contingency Plan (MCP): <u>https://www.mass.gov/doc/310-cmr-400000-massachusetts-contingency-plan/download</u>

Federal Regulations

- 40 CFR Part 280 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST): <u>https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-280?toc=1</u>
- 40 CFR Part 281 Approval of State Underground Storage Tank Programs: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-I/part-281?toc=1

MassDEP Website

- MassDEP UST Program Website: <u>https://www.mass.gov/guides/massdep-underground-storage-tank-ust-program</u>
- UST Program FAQ: <u>https://www.mass.gov/doc/frequently-asked-questions-310-cmr-8000/download</u>
- Compliance Assistance Document: <u>https://www.mass.gov/doc/compliance-assistance-ust-compliance-certification-submittal/download</u>



Resources

MassDEP Databases

- List of MassDEP-Certified UST System Operators, Class A&B (Excel spreadsheet): <u>https://tinyurl.com/9m9k4w8j</u>
- Search for Certified Third-Party Inspectors: <u>https://ma-ust.windsorcloud.com/ust/tpi/search?0</u>
- Facility Search of USTs Registered in Massachusetts: <u>https://ma-ust.windsorcloud.com/ust/facility/search/list?1</u>

Reporting Leaks and Spills

- Notification requirements and timing, see 310 CMR 40.0310: https://www.mass.gov/doc/310-cmr-400000-massachusetts-contingency-plan/download
- MassDEP Oil and Hazardous Material List and reportable quantities: <u>http://eeaonline.eea.state.ma.us/DEP/MOMHL/hazmat.aspx</u>
- Report a leak or spill:
 - Immediately call local fire department 911
 - Call MassDEP's Emergency Response at 1-888-304-1133
 - <u>https://www.mass.gov/how-to/report-a-spill-or-environmental-emergency</u>

Relevant Statewide Contracts

- List of Eligible Entities who can use statewide contracts: <u>https://tinyurl.com/5cfs6f6t</u>
- PRF77 Professional Environmental and Consulting Services: <u>https://www.mass.gov/doc/prf77designateddcamm/download</u>
- FAC110 Hazardous/Universal, Medical, Electronic Waste Disposal and Emergency Response: <u>https://www.mass.gov/doc/fac110/download</u>



Questions?





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