



Tank Tips 10

on *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations*

Record keeping for your storage tank system Environment Canada's new *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* require tank system owners or operators to maintain specific records. This fact sheet will give you an overview of the records you are required to keep, how long you must keep them and where they must be filed. Website addresses, useful documents and contact numbers for additional help are listed at the end.

Recurrent spills or a long history of disposal at specific sites can lead to concerns. Oil dumped onto soils can saturate the soil matrix. This type of very concentrated contamination can be virtually impossible to eliminate without excavating and removing all the soil materials.

What has changed?

On June 12, 2008 Environment Canada implemented new regulations governing storage tank systems under federal jurisdiction as described in the regulations, including privately owned systems located on federal and Aboriginal lands. Prior to these regulations, tank operators were required to register their storage tank systems with their federal department, and the federal departments reported annually to Environment Canada. There were, however, no record-keeping obligations for tank owners or operators.

Under the new regulations tank owners and operators are now required to maintain specific records on their storage tank systems. While some of these records must be kept for five years, you are required to keep others until the system is removed.

Compliance with these regulations is mandatory.

As [spilled] bulk oil migrates through the soil column, a small amount of the product mass is retained by soil particles. The bulk product retained by the soil particles is known as “residual saturation.”

Depending upon the persistence of the bulk oil, residual saturation can potentially reside in the soil for years.

What records do you have to keep for five years?

You must keep the following records for five years:

- records of all inspections and tests carried out on your system or components of your system, including leak tests carried out on tanks, piping or other components (sections 16 – 27 of the regulations)
- records related to the operation and maintenance of oil-water separators (sections 35 – 38)
- all test results related to maintaining and operating corrosion protection (sections 16 – 27)
- records on the disposal of water from tank bottoms (section 40)
- records documenting the temporary or permanent withdrawal from service of a system or any component of a system (sections 42 – 44)
- records of the removal of any system or component (section 45).

What information do you include in leak-testing and inspection records?

The information required for your records is laid out in section 27 as follows:

- the test or inspection date
- the storage tank system identification number
- the type of petroleum or allied petroleum product stored in the system
- the test or inspection results
- the testing method
- the name and address of the individual and, if applicable, the company that performed the test or inspection
- the components of any corrosion analysis program, if this applies to your system (see subparagraph 23(1)(a)(ii)).

What records are required for oil-water separators?

The record keeping requirements for oil-water separators are covered in detail in sections 35 to 37 of the regulations. If you operate an oil-water separator it is important that you read the applicable sections of the regulations.

Residual saturation of the soil is important as it determines the degree of soil contamination and can act as a continuing source of contamination for individual compounds to separate from the bulk product and migrate independently in air or groundwater.

What kind of record do you have to keep when you dispose of water from your tank bottom?

When you dispose of water from your tank bottom you must ensure that it is disposed of in a way that doesn't harm the environment or pose a risk to human health, and you are required to keep a record of its disposal (section 40) as follows:

- the quantity of tank-bottom water removed
- the date of its removal
- the name and address of the individual (and company, if applicable) who removed it
- the disposal method
- the place where it was disposed of.

What happens if you withdraw your system, or a component of the system, from service?

If, for any reason, you decide to withdraw your system, or a component of your system, from service either temporarily or permanently, there are specific records you must keep. For a temporary withdrawal (less than 2 years) you must keep a record of the date on which you withdrew the system or component from service (section 43). For a permanent withdrawal, you must keep a record of the date on which the system or component was withdrawn from service, and a record establishing that the work was carried out by a person designated to do so as laid out in the regulations. (subsection 44(2))

What records are required if you remove a system, and how long do you keep those records?

If you remove a component of a system or an entire storage-tank system you need a record establishing that the procedure was carried out by a person designated to do so under the regulations. You must retain these records for five years after the removal (subsection 45(2)).

Are there any exceptions to the five-year requirement for holding records?

Yes. Several records must be kept until the system is removed. They are:

- for *vertical aboveground tanks without secondary containment*, all inspection records (section 22 and paragraph 46(2)(a))

If a release of bulk oil is persistent in the environment, there can be impacts to extensive areas as the individual compounds continue to separate and migrate away from the spill area via air or groundwater.

- for *aboveground piping without secondary containment*, any inspection records related to components of a corrosion analysis program (subparagraph 46(2)(a)(ii)).
- for new systems, the records listed in the next section.

What records are required for a new system?

The regulations require owners or operators of new storage tank systems (installed after June 12, 2008) to maintain ‘as-built drawings’ for the life of the system (section 34 and paragraph 46(2)(b)). This is to ensure that the system’s design and precise layout are not lost with staff, operator or contractor changes, given the long life of some of these systems. The regulations also require that the drawings bear the stamp and signature of a professional engineer and show:

- the outline of all tanks
- the centreline of all piping
- the centreline of all underground electrical power and monitor sensor conduits
- the building foundation outlines
- the property lines
- secondary containment systems.

It is important to note that these as-built drawings must be kept up-to-date. If you alter your system in any way that affects the required information, the drawings must be updated, restamped and signed by a professional engineer.

Under the regulations your storage tank system must also be installed by a person approved to install tank systems in the province or territory where the system is located. If that jurisdiction does not approve installers, then the work must be supervised by a professional engineer. You are required to keep a record of who installed your storage tank system. The information in the record (for example, an invoice) must have sufficient information to establish that the system was installed by a person designated under the regulations to do so (subsection 33(2)), and the record must be kept until the system is removed.

Do all types of storage tank systems have the same record-keeping requirements?

If you have:

- *single-walled underground tanks or piping*
- *aboveground tanks or piping without secondary containment*
- *sumps*

there are specific inspection and leak monitoring requirements that apply to you. In addition to the records already mentioned, you must maintain records of the initial leak-test or inspection required in the regulations, as well as records on your ongoing leak-detection program (sections 16 to 27). These records must be held for a minimum of five years. (See Tank Tips 8: Leak detection and monitoring)

Where must you keep your records?

The records must be kept at the owner's or operator's place of work nearest to the system (subsection 46(1)).

Where do you get more information?

On our website: www.ec.gc.ca/st-rs. If you'd like us to mail you the information below please call: 819-934-2991 (0900 h – 1700 h EST/EDT)

The following documents are available on our website:

- *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations*
- *Tank Tips* fact sheets, each one covering a specific part of the new regulations
- *Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products*, Canadian Council of Ministers of the Environment
- *Canadian Environmental Protection Act, 1999*
- *Compliance and Enforcement Policy for the Canadian Environmental Protection Act, 1999*

If you have specific questions on the regulations please contact your regional office.

Pacific & Yukon	storage.tanks.pyr@ec.gc.ca	604-664-9100
Prairie & Northern		780-951-8600
Ontario	EnviroInfo.Ontario@ec.gc.ca	416-739-4826
Quebec	quebec.lavoieverte@ec.gc.ca	800-463-4311
Atlantic	15th.reception@ec.gc.ca	902-426-7231

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