



New Mexico Environment Department

Part 114 – Airport Hydrant, UST w/ Field Constructed Tank, Hybrid Systems

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Part 114 – AHS, UST – FCT, Hybrid

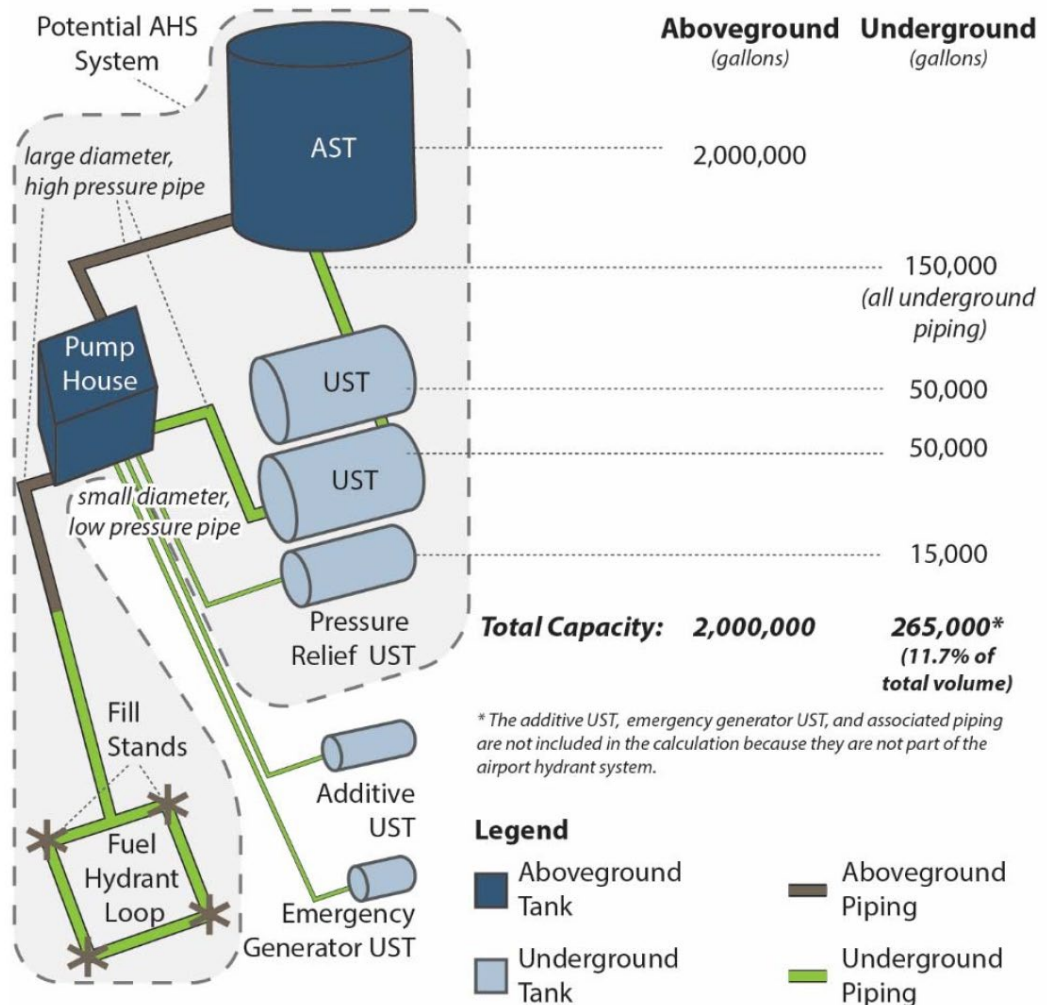
In 2015, the US EPA updated federal UST regulations and took away the exclusion for airport hydrant fuel distribution (“AHS”) systems and UST systems with field constructed tanks (“FCT”).

- ❑ AHS systems and FCT are tank systems regulated under 20.5 NMAC that meet the definition of a UST in that ten percent or more of the system is buried below the surface.



Part 114 – AHS & FCT

US EPA published a guidance document on how to determine if an owner or operator has an AHS or FCT. The diagram to the right has been taken from that document.





Part 114 – Hybrid Tank Systems

In the 2018 update to 20.5 NMAC, the New Mexico Environment Department included regulatory requirements for storage tank systems defined as “Hybrid” storage tank systems pursuant to 20.5.101.7(H)(4) NMAC.

“Hybrid storage tank system” means a storage tank system where any combination of above ground and underground storage tank systems are connected in a manner where fuel enters one tank from the other tank under pressure or gravity flow but is not part of a siphon system.



Part 114 – Hybrid Tank Systems





Part 114 - Requirements

Owners and operators of AHS and FCT systems will meet the following:

- ❑ Installation of new and the upgrading of existing tank systems will be designed by and overseen by a professional engineer ("PE") with training and experience in these types of systems.
- ❑ The PE shall prepare, sign, and stamp as-built drawing.
- ❑ Owners and operators shall submit a set of plans to the department at least 60 days in advance of construction.



Part 114 - Requirements

- ❑ Owners and operators shall hire a contractor who has at least two years of experience in the installation of these types of systems.
- ❑ Owners and Operators of AHS and FCT tank systems must register the tank systems with PSTB no later than July 24, 2021.
- ❑ Owners and Operators of ASTs that are part of AHS, FCT, and Hybrid systems with capacity of 55,000 and greater must register the tanks with PSTB no later than July 24, 2021.



Part 114 - Requirements

Note: AST systems that are part of AHS, FCT, and hybrid systems and have a capacity of 55,000 gallons and greater will be partially excluded from requirements in 20.5 NMAC.

Owners and operators of hybrid storage tank systems who want to modify, repair, or upgrade their tank systems must meet the above-mentioned requirements for a PE to design and oversee the project.



Part 114 - Requirements

Owners and operators of hybrid storage tank systems must have met the following requirements no later than July 24, 2019:

- ❑ Approval from the New Mexico State Fire Marshal's Office for the hybrid systems and for hybrid systems where the AST exceeds the size limit for retail facilities in the international fire code.
- ❑ Submit documentation from a NM Professional Engineer that the UST can withstand the head pressure from the AST anytime a transfer is made.



Part 114 - Requirements

- The installation of new hybrid storage tank systems are prohibited after July 24, 2018.

AHS systems will not be required to meet secondary containment requirements in 20.5 NMAC.

UST systems with field constructed tanks greater than 55,000 gallons shall not be required to meet secondary containment requirements for piping.



Part 114 - Requirements

- ASTs that are part of AHS, FCT, and hybrid storage tank systems that are greater than 10 years old and without cathodic protection must be assessed to ensure the tank is structurally sound and free of corrosion holes prior to installing cathodic protection. ASTs found to be structurally unsound or have corrosion damage or holes must be replaced pursuant to 20.5.109 NMAC.
- Metal piping on AHS or FCT system in contact with an electrolyte must be cathodically protected no later than July 24, 2021.



Part 114 - Requirements

- AST systems associated with AHS and FCT systems that have capacities between 55,000 gallons and 1320 gallons must have spill and overfill prevention equipment pursuant to 20.5.109.910 NMAC no later than July 24, 2021.
- Hybrid storage tank systems shall have redundant overfill prevention equipment installed no later than July 24, 2021.



Part 114 - Requirements

No later than July 24, 2021, owners and operators of AHS, FCT, and hybrid storage tank systems shall meet the operations and maintenance requirements in 20.5.107 NMAC and 20.5.110 NMAC, as applicable.

No later than July 24, 2021, owners and operators of AHS, FCT, and hybrid storage tank systems shall meet the Operator Training requirements in 20.5.104 NMAC.



Part 114 - Requirements

No later than July 24, 2021, owners and operators of existing AHS, FCT, and hybrid storage tank systems shall meet the release detection requirements in 20.5.114.1407 and 1408 NMAC.

Owners and operators of AHS, FCT, and hybrid storage tank systems shall comply with the closure requirements in 20.5.115 NMAC when placing their tank systems into temporary closure or permanent closure.



Part 114 - Requirements

- Once owners and operators of hybrid storage tank systems placed the AST into temporary closure, it can no longer be returned to service, and must meet permanent closure requirements.
- Records for AHS, FCT, and hybrid storage tank systems must be maintained pursuant to 20.5.114.1413 NMAC.