



Modification or Repairs to UST Systems

The DEM Underground Storage Tank (UST) Management Program oversees upgrades, repairs, and modifications to all UST systems in Rhode Island to ensure that each UST system complies with the UST Regulations, as well as recommended practices and industry standards for the installation, repair, or modification of UST components and systems. This document is intended to act as a quick reference to aid UST owners, operators, and contractors to gain a better understanding of the general requirements for making modifications or repairs to a UST system. This document is for general guidance only and does not replace or supersede the Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials (UST Regulations)

Types of Repairs or Modifications

The first step is to identify which category the repair falls into; A small number of repairs or modifications do not require prior notification or submittal of an application and are considered “exempt”, while the majority of repairs or modifications require the full application to be submitted and require written prior approval from DEM before construction can begin.

Repairs and Modifications that do not require a application or require prior written approval “Exempted Repairs”

- Fill and vapor port swivel adapters
- Fill caps and vapor caps
- Fill drop tubes
- Pressure/vent valve
- STP
- Line Leak Detectors
- Liquid Level Sensors
- ATG replacement
- Minor repairs to CMS Console
- Replacement of product piping or conduit boots completely inside of a sump or UDC
- Dispensers and components above the shear/crash valve
- Spill Containment basins (SCB)*
- Fill or vapor risers when performed in conjunction with a spill containment basin replacement*

*An expedited replacement process is available for the replacement of spill containment basins, as well as the replacement or modification of risers associated with the spill containment basin replacement. Please see the fact sheet titled “Requirements for Stage I EVR Upgrades on UST Systems”, available on our website at <http://www.dem.ri.gov/programs/benviron/evrfact.pdf> for additional information

Unless specifically exempted above, you should assume that all other repairs, modifications or replacements are required to submit a application and requires prior-written approval from DEM prior to the start of construction



A matrix which shows general requirements for repairs or modifications on a component-level is available on our website at <http://www.dem.ri.gov/programs/benviron/waste/pdf/ustmodmatrix.pdf>

Application for the Repair or Modification of a UST System

The Repair or Modification application is available on our website at <http://www.dem.ri.gov/ust> under the “Installation, Modification, and Repair” section. Please read the instructions carefully, as incomplete applications cannot be processed and will be returned. There is no fee to submit an application. The application and supporting materials will be reviewed by a staff engineer in the UST Management program who will evaluate the proposal and ensure it meets applicable State, Federal and industry standards, as well as determine what inspection, construction, and testing requirements are required. Review time will vary with the volume of applications and complexity of the project, however, review decisions are typically made within 14 days.



Any evidence of a release must be immediately reported to the DEM UST Management Program by calling (401)222-2797 or using the reporting tool on our website at <http://www.dem.ri.gov/ust>



Modification or Repairs to UST Systems

Who can perform repairs and modifications?

Any individual performing work on any component of a UST system is required to be licensed by the Rhode Island Department of Labor in Training and hold a valid "Gas Station Ltd" license. In addition, some repairs may require additional training and certification by the manufacturer, most notably product piping installation

Are there any limits to what can be repaired?

Yes. Spill containment basins cannot be repaired and must be replaced with Double-Walled, Stage I CARB-approved EVR basins. Sumps and UDCs can only be repaired using NLPA or manufacturer methods, and ad-hoc repairs using RTV, silicone, or other sealants are prohibited. USTs can only be repaired once, and most flexible product pipelines cannot be repaired and must be replaced

DEM Decision and Written Approval

After the application has been reviewed, the contractor and individual signing the application as owner will receive a decision from DEM. If the application is rejected, you will be notified of the reasons why and asked to re-submit with corrections. If the application is approved, the contractor and owner will receive a written approval letter and permit from DEM which clearly state the requirements associated with the repair, including, but not limited to, DEM inspection, environmental screening, and 3rd party testing requirements, as well as any required post-construction documentation. These requirements will vary from site to site and are a function of the type and construction of the UST system, system location and sensitivity, as well as circumstances which led to the repair or modification. Construction on any UST system or component should not start until written approval from DEM has been received and you fully understand the requirements associated with the approval

Modification and Repair Activities

During the repair and/or modification of the UST facility, contractors are expected to abide by all applicable municipal, State, and Federal laws and regulations, including safe work practices and obtaining permits when required. Please be aware that DEM and the Rhode Island Department of Labor and Training perform routine unannounced inspections at construction sites and may issue stop work orders if issues are observed. Contractors are expected to follow all applicable best practices and manufacturer guidelines for repairs and/or modifications, and all work must be performed exactly as approved by RI DEM. If the scope of work changes or change order is required, you must seek approval from RI DEM. Unapproved repairs or modifications may be required to be removed. During all activities which involve the excavation or exposure of soil, pea-stone, or the subsurface, a 3rd party environmental consultant is required to be on-site and screen the soils using a PID

Post-Construction Inspection and Return to Operation

Most repairs will require a pre-burial inspection by a DEM staff member. This inspection is to be performed after all modifications or repairs have been completed, but prior to backfill and paving or laying concrete. If component testing is required, all tests must be performed after backfill, compaction, and paving or laying concrete and performed by a DEM-licensed 3rd party. Most repairs or modification will also require submittal of documentation and certifications signed by the contractor. All items must be received and written permission from DEM given before the UST system may resume operation. A complete list of all required inspections, tests, and documentation will be included on the approval letter and permit issued by DEM if the application has been approved



All forms and additional documents can be found on the UST Program website at: <http://www.dem.ri.gov/ust>

Questions?

For all repairs or modifications: Joe Cunningham (401) 222-2797 ext. 7137

For installation or replacement of USTs : Greg Yekhtikian at 401-222-2797 ext. 7521



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