

**Guidance on the determination of causes and sources of release at petroleum storage tank
system facilities
and
Instructions for Completing Initial Incident Report Form**

The Petroleum Storage Tank Bureau (Bureau) is required to report the number, sources and causes of petroleum releases from petroleum storage tanks in order to implement the Public Records provision of the Energy Policy Act. This guidance is prepared to instruct the incident reporter to identify release source and cause information that will be compiled as part of the Bureau's public record report.

The Bureau has changed the existing Initial Incident Form so that it can be used to provide the initial report to the Bureau of a confirmed or a suspected release. Complete all information on the form to the best of your ability and knowledge. Include other pertinent information in comments sections, which will expand to accommodate additional information. Instructions are not provided for fields that are self-explanatory. Boxes have standard selections available; however, a different answer can be typed in the next comment field or the box can be left blank if the answer is not known.

Box top right of form

- **Facility ID:** Include the Facility Identification Number issued by the PSTB for the facility where the release is suspected/confirmed.
- **Owner ID:** Include the Owner Identification Number issued by the PSTB for the facility where the release is suspected/confirmed.
- **Release ID and AI ID:** Leave blank

Contact Information

- **County:** in which the facility is located
- **District:** PSTB district, if known
- **Date Received:** Enter the date that the release is being reported to the PSTB.
[PSTB Internal – When the PI Program refers a suspected release to the RA Program, this date should be the same as the “date referred” to the Remedial Action Program on the last page of the form.]

Owner Information: Complete all fields.

Operator Information: At some facilities, the tank operator is a separate entity from the tank owner (e.g., when an operator leases a facility from the tank owner). If the tank owner and operator are the same entity, leave this section blank.

Release Information

- **Confirmed or Suspected:** Check one depending on whether the release is confirmed or suspected. Some examples of a confirmed release include:
 - **Visual leaks or seeps** from any part of the storage tank system
 - **Non-aqueous phase liquid or vapors** in soil, basements, sewer and utility lines, groundwater, drinking water, or nearby surface water
 - **Soil analytical results** indicating total petroleum hydrocarbon concentrations of 100 parts per million or more
 - **Petroleum hydrocarbon vapor** field screening results greater than 100 whole instrument units
 - **Significant visible staining or obvious petroleum odors**
- **Leaking Tank Type:** Select one of the boxes. [Note: A hybrid tank is a combination of an aboveground (AST) and underground (UST) storage tank system connected so that fuel enters one tank from the other under pressure or gravity flow but is not siphoned.]
- **Type of Product Lost (1), (2), (3):** Enter what type of product was released/suspected to have been released from the list below the question. If more than one product type was/may have been released, identify in (2) and (3) as needed. If a known product type is not listed, type in the product type.

IF RELEASE IS NOT CONFIRMED, SKIP TO Tank Information - Suspected Releases BELOW

- **Further Release been prevented by:** Select a box or type in what was done in the space in the line above, or in the comments.
- **Fire Authorities notified...Contact Name and Phone:** Name & phone of fire authority contacted.
- **Has responsible party been informed of their responsibilities?** Have PSTB personnel informed the responsible party (i.e., tank owner and/or operator) of their responsibilities?
- **Contaminated saturated soils present?** Contaminated saturated soil is soil where non-aqueous phase liquid (NAPL, petroleum product) is observable in the soil and, if sufficiently liquid, the NAPL/product drains from the soil when the soil is lifted up.
- **Describe any removal:** Of contaminated soil, groundwater, or product

Hydro-geological Information

- **Depth to groundwater, Direction of GW flow, Surface waters endangered?** Your best knowledge of each of these based on on-site or off-site information and the surrounding area.

Actual/Possible Impacts

- **Well locations, depths, types:** For any on-site or nearby wells

Source Information – Where did the release come from? Check all that are applicable. Use the **Comments** section if additional space is needed to provide additional information.

- **Tank:** The tank storing the product and part of the petroleum storage tank system. The tank can be identified as a source of the release based on conditions found at the facility (e.g., a tank with holes)
- **Piping:** Piping and connectors connecting the tank to dispensers and used to transfer a regulated substance between. Does not include vent, vapor recovery, or fill lines. Obvious indications that this is the source are contaminated soil around loose joints along the piping run, a failed piping tightness test, or holes found in the piping.
- **Spill Prevention:** Equipment designed to prevent release of regulated substances when filling tanks (e.g., containment sumps, spill bucket).
- **Containment Sump:** Liquid-tight container that contains leaks and spills of regulated substances from piping, dispensers, pumps, and related components (e.g., pump sump, under-dispenser containment sump, transition or intermediate sump)
- **Dispenser/Loading Rack:** Equipment used to meter and transfer fuel from the tank system to a consumer or transporter via the connected product piping
- **Flex Connector:** Flex connectors attach the piping either to the shear valve under the dispenser or to the turbine pump.
- **Submersible turbine pump area:** This includes the pump head (which is typically located in the turbine sump), the line leak detector, and piping that connects the submersible turbine pump to either the tank or to the sump.
- **Delivery Problem:** Releases that occur during delivery of a regulated substance to the tank (e.g., spills and overfills).
- **Other:** Use this when the source of the release does not fit into any of the above categories. Examples of other causes are:
 - **Vent lines.** Regulated substances that enter and are released from vent lines due to physical damage or corrosion.
 - **Fill lines.** Lines used to fill tanks & which could be compromised by corrosion, physical damage, or improper installation.
 - **Multiple sources.** Though a release source may originate from a tank or piping, secondary containment or other portions of the system could be physically damaged or improperly installed and fail to contain a release. Therefore, any part of the tank system within the secondary containment that fails to contain a regulated substance will be a co-source of a release into the environment.

- **Vapor recovery lines.** Not likely to be a source of releases in New Mexico; however, this could be a release source if vapor recovery lines are present.
- **Comments:** Provide as much information about the source of the release as possible. If soil samples greater than 100 mg/kg TPH confirm the release, include a list of the analytical results and what was detected (e.g., 150 mg/kg diesel in SS#1; 220 mg/kg diesel & 50 mg/kg gasoline in SS#2, <50 mg/kg TPH in SS#3).

Cause Information – Why did the release occur? Check all that are applicable

- **Spill:** Applies to spills, e.g., when fuel is being transferred into or out of the tank system.
- **Overfill:** Applies when too much fuel is transferred to a storage tank during a delivery.
- **Corrosion:** Applies when the integrity of metal components of a storage tank system, including tanks and piping, has been compromised by corrosion, but only check corrosion if corrosion is the only apparent cause of the release.
- **Physical or Mechanical Damage:** Applies for all types of physical and mechanical damage found in a storage tank system other than corrosion-related damage or failure. Examples: cracked valves, punctured pipe, swollen or elongated flexible piping.
- **Installation Problem:** Applies when it is found that the storage tank system was not installed properly.
- **Other:** Use this when the cause does not fit into any of the above categories.
- **Comments:** Provide as much information as possible about the cause of the release, including your observations about corrosion, tank condition, etc.
- **Unknown:** Use this option only when the cause is unknown.

Tank Information – Suspected Releases: Include a line for each tank system from which the suspected release occurred. Use the table on the last page of the form if additional lines are needed. For compartment tanks, either add a line for each compartment and include the same tank ID for each compartment, or otherwise provide information that clarifies capacity and contents of each compartment of the tank.

- **Tank ID:** Provide the PSTB-provided tank identification number.
- **Capacity:** Identify the capacity of the tank with the associated suspected release. For compartment tanks, specify the capacity of each compartment.
- **Contents:** Identify the contents of the tank system with the associated suspected release. For compartment tanks, specify the capacity of each compartment corresponding to the capacity in the previous box.
- **Date of Tank Installation:** self-explanatory

- **Date of Piping Installation:** self-explanatory, may be different than date of tank installation.

Suspected Release Information* (What are the conditions for suspecting a release?): Check all that are applicable

- **Comments:** Include details about why the release is suspected.
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FORM SUBMITTAL: Submit the completed form to one of the following individuals:

- For suspected releases, submit the report to joe.godwin@state.nm.us
- For confirmed releases, submit the report to the Leak of the Week. The current Leak of the Week can be found on the PSTB website, on the right side of the page under “Report a Leak or Spill” (click on the word “here”): https://www.env.nm.gov/petroleum_storage_tank/.

If you are uncertain, submit the form to the Leak of the Week. For questions regarding suspected releases, contact the Inspection Program; if you know your inspector, contact the inspector. For questions regarding confirmed releases, contact the Remedial Action Program Leak of the Week.

PSTB INTERNAL:

- *Suspected Release forms - send directly to Inspector’s Program Manager (Joe)*
- *Confirmed Release forms - send to both the Leak-of-the-Week and to Remedial Action Program Manager (Lorena)*