

NMED

New
Mexico
Environment
Department



PART 114: AIRPORT HYDRANT SYSTEMS, USTS W/ FIELD CONSTRUCTED TANKS, AND HYBRID STORAGE TANK SYSTEMS

8/20/2018

Joe Godwin

Program Manager – Prevention and Inspection Program
New Mexico Environment Department

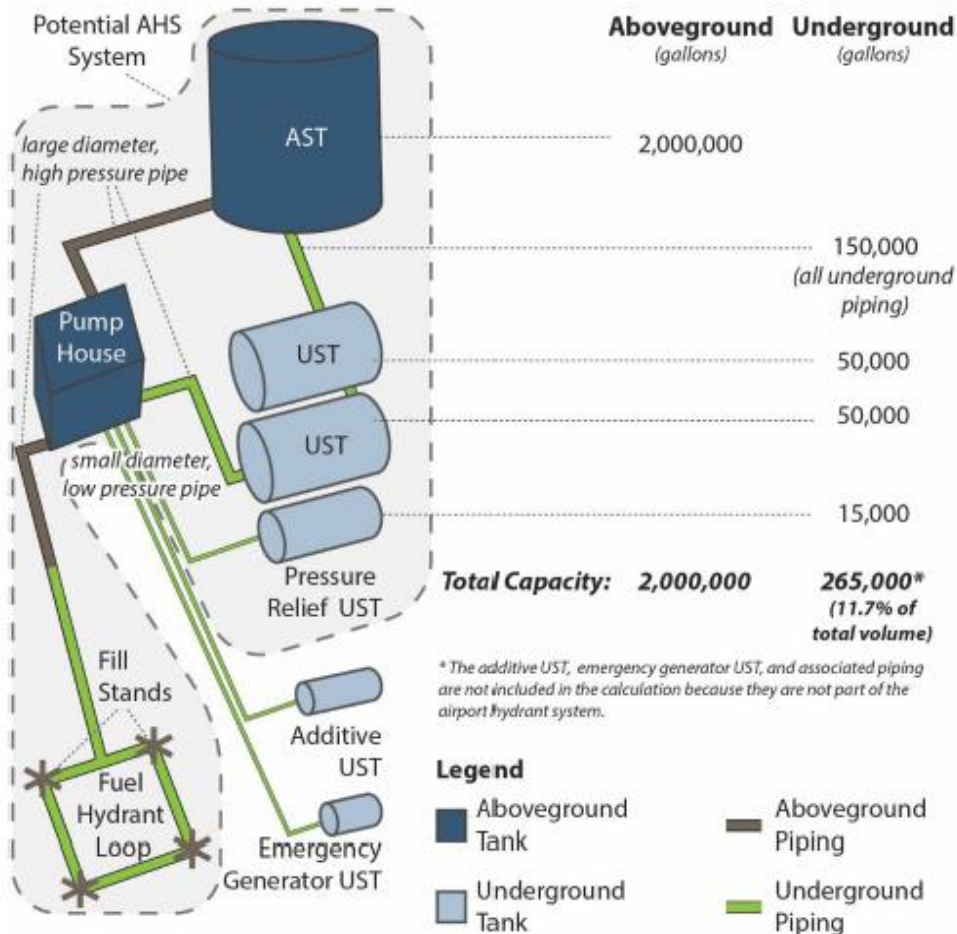
Part 114: Previously Partially Exempt Tanks

2

- Regulations now apply to Airport Hydrant Fuel Distribution Systems and USTs with Field Constructed Tanks.
- Hybrid storage tank systems are AST systems that are connected to and feed a regulated substance to USTs. New requirements for this type of storage tank system have been added to this Part.



Part 114 – Airport Hydrant System



Airport Hydrant Fuel Distribution System

4

ASTs with capacity of 55,000 gallons and greater that are part of an AHS are partially exempt from requirements.

- ❑ Systems involve large diameter piping, large volume ASTs and sometimes USTs that are used to fuel aircraft. They operate at high pressures and typically terminate into a hydrant.
- ❑ Typically referred to as AHS systems.
- ❑ Regulated if greater than 10% of the entire system is underground (definition of UST).



UST with Field Constructed Tanks

5

- USTs that are constructed in the field out of either concrete, steel, or fiberglass.
- Typically called cut & cover tanks, bunkered tanks, or FCTs.
- Typically associated with AHS systems at DOD facilities.
- A field constructed tank system where greater than 10 percent of the system is underground is a field-constructed UST. Field-erected ASTs would be partially exempt if part of a FCT.



AHS & FCT System Requirements

6

- New systems & upgrades must be designed by and installation overseen by a PE with experience in these types of tanks.
- The contractor who installs these types of tank systems must have two years of experience in the installation of them.



Part 114 of 20.5 NMAC

7



Hybrid Storage Tank System

8

- Hybrid systems typically have large field-erected ASTs that feed underground storage tanks at a high throughput facility.
- Hybrid systems do not have to meet the definition of a UST to be a regulated system in 20.5 NMAC.
- **New hybrid storage tank systems cannot be installed after July 24, 2018 (20.5.114.1403.D)**



Existing Hybrid System Requirements

9

- No later than July 1, 2019, owners and operators must submit documentation from a PE that the UST can withstand the head pressure from the AST.
- Existing hybrid systems must get NM State Fire Marshal's approval no later than July 24, 2019 (20.5.114.1400.G)
- If the NM State Fire Marshal's Office does not approve the hybrid system or the exception to the size restriction, then owners and operators must permanently close the AST in accordance with 20.5.115 NMAC.



AHS, FCT, and Hybrid Requirements

10

- Systems existing prior to July 24, 2018 have three years to meet the following:
 - Registration requirements in 20.5.102 NMAC
 - Corrosion Protection requirements in Part 106 and 107 of 20.5 NMAC.
 - Release Detection requirements in 20.5.106 NMAC or 20.5.114 NMAC, as applicable.
 - Financial Responsibility in 20.5.117 NMAC.
 - Release Reporting in 20.5.118 NMAC
 - Closure requirements in 20.5.115 NMAC.

