



Underground Storage Tank Certifications

Office of Land Quality

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Introduction:

The purpose of this fact sheet is to clarify requirements for underground storage tank (UST) contractor certifications relating to UST operation and maintenance, and to provide a temporary alternative for those who may need to obtain such certifications.

Discussion:

There has been confusion regarding which certification is required for the different types of work related to UST operation and maintenance, especially new periodic testing requirements that became effective June 28, 2021. There are currently four different UST certifications that may be obtained from the Indiana Department of Homeland Security (IDHS), Division of Fire and Building Safety. These certifications are required by Indiana Code § 13-23-3-1 and include the following: installation or retrofitting; testing; cathodic protection procedures; and decommissioning.

The 'installation or retrofitting' certification, based on the scope of the testing required to obtain it, allows a person to install and test all components of a regulated UST system. A person holding this certification should be able to install, replace, repair, and test any UST component. This certification covers much of the additional periodic testing that became required as of June 28, 2021. This certification (generally referred to as "U1" based on its classification by the International Code Council (ICC) testing catalogue) also covers what is known as tank and line tightness testing but is not limited thereto. While this certification touches on ensuring that factory installed galvanic corrosion protection (CP) is not damaged and is functional, it does not allow the person to perform periodic CP evaluations or to design and install field installed CP systems.

The 'testing' certification (generally referred to as "U3" based on its classification by the ICC testing catalogue) was designed to allow a person to perform tank and line tightness testing only. This certification appears to have been created to allow people or companies to get more employees certified in an easier manner for these specific activities during a time when tank and line tightness testing was a more common requirement for release detection purposes. This more abbreviated certification would have allowed companies to better manage resources by not having to commit the additional capital in training all their employees to be fully fledged UST installers/retrofiters. The ICC has titled the scope for this certification as "UST Tank Tightness Testing - U3", further reinforcing the fact that this certification is limited to tightness testing only.

The 'cathodic protection procedures' certification (generally referred to as "U4" based on its classification by the ICC testing catalogue) allows a person to design, install, and evaluate both galvanic and impressed current CP systems.

The 'decommissioning' certification (generally referred to as "U2" based on its classification by the ICC testing catalogue) covers permanent UST closures. Such closure would include a removal closure, an in-place closure or a change-in-service closure.

Conditions:

Depending on the work or testing being performed on a UST system, IDEM requires that at least one person be properly trained and certified for the work. The certified person must be on site and either performing the work/testing themselves or actively overseeing others performing the work/testing. The certified person must

certify the work was done correctly and that testing results are valid by affixing their IDHS certification number, name, and signature on applicable documents.

To reiterate, a properly trained and certified person must be fully present, managing and observing if uncertified persons are performing work or testing on any component of a UST system, and that certified person is responsible for the substantiation of that work or testing. If the certified person, whose name is utilized on the applicable documents is found to have not been present or otherwise not actively managing and observing the work, the work/testing will be determined to be invalid.

Temporary Alternative:

It has come to IDEM's attention that many owners, operators, and contractors have been unaware of the distinction between the "installation and retrofitting" and "testing" certification requirements. This has led to a higher-than-normal rejection rate of UST compliance testing documentation by IDEM. To alleviate this, for a temporary period of time, IDEM will allow persons with an IDHS issued "testing" certification (U3) to perform UST compliance testing if they provide an acceptable alternative testing certification for each type of applicable compliance testing.

As an example, most of the newer compliance testing must be completed in accordance with the Petroleum Equipment Institute (PEI) Publication RP1200 "Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities". PEI has an online testing and certification process for this RP. If a person submits a copy of their IDHS "testing" certification along with the PEI RP 1200 certification, IDEM will temporarily consider that to be acceptable. A manufacturer's certification for specific equipment may also be considered an acceptable alternative certification.

This alternative certification process will remain in force until July 1, 2023, unless extended further via a publicly posted announcement.

Environmental Impacts:

- Indiana has over 4,100 operating UST sites that have over 12,000 USTs. If not managed properly, these sites can have negative impacts on human health and the environment from releases such as underground leaks and above ground spills.
- Refined petroleum products such as gasoline and diesel are a mixture of numerous compounds that have a detrimental effect on human health or the environment. These compounds are often toxic or carcinogenic.
- Contamination from leaking UST sites can migrate to streams or lakes, contaminate drinking water, or cause dangerous vapors in buildings and underground sewers.
- By ensuring that UST owners, and operators operate and maintain these systems and have them periodically tested by properly trained and certified people, releases can be prevented to protect human health and the environment.

Additional Information:

- For questions regarding UST compliance, call the UST Program at (317) 234-4112 or (800) 451-6027, ext. 4-4112.
- Applicable laws are found at:
 - UST Rule- [IN.gov/legislative/iac/T03290/A00090.PDF](https://www.in.gov/legislative/iac/T03290/A00090.PDF)
 - IC 13-23-3- iga.in.gov/legislative/laws/2021/ic/titles/013
- International Code Council (ICC) certification information: www.iccsafe.org/professionaldevelopment/about-code-council-examinations/