

Owners\Operators Responsibilities During Fuel Deliveries

Good fuel transfer practices prevent spills and overfills. Although overfills may not be an everyday occurrence, the results can be catastrophic to both the environment and human safety. Generally overfill equipment is not the problem, but rather it is human error.

In a tragic case in Biloxi, Mississippi, a tank overfill caused by human error resulted in the death of five people after the fuel ignited and engulfed their cars as they sat in traffic near the service station.

In Ohio, compliance with UST regulations is a pre-requisite to remaining eligible for Fund coverage. Allowing overfill devices to be disabled and ignoring the responsibilities owners and operators have to ensure the safe transfer of product may lead to your being declared ineligible for claim reimbursements should an overfill occur. Protect your coverage under the Fund. Implement sound practices for the safe transfer of fuel to your UST system.

Both federal law and BUSTR's rules simply state: "**Owners and operators** of all UST systems shall ensure that releases due to spilling or overfilling do not occur. The owner and operator shall ensure that the volume available in the tank is greater than the volume of product to be transferred to the tank before the transfer is made and that the transfer operation is monitored constantly to prevent overfilling and spilling."

Therefore, the responsibility for overfill protection rests squarely on the shoulders of the owner and operator, not the delivery truck driver. The following procedures should prevent overfills from occurring and will keep owners and operators in compliance with UST regulations.

- Post clear signs indicating to the delivery person what overfill devices and alarms are in use and make and record accurate readings for product and water in the tank before delivery.
- Keep fill ports locked until the fuel delivery person requests access and verify that your spill bucket is empty, clean, and will contain spills.
- Order only the quantity of fuel that will fit into 90% of the tank. The formula for determining the maximum amount of gasoline to order

Tank Capacity in gallons X 90% minus product currently in tank equals Maximum fuel order

Example: (10,000 gal X 0.9 = 9,000 – 2,000 = 7,000 gallon maximum order)

- Verify that the flow restrictor/high level alarm, automatic shutoff, or other overfill device is functional and, if appropriate, make sure the high level alarm is located where the delivery person and your employees can see or hear it.
- Review and understand spill response procedures and have spill sorbent pads available in case a spill or overfill occurs.
- Have the fuel delivery when staff is present and provide adequate lighting and safety barriers around the fueling zone. Have an accurate tank capacity chart available for fuel delivery person.
- The fuel delivery person makes all hook-ups. The driver and facility personnel assigned to observe should stand by during the entire delivery and be prepared to stop the flow of fuel from the truck should any unusual conditions, leaks, or spills be observed. Following delivery, the driver is responsible for disconnecting all hook-ups.
- Verify the amount of fuel received and make and record accurate readings for product and water in the tank after delivery. Make sure fill ports are properly secured.

Remember, compliance with proper transfer procedures should prevent spills and overfills and is a pre-requisite for remaining eligible for Fund coverage and claim reimbursement.