

# Environmental compliance self-evaluation

## Underground petroleum storage systems: Are you up to date with your obligations?

Leaks from underground petroleum storage systems (UPSS) are a major environmental problem and can have impacts that are costly and time consuming to fix. For these reasons minimum requirements for UPSS construction and operation are provided in the Protection of the Environment (Underground Petroleum Storage System) Regulation 2019 (UPSS Regulation).

From 1 September 2019, local councils became responsible for regulating most UPSS sites in NSW, including service stations. The NSW Environment Protection Authority (EPA) remains the appropriate regulatory authority (ARA) for UPSS sites that are operated by public authorities, subject to an environment protection licence or located in an unincorporated area of NSW.

This self-evaluation has been developed to provide UPSS operators with a quick and simple way to review their compliance with environmental requirements for UPSS in NSW.

## Why should you participate?

UPSS operators who complete this form are more likely to identify shortcomings and take the necessary actions to correct them before they develop into major environmental issues.

## Who should complete this self-evaluation?

This self-evaluation can be completed at any time by any operator of a UPSS in NSW. The form should be completed by the company or person who has primary responsibility for managing and maintaining the UPSS (known as the 'person responsible').

If you have questions about this self-evaluation or are not sure whether it applies to you, please call your local council or the EPA on **131 555** or email [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

## How should this self-evaluation be completed?

This self-evaluation is a series of short questions. Please answer all questions to the best of your knowledge and insert additional comments or detail where required.

This self-evaluation should take 5 to 15 minutes to complete.

## What if you operate multiple sites?

If you operate multiple sites in NSW with a UPSS, you should complete one form per site.

### Part 1: Site details

#### Site information

Site name:	Site owner's name (individual or company):
Site address – Street number and name:  Suburb and postcode:	Site operator's name (individual or company):
Property details: Lot no.:	DP no.:

#### Contact information

Name of person completing this self-evaluation:	
Contact email/s:	
Contact phone number/s:	
Signature: (upload image)	Date:

Name of person responsible for the UPSS (individual or company):	
Company:	
Street number and name:	
Suburb and postcode:	
Contact email/s:	Contact phone number/s:

## Details of all underground petroleum storage tanks at the site

Complete one row per underground storage tank. Add rows if necessary.

Underground storage tank ID number	Tank contents/fuel grade	Capacity (litres)	Tank material type (e.g. steel, fibreglass, other non-corrodible tanks, tanks with secondary containment)	Date commissioned (give year/decade only if exact date unknown)
Example: Tank 1	ULP 91	10,000	Steel	10 March 1985

## Part 2: UPSS infrastructure

This part only applies to UPSS installed or significantly modified after 1 June 2008 (including any tanks or piping that have been modified or replaced since 1 June 2008).

If you only have tanks and piping that have been installed before 1 June 2008, please go to Part 3.

1	<p>Ensure all 'new' UPSS have the four items of mandatory pollution protection equipment listed in 1a-d.</p> <p>Answer questions 1a-d for those underground storage tanks identified in the table above as being installed after 1 June 2008.</p> <p><b>Action needed</b> if 'No' is answered to any questions 1a-d.</p>	<p>List any tank numbers not operated with mandatory pollution protection equipment and what is needed.</p> <p>Tank lacks</p> <p>Tank lacks</p> <p>Tank lacks</p> <p>Tank lacks</p>	<p>Comment (if required):</p>
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	1a Are they constructed of non-corrodible material (e.g. fibreglass)?	Yes	No
	1b Do they have secondary containment (e.g. are they double walled)?	Yes	No
	1c Do they have over-fill protection devices?	Yes	No
	1d Did they pass an integrity (tightness) test at the time of commissioning?	Yes	No

### Part 3: Fuel loss monitoring procedure (all UPSS sites)

2	<p>Is there a loss monitoring procedure in place at the site to measure discrepancies between the amount of petroleum that should be in the system and the actual amount present?</p> <p>Examples of loss monitoring procedures are:</p> <p>automatic tank gauging (ATG) plus line leak detection</p> <p>statistical inventory reconciliation analysis (SIRA)</p> <p>manual dipping with wet-stock reconciliation.</p>	<p>Yes</p> <p>If 'Yes', provide details of the loss monitoring procedure.</p>		<p>No</p> <p><b>Action needed:</b> Do not use a UPSS unless a loss monitoring procedure is in place.</p> <p>Comment (if required):</p>
3	<p>Does the loss monitoring procedure generate a report monthly (as a minimum)?</p>	<p>Yes</p>	<p>No</p> <p><b>Action needed:</b> Ensure loss monitoring procedures provide a report or inventory analysis at least monthly.</p>	
4	<p>Are all records relating to the loss monitoring procedure retained on site or in a readily accessible location?</p>	<p>Yes</p>	<p>No</p> <p><b>Action needed:</b> Retain on site or make readily accessible the records of all aspects of the loss monitoring procedure.</p>	

## Part 4: Secondary leak detection (all UPSS sites)

5	All UPSS sites are required to have a secondary leak detection system. At least three groundwater monitoring wells (GMWs) are preferred. Does your site have a network of GMWs to help detect UPSS leaks?	Yes (Go to Q9)	No (Go to Q6)
6	Do you have an alternative system for secondary leak detection?	Yes (Go to Q7)	No (Go to Q11) <b>Action needed:</b> Arrange for the installation of GMWs or an alternative secondary leak detection system by an appropriately qualified person.
7	Which alternative system/s is/are used for secondary leak detection of the UPSS?		
	Automatic line leak detectors		
	Continuous inventory monitoring		
	Integrity/tank tightness testing		
	Interstitial monitoring		
	Manual tank gauging methods		
	Visual leak detection		
	Other (please specify)		
8	Was/were the alternative system/s for secondary leak detection designed and installed by a duly qualified person?	Yes	No <b>Action needed:</b> Arrange for the alternative system/s for secondary leak detection to be inspected and verified by a duly qualified person.
9	Do you ensure groundwater is sampled from the GMWs and tested at least every six months?	Yes	No <b>Action needed:</b> Sample and test GMWs at least six-monthly.
10	Are all records relating to the secondary leak detection system (e.g. well installation reports, testing procedures and six-monthly groundwater monitoring reports) retained on site or in a readily accessible location?	Yes	No <b>Action needed:</b> Records of all aspects of the secondary leak detection system should be retained on site or be readily accessible.

## Part 5: Environment Protection Plan (all UPSS sites)

11	Do you have an Environment Protection Plan (EPP) or an equivalent document with information about your UPSS?	Yes	No (Go to Q13) <b>Action needed:</b> Develop an EPP and keep it on site.
12	Does the EPP contain the following documents and information about the design, construction, operation and maintenance of the UPSS?		
	A fuel loss monitoring procedure	Yes	No
	An incident management procedure	Yes	No
	A maintenance schedule	Yes	No
	Current 'as built' drawings of the UPSS and site plans	Yes	No
	A copy of the specifications and/or industry standards used in the design and construction of the UPSS	Yes	No
	The name, address and 24-hour contact phone number of the 'person responsible' for the UPSS	Yes	No
	The access details for the site, including details of locks, gates and fences	Yes	No
	Copies of records relating to loss monitoring and groundwater monitoring at the site?	Yes	No
13	Have any tanks at the site been out of use for more than two years?	Yes <b>Action needed:</b> The tank/s must be removed or abandoned (see Australian Standard AS 4976-2008: Removal and disposal of underground petroleum storage tanks)	No
14	Has a UPSS previously been decommissioned at the site?	Yes (Go to Q15)	No (Checklist complete)
15	Has a report been provided to the local relevant authority for any decommissioned tanks?  Local councils are responsible for regulating most UPSS sites in NSW, including service stations. The EPA remains the ARA for UPSS sites that are operated by public authorities, subject to an environment protection licence or located in an unincorporated area of NSW.	Yes <b>Action needed:</b> The report must be kept for seven years after the system is decommissioned.	No <b>Action needed:</b> Within 60 days of validation or remediation works to remove one or more tanks, the local relevant authority must be given a report prepared by a duly qualified person.

Thank you for completing this self-evaluation. Keep a copy of this form for your records.

If you have any questions or need help completing this form, please contact the EPA on 131 555 or your local council.

## Next steps

Please take note of any answers that indicated **'Action needed'** and take steps to implement the specified improvements.

If you are unsure about which actions to take, contact your industry association, your local council or visit the **EPA's website**

## Further information and advice

Further detailed information on the design, construction, operation, maintenance and monitoring of UPSS is available at:

- the EPA's **Guidelines for Implementing the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (PDF 3.8MB)** available on the EPA website
- Standards Australia, The Design, Installation and Operation of Underground Petroleum Storage Systems AS4897-2008
- the **Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019**

Acknowledgements: The NSW EPA gratefully acknowledges the assistance of EPA Victoria in developing this checklist.

Disclaimer: The UPSS Regulation has numerous and detailed requirements. This brief self-evaluation cannot be relied upon as a legal determination of your compliance with the Regulation.