**UPSS Environmental Compliance Self-Evaluation Survey**

This survey was created by the NSW Environment Protection Authority. It has been modified by the Riverina and Murray Joint Organisation (RAMJO) and the Riverina Eastern Organisation of Councils (REROC) in a process to assist councils in developing a UPSS Inspection and Monitoring Program.

**Underground Petroleum Storage Systems (UPSS) – are you up to date with your obligations?**

Leaks from UPSS are a major problem that can have impact on public health and the environment, and are costly and time consuming to fix. For these reasons minimum requirements exist for the design, installation, operation and maintenance of UPSS under the UPSS Regulation 2019.

*The attached self-evaluation provides UPSS owners with a quick and simple way to review their compliance with environmental requirements for UPSS in NSW.*

**Why should you participate?**

UPSS owners/operators who undertake this survey are more likely to identify short comings, and plan for and undertake take the necessary actions to rectify these before they develop into major public health and environmental issues.

As a UPSS owner/operator, you are strongly encouraged by [CouncilName] (being the Appropriate Regulatory Authority for UPSS) and by RAMJO and REROC to complete this survey.

*Council will work with those operators who participate in this self-evaluation survey to help bring them into compliance with the requirements.*

**Who should complete this self-evaluation?**

This self-evaluation should be completed by the company or person who has primary responsibility for managing and maintaining the UPSS at your site (known as the ‘person responsible’).

*If you have questions about this self-evaluation or are not sure as to whether it applies to you, please call Council on (Council Customer Service number) or email the RAMJO-REROC contaminated land officer on* [*ContaminatedLands@ramjo.nsw.gov.au*](mailto:ContaminatedLands@ramjo.nsw.gov.au)*.*

**How should this self-evaluation be completed?**

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

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

**What if you operate multiple sites?**

If you operate multiple sites with the local government area of [Council], you are required to complete and lodge surveys per UPSS site.

This modified survey has been developed with use of resources and templates developed by other *NSW Council Regional Capacity Building program on contaminated land* projects.

**Part 1 Site Details**

Site information

|  |  |  |
| --- | --- | --- |
| Site Name: | | Service Station **site owners** name (individual or company): |
| Site Address: | | Service stations **operators name** (individual or company): |
| Property Details: | Lot no.:  DP no.: | |

Contact information

|  |  |
| --- | --- |
| Name of person completing this self-evaluation: | |
| Contact email: | |
| Contact phone number: | |
| Signature: (Insert picture) | Date: |
|  | |
| Name of **person responsible** for the UPSS: | |
| Company: | |
| Address: | |
| Contact email: | Contact phone number: |

Details of all underground petroleum storage tanks at the site

Complete one row per underground storage tank.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Underground storage tank ID number** | **Tank contents / fuel grade** | **Capacity (L)** | **Tank material type (steel, fiberglass, tanks with secondary containment)** | **Date commissioned** |
| *Example: Tank 1* | *ULP 91* | *10,000* | *Steel* | *March 1985* |
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**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 June 2008).

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

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **1** | Ensure all ‘new’ UPSS have the four items of mandatory pollution protection equipment listed in 1a-d. | List any tank numbers not operated with mandatory pollution protection equipment, and what is needed. | | | | | |
| Tank: | Lacks: | | | | |
| Tank: | Lacks: | | | | |
| Tank: | Lacks: | | | | |
| Tank: | Lacks: | | | | |
| Comment: | |  | | | |
| 1a Are they constructed of non-corrodible material (e.g. Fiberglass) | | |  | Yes |  | No |
| 1b Do they have secondary containment (e.g. Are they double walled)? | | |  | Yes |  | No |
| 1c Do they have overfill 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** | 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?  Examples of loss monitoring procedures are:   * Automatic tank gauging (ATG) plus line leak detection * Statistical Inventory Reconciliation Analysis (SIRA) * Manual dipping with wetstock reconciliation | Yes  If ‘Yes’, please provide details on the loss monitoring procedure: | No  **Action needed: do not use a UPSS unless a loss monitoring procedure is in place.**  Comment: |
| **3** | Does the loss monitoring procedure generate a report monthly (as a minimum)? | Yes | No  **Action needed: Ensure loss monitoring procedures provide a report or inventory analysis at least monthly.** |
| **4** | Are all records relating to the loss monitoring procedure retained on site or in a readily accessible location? | Yes | No  **Action needed: Retain on site or make readily available the records of all aspects of the loss monitoring procedure.** |

**Part 4: Secondary Leak Detection (all UPSS sites)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **5** | All UPSS sites are required to have a secondary leak detection system. At least 3 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  **Action needed: Arrange for the installation of GMWs or an alternate secondary leak detection system by an appropriately qualified person.** | |
| **7** | Which alternative system/s is/are used for secondary leak detection of 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  **Action needed: 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  **Action needed: 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, ground water modelling reports) retained on site or in a readily accessible location? | Yes | No  **Action needed: Records of all aspects of the secondary leak detection system should be retained on site or be readily accessible.** | |

**Part 5: Fuel System Operation Plan (all UPSS sites)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **11** | Do you have a Fuel System Operation Plan (FSOP) or an equivalent document with information about your UPSS? | Yes | | No (Go to Q13)  **Action needed: Develop an (FSOP) and keep it on site.** |
| **12** | Does the FSOP contain the following documents and information about the design, construction. Operation and maintenance of the UPSS? | | | |
| A fuel loss monitoring procedure | Yes | No | If ‘No’ ticked.  **Action needed: Amend FSOP to include all this information.**  Comment: |
| An incident management procedure | Yes | No |
| A maintenance schedule | Yes | No |
| Current ‘as built’ drawing 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 address 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  **Action needed: The tank/s must be removed or abandoned (see Australian Standard AS 4976-2008: R*emoval and disposal of underground petroleum storage tanks*)** | | No |
| **14** | Has the UPSS previously been decommissioned at the site? | Yes  (Go to Q15) | | No  (Checklist complete) |
| **15** | Has a decommissioning validation report been provided to your local council for any decommissioned tanks? | Yes  (Checklist complete) | | No  **Action needed: Within 60 days of validation or remediation works to remove one or more tanks, your local council must be given a decommissioning validation report prepared by a duly qualified person.** |

Thank you for completing this self-evaluation. Please return the completed form to Council by [Date] and send by email to [insert council email address] with a copy to [ContaminatedLands@ramjo.nsw.gov.au](mailto:ContaminatedLands@ramjo.nsw.gov.au).

Your answers and contact details will be retained by Council in its UPSS inspection and monitoring register, and will not be shared with other parties.

**Next steps**

Please take note of any answers that indicated ‘Action needed’. These items can be listed in an ‘Action Plan’ in which you identify necessary steps to be implemented in order to achieve compliance, and estimated date of compliance.

If you require assistance in developing an ‘Action Plan’ and/or to identify actions required to achieve compliance, the organizations and information provided on the next page can assist.

You can also contact Council at [insert email address] or the RAMJO-REROC contaminated land project officer ([ContaminatedLands@ramjo.nsw.gov.au](mailto:ContaminatedLands@ramjo.nsw.gov.au)) for advice and assistance.

Please note that Council may undertake follow-up actions to verify the answers you have provided in this self-evaluation. Therefore, it is important you have answered them as accurately as possible.

**Further information and advice**

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

* The NSW EPA’s Guidelines for Implementing the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019. ([Underground Petroleum Storage Systems: Guidelines (nsw.gov.au)](https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/contaminated-land/20p2700-underground-petroleum-storage-systems-guidelines.pdf?la=en&hash=FDB1D11DB26BF5465985C0340A5E83DCC333AE00))
* NSW EPA technical notes and fact sheets. ([Resources for implementing the UPSS Regulation (nsw.gov.au)](https://www.epa.nsw.gov.au/your-environment/contaminated-land/upss/resources-for-implementing-upss))
* Standards Australia, The Design, Installation and Operation of Underground Petroleum Storage Systems AS4897-2008.
* The Australasian Convenience and Petroleum Marketers Association (ACAPMA) and the Motor Traders’ Association of NSW – Service Stations Association (MTA NSW – SSA), can provide their members with advice and guidance about their obligations regarding UPSS.
* The Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019. ([Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019 (nsw.gov.au)](https://www.legislation.nsw.gov.au/view/pdf/asmade/sl-2019-411))
* RAMJO-REROC contaminated land project officer ([ContaminatedLands@ramjo.nsw.gov.au](mailto:ContaminatedLands@ramjo.nsw.gov.au)), as well as your local council can provide advice and assistance regarding your obligations.