Comments on

Oklahoma Proposed

Aboveground Storage Tank Regulations

Chapter 26

Case RM 201600012

OCC Court Clerk's Office

2101 N. Lincoln Blvd.

Oklahoma City, OK 73105

65-26-2-5.1 General spill and overfill prevention requirements

Add:

c. (1) High level alarms with an audible or visual signal that alerts personnel when the tank reaches 90% capacity at a constantly attended operation or surveillance station.

Reason: to make it consistent with 165-26-2-5.1 (d) (1) and the way it was written did not make sense to require a high level alarm and not indicating the trigger point.

165-26-2-6 Vent Piping Requirements

~~(a)~~(b) Normal vents must be sized in accordance with either:

Add: 1. U L *These are the industry standards most new ASTs are built to.*

2. API new tank manufacturing standards.

~~1.~~3. API 2000 or

~~2.~~ 4. Other accepted standards; or

~~3.~~5. Must be at least as large as the filling or withdrawal connection, whichever is larger, but in no case less than 1 ¼ in. nominal inside diameter.

The standards listed are more commonly used to modify or retrofit an existing storage tank and not usually used by the tank manufacturer.

c. Emergency vents must be sized in accordance with either:

Add: 1. U L *These are the industry standards most new ASTs are built to.*

2. API new tank manufacturing standards.

~~1.~~ 3, API 2000 or

~~2.~~ 4. Appendix I, or

~~3.~~ 5 Other accepted standards

The standards listed are more commonly used to modify or retrofit an existing storage tank and not usually used by the tank manufacturer.

g. Total venting capacity must be sized in accordance with:

Add: 1. U L *These are the industry standards most new ASTs are built to.*

2. API new tank manufacturing standards.

~~1.~~3 Wetted calculations per tank design, and

~~2.~~4. Appendix I, or

~~3~~5 Other approved method

The standards listed are more commonly used to modify or retrofit an existing storage tank and not usually used by the tank manufacturer.

165:26-2-53 Valves on Piping

Add:

(d) Each ~~outlet~~ connection, located below the highest liquid level of ~~to~~ an aboveground tank through which liquid can normally flow must be provided with an internal or an external emergency fire valve located as close as practical to the shell of the tank or submerged pump (this includes product and fill lines)

Should a fire occur around the tank and the piping connected to the connection is severed only product below the liquid level of tank will flow out of the tank. Connections located above the liquid level of the tank (fittings on top of horizontal and vertical tanks) do not pose this hazard.

Liquid does not flow up hill.

It was never intended to have a fire valve, in addition to a check valve and manual shutoff valve on the fill connection located on top of tanks whether they be horizontal or vertical.

165-26-8-88 Fire Extinguishers

a. Each marina must be provided with ~~listed~~ fire extinguishers which have a minimum ~~total capacity of 40 pounds, Class B, Class C.~~ *rating of 40BC.*

NFPA does not mention that the fire extinguisher be listed in the fire code. I do not believe that UL lists fire extinguishers.

40 designates the area in sq. ft. over a surface with no depth to the liquid. 40 does not designate pounds.

B indicates a fire of flammable or combustible liquids

C indicated a fire of live electrical components.

References to justify the comments:

1. NFPA 10-2013 Standard for Portable Fire Extinguishers
2. OCC UST Removal Guidebook July 2004 page 6.

Submitted by:

Alex Ralston, POE

Petcon, Inc.

P.O. Box 6225

Jackson, MS 39288

601-939-7311

petconinc@comcast.net