

Environmental Stewardship Division Environmental Programs and Strategies 1007 Century Street Winnipeg MB R3H 0W4 F 948-2420 www.manitoba.ca/conservation

December 19, 2014

To Whom It May Concern:

Re: <u>Certification for Cathodic Protection Testing of Petroleum Storage Tank Systems</u> in Manitoba

Manitoba Conservation and Water Stewardship (the Department), as the Authority having jurisdiction, recognizes the certification offered by the Ontario Petroleum Contractors Association (OPCA) for testing of systems meeting the criteria of CAN/ULC-S603.1-2011 (i.e. underground tanks and associated piping protected with a sacrificial anode system).

## Background

Petroleum storage facilities in Manitoba must be operated in accordance with *The Storage and Handling of Petroleum Products and Allied Petroleum Products Regulation (MR* 188/2001) (the Regulation). All underground storage tanks and aboveground storage tanks 5000 L and greater must operate under the authority of an operating permit and are subject to conditions of that operating permit. The Regulation provides standards for conditions of an operating permit in Part 5: Permits for Operation.

## Conditions of operating permit

28(1) Subject to subsection (2), an operating permit issued under this Part is subject to the following conditions:

- (a) that the tests, inspections and corrections required under Part 6 and Section 8.4 of the Code of Practice\* are performed at the times and in the manner under that Part;
- (b) cathodic protection measurements for storage tank systems equipped with impressed current corrosion protection shall be conducted as required by Clause 8.6.1(2) of the Code of Practice;
- (c) cathodic protection measurements for storage tank systems equipped with sacrificial anode corrosion protection shall be conducted as required by CAN/ULC-S603.1:

Certification for Cathodic Protection Testing of Petroleum Storage Tank Systems in Manitoba December 19, 2014 Page 2

\*CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products. 2003.

Part 8.6.1(2) of the Code of Practice requires that:

Cathodic protection measurements for a storage tank system shall be conducted by a person with NACE CP Level 1 (CP tester minimum certification) or otherwise as authorized by the *authority having jurisdiction*, at commissioning, within one year of commissioning, and annually thereafter.

The Department acknowledges that NACE Certified Technicians are qualified to test both impressed current and sacrificial anode cathodic protection systems. Currently there are no licensed petroleum technicians in Manitoba holding NACE certification.

A certification course offered by OPCA is recognized by the Technical Safety Standards Association (TSSA), Ontario's regulatory authority for fuels for testing of tank systems that are Cathodic Protection System certified under the ULC-S603.1 Standard.

The Department recognizes the certification offered by OPCA for testing of systems meeting the criteria of CAN/ULC-S603.1-2011 (i.e. underground tanks and associated piping protected with a sacrificial anode system).

All other systems, including impressed current cathodic protection, must be tested by NACE certified technicians.

Any person who wishes to be licensed to test tank systems that are Cathodic Protection System certified under the ULC-S603.1 Standard must apply to the Department and provide proof of OPCA certification. The petroleum technician will be issued a license and wallet card that identifies that they are licensed to conduct that work.

An application for Petroleum Technician License can be found on the Petroleum Storage program website: <a href="http://www.gov.mb.ca/conservation/envprograms/psp/index.html">http://www.gov.mb.ca/conservation/envprograms/psp/index.html</a>

Sincerely,

Laurie Streich Director