FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

MEMORANDUM

TO: District Tank Manager and Local Tank Programs

FROM: William E. Burns, Jr.,
             Environmental Administrator,
             Compliance Assistance

SUBJECT: **Ammonia Derivative Tanks**

DATE: August 25, 2017

The purpose of this memorandum is to help clarify the requirements found in the storage tank rules for storage tank systems containing ammonia derivatives. For the storage tank to be regulated, the ammonia derivative must be a liquid at standard temperature and standard pressure. Ammonia products that are stored in aboveground storage tanks and are either cooled to remain liquid or are stored in pressure vessels are exempt from the requirements of Chapter 62-762, Florida Administrative Code (F.A.C.), but must register and pay the appropriate annual registration fees. Similarly, if the ammonia derivative is solely a CERCLA hazardous substance in the List of Hazardous Substances and Reportable Quantities in 40 CFR section 302.4, August 1989, then any aboveground tank greater than 110 gallons is exempt from the requirements of Chapter 62-762, F.A.C., but must register and pay the appropriate annual registration fees.

For ammonia derivatives that are not CERCLA listed and that are liquid at standard temperature and pressure, the requirements of Chapter 62-762. F.A.C., apply. Many ammonia salts that are dissolved in water contain small amounts of ammonia and ammonium ions. A two percent concentration of free ammonia and ammonia ions in the stored product is considered de minimis per paragraph 62-762.301(2)(i), F.A.C. If the facility can provide specifications or documentation of the stored product that the concentration is two percent or below, or if a letter from the facility's supplier or distributor states that all product provided is two percent concentration or less, the exemption for being de minimis would be met. Any tank that does not meet any of the above exemptions is subject to the full requirements of the storage tank system rules.