

# TN Underground Storage Tanks

## Preparing for a Compliance Inspection

For some people, notice of a visit from a compliance inspector from the Tennessee Division of Underground Storage Tanks is stressful. Many tank owners or their representatives go into an inspection unprepared. They may spend considerable time while an inspector is on site looking for records or other paperwork. The purpose of this is to help the tank owner or operator better prepare for a compliance inspection.

Compliance inspections are scheduled randomly and are conducted by staff from the local Environmental Assistance Centers. Field visit compliance inspections are not usually made without prior notice to the tank owner. Tank owners and/or operators are notified by mail or telephone call prior to the inspection date unless a reasonable effort to contact them has failed. The inspector will work with a tank owner to arrange a time for an inspection. Notice may not be given if an emergency situation demands an immediate inspection, a complaint is received or other conditions arise. If a phone call is the means of contact a follow up letter is usually mailed confirming the date and time of the inspection and informing the tank owner about the records the tank owner should have available for inspection.

You can prepare for a compliance inspection by having all records available for inspection and tools available for removing dispenser covers and access manhole covers.

Some of the items you need are listed below.

- 1.Ensure the tank owner or a representative who has knowledge of the UST system and its operation is on site during the inspection.
- 2.Have keys and tools to open dispensers and inspection ports available. Be sure appropriate personnel are available to open equipment.
- 3.Locate all applicable records.
- 4.Ensure an up-to-date Certificate is posted appropriately.

On the day of the visit, the inspector will explain the reason for the visit and review the things he will be evaluating. Some things you can expect them to do include:

1. Check the Certificate to ensure it is posted and up-to-date.
2. Review all appropriate records pertaining to leak detection for the previous 12 months.
3. Verify that information entered in the Division's central tracking system is correct and obtain information to update it, if necessary.
4. Examine the spill and overfill prevention devices.
5. Examine the dispenser area for leaks.
6. Check the corrosion protection system, if applicable.
7. Check line leak detection.
8. Check vent lines for water caps.
9. Observe sticking methods. Inspect the stick.
- 10.Check for drop tubes, if applicable.

After examining records and equipment, they will review findings and explain the next step in the compliance inspection process. A letter will be sent to you with all findings summarized. If deficiencies are found, a schedule will be developed with you in order to provide time to come into compliance. If compliance deadlines are not met, case may be referred for other action and civil penalties or fines could be assessed.

For complete information on operational requirements for underground storage tanks in Tennessee, request a copy of applicable Compliance Guidance Documents (CGDs). Notification forms are also available upon request.

. The following is a summary of records which you need to have available.

#### **ALL RECORDS PERTAINING TO TANK LEAK DETECTION**

- Last 12 months of records (applies to all methods)

#### **INVENTORY CONTROL WITH TANK TIGHTNESS TESTING**

- Monthly measurements and leak check results for the last 12 months
- Last tank and line tightness test results

#### **STATISTICAL INVENTORY RECONCILIATION (SIR)**

- Monthly SIR results for the last 12 months
- Copy of agreement between TN UST and SIR Vendor

#### **MANUAL TANK GAUGING**

- Monthly measurements and leak check results for the last 12 months
- Last tank tightness test if tank is 1,001-2,000 gallons

#### **AUTOMATIC TANK GAUGING (ATG)**

- Last 12 monthly test results (conducted at least at a 0.2 gph leak rate)

#### **VAPOR AND GROUNDWATER MONITORING**

- Site assessment verifying the site is suitable for the method chosen and that monitoring wells are installed properly
- Monthly results for the last 12 months

#### **INTERSTITIAL MONITORING**

- Verification monitoring device is functional
- If required, third party certification

#### **PIPING**

- Suction with only one check valve at dispenser: tightness test not required
- Suction with check valve at tank: tightness test required every 3 years
- Pressurized: Last tightness test result; if required, must be performed annually
- Line leak detector test results: annual results required

## **REPAIRS**

- Meter and dispenser repair records
- Tank repair records
- Line repair records
- Release detection equipment records

## **UST SYSTEM INSTALLATIONS**

- Manufacturer's installation checklist for tanks and lines
- Type of equipment installed
- Installer's certification, if required
- System tightness test results

## **UPGRADES - IMPRESSED CURRENT SYSTEM**

- Corrosion expert analysis and design of system
- Tank tightness test results, if required
- Tank assessment, if internal inspection note done

## **UPGRADES - INTERNAL LINING**

- Type of lining material
- Tank assessment report
- Certification of installer
- Tank tightness test results

## **UPGRADES - GENERAL**

- Type and size of new piping
- Overfill prevention type
- Spill prevention type

## **CATHODIC PROTECTION SYSTEMS Galvanic (STI-P3)**

- Last two test results by cathodic protection tester

### **Impressed Current**

- Last two test results by cathodic protection tester
- Rectifier inspected every 60 days; last 3 inspection results available