

Tennessee Division of Underground Storage Tanks

Preparing for an UST Operational Compliance Inspection – Instructions and Checklist

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 looking for records or other paperwork while an inspector is on site. The purpose of this document is to assist the tank owner or operator to be better prepared for a compliance inspection.

UST Operational Inspections are scheduled and conducted by Division staff from your regional field office. Site visit compliance inspections are not usually conducted without prior notice to the tank owner. Tank owners and/or operators are notified by email, mail and/or telephone 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 demands an immediate inspection, a complaint is received, or other conditions arise. If an email or 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 that should be available for review.

You can prepare for a UST Operations Inspection by having all records available for review and tools available for removing dispenser covers and accessing tank manway lids.

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. Failure to have a representative present could result in future enforcement action.
2. **Have keys and tools to open dispensers and inspection ports available. Be sure appropriate personnel are available to open equipment. Division staff members do not open equipment for you in the event of your absence.**
3. Locate all applicable records prior to the inspection.
4. Ensure that all applicable Division fees and civil penalties have been paid. Failure to do so may place the site on the Division's Delivery Prohibition List.

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

1. Fees are suspended until June 30, 2026. After this date confirm the facility has been issued an invoice for annual tank fee payment.
2. Review all applicable records pertaining to tank and piping release detection method(s).
3. Verify the notification database information is correct and obtain information to update it, if necessary.
4. Examine the spill prevention equipment and review monthly and annual walkthrough inspections.
5. Examine underneath all dispensers for leaks, verify proper piping installation, and review quarterly dispenser inspection documentation.
6. Check the corrosion protection system if applicable.
7. Check vent lines for rain caps.
8. Observe tank gauging methods and inspect gauging stick used for inventory.
9. Check for drop tubes in UST systems, if applicable.

After examining records and equipment, they will review findings and explain the next step in the UST Operational Inspection process. A letter will be sent to you with all the findings summarized. If violations and/or deficiencies are found, a schedule will be developed with you to provide time to come into compliance. If compliance deadlines are not met, the inspection may be referred for other action or fines could be assessed. Be advised that some violations found at the time of the inspection may be uncorrectable and could result in fines even if addressed in a timely manner.

Facility ID#:

Date:

UST OPERATIONAL INSPECTION CHECKLIST OPERATIONAL COMPLIANCE RECORDS TO BE REVIEWED

◆ October 13, 2021, new rule testing and recordkeeping requirements◆

Submit an amended notification form for any changes to the status of the tanks at the facility

Examples: change of ownership, TOS tank(s), change in tank or piping equipment, product stored, change of release detection method, change of address, or contact information

TANK AND PIPING RELEASE DETECTION RECORDS

INTERSTITIAL MONITORING (TANKS AND PIPING)

REQUIRED FOR ALL NEW TANKS AND PRESSURIZED PIPING INSTALLED AFTER JULY 24, 2007

◆ Annual ATG Operability test - Maintain the three previous test results◆

Annual sensor function test results - Maintain the three previous test results◆

Last 12 monthly leak sensor status reports

Last 12 monthly alarm history reports

◆ All containment sumps with IM pressurized piping must be tested for integrity every three years; or monthly monitoring records for double walled containment sumps◆

Documentation of investigation and repairs of alarms

AUTOMATIC TANK GAUGE (ATG)

◆ Annual ATG Operability test - Maintain the three previous test results◆

Last 12 monthly test results (conducted at a 0.2 gph leak rate and 0.1 gph threshold)

ATG in-tank inventory reports with water level measurement generated during inspection

ATG in-tank system setup report is required during the annual operability test

ATG alarm history report generated during inspection if records are missing

Documentation of investigation and repairs of failed leak tests and alarms

STATISTICAL INVENTORY RECONCILIATION (SIR)

◆ Annual ATG Operability test if inventory is monitored by a console◆

Last 12 months of inventory readings (raw data)

Copies of last 12 monthly SIR reports

Verification of annual calibration of dispenser meters

Monthly tank water level measurement records

◆ Annual gauging stick inspection documented on the annual walkthrough form◆

Verify all tanks are equipped with drop tubes during inspection

MANUAL TANK GAUGING

Last 12 months of stick readings and results

Last tank tightness test if tank is 1,001 - 2,000 gallons

◆ Annual gauging stick inspection documented on the annual walkthrough form◆

SUCTION PIPING

Verification piping is Safe Suction

If piping is not Safe Suction a line tightness test must be conducted every three years

 PRESSURIZED PIPING

Most recent annual line tightness test results; or, twelve months of IM or SIR monthly monitoring records
Annual test results of all line leak detectors – Maintain the three previous annual test results◆

 ELECTRONIC LINE LEAK DETECTORS (PRESSURIZED PIPING)

Annual test results of all line leak detectors – Maintain the three previous test results◆

12 months of 0.2 gph or annual 0.1 gph leak test reports

Pressure line leak setup report generated from ATG (verify piping type, piping length)

Verify 3.0 gph leak rate pump shutdown or alarm enabled

Documentation of investigation and repairs of alarms

CATHODIC PROTECTION SYSTEM RECORDS

 CATHODIC PROTECTION SYSTEM REPAIRS (if required)

Corrosion expert evaluation and design of system

Cathodic protection test within six months of repair

Tank tightness test results no sooner than three months and no later than six months from repair

 CATHODIC PROTECTION SYSTEM (TANKS AND PIPING)

GALVANIC (STI-P3)

Records of last two cathodic protection tests

IMPRESSED CURRENT

Records of last two cathodic protection tests

Rectifier inspected every 60 days; last 3 inspection results available

OTHER FACILITY RECORDS TO HAVE AVAILABLE:

 WALKTHROUGH INSPECTIONS

◆ANNUAL WALKTHROUGH INSPECTION◆

-Inspect all containment areas and remove any liquid or debris

-Inspect all hand-held release detection equipment (gauging stick for SIR and MTG)

◆MONTHLY WALKTHROUGH INSPECTION◆

-Inspect spill prevention for liquid, debris, or damage

-Visually check and remove obstructions in fill pipe

-Check all fill caps to ensure it is securely on fill pipe and not in contact with the spill bucket lid

-For double walled spill prevention equipment with IM, check for a leak in the interstitial area

-Check release detection equipment to ensure it is operating with no alarms or other unusual operating conditions.

-Review and confirm release detection records are current

-Suspected release documented and reported to the Division

SPILL AND OVERFILL PREVENTION

- ◆ Three Year Spill Integrity Test or monthly monitoring records for double walled spill buckets ◆
- ◆ Three Year Overfill Functionality Test ◆
- Monthly spill bucket inspection logs – After October 13, 2021 part of monthly walkthrough inspection ◆
- Documentation of spill bucket repairs, replacement and investigation of any leaks found
- Verify ball float valves are not installed with suction or remote fill piping
- As of October 13, 2021, ball float valves cannot be installed, repaired, or replaced

FUEL DISPENSERS

- Quarterly dispenser inspection logs – After October 13, 2021 documented on the walkthrough inspection form
- Documentation of repairs and investigation of any leaks found

CERTIFIED CLASS A AND CLASS B OPERATOR DESIGNATION

Visit the TN Tank Helper website prior to the inspection - <https://tdec.tn.gov/tankhelper>

- Verify one or more certified Class A and Class B operators are designated to the facility
- Post Class C Operator sign at facility or have in an onsite instruction manual
- For more assistance see the instructions on the website link above

REPAIRS

Repair records for the following must be maintained and transferred to the new owner for the life of the UST system:

- Meter and dispensers (Division approval required for pressurized piping repairs below shear valve)
- All tanks and/or lines and applicable tightness testing results
- Release detection equipment

ALTERNATIVE FUELS COMPATIBILITY REQUIREMENTS

Prior to storing blended fuels greater than 10% ethanol or 20% biodiesel by volume, submit an Equipment Compatibility Checklist (CN-1285) and a Statement of Compatibility (CN-1283).

OTHER INFORMATION REQUESTED
