

Tennessee Division of Underground Storage Tanks

Preparing for a UST Operations 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 document is to assist the tank owner or operator to be better prepared for a compliance inspection.

UST Operations Inspections are scheduled randomly and are conducted by staff from your regional field office. Field visit compliance inspections are not usually made without prior notice to the tank owner. Tank owners and/or operators are notified by mail and/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 UST Operations Inspection by having all records available for inspection 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 will no longer 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 he will be evaluating. Some things you can expect them to do include:

1. Confirm the facility has been issued an invoice for annual tank fee payment.
2. Review all applicable 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 device and review spill bucket inspection logs. Physical verification of the presence of the overfill device may be necessary.
5. Examine underneath all dispensers for leaks, verify proper piping installation, and review dispenser inspection logs.
6. Check the corrosion protection system if applicable.
7. Inspect all leak detection equipment and records.
8. Check vent lines for rain caps.
9. Observe tank gauging methods and inspect the gauging stick used for inventory.
10. 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 Operations Inspection process. A letter will be sent to you with all findings summarized. If violations and/or 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, 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.

**UST OPERATIONS INSPECTION CHECKLIST
OPERATIONAL COMPLIANCE RECORDS TO BE REVIEWED:**

ALL RECORDS PERTAINING TO TANK LEAK DETECTION FOR THE METHOD(S) IN USE
Previous 12 months of leak detection records for each tank at this facility

- SUBMIT A TEMPORARY CLOSURE AGREEMENT IF THE UST SYSTEMS AT THIS FACILITY HAVE BEEN OUT OF OPERATION FOR MORE THAN 90 DAYS**

- STATISTICAL INVENTORY RECONCILIATION (SIR)**
 - Last 12 months of inventory readings (raw data)
 - Copies of monthly SIR reports
 - Verification of annual calibration of dispenser meters
 - Monthly tank water level measurements
 - Verify if tank gauging stick needs replacement during inspection
 - 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
 - Verify if tank gauging stick needs replacement during inspection

- AUTOMATIC TANK GAUGING (ATG)**
 - 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 generated during inspection to verify alarm settings
 - ATG alarm history report generated during inspection if records are missing
 - Documentation of investigation and repairs of failed leak tests and alarms

- INTERSTITIAL MONITORING (TANKS AND PIPING)**
 - Results of air or vacuum test conducted during installation (if tanks were installed after July 24, 2007)
 - Verification that tank, sump, or dispenser monitoring devices are functional
 - Last 12 monthly leak sensor status reports or applicable inspection checklist
 - Last 12 monthly alarm history reports
 - Documentation of investigation and repairs of alarms

- SUCTION PIPING**
 - System with one check valve located at dispenser: tightness test not required
 - System with check valve at tank: tightness test required every 3 years
 - System with more than one check valve: tightness test required every 3 years
 - Piping does not slope back to tank: tightness test required every 3 years

- PRESSURIZED PIPING**
 - Last annual line tightness test result; if required
 - Annual test results of all mechanical line leak detectors

- ELECTRONIC LINE LEAK DETECTION (PRESSURIZED PIPING)**
 - Previous 12 months of 0.2 GPH or annual 0.1 GPH leak test reports
 - Pressure line leak setup report generated from ATG during inspection (piping type, piping length)
 - Verify 3.0 GPH leak rate pump shutdown or alarm enabled
 - Documentation of investigation and repairs of alarms

CORROSION PROTECTION RECORDS TO BE REVIEWED:

- FIBERGLASS REINFORCED PLASTIC AND FIBERGLASS CLAD STEEL TANKS:**
Documentation of installation to verify UST system does not require additional corrosion protection, such as installation invoices, installation photos, or installer's warranty certification checklist.

- IMPRESSED CURRENT CORROSION PROTECTION SYSTEM UPGRADE**
Corrosion expert analysis and design of system
Tank tightness test results before and after upgrade

- CATHODIC PROTECTION SYSTEM (TANKS AND PIPING)**
GALVANIC (STI-P3)
Records of last two cathodic protection tests
or
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:

- CERTIFIED A & B OPERATOR**
If you have not visited the TN Tank Helper Website and done the following you will need to do so before the inspection:
 - Owner registration under "Tennessee Facility Owners"
 - Owner designation of both A & B Operator in the "Tennessee Facility Owner" account
 - Have all operators complete required training

- SPILL AND OVERFILL PREVENTION**
Monthly spill bucket inspection logs
Documentation of spill bucket repairs and investigation of any leaks found.
Documentation of installation of overfill device if installed in the past 3 years.
Verify no ball float valves installed with suction or remote fill piping

- FUEL DISPENSERS**
Quarterly dispenser inspection logs
Documentation of repairs and investigation of any leaks found.

- REPAIRS:**
Meter and dispensers (Division approval required for pressurized piping repairs below shear valve)
All tanks and/or lines and applicable tightness test results
Release detection equipment
Repair records must be maintained and transferred to new owner for the life of the UST system.

OTHER INFORMATION REQUESTED:
