

What to Expect During an Underground Storage Tank (UST) Formal Inspection

Overview

This document explains what to expect during an UST facility inspection and reviews the tank owner's responsibilities as well as the actions a DEQ inspector will take during the inspection. The attached Checklist also describes what documents a tank owner must have available for review during the inspection.

Your responsibilities before the inspection:

Inspection Notification: DEQ usually conducts announced inspections and generally will send a letter or email notifying you of the date of the inspection at least 15 days before your inspection date.

Records Preparation: Gather all records and test reports necessary to demonstrate compliance with the [UST Technical Regulation](#). See the attached Records Checklist for the documents that are required to meet each regulatory requirement.

Facility Notification Changes: If anything has changed at the facility since the last inspection--for example, new owner, new contact name and/or contact information, new equipment or release detection methods--make sure to complete the correct registration form informing DEQ of the change. Click [here](#) for more information on what form to use for your situation. If you do not know how to do this, your inspector can assist you.

On inspection day your DEQ inspector will:

- Introduce themselves and show their identification.
- Review all the paperwork you have gathered to demonstrate whether the facility is meeting regulatory requirements. The attached Records Checklist describes the paperwork you must maintain and make available for review.
- Physically inspect equipment such as the insides of dispensers, spill buckets, overfill prevention devices, containment sumps and release detection equipment. During this time, inspectors may use safety cones to create a safe space to inspect the equipment.
- Discuss with you any problems the inspector sees that need to be corrected. The inspector will also answer any questions you may have on how to correct the problems.

Your responsibilities on inspection day:

- The tank owner, tank operator or an authorized representative who knows the tank systems **must** be present to attend the inspection.
- **Have the keys, tools, and people necessary to open the dispensers, sump lids and ports so that the inspector can perform the inspection. DEQ inspectors do not have keys or tools to access the equipment.**
- Have all the necessary records and documents ready for inspection.

After the inspection:

If the DEQ inspector identifies any issues that need to be corrected, DEQ will provide you with your inspection report, a list of the deficiencies with recommendations on how to correct them, and a deadline for correction. You must correct the problems within the specified timeframe or DEQ will take enforcement action against you. **DEQ enforcement actions may result in imposition of a monetary penalty or prohibiting delivery of petroleum to tanks at the facility until the issues are corrected.**

Attachment - Records Checklist

- ☐ **Spill Prevention** (Spill buckets must be tested for proper function every 3 years)
 - Spill bucket tightness test results showing the spill buckets were tested and passed within the last 3 years OR
 - 12 months of monthly monitoring records (visual or interstitial sensor) allowed for double walled spill buckets
 - Any spill bucket repair or replacement records, for example, invoices
- ☐ **Overfill Prevention** (Shutoff valves, ball float valves and overfill alarms must be tested for proper function every 3 years)
 - Overfill prevention functionality test results showing the equipment (shutoff valves, ball float valves, and/or overfill alarm) was tested and passed within the last 3 years
 - Any overfill equipment repair or replacement records, for example, invoices
 - NOTE: Failing ball floats must be replaced with a shutoff valve or overfill alarm
- ☐ **Secondary Containment** (Only required if Interstitial Monitoring is your Release Detection Method. Interstitial Monitoring is required if tank or piping was installed after September 15, 2010. It is also an optional method for tanks/piping installed prior to this date – see *Release Detection for Tanks* for more information.)
 - Containment Sump tightness test results showing the sumps were tested and passed within the last 3 years
 - Any containment sump repair or replacement records, for example, invoices
- ☐ **Operator Training**
 - Document identifying the facility's Class A, Class B and Class C operators by legal name
 - Certificates documenting successful completion of Class A and Class B operators by a DEQ-approved provider
 - Document demonstrating each Class C operator has received training within last year
 - For "manned" facilities: a copy of the facility's Emergency Response Procedures. For "unmanned facilities": Emergency Response procedures must be posted in an obvious location onsite (e.g., outside by the dispensers)
- ☐ **Walkthrough Inspections**
 - 12 months of complete monthly walkthrough inspection records (e.g., recorded on checklist)
 - Annual walkthrough inspection checklist documenting an annual walkthrough inspection performed within the past year
- ☐ **Cathodic Protection** (if required)
 - CP system test results showing the equipment was tested and passed within the last 3 years
 - Impressed Current System only: A log of rectifier readings showing the rectifier was inspected every 60 days
- ☐ **Internal Liner** (if required)
 - Internal liner inspection results showing the liner was inspected and passed within the past 10 years (10 years after liner installation) or last 5 years (every 5 years after the 10 year inspection)
 - Any liner repair records
- ☐ **Release Detection for Tanks** (See below for method-specific requirements)
 - ☐ **Interstitial Monitoring** (Required for all tanks and pressurized piping installed after September 15, 2010)
 - Last 12 months of leak sensor status reports (or visual/manual monitoring logs)
 - Last 12 months of alarm history reports (if conducting visual/manual monitoring, notes on any issues found and how they were addressed)
 - Test results showing the interstitial monitoring console and all interstice and/or sump sensors (if present) were tested within the last year
 - For interstitial monitoring of piping: test results showing the containment sumps used for interstitial monitoring were tightness tested within the last 3 years
 - Documentation that any leak alarms or fuel found in sumps were investigated and addressed

☐ **Automatic Tank Gauge System (ATG)**

- Last 12 months of leak test results for each tank (must be valid Pass/Fail results, not “inconclusive” or “aborted”)
- Test results showing the ATG system was tested for functionality within the last year
- ATG alarm history report covering the last 12 months
- ATG in-tank system setup report
- Documentation that any leak alarms or failed leak tests were investigated and addressed

☐ **Statistical Inventory Reconciliation (SIR)**

- Last 12 months of daily stick reading logs
- Last 12 months of SIR reports from vendor (results should be valid Pass/Fail, not “Inconclusive”)
- Results of annual inspection of tank gauging stick for operability and serviceability
- If an Automatic Tank Gauge system is used to collect daily inventory readings, also keep:
 - the annual ATG functionality test and
 - ATG in-tank system setup report

☐ **Vapor Monitoring**

- Last 12 months of monthly monitoring results
- Annual functionality test of vapor monitoring device (e.g., calibration per manufacturer’s instructions)
- Site Assessment demonstrating the site’s suitability for vapor monitoring (i.e., providing info on tank pit backfill composition, groundwater/rainfall, background contamination, monitoring well placement, etc.)
Site Assessments prepared after January 1, 2018, must be certified by a professional engineer, professional geologist or a licensed professional with equivalent education or experience

☐ **Groundwater Monitoring**

- Last 12 months of monthly monitoring results
- Results of annual inspection of groundwater bailers for operability and serviceability
- Site Assessment demonstrating the site’s suitability for vapor monitoring (i.e., providing info on tank pit backfill composition, groundwater/rainfall, background contamination, monitoring well placement, etc.)
Site Assessments prepared after January 1, 2018, must be certified by a professional engineer, professional geologist or a licensed professional with equivalent education or experience

☐ **Manual Tank Gauging (for tanks < 2000 gal)**

- Last 12 months of weekly stick readings and averages and monthly comparison records
- Passing tank tightness test results dated within the past 5 years
- Results of annual inspection of tank gauging stick for operability and serviceability

☐ **Release Detection for Piping** (see below for method specific to piping type)

☐ **Pressurized Piping installed before September 15, 2010**

- Line leak detector (LLD) annual functionality test (must have passed testing within the past year)
- Choose one of the following secondary methods (required in addition to LLD testing):
 - Line tightness test results (annual test, or 12 months of 0.2 gph tests from ATG) **OR**
 - 12 months of monthly monitoring results using another method (e.g., interstitial monitoring, SIR)

☐ **Pressurized Piping installed after September 15, 2010**

- Line leak detector (LLD) annual functionality test (must have passed testing within the past year)
- 12 months of monthly interstitial monitoring results

☐ **Suction Piping installed before September 15, 2010**

- Safe suction piping: does not require release detection so no records needed

- Unsafe suction piping: line tightness test results showing piping was tested in the past three years **OR** 12 months of monthly monitoring results using another method (e.g., interstitial monitoring, SIR, etc.)

☐ **Suction Piping installed after September 15, 2010**

- Safe suction piping: does not require release detection so no records needed
- Unsafe suction piping: 12 months of monthly interstitial monitoring results

☐ **Repairs**

- ALL repair records for any UST system (tanks or piping) or UST system equipment repaired. Must keep for the life of the equipment
- Passing test results for functionality testing following equipment repair

☐ **Other Information**
