



Department of
**Environment &
Conservation**



Standardized Operational Compliance Inspection Process

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Standardized Operational Compliance Inspection Procedure

The inspection provides an opportunity to educate and assist tank owners with maintaining compliance with the underground storage tank program.

The following information is provided as an outline of the steps to follow to set up and complete the inspection. It is not intended to be a stand-alone document. It is supported by the general requirements outlined in the “Preparing for an Inspection” Policy and all the Technical Chapters. The Technical Chapters contain the details for each item to be inspected and the records required. All correspondence, records, etc. shall be tracked in the Compliance Database when received or issued in accordance with the Compliance Tracking Instructions included in the Compliance Manual.

1. Prepare for Inspection

- a. A three (3) year list of facilities to be inspected is accessible in GasLog. Review the list and select facilities to be inspected using the first year for the appropriate region. Inspections can be coordinated based on proximity, owner/operator (O/O), etc. Inspectors should consider all reasonable requests from the O/O to schedule inspections if it will not interfere with the scheduled inspection cycle or generated list.
- b. Review the Notification database for O/O and facility information for the selected facility and record or print the facility report. This information shall include, but not be limited to:
 - Facility name and location
 - Owner name and address
 - Tank compartment status (CIU, TOS, etc.)
 - Tank/piping release detection method
 - Tank/piping material of construction/ CP system type
 - Piping type (suction/pressure)
 - Presence of spill protection
 - Type of overfill prevention
- c. Review the Compliance and Case tracking database for past inspection and release history. Review the Tank Helper database to determine if the owner/operator has designated A and B operators. If not, include reminder variable in FO-030 scheduling letter. Check the delivery prohibition list on the

- UST website to determine if the facility is on the list. If a facility is on the list, it should already be red tagged. If the compliance database does not indicate the tanks have been red tagged, contact the Notification Manager in order to determine if an Authorization to Remove the Red Tags has been issued. If not, the Notification Manager will issue a Notice of Red Tag Application to the inspector. If the facility should not be on the list, the Notification Manager will be notified. Check the Enforcement database for a possible active enforcement case and if identified, contact the Enforcement Section case manager to determine if inspection should be a follow-up to be forwarded to the Enforcement Section case manager or if inspection should be postponed.
- d. Review the facility file for the previous inspection and determine if any reported releases or ongoing release investigations have occurred. If an ongoing release investigation/corrective action is identified, notify the contamination case manager of pending inspection. The discovery of a release during the inspection may be handled differently with an ongoing release investigation/corrective action case. The case manager may also want to attend the inspection as well. There could be wells present for the investigation/cleanup that are not for release detection (RD) purposes.
 - e. Personally contact the O/O **by phone** to schedule the inspection. While scheduling the inspection, if an ownership change is discovered, send a Notification for Underground Storage Tanks Form to the new owner and a Sellers form to the registered owner. During the phone call, ensure that the O/O or a duly authorized representative (DAR) who has knowledge of the UST system and its operation will be on site during the inspection and is able to open all manways, dispenser covers and provide print off information as designated below. Obtain alternate phone number of representative to be present. If unable to reach by phone, indicate in the scheduling memo and go to next item.
 - f. Complete scheduling memo and enter new inspection into GasLog (refer to appendix).
 - g. Issue FO-030 form letter (with checklist) confirming inspection. The letter should be addressed to the owner of record in the Notification database. If the letter is refused or returned unclaimed, then contact the O/O for an accurate address. If the O/O has not designated an A and B operator, include the reminder variable in scheduling letter. Track all correspondence in GasLog.

- h. Reserve a vehicle in accordance with the standard operating procedure for your field office.

2. Day of Inspection

- a. Gather equipment (refer to "Preparing for an Inspection" document).
- b. Gather paperwork including any voluntarily previously submitted records including UST Operational Inspection Form (applicable schedules) and UST database facility report.
- c. Get vehicle.
- d. Confirm directions to location (i.e. Mapquest, Google, Yahoo).
- e. Notify facility O/O upon arrival. If applicable, sign visitor log to indicate presence (do not sign waiver, see appendix). If no representative is present, call provided alternate number or consult onsite employee. If no onsite contact available, return to office and issue appropriate FO-036 NS form letter.
- f. Complete UST Operational Inspection Form (applicable schedules) for all appropriate sections and indicate "N/A" if not applicable.
- g. Verify name of facility, address and ID#.
- h. Verify owner name and address.
- i. Ask to see the designated C operator sign or instruction manual (not required for unmanned facility). If not available, then include as a violation in Results of Inspection letter. If facility is unmanned, then the designated B operator who is also trained as the designated Class C operator will cover this requirement.
- j. Collect latitude/longitude at tank system if not previously collected or inaccurate.
- k. Indicate if UST regulated unregistered tank discovered, have O/O complete notification form and O/O sign. Add unregistered tank finding to Results of Inspection letter citing statute language and refer to enforcement.

- I. If the facility has been red tagged but not authorized to remove, determine if red tags are still in place. If red tags have been removed, make photos of fill ports and indicate if facility is in operation, collect all applicable information including photos of delivery tickets, record product levels, and forward a copy of the inspection report to the Notification Manager.

3. Records Review-Records will be reviewed the day of inspection (if O/O prefers to submit records prior to inspection, electronic submittals are acceptable. If printed copies are submitted by mail, then the inspector will copy the documents using TDEC's equipment and return the records submitted unless the O/O has indicated they are copies not to be returned. Ensure the records clearly identify with the facility information. Complete applicable records section of the UST Operational Inspection Form.

a. Release Detection (RD) Records (refer to applicable Technical Chapter or the O/O checklist). Indicate on inspection form if release identified by RD method and notify case manager. If not notified of suspected release, issue form letter FO-038a, Suspected Release-Unreported.

i. Statistical Inventory Reconciliation (SIR) - Do records provide the following information (see Technical Chapter 3.3):

- Summary page with monthly results indicating pass, fail or inconclusive
- SIR Vendor
- SIR Method (if Continuous In-Tank Leak Detection System (CITLDS), refer to section iii. below) Must be listed by NWGLDE
- Method meets tank size and flow-through criteria as noted in the third party certification (NWGLDE)
- A calculated leak rate not greater than 0.10 gallons per hour
- Inventory (raw) data available for last twelve months which shows:
- Water checked monthly and recorded
- Petroleum levels are measured to the nearest 1/8th of an inch
- Raw data set covers thirty days (If not, refer to SIR Technical Chapter 3.3)
- Meters calibrated annually
- Last twelve months of records available
- All tests pass

ii. Automatic Tank Gauging (ATG) - Do records provide the following information (see Technical Chapter 3.2):

- Facility information
- Manufacturer name and model #
- Type of test (static, continuous, if Continuous In-Tank Leak Detection System (CITLDS), refer to section iii. below)
- Evaluate tank capacity limitations
- Last twelve months of ATG records are available
- Test measures to 0.2 gph monthly
- All tests pass
- Alarm histories are not required to be submitted but if the O/O provides the information voluntarily and an alarm is indicated, evaluate the reason for alarm to determine if additional review is needed (i.e. probe out)
- Test meets third party certification requirements

iii. Continuous In-Tank Leak Detection System (CITLDS) - Do records provide the following information:

- Summary page with monthly results including facility information
- CITLDS Vendor
- CITLDS Method
- Summary of monthly product throughput to insure method is viable
- Tank capacity limitations
- Last twelve months of records available
- Manufacturer name and model # of ATG
- Test measures to 0.2 gph monthly
- All tests pass

iv. Interstitial Monitoring - (tanks and piping are listed separately in order to address situations in which interstitial monitoring (IM) is used on only tanks or piping. See Technical Chapter 3.4). Ensure records provide the following information and are submitted on the standardized forms (unless an alternative form that contains the same information as recorded on the standardized form and is approved by the Division prior to use):

All tanks and pressurized piping installed or replaced after 7/24/07 shall be secondarily contained with IM, however IM may be used for older tanks:

- Monitoring of interstitial space –electronic only (manual or visual monitoring is no longer allowed if IM is the RD method selected for systems installed prior to 7/24/07)
- Type of monitoring device (liquid, pressure, discriminating)
- Monitoring device is certified by third party (on NWGLDE list)

- Last twelve months of sensor status reports available
- Last twelve months of alarm history reports available
- All tests pass

v. Manual Tank Gauging (MTG)- Do records provide the following information:

- Tank size and diameter verified by O/O
- The method applicable for the tank size (less than or equal to 2,000 gal.) and tank age (Manual tank gauging can only be used for 10 years after the tank was installed for tanks with capacity of 551-1000 gallons that do not meet the specific tank diameters or 1001-2000 gallons capacity).
- Based on the tank size (including test duration and diameter) in Table 1 of the MTG Technical Chapter 3.1, a tightness test was required and conducted
- The time interval between stick readings is appropriate for tank size
- Tank liquid level measurements taken at beginning and end of appropriate duration of test
- Level measurements are based on two consecutive stick readings at both the beginning and ending of required test duration
- Petroleum levels are measured to the nearest 1/8th inch and measurements recorded to the nearest 1/8th inch
- Last twelve months of records available
- All tests pass

vi. Tank Tightness Testing - If tank tightness test required for release detection, identify the following:

- Complete tank tightness test includes testing of ullage space
- Tank tightness test was performed within the last 5 years if conducted in conjunction with manual tank gauging
- The report format should include information outlined in Technical Chapter 3.7

vii. Pressurized piping - Identify the following: [requires one catastrophic **and** one periodic option (see Technical Chapter 3.5)]

1). Catastrophic (automatic line leak detector):

a) Mechanical Line Leak Detector

- Annual line leak detector test (must meet 3.0 gph at 10 pounds per square inch (psi) or equivalent leak rate, not just pass/fail results. If leak detector does not pass must replace)

b) Electronic line leak detector

- Annual line leak detector test (must meet 3.0 gph at 10 psi or equivalent leak rate, not just pass/fail results. If leak detector does not pass , must replace);

2). Periodic (annual line tightness test or monthly monitoring)

- a) If annual line tightness test, test must be provided including information outlined in Technical Chapter 3.5
- b) Electronic line leak detector – have last twelve months of passing 0.2 gph tests or annual 0.1 gph test.
- c) Monthly monitoring – have last twelve months of acceptable monthly monitoring results

viii. Suction Piping – Identify the following (see Technical Chapter 3.6):

- American (U.S.) Suction Piping – three year line tightness test or last twelve months of monthly monitoring records
- European (safe) Suction Piping – No release detection is required on suction piping that is designed and constructed to meet the following:
 - 1) Below-grade piping operates at less than atmospheric pressure
 - 2) Below-grade piping is sloped so that the contents drain back into the storage tank if suction is released
 - 3) **Only one** check valve is present **and** is directly below the suction pump (if previously verified for the current piping, not required to resubmit)
- Product that flows by gravity such as in a remote fill pipe or waste oil piping will be regulated as safe suction piping

b. Corrosion Protection Records (impressed current or galvanic system survey form must be completed and submitted unless an alternative form that contains the same information as recorded on the standardized form is approved by the Division prior to use. See Technical Chapter 4.1)

The most current 3 year cathodic protection test results and the previous 3 year cathodic protection results and if applicable, cathodic protection test results conducted within six months after a repair to the CP system shall be provided on the Division’s form (unless an alternative form that contains the same information as recorded on the standardized form is approved by the Division prior to use) and shall be complete. If CP test results indicate readings are not consistent with the reported material of construction, discuss with O/O during onsite inspection and follow outlined procedures in Section 4.i.3. below.

For impressed current systems, the Impressed Current Cathodic Protection 60-Day Record of Rectifier Operation form (CN-1282) containing at least the last three required readings shall be provided (unless an alternative form that contains the same information as recorded on the standardized form is approved by the Division prior to use).

- i. **Interior Tank Lining** - (if impressed current or galvanic cathodic protection is not present or active, the tank(s) must be permanently closed. See Technical Chapter 4.1) The O/O should have records relative to adding CP including:

- 1) CP Expert Design
- 2) Tightness test results within 3 to 6 months after addition of impressed current (IC) (see tank tightness testing section above and Technical Chapter 3.7)
- 3) CP test within 6 months after installation of IC

c. Spill Bucket/Dispenser Logs (refer to Technical Chapter 4.2)

Must be completed for the last twelve months and showing any actions taken as a result and reported on the Division's standardized form CN-1286 (unless an alternative form that contains the same information as recorded on the standardized form is approved by the Division prior to use).

d. Overfill verification - (not required for systems filled by transfers of no more than twenty-five (25) gallons at one time). See Technical Chapter 4.2.

Must be verified during each inspection by one of the options below:

- Ball Float Valve (cannot be used with suction piping, pressurized deliveries, remote fills or coaxial stage I vapor recovery)
 - 1) Invoice verifying installation; or
 - 2) Visual verification documented by third party certification; or
 - 3) Field verified by inspector during inspection

If a tank owner elects to install a flapper valve in addition to a ball float, it must be set to activate at a lower shutoff level than the ball float according to PEI RP-100.

- Flapper valve (verify presence during day of inspection)
- High level alarms (verify presence during day of inspection)

e. Installation

If new installation within the last twelve months, installation records including tank bill of lading, installation checklist, installer's invoice, air pressure and initial systems test prior to dispensing (see tank tightness test section above and Technical Chapter 3.7). For a safe suction system, installation records indicating only one check valve is present in the piping immediately below the dispenser or

a signed statement from a contractor verifying the same and describing how the determination was made.

f. Repair/replacement, if applicable.

- Records of repairs to release detection or cathodic protection equipment (for three years after repair for all permanently installed equipment).
- Records of repairs to steel tanks or fiberglass-reinforced plastic (FRP) tanks or FRP piping. Tightness test or monthly monitoring results following repair (see tightness testing section above).
- Tightness test results conducted no later than 6 months but no sooner than 3 months following the addition of anodes to any cathodic protection system. See release detection record section above for tank tightness testing and Technical Chapter 3.7.

g. E85, if applicable, check with Notification Manager to determine if Ethanol Equipment Compatibility Checklist and Statement of Compatibility was submitted as required.

4. Equipment Inspection-The following information is provided as an outline of the steps to follow to complete the inspection. It is not intended to be a stand-alone document. It is supported by the general requirements outlined in the “General Requirements for an Inspection” Policy and all the Technical Chapters. These contain the details for each item to be inspected and the records required.

- a. Inspect UST equipment and facility perimeter. This outline was designed to aid the inspector of how to inspect equipment based on the location of the component to be inspected and does not necessarily fit into the broad category. Some items may be repeated if located in multiple areas to be inspected. It is not intended to dictate the actual order of inspection but to insure that all system components are inspected. The owner/operator or DAR should provide safe access to all manways and dispensers and remove covers during the inspection. The inspector should take time to thoroughly inspect all equipment. If evidence of a release is discovered, notify contamination case manager and refer to Rule 0400-18-01-.05 for steps to complete under suspected release including dispenser and STP manways/sumps, environmental impacts (per rule .05(2) includes discovery of petroleum escaping from the UST system, associated

containment devices, or any component of a tank, line, dispenser, meter or line leak detector, not designed for the purpose of dispensing petroleum as well as the discovery of petroleum in the environment such as the presence of free product or vapors in soils, basements, sewer and utility lines, and nearby surface water and drinking waters), unusual operating conditions, etc. **Take photographs of the UST facility with Division issued equipment including the layout unless there have been no modifications since the last inspection. Photograph all tank system anomalies (water in sump, flex piping failure, uncertain if violation(s) exists) and issues/records that require additional review. Photographs should be saved in electronic format and if needed, forwarded to the appropriate technical expert for assistance.**

- b. Verify system configuration including number, size, contents, location, if tanks are manifolded, etc. and compare to Division records. If discrepancies between database and actual equipment, etc. exist, then the owner/operator shall complete a notification form with changes and sign. If O/O is not present, mail Notification Form to O/O for completion. Require O/O to return signed form by established deadline to inspector who will forward to Notification Manager.
- c. If applicable, identify if oil/water separator is present and has separate holding tank that is regulated and not registered. If not registered, complete Notification Form and refer to Addendum-Atypical UST Systems.
- d. Submersible Turbine Pump Manways/Sumps/Other Access Port Location
 - Check for presence of seepage or drips.
 - Is vent tube connected, if required.
 - Check for water/soil intrusion or debris/foreign matter that would prevent adequate inspection.
 - Inspect wall integrity, seals, boots/gaskets. If ball float valves are present, insure tank top fittings are tight to insure proper operation. Ball float valves shall not be used with suction system, coaxial Stage I vapor recovery, remote fills and pressurized deliveries. Examples include vapor recovery poppet must seat properly, ATG probe cap installed properly and not cracked, unused or other gauging ports, etc.
 - If present, determine if manifold lines are corrosion protected (piping associated with vapor recovery does not require CP, see Atypical UST Systems, Stage I and II Vapor Recovery section).
 - For any sumps that were installed after July 24, 2007 or sumps associated with interstitial monitoring for release detection regardless of installation

date and cracks are discovered, then sump or entry boots must be repaired or replaced. If debris or liquid is found, the O/O or DAR should be advised to expeditiously remove and properly dispose of debris/liquid/residue in accordance with local, state and federal requirements and determine the source. Small amounts of debris/liquid/residue are acceptable as long as it does not interfere with the placement or the operation of the sensor.

- If sump sensors are present, insure they are properly placed and functioning as designed to detect a release. Inspectors should not initiate sensor alarm test; the proper function should have been demonstrated on the Division provided form (unless an alternative form that contains the same information as recorded on the standardized form is approved by the Division prior to use).
- Although the submersible turbine pump (STP) head does not require CP, if any associated piping is in contact with soil (not isolated) or water, require removal to allow inspection of equipment or corrosion protection may be required (all metal components of the tank, piping and underground ancillary equipment that routinely contains petroleum and is in contact with the ground must have continuous corrosion protection in accordance with .02(4)(c)1.) unless a corrosion expert determines that CP is not required.
- Are CP requirements met for all buried metallic piping types (suction/pressurized/gravity) as well as flex connectors or swing joints.
- If the reported material of construction is in question, require verification by:
 - a. invoice verifying installation (if installed within the last 3 three years), or
 - b. visual verification by third party certification with photographs of piping material.
 - c. CP testing conducted and appropriate CP added unless tank or piping was never upgraded to comply with the 1999 upgrade deadline, and thus would require removal.

If material of construction is confirmed to be in conflict with the reported information, require completion of a notification form.

- If first generation Total Containment Inc. (TCI) flex piping is identified, issue appropriate FO-035. See Technical Chapter 3.5 for example photos.
- Line leak detectors, if required, are they present and located in the proper location. For electronic line leak detectors, an authorized representative shall be available to print off pressure line leak setup information every six years or if a problem is identified onsite which will require a follow-up inspection with setup provided thereafter. If Veeder Root ELLD, the inspector should verify piping type and length settings using Rollatape to insure the

estimated piping length matches the reported length (within fifty feet) on the provided setup information to insure ELLDs are setup correctly.

e. Fill Port/Spill Bucket(s) Location

- Visually confirm buckets appear to be functional (no holes or cracks, no debris). If debris or liquid is found and immediately removed, this would not be a violation. If not removed during the inspection, require removal as a violation in the results of inspection letter. If not removed within timeframe outlined, issue as a violation in Enforcement Action Notice. If the inspector encounters a cracked or defective spill bucket during an inspection, they should inform the O/O that a replacement is required unless the damaged part is a component for which the manufacturer provides repair parts and allows repairs to be conducted. Some companies provide spill bucket liners, however, most manufacturers do not support the installation of liners as an acceptable repair to the spill bucket. Depending upon the appearance of the damage to the spill bucket, an owner/operator will be given an opportunity to conduct an integrity test in lieu of replacement. If the integrity test determines that the bucket is tight, it would not require replacement. Refer to Technical Chapter 4.2, Appendix 1 for Hydrostatic Testing Procedures. Inform the O/O and request in results of inspection letter that they notify the inspector 72 hours prior to replacement so that the inspector can be present to determine if an environmental impact has occurred. If properly notified, the inspector would inspect beneath the spill bucket to determine if staining and/or free product is present. If contamination is discovered, a site check would be required (issue form letter FO-001scsb with the enclosure). This would involve placing one boring in the assumed downgradient direction of the tankhold which houses the defective bucket but outside the tankhold.
- Determine if drop tube is present, if required (for SIR, to exempt risers from CP or for a flapper-valve installation)
- Determine if measurements made through a drop tube using gauging stick (for SIR only). Gauging stick should be in good condition and be capable of measuring to the nearest 1/8th of an inch.
- Presence of overfill equipment (visually verify flapper valve or other automatic shutoff, if applicable)
- Each spill bucket shall be provided with a lid that is in good condition and is not in contact with the fill cap.

f. Overfill Equipment (if not flapper or other automatic shutoff) Location

- If ball float valves are present, insure tank top fittings are tight to insure proper operation. Ball float valves shall not be used with suction system, coaxial Stage I vapor recovery, remote fills and pressurized deliveries.
 - Determine if evidence of an overfill has occurred.
 - High level alarms-(verify presence and see Technical Chapter 4.2 for operability)
 - Determine if alarm is visible and/or audible to the delivery driver.
- g. Dispenser Location
- Check for presence of seepage or drips and note as an observation to be addressed and if applicable, consult Modified Site Check Policy for Dispenser Leaks (issue form letter FO-001scd). If not repaired within timeframe outlined, issue as a violation.
 - Debris that is found under a dispenser may interfere with the following: observing a leak, determining if flex connectors require boots/CP or to determine if shear valves are properly anchored. Debris should be immediately removed. If not immediately removed, require removal as an observation in the results of inspection letter.
 - Inspect sumps, if present.
 - For any sumps that were installed after July 24, 2007 and cracks are discovered, then sump or entry boots must be repaired or replaced. If debris/liquid is found in a sump (small amounts of debris/liquid/residue are acceptable as long as it does not interfere with the placement or the operation of the sensor), require the O/O to remove and properly dispose of the liquid in accordance with local, state and federal requirements. If damaged sump appears to have allowed a release to the environment, consult Modified Site Check Policy for Dispenser Leaks (issue form letter FO-001scd).
 - If sensors are present, insure they are properly placed and functioning as designed. (Inspectors should not initiate sensor alarm test). If liquid is found, the O/O or DAR should be advised to expeditiously remove and properly dispose of in accordance with local, state and federal requirements.
 - If discrepancies between database and actual equipment, etc. exist, then require O/O to complete notification form with changes and sign. If O/O is not present, mail Notification Form to O/O for signature. Require O/O to return signed form by established deadline to inspector.

- Verify piping type (suction/pressurized/gravity), configuration, and presence of flex connectors and/or swing joints (sometimes seen in metallic piping runs). Determine if CP requirements are met. If piping installed after November 1, 2005 determine if piping is labeled as required in rule 0400-18-01-.02(4)(b)1.
 - If not previously verified by inspector in the inspection database, identify material of construction (see Section 4.i.3.).
 - If first generation TCI flex piping is identified, issue appropriate FO-035. See Technical Chapter 3.5 for example photos.
 - If applicable, determine if E-85 compatibility documents have been submitted by the O/O to the Notification Manager. If documents not on file, require documents as a violation in the results of inspection letter.
 - Check for presence of satellite dispensers (refer to addendum Atypical UST Systems).
 - If dispenser nozzles are bagged, ask if related to regulated issue. For example, if all nozzles for the regular product are bagged, this may indicate a leak detector restricted flow or line problem.
 - Ensure shear valves are properly anchored (see Technical Chapter 3.5) Refer to Shear Valve Policy.
- h. Identify CP equipment (everything not seen at manways or dispensers)
- Locate rectifier box if system is impressed current
 - Verify that the impressed current system is turned on (inspectors should not activate).
 - Verify power warning and alarm lights functional, if present.
 - Determine if volt and amp gauges appear to be operating properly.
 - If junction box present, inspect the number of shunts being used to determine number of anodes (should almost always have one anode per shunt being used).
 - Check rectifier log if not previously provided.
 - Note the volt and amp readings at time of inspection and determine if they are consistent with readings from rectifier log.
 - Document if exposed or broken anode wires are present and require repairs.
- i. Site Evaluation (to determine if environmental impact is present and if so, refer to contamination case manager) Check for:

- Surface water impacts
- Storm/sanitary sewer impacts
- Petroleum vapors in buildings
- Evidence of a substantial impact to soil and/or parking lot from spill, overflow or underground release (with the exception of diesel dispenser)
- If new concrete patches, ask for repair/replacement records if related to UST regulated issue.
- If release is **suspected or confirmed** and observation wells are present and can be accessed, require the O/O or DAR to open the well and the inspector should use a bailer to determine if free product is present.
- Indications of an unapproved closure.

j. Inside facility

- If ATG present, insure operational (inspectors should not touch or instruct on use). An authorized representative shall be available to print off setup information every six years or if a problem is identified onsite (if ATG is programmed improperly for size of tank, ATG should be reprogrammed which will require a follow-up inspection with setup provided thereafter to insure it is setup in accordance with manufacturer's requirements), original current inventory report and original leak history (if only the leak history was provided prior to inspection) from the ATG (see Technical Chapter 3.2 for required setup information). If leak detection records are missing or invalid or active alarms are observed (such as flashing lights, audible or displayed alarm), owners should provide a copy of the in-tank alarm history report to determine if any tank alarms were documented during that time frame. This allows the inspector to determine if a suspected release has occurred but does not substitute for monthly RD records. (see Technical Chapter 3.2 to identify a suspected release response). If records are not available on the day of the inspection, then the O/O should be cited for a failure to meet the compliance deadline (date of inspection) in accordance with rule 0400-18-01-.03(2)(c)2. and a new deadline established to submit required records.
- For electronic line leak detectors, an authorized representative shall be available to print off pressure line leak setup information every six years or if a problem is identified onsite which will require a follow-up inspection with setup provided thereafter. If Veeder Root ELLD, the inspector should verify piping type and length settings using Rollatape to insure piping length matches the reported length on the provided setup information (within fifty

feet). (If approximate piping length does not match setup information, the LLD will not function properly and the information should be submitted for additional review).

- If rectifier located inside, see CP section above.
- k. Take photographs of the UST facility with Division equipment including the layout unless there have been no modifications since the last inspection. Photograph all tank system anomalies (water in sump, flex piping failure, uncertain if violation(s) exists) and issues/records that require additional review. Photographs should be saved in electronic format and if needed, forwarded to the appropriate technical expert for assistance.
 - l. Temporarily Out of Service (check product levels, CP operational, RD if product present and greater than one inch, if TOS >3 months; all pumps, lines, manways, ancillary equipment secured, properly registered as TOS)
 - m. Complete site sketch sheet unless sketch completed in previous inspection and no modifications since the last inspection.
 - n. Complete site evaluation section on inspection form with photos to determine if a suspected release or environmental impacts are discovered.
 - o. O/O discussion-discuss violations and/or observations, if found. During inspection, if inspector notes items that cannot be answered or resolved or more information is needed, those items will be noted on the inspection report, explained to the O/O onsite, and note that a follow-up letter will be issued outlining violations, or additional records needed, answer questions and offer suggestions to organize records. If inspector later discovers issues that were not discussed onsite, inspector should contact O/O identifying issue, working with the O/O to resolve and note that it will be reviewed during the next inspection. However, if inspector notes missing records that were required to be present at time of inspection and are submitted later, these and other submitted records are subject to observations and violations. An example includes but is not limited to records submitted after inspection indicate a suspected release. If tank internal lining is the only method of corrosion protection, inform the O/O that they must permanently close the tank(s) and refer to the Enforcement Section.
 - p. Provide the Departmental pamphlet regarding mercury disposal (see Appendix) or state the following:

"Are you aware that, if any of the following criteria apply to your business and your business utilizes mercury-added consumer products, such as fluorescent light bulbs, the Mercury Product Control Act applies to your business:

- (1) Employs ten (10) or more employees;
- (2) Owns or maintains a building of at least three thousand (3,000) square feet, excluding private residences;
- (3) Owns or maintains one (1) or more electrical distribution systems;
- (4) Engages in the demolition of buildings, excluding private residences; or
- (5) Owns or operates a tanning bed salon?

The Mercury Product Control Act requires proper recycling of mercury-added consumer products rather than disposing of such products in the solid waste stream. Do you have a plan for recycling mercury-added consumer products?"

- q. Inspector shall sign inspection form and have O/O or DAR sign inspection form. Their signature does not imply agreement with the findings. If O/O refuses, indicate on signature line. Any modifications made to the inspection form after completed and signed shall be properly initialed and dated.

5. Inspection Follow-up

- a. Review subsequent records (paper or photographs), if applicable. If records not provided on date of inspection, cite rule 0400-18-01-.03(2) (c)2. If ownership issues were encountered during the scheduling or inspection process but were resolved through proper registration, issue all correspondence to the new registered owner. If ownership was unresolved, issue correspondence to registered owner. If tank internal lining is the only method of corrosion protection, include language in the correspondence to inform the O/O that they must permanently close the tank.
- b. If no violations found, issue FO-037.
- c. If violations found (if uncertain of violation type, contact the Enforcement Section):
 - i. Violations found (if not identified in regulation, would be considered observation and should be noted in accordance with the form letters), issue FO-036 Results of Inspection. If additional information is needed to properly complete inspection, complete that variable. If the O/O has not designated a Class A/B, include as a violation in the Results of Inspection letter. If a C

- operator could not be verified during the inspection by viewing a sign or instruction manual, then include in Results of Inspection letter.
- ii. If specific violations for TCI piping, spill bucket replacement, failure to register, or failure to report a suspected/confirmed release are discovered as noted during the inspection, use the applicable form letter for each.
 - d. If extension request filed, issue extension as outlined in the Enforcement Policy.
 - e. If enforcement action required as outlined in the Enforcement Policy, then issue FO-036a and prepare Enforcement Action Request.
 - f. If new notification form was completed during inspection or required to update information, upon receipt of the form, the inspector will then forward to the Notification Manager.
 - g. Track all correspondence in GasLog.
 - h. Complete SOC table for both Release Detection and Release Prevention.
 - i. If inspection is being conducted in accordance with .09(10) (c) as a result of a release, notify the Contamination Case Manager, if applicable and/or complete the .09(10)(c) form and submit to Fund Eligibility Coordinator.
 - j. If applicable, draft memo to EFOM for referral to appropriate agency for issues not regulated by UST but observed during inspection.