



Division of
Underground
Storage Tanks



September 2021

Tennessee Tank Talk



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Countdown to Compliance

October 13, 2021 New Rules

00:07:21:00

Days Hours Minutes Seconds

Welcome!

Welcome to the 12th edition of *Tennessee Tank Talk*.

As this newsletter arrives in your inbox, the full implementation date of the new rules will go into effect on October 13, 2021, about two weeks away. Take a moment to assess your level of operational compliance. Do you know what the rule changes are? Are you prepared for your next operational compliance inspection? Has your equipment been properly tested and repaired if needed? Most importantly, is your level of compliance the best it can be to prevent petroleum releases into the environment?

We've been working hard all year in different ways; flyers, direct communication during inspections, webinars, emails. etc. doing our best to make sure you have the knowledge and information to be the most prepared. An adaptation of a quote from an old movie *Jerry Maguire* is "Help us help you!". We're in this together to help

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keep Tennessee the best place to live, work and play in the nation. Maintaining compliance helps us all keep and use petroleum where it belongs - in your underground storage tank system and out of the environment.

Each one of our newsletters has highlighted a specific requirement. Outlined below are the Walkthrough Inspection / Documentation requirements. Look them over carefully and if you have any questions or concerns [contact](#) any of our staff to request assistance or email us at Tanks.UST@tn.gov. Finally, be sure to take advantage of the remaining webinars offered by the Division using the registration links provided.

Thank you for helping us keep Tennessee the best it can be.

Sincerely,



Stan Boyd

Director

New Rules Webinars for Owner / Operators

The Division is on the second series of webinars for Owner / Operators. If you weren't able to join us last week, you can always download the presentation and/or listen to the webinar recording on our *New Rules* [webpage](#). The next webinar is being held tomorrow. Click [here](#) to register. Attending during the webinar does offer the advantages of meeting our staff and the ability to ask specific questions as topics are presented.

These 1.5 hour-long webinars are presented by Division staff for the purpose of reviewing the 2018/2021 TN UST New Rule requirements at an owner/operator audience level to encourage discussions and clarifications of the new requirements. The Division is encouraging participation and feedback on any issues encountered going forward. The goal is to provide an open forum of communication between inspectors, service providers, tank owners and/or operators, and any other interested parties. The participation password for each webinar is **newrule**.

Our schedule (subject to change without notice) is as follows:

- Thursday, September 30, 2021 | 10 a.m. ET / 9 a.m. CT | General New Rule Overview | [Register](#)
- Thursday, October 14, 2021 | 10 a.m. ET / 9 a.m. CT | General New Rule Overview | [Register](#)

Participants are encouraged to contact their local field office inspectors or email us at Tanks.UST@tn.gov for more information and assistance if necessary. The webinars are recorded and available on the Division's *New Rules* [website](#). Upon request, the Division can provide onsite and/or remote meetings and webinars for tank owners/operators and interested parties.

Monthly Walkthrough Inspections

Must be conducted prior to October 13, 2021!

New Rule Requirement: Periodic (Monthly) operation and maintenance walkthrough inspections.

Tank Owner Responsibility: Every 30 days a walkthrough inspection must include:

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- Visually check for damage
- Remove liquid or debris
- Check for and remove obstructions in the fill pipe
- Check the fill cap to make sure it is securely on the fill pipe
- Double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.

Release Detection Equipment:

- Check to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present
- Ensure records of release detection testing are reviewed and current.

Record Keeping

- Monthly walkthrough inspection records shall be maintained for twelve months.
- Records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue.
- The monthly walkthrough inspections must be documented on a form approved by the Division.
- The Monthly/Annual Facility Walkthrough Inspection Form can be found [here](#).



Annual Walkthrough Inspections

Must be conducted prior to October 13, 2021!

New Rule Requirement: Annual operation and maintenance walkthrough inspections.

Tank Owner Responsibility: Annual walkthrough inspections must include:

Containment Sumps:

- Visually check for damage, leaks to the containment area, or releases to the environment. (Both contained and non-contained sumps)
- Remove liquid (in contained sumps) or debris.
- For double walled sumps with interstitial monitoring, check for a leak in the interstitial area.

Hand Held Release Detection Equipment

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Record Keeping

- Annual walkthrough inspection records shall be maintained for one year.
- These records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue.
- The annual walkthrough inspection must be documented on a form approved by the Division.
- The Monthly/Annual Facility Walkthrough Inspection Form can be found [here](#).



New Rules Resources

[UST- New Rules Web Page](#)

[Current Tennessee UST Rules](#)

[2018 Federal Rule Change Quick Reference Guide](#)

[Tank Owner Quick Reference Guide](#)

Additional Resources

[UST New Contact Information](#)

[Contact Your Local Field Office](#)

[UST Forms and Guidance](#)

[EPA -Must For USTs](#)

[TDEC Underground Storage Tanks Home Page](#)

[EPA- Underground Storage Tanks Home Page](#)

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