



Division of
Underground
Storage Tanks



December 2020

Tennessee Tank Talk



[Welcome!](#) | [Proposed Rule Change Update](#)

[New Rules Contractor / Vendor Webinars](#) | [Toolbox](#)

[Interstitial Monitoring for Piping Rule Change](#) | [What are the Requirements?](#)

[Q&A](#) | [Helpful Resources](#)

Welcome!

Welcome to the fifth edition of *Tennessee Tank Talk*. Our continuing purpose is to bring you information about the implementation of the Tennessee Division of Underground Storage Tanks (UST) Rules that became effective October 13, 2018. As always, we encourage your feedback and input so that we can have the most meaningful Rules for all Tennesseans.

Let us know what you think of this newsletter by emailing us at Tanks.UST@tn.gov. Send us your ideas and suggestions to help us continually improve.

A handwritten signature in black ink that reads 'Stan Boyd'.

Stan Boyd

Director

Proposed Rules Update

An initial set of draft rules were prepared for public review and comment that may be accessed [here](#). A public hearing was held on December 1, 2020, 10:30 AM CDT at the William R. Snodgrass Tennessee Tower 2nd Floor conference rooms A, B & C {additional information provided in the link above}. Where does the rulemaking process go from here?

[Subscribe](#) to our email list.

The public comment period closed on December 8, 2020. The Division will review and respond to both oral and/or written comments. A series of established rulemaking process steps follow that involve various levels of government to ensure the process is properly adhered to, appropriately reviewed, and considered for appropriate levels of approval. The Division will continue to provide status updates in future *Tennessee Tank Talk* Newsletters.

Summary of the Proposed Rules

UST Fund Coverage and Fee Suspension Rules provide two major changes. First, the current rules make fund coverage for a fund eligible release dependent upon an owner or operator's compliance history. With these revisions, all fund eligible releases will be entitled to reimbursement from the fund; however, an owner or operator's compliance history will now determine the amount of the fund deductible. Second, the revisions will suspend annual tank fees from July 1, 2021, through June 30, 2026. The rules also provide general cleanup revisions to Rules 0400-18-01-.09 and 0400-18-01-.10.

New Rules Contractor / Vendor Webinars

Register Today!

Another way the Division will be keeping you up-to-date beginning January 25, 2021, is by hosting a series of webinars focused on a variety of compliance subjects; Sump Testing, Spill / Overfill, Release Detection, Walkthroughs, and Generators / Dual Use UST Systems. These hour-long webinars will be presented by Division staff for the purpose of reviewing New Rule requirements at a **contractor/vendor** audience level, but also to receive feedback and input from you going forward. Our tentative schedule (subject to change without notice) is as follows:

- Monday, January 25, 2021 | 10 a.m. ET/ 9 a.m. CT | Sump Integrity Testing | [Registration](#)
- Monday, February 8, 2021 | 10 a.m. ET/ 9 a.m. CT | Spill / Overfill
- Monday, February 22, 2021 | 10 a.m. ET/ 9 a.m. CT | Release Detection
- Monday, March 8, 2021 | 10 a.m. ET/ 9 a.m. CT | Walkthroughs
- Monday, March 22, 2021 | 10 a.m. ET/ 9 a.m. CT | Generators / Dual Use UST Systems

April and May 2021, we will be offering Monday hour-long general New Rules overviews for tank owners/operators. More information, along with registration links, will be provided in future *Tennessee Tank Talk* Newsletters. Register today as space is limited.

2021 TN UST Owners Compliance Toolbox

The Division is pleased to announce the latest version of the Toolbox will be available in January 2021.

The Toolbox is a Division outreach effort to assist tank owners and/or operators in Tennessee to achieve and maintain compliance with the Division's operational regulatory requirements through education, awareness and access to resources such as current rules, Division forms, inspection guidelines, operator training opportunities and any upcoming new relevant information.

The Division provides a TN Tank Owner Compliance Toolbox annually to all registered owners of regulated USTs in Tennessee. The Toolbox is also available to any owners, operators and interested parties upon request. The Toolbox can also be accessed on the Division website.

Operational compliance of UST systems is essential to prevent petroleum releases to the environment and to

[Subscribe](#) to our email list.

regulatory compliance can ensure the release will be promptly investigated and remediated.

Interstitial Monitoring for Piping Rule Change

Containment Sump Integrity Testing

Requirements and Recordkeeping

Action: UST systems using Interstitial Monitoring (IM) for piping release detection must conduct secondary containment sump integrity testing every three years.

Tank Owner Responsibility: Conduct a secondary containment sump integrity test at least every three (3) years and maintain the test records for three (3) years.

- This requirement is applicable to all new piping installations after **October 13, 2018**.
- This requirement will be in effect for all Tennessee Underground Storage Tank facilities using Interstitial Monitoring (IM) as release detection on the applicable UST piping systems on **October 13, 2021**.
- ***Please review the next section regarding the requirements for specific IM piping release detection and secondary containment sump equipment construction and design, secondary containment sump monitoring methods, and all recordkeeping requirements.***



What are the new Requirements?

For owners and/or operators of UST systems using Interstitial Monitoring (IM) release detection method of piping, all of the secondary containment sumps in the IM UST piping systems must meet the testing and record-keeping requirements to ensure the equipment is operating properly and will prevent releases to the environment. Interstitial Monitoring is required for all UST systems installed on or after **July 24, 2007**.

Monitoring and Testing Requirements

1. Single-wall containment sumps on piping systems installed **prior to July 24, 2007**.
 - Sump sensors and/or monthly interstitial monitoring are not required.
 - Three-year containment sump integrity testing is not required.
 - Line tightness testing and/or SIR may be used for periodic piping release detection requirements. (All pressurized piping systems also require catastrophic line leak detection.)

[Subscribe](#) to our email list.

2. Single-wall secondary containment sumps installed on IM piping systems.
 - Secondary containment sump sensors.
 - Continuous interstitial monitoring (monthly sensor status reports and alarm history reports).
 - Three-year secondary containment sump integrity testing.
 - Annual secondary containment sump IM sensor operability testing.
3. Double-wall secondary containment sumps, with a **dry** interstice, installed on IM piping systems.
 - Both the interstitial space and the primary space of the secondary containment sump **must** be monitored with a sensor.
 - Monthly periodic monitoring is required (monthly sensor status reports).
 - Three-year secondary containment sump integrity testing.
 - Annual secondary containment sump IM sensor operability testing.
4. Double-wall secondary containment sumps with a **brine** (liquid) or **vacuum** interstice constructed so that the inner and outer walls are continuously monitored.
 - Secondary containment sump sensors.
 - Continuous interstitial monitoring. (monthly sensor status reports and alarm history reports).
 - Annual secondary containment sump IM sensor operability testing.
 - Three-year containment sump integrity testing is **not required** if the sump sensors are continuously monitoring the inner and outer walls of the sump and a sensor operability test is conducted annually.

Containment Sump Integrity Testing Method Requirements

Testing of secondarily contained components of UST systems may be done using the testing procedures specified in PEI RP-1200 2012 edition or later, a NWGDLE third-party approved testing method, requirements developed by the manufacturer or guidance provided by the Division.

A Low-Level Hydrostatic Integrity Test can be conducted if the facility meets the Division requirements of a positive shutdown and has written pre-approval from the Division.

Recordkeeping Requirements for Secondary Containment Equipment on IM Piping Systems

- All sump integrity test results must be maintained for three years.
- All annual IM sensor operability test results must be maintained for three years.
- Monthly sensor status reports and/or monthly alarm history reports for IM sensors must be maintained for twelve months.

Q&A

<p>How often is integrity testing required for secondary containment sumps on IM piping systems?</p>	<p>A secondary containment sump integrity test is required every three years for UST piping systems with IM release detection.</p>
---	--

<p>How long must secondary containment sump integrity testing be</p>	<p>The secondary containment sump integrity testing results for IM piping systems must be maintained for three years.</p>
---	---

[Subscribe](#) to our email list.

maintained for IM piping systems?

When is a three-year integrity test required for a double-walled secondary containment sump?

Double-walled containment sumps with a dry interstice using periodic monitoring every 30 days are required to conduct sump integrity testing every 3 years. This can be achieved by hydrostatic or vacuum test methods approved by the Division, a sump manufacturer or PEI/RP 1200.

Double-walled brine/vacuum filled containment sumps using continuous monitoring do not require 3-year integrity testing.

What are the test method requirements for secondary containment sump integrity testing?

Testing of secondarily contained components of UST systems may be done using the testing procedures specified in PEI RP-1200 2012 edition or later, a NWGDLE third-party approved testing method, requirements developed by the manufacturer or guidance provided by the Division.

What method of secondary containment sump integrity testing requires positive shutdown and pre-approval from the Division?

A Low-Level Hydrostatic sump integrity test.

How often is an integrity test required for a double-wall secondary containment sump with a brine interstitial space? The inner and outer wall are continuously monitored with sensors that are tested annually.

UST systems with double-walled secondary containment sumps, a brine interstitial space and interstitial sensors in the primary and secondary interstice are not required to conduct sump integrity testing every three years if the interstitial sensors are monitored continuously and tested annually.

[Subscribe](#) to our email list.

Helpful Resources

[UST- New Rules Web Page](#)

[Contact Your Local Field Office](#)

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

[Current Tennessee UST Rules](#)

[EPA -Must For USTs](#)

[TDEC Underground Storage Tanks Home Page](#)

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



12th Floor, TN Tower
312 Rosa L. Parks Ave
Nashville, TN 37243

(615)-532-0945
(615) 532-0199 (fax)

Share this email:



[Manage](#) your preferences | [Opt out](#) using TrueRemove®

Got this as a forward? [Sign up](#) to receive our future emails.

View this email [online](#).

12th Floor, TN Tower 312 Rosa L. Parks Ave
Nashville, TN | 37243 US

This email was sent to .
To continue receiving our emails, add us to your address book.



[Subscribe](#) to our email list.