

2018 UST Rule Changes- Contractor Series

Walkthrough Inspections

Dustin Turner and Don Taylor

Rule Change Webinar Series

- Sump testing & repairs: https://youtu.be/vtDbY8cF2MA
- Spill & overfill testing: https://youtu.be/_G--RLwT4TE
- Release Detection:
 - https://www.dropbox.com/s/9q7gjn1ajzhy0iq/TN%20UST%20Release%20 Detection%202021%20Rules%20for%20Contractors-20210222%201500-1.mp4?dl=0
- Generators/dual use tanks: September 16 @ 9/10est
- Webinar registration: <u>https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/ust/new-rules.html</u>



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Today's agenda

- Important dates
- Monthly Walkthrough Inspections
- Annual Walkthrough Inspections
- New forms



Important Dates

• Oct. 13, 2015 Effective date for EPA's federal rules

Oct. 13, 2018 Due date for systems installed <u>on or</u>
 <u>after October 13, 2018</u>

Oct. 13, 2021 Due date for systems installed <u>prior to</u>
 October 13, 2018



Walkthrough Requirements: Rule quote

 0400-18-01-.02(8). Periodic operation and maintenance walkthrough inspections.

- Below is a link to the 2018 Rules
 - https://publications.tnsosfiles.com/rules/0400/0 400-18/0400-18.htm



1a) Monthly Requirement Breakdown

- Spill Prevention- Single wall spill bucket
 - Remove liquid / debris
 - Check for damage
 - Check fill pipe for obstructions
 - Fill pipe is secure and not in contact with the lid.



Walkthrough Form

ACTIVITY

MONTHLY/ANNUAL FACILITY WALKTHROUGH INSPECTION FORM

Use this form in place of: 1-Monthly Spill Bucket Log, 2-60-Day Record of Rectifier Operations Form, 3-Quarterly Dispenser Inspection Log, and 4-Monthly Electronic Interstitial Monitoring Alarm Report

Facility Name	Address	UST Facility ID	YEAR	

YOUR INITIALS OR SIGNATURE INDICATE THE DEVICE OR SYSTEM WAS INSPECTED AND SATISFACTORY.

DOCUMENT ANY ACTIONS TAKEN IN RESPONSE TO UNUSUAL OPERATING CONDITIONS IN THE COMMENTS SECTION ON PAGE 4.

I. MONTHLY (EVERY 30 DAYS)

If your UST system receives deliveries at intervals greater than 30 days, you may check your spill prevention equipment prior to each delivery. Only complete the applicable release detection section at the top of page 2. Indicate any problems found, including tank number and product type in the COMMENTS / ACTIONS TAKEN section at the end of this document.

ACTIVITY	JAN	LEB	MAK	APK	WAY	JUN	JUL	AUG	SEP	OCI	NOV	DEC
Date of Inspection												
 Visually check all spill prevention equipment for damage and remove all liquids and debris. Standalone Monthly Spill Bucket Inspection Log no longer required. 												
2. Check for and remove obstructions in fill pipe.												
3. Check all fill caps to ensure it is securely on fill pipe and not in contact with the spill bucket lid.												
 For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area if equipped with a sensor (ATG sensor or float type). 												
Check release detection equipment to ensure it is operating with no alarms or other unusual operating conditions present.												
6. Review and confirm release detection records are current.												
7. Suspected release documented and reported to the Division*												



Example of fill port in contact with the lid





Damaged spill bucket example



09.07.2016 11:27



Fill Pipe obstruction example





1b) Monthly Requirement Breakdown

- Spill Prevention- Double wall spill bucket
 - Electronic sensor if monitored with IM records no operability testing required.
 - Standalone sensor if monitored monthly no operability testing required.
 - Liquid Float Gauge will require operability testing.
 - Not part of monthly leak detection by rule



Walkthrough Form

A CTIVITY

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DW Spill bucket example





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5. Check release detection equipment to ensure it is operating with no alarms or other unusual operating conditions present.												
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2a) Release detection equipment (ATG)

- Review and confirm release detection records are current
- Ensure operation with no alarms or unusual operating conditions







2b) Release detection equipment (SIR)

- Review current report each month
- Ensure drop tube is present
- Record water level reading each month

Be sure to include inventory records (raw data) with

monthly report





2c) Release detection equipment (IM)

- Maintain monthly liquid status reports
- Maintain monthly alarm history reports
- Document the date location cause and corrective action taken to investigate/resolve each alarm

```
ALARM HISTORY REPORT

---- SENSOR ALARM -----
LI:DISP12
DISP SUMP
FUEL ALARM
JUL 22, 2006 10:12 PM

FUEL ALARM
SEP 20, 2005 8:27 PM

FUEL ALARM
FUEL ALARM
FEB 22, 2005 5:03 PM
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LIQUID STATUS
NOV 1. 2004 1:30 PM
L 1:ANNULAR DIESEL 1
FUEL ALARM
L 2:SUMP DIESEL 1
SENSOR NORMAL
 3:ANNULAR D2 TANK 2
SENSOR NORMAL
L 4:SUMP D2 TANK 2
SENSOR NORMAL
L 5:ANNULAR D2 TANK 3
SENSOR NORMAL
L 6:SUMP D2 TANK 3
 7:ANNULAR D2 TANK 4
SENSOR NORMAL
 8:SUMP D2 TANK 4
SENSOR NORMAL
```



2c) Release detection equipment (IM) cont.

IN THE FOLLOWING COMMENT SECTION, EXPLAIN ANY ACTIONS TAKEN TO ADDRESS ISSUES FOUND DURING WALKTHROUGH

DATE	ACTION TAKEN										
Main	Maintain the annual walkthrough records for one year. Operational compliance records should be maintained according to the regulations.										

2d) Release detection equipment (MTG)

 Ensure tank liquid level measurements do not exceed weekly or monthly standards for appropriate tank size

TANK SIZE	MINIMUM DURATION OF TEST	WEEKLY STANDARD (One test)	MONTHLY STANDARD (Average of 4 Tests)
up to 550 gallons	36 hours	10 gallons	5 gallons
551-1000 gallons (diameter 64 in.)	44 hours	9 gallons	4 gallons
551-1000 gallons (diameter 48 in.)	58 hours	12 gallons	6 gallons
551-1000 gallons*	36 hours	13 gallons	7 gallons
1001-2000 gallons**	36 hours	26 gallons	13 gallons

^{*} For all tanks of 551-1000 gallon capacity that cannot meet test duration requirements over 36 hours, a tank tightness test must be performed at least every five years.

^{**} Must be combined with tank tightness testing at least every five years.



Walkthrough Form

1														
Facility Name	UST	Facility ID	<i>'</i>									YEAR		
Release Detection Method	ACTIVITY	J/	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
ATG	1.Monthly leak test report is printed and stored with release detection records (Y/N)?													
Automatic Tank Gauge	2.ATG console has active leak alarms (Y/N)?													
	1.Current monthly SIR report reviewed (Y/N)?													
SIR	2.Drop tube is present (Y/N)?													
SIN	3.Water level reading recorded (Y/N)?													
Statistical Inventory Reconciliation	4.Inventory records used (raw data) included with monthly report (Y/N)?													
IM	1.Maintain monthly sensor status and alarm history reports (Y/N)? Standalone Monthly Electronic Inters Alarm Report form no longer required.													
Interstitial Monitoring	2.Document the date, location, cause, and action take to investigate/resolve each alarm and suspected rel in COMMENTS / ACTIONS TAKEN section on page 4 of this form (Y/N)?													
MTG Manual Tank Gauge	Tank liquid level measurements exceed weekly or monthly standards for appropriate tank size (Y/N)?													



3) Impressed current rectifier insp. (60 day)

- Record the as left measured rectifier output as indicated in section X of the last IC CP test form.
- Record the current voltage and amperage readings
 - If your rectifier does not have a voltage gauge only record the amps on your test form.
- If present record the hour meter reading
- Record the date of the inspection
- If your rectifier reading changes 20% or more from the as left settings on your previous CP test you will need to investigate and repair your system.



3) Impressed current rectifier insp.





Walkthrough Form

II. IMPRESSED CURRENT RECTIFIER INSPECTION (EVERY 60 DAYS) (If applicable this section can be used in lieu of the Division's 60-Day Record of Rectifier Operation form (form CN-1282)												
Any variance greater than 20% of an amperage from the last test should be investigated and necessary repairs/adjustments made. A corrosion expert's approval may be required.												
What is the "as left" measured rectifier output as indicated in	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS
Section X of the last Impressed Current Cathodic Protection Test Form?												
Current voltage and amperage readings:		AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS	VOLTS	AMPS
2. Current voltage and amperage readings.												
3. Hour meter reading (if present)		HOURS		HOURS		HOURS		URS	HOURS		HOURS	
3. Hour meter reading (ii present)												
4. Rectifier Inspection Date (MM/DD/YY)												



4) Dispensers

- Required since 2005, now recorded on the monthly walkthrough form
- Frequency Quarterly inspection
- Visual inspection for leaks
- If a petroleum leak is observed or evidence of petroleum staining is found, make repairs and document in the comments the action taken.

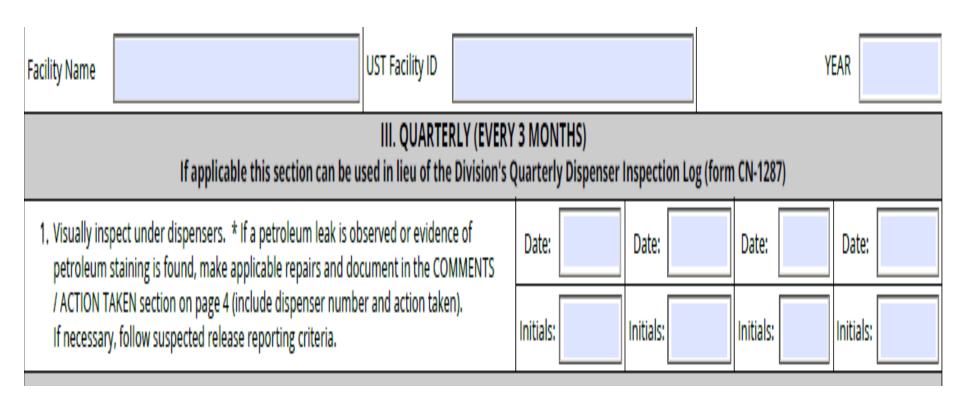


Example of a dispenser leak





Walkthrough Form





1) Visually check for damage

- floors, walls and lids (gaskets)
- seals, boots, penetrations
- cracks, physical separation
- sensors in lowest point for IM
- ✓ CLEAN THE SUMP- visual inspections
- ✓ WHEN IN DOUBT- test it
- ✓ "LIQUID TIGHT"- required by rule
- REPAIRS- manufacturer or UL approved







- ✓ Penetration Fittings
- ✓ Piping (joints)
- Electrical conduit
- ✓ Pump Riser (sump floor)
- ✓ Lids/Gaskets
- ✓ Test Boots (open)
- Ethanol/BiofuelsCompatibility











- Piping Degradation
- Long term exposure to fuel or contact water
- Typically found in sumps without sensors
- Deactivate system and replace immediately
- "unusual operating condition"







2) Leaks to the containment area

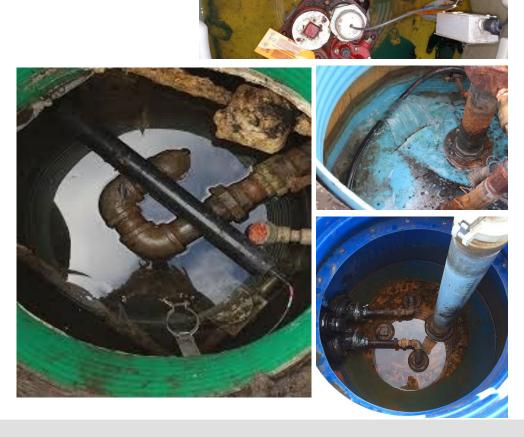
- Remove liquids
- Has product escaped the sump?
- Metal components
- Liquid in secondary piping

REPORT TO THE DIVISION

"Unusual operation condition"

"unexplained presence of liquid"

"immediately repair and replace"





3) Releases to the environment

- ✓ Report within 72 hours
- ✓ Repair/replace immediately
- ✓ Discontinue use until repairs are completed
- Re-test tanks, sumps and lines prior to startup







Annual Walkthrough cont.

4) Remove liquid and debris

- ✓ Sump floor is visible
- Boots are in place and open to piping secondary
- ✓ UDC- filters, trash- all components visually inspectable
- Proper disposal of contact water
 - hazardous waste determination (TDEC-SWM)
 - permitted disposal (TDEC- Water Resources)

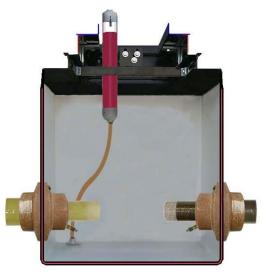
If a sump isn't clean, have you really inspected it?

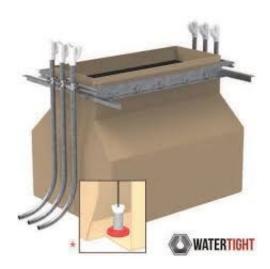






- 5) Double Walled Sumps- liquids in interstice
- Secondary sensors (mechanical, electronic)
- Dry interstice
- Brine filled
- Vacuum filled











5) Handheld Release Detection Equipment- Gauging Stick

- measurement numbers and lines are legible (1/8-inch increments)
- tank bottom button is present
- exterior coating is intact (wicking)
- tank chart is onsite and accurate
- water finding paste is onsite (monthly)





Tank calibration charts

Xerxes

https://www.xerxes.com/en/document-library/

Containment Solutions:

http://containmentsolutions.com/fiberglass-calibration-charts.html

Modern Welding:

https://www.modweldco.com/resources/tank-chart-generator

Highland Tank:

https://www.highlandtank.com/gauge-charts/

Steel Tank Institute:

https://www.steeltank.com/FabricatedSteelProducts/ShopFabricatedTanks/TankCapacityChart/tabid/459/Default.aspx

	Di	pstick C	alibrati	on Char	1 20,000) Gallor	- 12' D	iameter	SW Ta	ink	
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READING	GALLONS	READING	GALLONS	READING	GALLONS	READING	GALLONS	READING	GALLONS	READING	GALLON
1/8	3	7 1/8	400	14 1/8	1095	21 1/8	1980	28 1/8	3009	35 1/8	4151
1/4	6	7 1/4	410	14 1/4	1109	21 1/4	1997	28 1/4	3029	35 1/4	4172
3/8	8	7 3/8	421	14 3/8	1124	213/8	2015	28 3/8	3048	35 3/8	4194
1/2	11	7 1/2	431	14 1/2	1138	21 1/2	2032	28 1/2	3068	35 1/2	4215
5/8	15	7.5/8	442	14 5/8	1153	21 5/8	2049	28 5/8	3087	35 5/8	4236
3/4	18	7 3/4	453	14 3/4	1167	21 3/4	2067	28 3/4	3107	35 3/4	4258
7/8	22	7 7/8	463	14 7/8	1182	21 7/8	2084	28 7/8	3127	35 7/8	4279
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1.1/4	34	8 1/4	496	15 1/4	1226	22 1/4	2137	29 1/4	3186	36 1/4	4344
1 3/8	39	8 3/8	507	15 3/8	1241	22 3/8	2154	29 3/8	3206	36 3/8	4365
1 1/2	44	8 1/2	518	15 1/2	1256	22 1/2	2172	29 1/2	3225	36 1/2	4387
1 5/8	49	8 5/8	530	15 5/8	1271	22 5/8	2190	29 5/8	3245	36 5/8	4408
13/4	54	8 3/4	541	15 3/4	1286	22 3/4	2207	29 3/4	3265	36 3/4	4430
17/8	59	8 7/8	552	15 7/8	1301	22.7/8	2225	29 7/8	3285	36 7/8	4451
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2 1/4	76	9 1/4	587	16 1/4	1346	23 1/4	2279	30 1/4	3345	37 1/4	4516
2 3/8	82	9 3/8	599	16 3/8	1361	23 3/8	2297	30.3/8	3365	37.3/B	4538
2 1/2	88	9 1/2	610	16 1/2	1377	23 1/2	2315	30 1/2	3385	37 1/2	4560
2 5/8	96	9 5/8	622	16 5/8	1392	23 5/8	2333	30 5/8	3405	37 5/8	4582
2 3/4	101	9 3/4	634	16 3/4	1408	23 3/4	2351	30 3/4	3426	37 3/4	4603
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3 1/4	128	10 1/4	683	17 1/4	1470	24 1/4	2424	31 1/4	3507	38 1/4	4691
3 3/8	135	10 3/8	695	17 3/8	1486	24 3/8	2442	31 3/8	3527	38 3/8	4713
3 1/2	143	10 1/2	707	17 1/2	1501	24 1/2	2460	31 1/2	3547	38 1/2	4735
3 5/8	150	10 5/8	720	17 5/8	1517	24 5/8	2479	31.5/8	3568	38 5/8	4757
3 3/4	157	10 3/4	732	17 3/4	1533	24 3/4	2497	31 3/4	3588	38 3/4	4779
3 7/8	165	10 7/8	745	17 7/8	1549	24 7/8	2516	31 7/8	3609	38 7/8	4801
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4	173	11	757	18	1565	25	2534	32	3629	39	4823
4 1/8	181	11 1/8	770	18 1/8	1581	25 1/8	2553	32 1/8	3650	39.1/8	4845
4 1/4	189	11 1/4	783	18 1/4	1597	25 1/4	2571	32 1/4	3670	39 1/4	4867
4 3/8	197	11.3/8	796	18 3/8	1613	25 3/8	2590	32 3/8	3691	39 3/8	4889
4 1/2	205	11 1/2	809	18 1/2	1629	25 1/2	2608	32 1/2	3711	39 1/2	4911
4 5/8	213	11 5/8	822	18 5/8	1645	25 5/8	2627	32 5/8	3732	39 5/8	4933
4 3/4	221	11 3/4	835	18 3/4	1662	25 3/4	2646	32 3/4	3753	39 3/4	4956
4 7/8	230	11 7/8	848	18 7/8	1678	25 7/8	2665	32 7/8	3773	39 7/8	4978
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5	239	12	861	19	1694	26	2684	33	3794	40	5000
5 1/8	247	12 1/8	874	19 1/8	1711	26 1/8	2702	33 1/8	3815	40 1/8	5022
5 1/4	256	12 1/4	888	19 1/4	1727	26 1/4	2721	33 1/4	3836	40 1/4	5045
5 3/8	265	12 3/8	901	19 3/8	1744	26 3/8	2740	33 3/8	3856	40 3/8	5067
5 1/2	274	12 1/2	914	19 1/2	1760	26 1/2	2759	33 1/2	3877	40 1/2	5089
5 5/8	283	12 5/8	928	19 5/8	1777	26 5/8	2778	33 5/8	3898	40 5/8	5112
5 3/4	292	12 3/4	942	19 3/4	1794	26 3/4	2797	33 3/4	3919	40 3/4	5134
5 7/8	302	12 7/8	965	19 7/8	1810	26 7/8	2816	33 7/8	3940	40 7/8	5156
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6 1/4	330	13 1/4	996	20 1/4	1861	27 1/4	2874	34 1/4	4003	41 1/4	5224
6 3/8	340	13 3/8	1010	20 3/8	1878	27 3/8	2893	34 3/8	4024	41 3/8	5246
6 1/2	350	13 1/2	1024	20 1/2	1895	27 1/2	2912	34 1/2	4045	41 1/2	5269
6 5/8	360	13 5/8	1038	20 5/8	1912	27 5/8	2932	34 5/8	4066	41 5/8	5291
634	370	13 3/4	1052	20 3/4	1929	27 3/4	2951	34 3/4	4088	41 3/4	5314
67/8	380	13 7/8	1067	20 7/8	1946	27 7/8	2970	34 7/8	4109	41 7/8	5336
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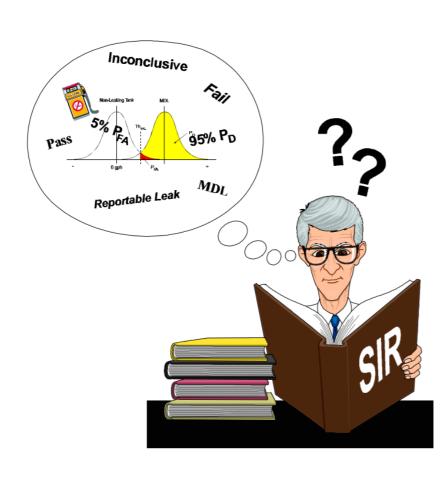
XERXES CORPORATION

XERXES CORPORATION 7901 XERXES AVENUE SOUTH, MINNEAPOLIS, MN 55431 - (952) 887-189
File Name: Xerxes Tank 12inSW calibrationsharts D102



Statistical Inventory Reconciliation (SIR)

- In use at >30% of sites in Tennessee
- Daily measurements and consistency
- Consistent errors allow leaks to go unnoticed
- Gauging stick, charts and water paste are critical components
- SIR Vendor charts
- Higher sales less likely to find leaks
- Annual walkthrough equipment checks are critical



5) Sumps – Annual Walkthrough

- Visually check containment sumps for damage and leaks to the containment area or a release to the environment.
- Remove any debris and liquid from containment sumps that are required to be liquid tight (ex. IM sumps)
- If Interstitial monitoring is being performed, check for leaks in the interstice of the double wall containment sumps (if applicable).



Contained vs Uncontained Sumps

- IM monitored Sump
- Contained Sump not monitored
 - Reporting requirements
- Uncontained Sump
 - Reporting requirements



Contained vs uncontained sump





Secondary Containment Sumps

- Sumps containing metallic components in contact with water
 - Used for interstitial monitoring?
 - Metallic components in contact with water?
 - Piping material- in contact with water?
 - installed on or after July 24, 2007?



Test record retention times

- Annual line tightness test for pressurized piping – 1 year
- Triennial line test for US Suction piping 3 years
- Annual line leak detector tests 3 years
- Annual Interstitial sensor test 3 years
- Annual functionality test of ATG console 3 years



Test record retention times cont.

- Annual inspection of vacuum pump and pressure gauges if applicable – 3 years
- Triennial spill bucket integrity test 3 years
- Triennial overfill prevention device operability test – 3 years
- Triennial secondary containment sump integrity test for systems using IM – 3 years



Walkthrough Form

			<u> </u>				
IV. ANNUA	L WALKTHROUG	H INS	PECTION				
Visually check containment sumps for damage and leaks to the containment release to the environment. If applicable, follow * procedures in Section II	ent area or a II.1 above.	Date:			Initials:		
Remove any debris and liquid from containment sumps that are required If applicable, follow * procedures in Section III.1 above.	to be liquid tight.	Date:			Initials:		
If Interstitial Monitoring is being performed, check for leaks in the interstic of the double wall containment sumps (if applicable) that are continuously monitored with a sensor connected to a monitoring console, for example	/	Date:			Initials:		
Check tank gauging sticks for operability and serviceability. (SIR or Manual Tank Gauging Only)		Date:			Initials:		
V. R Records should be maintained for	EVIEW OF TEST R the time listed a			t is conducted			
TEST RECORD TYPE	Record to be maintained		Initials		MOST RE	ECENT TEST DATE	
Annual Line Tightness Test for pressurized product lines. Report any failed test within 72-hours. Attach documentation.	1 YEAR						
Every 3 years, conduct Line Tightness Test for US Suction product piping. Report any failed test within 72-hours. Attach documentation.	3 YEARS						
3. Annual Line Leak Detector Tests performed for pressurized product lines.	3 YEARS						
4. Annual Interstitial Sensor test performed (if applicable)	3 YEARS						
5. Annual functionality test of ATG console performed (if applicable).	3 YEARS						
Annually inspect all vacuum pump and pressure gauges to ensure proper communication with sensors and controller.	3 YEARS						
7. Every 3 years, conduct Spill Bucket Integrity Test(s).	3 YEARS						
8. Every 3 years, conduct Overfill Prevention Device Operability Test(s).	3 YEARS						
9, Every 3 years, conduct Secondary Containment Integrity Test(s) for	2.454.06						ĺ

3 YEARS



UST systems using Interstitial Monitoring

Announcements

- Upcoming Webinars
 - Emergency Generators/Dual Use September 16, 2021
 0 10 ET/ 9 CT
- Webinar registration: https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/ust/new-rules.html

Thank you for your participation

- Dustin Turner
 - **-** (423) 500-8157
 - dustin.turner@tn.gov
- Don Taylor
 - **-** (423) 309-1599
 - don.taylor@tn.gov

