



Division of
Underground
Storage Tanks



October 2022

Tennessee Tank Talk



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Welcome!

Welcome to our 18th edition of Tank Talk, a newsletter designed to inform our Tennessee underground storage tank owners/operators, and stakeholders. The reason for this newsletter and the many other outreach efforts the Division has taken over the last few years is to help our regulated community come into compliance with the new rules that went fully into effect one year ago on October 13, 2021. Our goal is for all our tank owners and operators to be in compliance.

The 2005 Federal Energy Policy Act requires the State of Tennessee to inspect each regulated Underground Storage Tank System at least once every 3 years. That's just over 5,000 facilities operating in our state. This means Division staff have inspected roughly 1/3 of our UST systems statewide within the last year. The results are in. While our most recent operational compliance inspections are showing some improvement there is still

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note on each of these to ensure your facilities are in compliance and ready for your upcoming inspection. Please share our Tank Talk newsletter with any tank owner, operator, contractor, or service provider who could benefit from the provided information. If you have any operational compliance questions, reach out to your [regional field office](#).

Let's all work together to achieve our shared common operational compliance goals. Achieving compliance goals helps prevent petroleum releases to make Tennessee a great place to live, work and play.



Sincerely,

Stan Boyd
Director

Top Three New Rules Violations

- Action:** Inspect overfill prevention equipment every 3 years.
Tank Owner Responsibility: Maintain records demonstrating overfill functionality testing conducted within the last 3 years. Applies to all forms of overfill and documentation must be maintained for 3 years.
- Action:** Conduct a spill bucket integrity test every 3 years or use a double-walled spill bucket with interstitial monitoring.
Tank Owner Responsibility: Maintain a passing spill bucket integrity test conducted within the last 3 years or documentation the prevention equipment is double walled and is periodically monitored. Spill bucket tests must be maintained for 3 years.
- Action:** Annual testing of electronic and mechanical release detection components.
Tank Owner Responsibility: Maintain the 3 previous annual tests of release detection components.

Time for Maintaining Compliance

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- Get on your compliance contractor's schedule early due to supply chain and manpower shortages.
- Be prepared for possible repairs and replacements following new testing requirements.
- Review the inspection checklist prior to the inspection (enclosed with the letter confirming the inspection).
- Have the required paperwork organized and easy to find prior to inspection.
- Have an owner/operator available during the inspection knowledgeable about the underground storage tank system.
- Have dispenser keys and tools readily available for inspection.
- Contact the inspector or your local field office if you have any questions regarding your inspection.
- To review the Standardized Inspection Process [click here](#).



Field Office Spotlight

Columbia Field Office



Counties Served: Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne

Field Office Manager: [Dale Robinson](#) (931) 306-8712

Field Office Inspectors: Mark Mashburn and Jakki Soderman

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New Rules Resources

[UST- New Rules Web Page](#)

[Current Tennessee UST Rules](#)

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

[Tank Owner Quick Reference Guide](#)

[Tank Operator Reference Guide](#)

(includes Tank Helper step-by-step instructions)



Additional Resources

[Standardized Inspection Manual \(SIM\)](#)

[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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