



Tennessee Tank Talk

Welcome!

Let's talk numbers. The Federal 2005 Energy Policy Act requires states to inspect regulated petroleum underground storage tank facilities at least once every 3 years. That means, as of today (July 31, 2022), the State of Tennessee has 4,889 facilities to inspect. We are over ½ way through the 3-year inspection cycle that began October 18, 2021, the fully effective date of rules that were enacted October 18, 2018.

The Division of Underground Storage Tanks has and is continuing to perform several outreach methods to help make sure anyone that is regulated knows how to comply with these requirements. Those have included public notice/input as a part of the rule making process, on-site training, operator training, flyers, webinars, email marketing, webpages, pre-inspection letters, etc. However, a quick look at the numbers over the past 6 months, specifically violation rates, the numbers remain too high.

Spill and overfill requirements continue to be in the Division's top 10 list of violations, with number 2 being "failure to inspect overfill prevention equipment at least once every three (3) years". Take a few minutes to read the spill and overfill requirements summarized below to make sure that you are familiar with and can comply with the requirements. [Contact our environmental field office staff](#) if you have any questions – they'll be glad to assist you.

Given that petroleum releases occur from spills and overfills complying with rules intended to prevent releases only makes sense. Preventing petroleum releases helps us all make sure we're protecting human health and the environment and keeping Tennessee a good place to live, work, and play.

Sincerely,

Stanley R. Boyd

2021 NEW RULE REFRESHER



Spill & Overfill Equipment

SPILL

- Single wall spill prevention equipment must be integrity tested at least once every three years or use a double-walled spill bucket monitored with an interstitial sensor.

OVERFILL

- All overfill prevention equipment must be inspected at least once every three years. At a minimum, the inspection must ensure that overfill prevention equipment is set to activate at the correct level and will activate when petroleum reaches that level.
- Tank charts must be used for correct calculations for overfill inspections and testing. Tank charts can be obtained from the tank manufacturer, calculated from inventory records (ATG or SIR), or generated using a manufacturer's website.

REPAIR AND REPLACEMENT

- If the device manufacturer does not have an approved method to repair the damaged or defective spill or overfill prevention device, the equipment must be replaced. Repaired or replaced spill and overfill prevention devices must be integrity tested or tested for functionality within thirty days of the repair or replacement.
- Flow Restriction Overfill Devices (Ball Float Valves) **cannot be repaired or replaced** if found damaged or defective. Another method of overfill prevention must be installed within thirty days. (Automatic Shutoff Device or High-Level Alarm). If the ball float device is not removed and an automatic shutoff flapper valve is installed, the flapper valve must activate at 90%, and below the length of ball float piping in the tank.

RECORDKEEPING

- The [spill](#) and [overfill](#) test results must be maintained for three years.
- Records for double-walled spill prevention monitored with an interstitial sensor must be maintained for as long as the equipment is in use. Conduct an integrity test within thirty days of discontinuing the interstitial sensor monitoring.
- All post-repair and replacement testing must be conducted within thirty days and maintained for three years.
- All repair documentation must be maintained for the life of the UST system.
- Monthly inspections are required for all spill prevention devices. The results of these inspections must be recorded on the Division's Monthly/Annual Facility Walkthrough Inspection Form, Section I ([CN-2544](#)).

New Rules Resources

[Division Updates and Outreach](#)

[Current Tennessee UST Rules](#)

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

Additional Resources

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

[UST 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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Department of **Environment & Conservation**

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