



Tennessee Tank Talk

TDEC COOKEVILLE FIELD OFFICE LOCATION UPDATE

The Cookeville Environmental Field Office has moved to a temporary location pending the permanent location's renovations. Please address mail to **Tennessee Department of Environment and Conservation TDEC** with **Attention to: Recipient**. Temporary addresses are:

Mailing Address: PO Box 938, Cookeville, TN 38503

Physical Address: 955 E. 20th Street, Cookeville, TN 38501

Temporarily Out of Service UST Systems

What are the operational requirements of a temporarily out of service (TOS) underground storage tank (UST) system? How do those requirements differ from a currently in-use UST system? This newsletter focuses on the details of this UST system status.

Tank Status Terminology

Temporarily Out of Service (TOS) - A UST system that is not routinely receiving deliveries or dispensing fuel and is not permanently closed.

Empty UST System - A UST system is empty when all liquid/residue has been removed using commonly employed practices so that no more than one inch remains in the system.

Currently in Use (CIU) - A UST system that routinely receives deliveries and/or dispenses fuel.

Permanently Out of Service (POS) - When a UST system has been properly removed from the ground or closed in place in accordance with Division rules and guidance.

Change in Service - Changing the product stored in a UST from a regulated to a non-regulated product.

Operational Compliance Requirements for TOS tanks

REQUIREMENTS FOR TOS:	Less than or Equal to 1" Liquid / Residue	Greater than 1" Liquid / Residue
Corrosion Protection	REQUIRED	REQUIRED
Spill and Overfill Testing	NOT REQUIRED	REQUIRED
Release Detection for Tanks and Piping	NOT REQUIRED	REQUIRED
Quarterly Dispenser Checks	NOT REQUIRED	REQUIRED
Monthly and Annual Walkthroughs	NOT REQUIRED	REQUIRED

***As a best management practice, it is recommended to periodically gauge tank(s) to ensure they contain less than or equal to one (1) inch of residue.**

Corrosion Protection for TOS Tanks

When a UST system is temporarily closed, owners, operators, and/or other responsible parties must continue operation and maintenance of corrosion protection. Metal components (tanks, piping, flex connectors, etc.) in contact with soil and/or water must be protected from corrosion. If metal components are protected with a galvanic or impressed current cathodic protection system, then:

ALL CATHODIC PROTECTION SYSTEMS:

- Continue operation and maintenance of the corrosion protection system;
- Test the cathodic protection system within 6 months of installation or repair, and every 3 years thereafter.
- If anodes are added or replaced (unless added to a flex connector), a UST system tightness test must be performed between 3 and 6 months of performing this work.
- Maintain all applicable records.

IMPRESSED CURRENT SYSTEMS:

- Ensure electricity is continuously supplied to the rectifier.
- If an impressed current cathodic protection system has been turned off or is inoperable:
 - Less than 12 months – specific testing is required to return the UST System into operation.
 - More than 12 months – the UST system must be permanently closed or obtain Division approval.
- Perform 60-day rectifier inspections and retain the results of the last 3 inspections.

***As a best management practice, periodically inspect dispenser and tank top openings. If metal components are in contact with soil and/or water, ensure these components are protected from corrosion.**

Notification Status Changes

Any change in the status of a UST system must be reported within 30 days. This includes but is not limited to changes of ownership, upgrading or replacement of tanks, changes in mailing address, and changes in service.

These changes must be made using the [Amended Notification Form \(CN-1260\)](#).

Q. Are spill and overfill prevention devices for empty TOS tanks required to be replaced/repaired if damaged?

A. Empty TOS tanks do not require three year spill and overfill prevention devices integrity testing and inspections. They are REQUIRED to be replaced/repaired if found damaged.

Q. For empty TOS tanks, is it best practice to regularly maintain spill buckets?

A. Yes, not maintaining spill buckets on empty TOS tanks may result in water entering the tank through a faulty fill-cap, etc.

Q. Are Impressed Current Rectifier Inspections required for TOS USTs?

A. Yes, Impressed Current Rectifier inspections are required every 60 days. The results of the most recent three inspections must be maintained.

Q. When must the Division be notified to change the status of a CIU UST to a TOS UST?

A. The Division must be notified of ANY change in status by submitting an [Amended Notification form \(CN-1260\)](#) within 30 days of the change.

UST RESOURCES

[UST Forms and Guidance](#)

[UST Contact Information](#)

[Contact Your Local Field Office](#)

[Division Updates and Outreach](#)

[Current Tennessee UST Rules](#)

[UST Documents in Other Languages](#)

[TDEC Underground Storage Tanks Home Page](#)

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

DIRECT UST EMAILS

Report Suspected Release - Releases.UST@tn.gov

Submit Fund Eligibility Application - UST.Fund@tn.gov

Submit Closure Application - Closure.Application.UST@tn.gov

Submit Notification Form - Notification.Fees@tn.gov

Submit Reimbursement Claim - UST.Reimbursement@tn.gov

Submit Newsletter Topics & Feedback - Tanks.UST@tn.gov

DISCLAIMER: This document is provided by TDEC as a reference for the regulated community. Every effort has been made to ensure its accuracy; however, it is not intended as a substitute for the requirements in the rules of the TDEC Chapter 0400-18-01 Underground Storage Tank Program. Tank owners/ operators are responsible for compliance with the requirements of 0400-18-01.



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