



Division of
Underground
Storage Tanks



March 2021

Tennessee Tank Talk



[Welcome!](#) | [Standardized Inspection Manual Revisions](#)

[New Rules Contractor / Vendor Webinars](#)

[Annual Walkthrough Inspections Rules](#)

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

Welcome!

Welcome to the seventh 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

Revised TN UST Standardized Inspection Manual

Seeking Public Feedback

On October 1, 2015, The Division published a Standardized Inspection Manual (SIM) to provide operational compliance assistance to our regulated community and to ensure statewide consistency of the compliance

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process for compliance inspectors and specific technical chapters for the available release detection methods and release prevention requirements. The technical chapters provide comprehensive information on UST systems equipment, operations, maintenance, and testing methods. The technical chapters also provide recordkeeping requirements and documentation approved by the Division.

The implementation of October 13, 2018, new rules provided an opportunity for the Division to update and make necessary revisions to the October 1, 2015, SIM document. The Division has since been working diligently on each technical chapter of the SIM document to incorporate the new rules, new requirements, and updated inspection policies and procedures.

The draft versions of each technical chapter of the Standardized Inspection Manual (SIM) document are available for internal and external customer review and comments until **April 9, 2021**. The draft technical chapters can be accessed in the Division New Rules section on the website. <https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/ust/new-rules.html>

The Division always encourages feedback and participation from stakeholders, tank owners and/or operators, and service providers. Please take this opportunity to visit our website and review the new SIM draft technical chapters, draft forms, and other up-to-date information from the Division.

Any comments and/or questions can be emailed to Tanks.UST@tn.gov, or please feel free to contact your local inspector or field office.

New Rules Contractor / Vendor Webinars

The schedule of our webinar series about Tennessee Underground Storage Tanks Rules that became effective October 13, 2018, is shown below. Our webinar series has been well-received with near 250 participants to date. The webinars are provided at no cost to participants and are solely designed to help our regulated community maintain compliance and continue an open dialogue and communication with our stakeholders. A question and answer period is held at the conclusion of the presentation where you can gain a better understanding or clarification of any requirement.

Walkthrough Webinar

Our webinar reviewing the new Walkthrough requirements is also open for registration. This webinar will be held on Monday, March 8, 2021, at 10 a.m. eastern. Dustin Turner, our inspector who works from the Johnson City Environmental Field Office will be the presenter. Dustin also presents the material in relatable everyday terms.

Emergency Generator Systems Webinar

Sign up by registering for our upcoming Emergency Generator Systems webinar coming up this Monday, March 22, 2021, at 10 a.m. eastern. Our presenter this week is David Stone, TDEC Knoxville Environmental Field Office consultant. David always presents the material in a thorough, technically complete way.

Be sure to join Dustin, David, our co-host Don Taylor, and our other knowledgeable and experienced panelists Mitzie Berry, Nigel Luther, and David Stone for these informative webinars.

Subjects reviewed in our past webinars include: 1) Sump Integrity Testing, 2) Spill / Overfill and 3) Release Detection. WebEx video recordings and presentation slides can be found on our new rules [webpage](#).

Please contact Division personnel if you have any difficulties registering.

Beginning in April 2021, the Division will be offering general 2018/2021 New Rules Overview webinars for

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and/or remote meetings and webinars for tank owners/operators and interested parties. If you have a question, comment or suggestion email us at Tanks.UST@tn.gov.

New 2018/ 2021 Rule Change Annual Walkthrough Inspections

Annual Walkthroughs - Operations and Maintenance Requirements and Recordkeeping

New Rule Requirement: Periodic (Annual) operation and maintenance walkthrough inspections.

Tank Owner Responsibility: Annual walkthrough inspections must include:

Containment Sumps:

- Visually check for damage, leaks to the containment area, or releases to the environment. (Both contained and non-contained sumps),
- Remove liquid (in contained sumps) or debris,
- For double-walled sumps with interstitial monitoring, check for a leak in the interstitial area.

Hand-Held Release Detection Equipment:

- Check devices such as tank gauge sticks or groundwater bailers for operability and serviceability

Annual walkthrough inspection records shall be maintained for one year. These records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue. The annual walkthrough inspections must be documented on a form approved by the Division.



Q&A

How long must the annual walkthrough

The annual walkthrough inspection records must be maintained for

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What items must the annual walkthrough inspection records include?	The annual walkthrough inspection records must include a list of each area checked, whether each area checked was acceptable or needed action taken, and a description of actions taken to correct an issue.
What is checked on double walled containment sumps with interstitial monitoring during an annual walkthrough inspection?	During the annual walkthrough inspection, double-walled containment sumps with interstitial monitoring must be checked for a leak in the interstitial area.
How often must hand-held release detection equipment be inspected?	Hand-held release detection equipment must be inspected annually.
What are containment sumps inspected for during an annual walkthrough inspection?	Visually checked for damage, leaks to the containment area, or releases to the environment. (Both contained and non-contained sumps) Remove liquid (in contained sumps) or debris.

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](#)



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