2015 Federal UST Regulation Equipment Testing and Inspection Requirements

BY:
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Red Lake Band of Chippewa Indians
40 CFR Part 280 Subparts C & D

• Causing confusion for Operators, Contractors, and some Regulators
  ➢ Some Operators are still unsure of type and frequency of equipment testing/inspection specific to their facility
  ➢ Some Contractors advising Operators to have unnecessary tests conducted or equipment installed
  ➢ 40 CFR Part 280.35 seems to be causing the most confusion
  ➢ Compliance Inspectors must educate operators
Spill Prevention Equipment Testing

- **Testing**
  - Tightness test *every 3 years*; or
  - Use double-walled spill bucket and monitor interstitial space monthly
  - Some Operators think it is required every year

- **Keep Records 3 years**

- **Implementation:**
  - Installations after October 13, 2015 effective immediately
  - Installation on or prior to October 13, 2015 first test must be conducted by October 13, 2018
Overfill Prevention Equipment Inspection

• Ensure overfill operates as intended

• Once *every 3 years*
  
  ➢ Some Operators think this is required annually

• Keep to records for 3 years
Release Detection Equipment Testing

- Test or Inspect release detection equipment **Annually**
  - Ensure proper operation
- Keep records for 3 years
- Implementation:
  - First test must be conducted by October 13, 2018
**Containment Sump Testing**

- **Interstitial Monitoring Sumps & UDC**

- **Testing**
  - Tightness test *every 3 years* [If used for Interstitial Monitoring of Piping;]
  - or
  - Double-walled sump with monthly interstitial monitoring

- **Keep records for 3 years**

- **Implementation:**
  - Installations after October 13, 2015 effective immediately
  - Installation on or prior to October 13, 2015 first test must be conducted by October 13, 2018
Real World Problem examples:

- “Contractor told me I need to install sump sensors so I can have the sumps tested.”
  - Facility has safe suction system sumps for ATG probes only
- “Contractor said I have to test my fills, sumps and under the pumps every year.”
  - Facility used ATG for monthly pressure line test, not IM
  - Test, if applicable is Tri-annual, not annual
- “Why do I have to buy all new double walled spill buckets and sumps?”
  - Operator misunderstood new rules and thought he needed double walled everything plus needed to test them all
  - Facility uses CSLD and monthly Pressure Line Tests
How can we help Operators?
Scenario 1:

- Facility has Safe Suction with 1 Tank and sticks interstitial space for release detection, records findings in a log book

**Compliance Assistance/Inspection Follow Up**

**Beaulieu's Store**

**Tank Release Detection Reports:** Continue Sticking Interstitial Space and recording results

**Monthly Walk Through Checklists:** Begin By October 13, 2018

**Class A/B Operator Certified:** Begin By October 13, 2018

[https://www.epa.gov/ust/class-a-and-class-b-ust-operator](https://www.epa.gov/ust/class-a-and-class-b-ust-operator)

**Class C Operators Trained:** Train Before October 13, 2018 and Train all new C Operators prior to beginning work

**Release Prevention Equipment Testing Due By:** First must be conducted by October 13, 2018

(Spill bucket, Flapper must be tested for functionality & integrity every 3 years)

**Release Detection Equipment Testing Due By:** First must be conducted by October 13, 2018

(Dipping stick must be inspected every year)

**Repairs Required or Completed:**
Scenario 2:

- Facility has pressurized systems on 5 tanks
  - Tank 1 uses IM for Tank and liquid sensors in sumps and UDC for IM of piping
  - Tanks 2-5 use monthly CSLD and Pressure Line Tests for all tanks and piping
# TANK MONITOR STATUS REPORT

**Make:** 
**Model:** N50  
**S.N.:**  
**W.O.:** 72185  
**Location Name:** Shropshire Farms Store #1  
**Date:** 6/25/18  
**Location Address:** 15026 Myrick Ave.  
**City:**  
**Zip:**  

<table>
<thead>
<tr>
<th>TELEMETER</th>
<th>PHONE 1</th>
<th>TANK STICK INCHES</th>
<th>MONITOR INCHES</th>
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**SENSORS**  
**PASS**  
**FAIL**  
**F.D. LINE**  
**PASS**  
**FAIL**  
**PASSING DATE**

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| 2 | 0 | 2 | 0 | 0 |  
| 3 | 0 | 3 | 0 | 0 |  
| 4 | 0 | 4 | 0 | 0 |  
| 5 | 0 | 5 | 0 | 0 |  
| 6 | 0 | 6 | 0 | 0 |  
| 7 | 0 | 7 | 0 | 0 |  
| 8 | 0 | 8 | 0 | 0 |  
| 9 | 0 | 9 | 0 | 0 |  

__*THIS DATA ONLY INDICATES THE TEST EQUIPMENT DOES NOT MEET THE MANUFACTURER'S SPECIFICATIONS.*__

__*THIS IS NOT THE ACTUAL PRECISION TEST OF YOUR FUELING SYSTEM.*__
Scenario 3:

- Facility has pressurized systems for three tanks
  - Does not use any interstitial monitoring for tanks or piping
  - Uses monthly CSLD and Pressure Line Tests for release detection
  - Contractor tested and inspected Interstitial Sensors?
Scenario 4:
- Facility has safe suction for two tanks for generators, uses interstitial monitoring for tank release detection
  - Followed Compliance Assistance Advice and is in compliance with new regulations... Almost!
  - All required testing conducted, only needs Operator Training completed

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Annual Tank Monitor Certification

Location: Red Lake Hospital
24750 Hospital Road
Red Lake, MN, 56749

Detect: May 16, 2018

- System Setup Complete: Yes
  - Monthly Tank Testing Requirement Completed: Yes
  - Interstitial Sensors Tested and Operated: Yes

- Correctly configured alarm output to high level alarm, 1 normal alarm.
  - Changed T1 and T2 high level to 99% from 95%
  - Interstitial test pass on error for T2
  - Interstitial pass in line test below 2.4 inches, worked at 12.05
  - Start/End level on bubbling test P. Results are pass.

Technicians: Darrin Folds

Signature: Darrin Folds

Date: May 16, 2018

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Compliance Assistance/Inspection Follow Up

Red Lake IHS - Hospital

Tank Release Detection Reports: Continue printing Interstitial Status Reports monthly

Monthly Walk-Through Checklists: Continue Monthly Walkthroughs, add spill cabinets

Class A/B Operator Certified: Must be Certified By October 13, 2018
http://www.epa.gov/ust/class-a-and-class-b-ust-operator

Class C Operators Trained: Train Before October 13, 2018 and Train all new C Operators prior to beginning work

Cathodic Protection Test Due By: May 16, 2021

Release Prevention Equipment Testing Due By: May 16, 2021
(Soil Buckets, Alarms, must be tested for functionality & integrity every 3 years)

Release Detection Equipment Testing Due By: May 16, 2019
(Monitor, Interstitial Monitor, Sensors must be tested for functionality & integrity every year)

Repairs Required or Completed:
In Summary:

• Most confusion about the new rules are regarding the new testing and inspection requirements
• Some Contractors may be “misinterpreting” the requirements for individual facilities
• Operators still need extra guidance from Tribal Environmental and Compliance Assistance Staff
• I am glad this presentation is over
Questions?

OUST Website on Revised Regulations
http://www.epa.gov/oust/fedlaws/revregs.html

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