



Underground Storage Tank Inspection Procedure

Clarksville-Montgomery County School System

1.0 SCOPE:

- 1.1 This procedure is to outline preparation for an Underground Storage Tank Compliance Inspection.

The online version of this procedure is official. Therefore, all printed versions of this document are unofficial copies.

2.0 RESPONSIBILITY:

- 2.1 Vehicle Maintenance Manager

3.0 APPROVAL AUTHORITY:

- 3.1 Chief Operations Officer

4.0 DEFINITIONS:

- 4.1 NEFO-Nashville Environmental Field Office
- 4.2 VMM-Vehicle Maintenance Manager
- 4.3 EPA-Environmental Protection Agency
- 4.4 UST-Underground Storage Tanks
- 4.5 SIT-Statistical Inventory Reconciliation
- 4.6 ATG-Automatic Tank Gauging

5.0 PROCEDURE:

- 5.1 CMCSS is notified by NEFO of an upcoming compliance inspection. The date of the inspection is considered to be the compliance deadline therefore all records must be available at the facility during the inspection. If violations are found, substantial civil penalties may be assessed. Compliance inspections are scheduled based upon the EPAs mandate requiring an inspection at least every three (3) years, although additional inspections may be conducted in the interim at the State's discretion.
- 5.2 Some of the items required are listed below:
 - 5.2.1 The tank owner (VMM) or an authorized representative who has knowledge of the UST system and its operation must be on site during the inspection.
 - 5.2.2 Representative must have keys and tools available to open dispenser covers, well covers, manways, and inspection ports. Appropriate personnel must be available to access any inspection ports or operate any equipment during the inspection. Representative must be able to explain the various equipment and its operation.
 - 5.2.3 Representative must be able to locate all applicable records and have them available for review during the inspection.
- 5.3 On the day of the inspection, the representative must be available and assist the inspector with the following:



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5.3.1 Provide all appropriate records pertaining to leak detection for the previous 12 months for each tank for at least one (1) of the following methods

5.3.1.1 Inventory Control With Tank Tightness Testing

Monthly measurements and leak check results for last 12 months

Last tank and line tightness results

Verification of annual calibration of dispenser results

5.3.1.2 Statistical Inventory Reconciliation (SIR)

Monthly SIR results for last 12 months (to include daily stick readings)

Verification of annual calibration of dispenser meters

Monthly water level readings

5.3.1.3 Manual Tank Gauging

Monthly measurements and leak control check results for last 12 months

Last tank tightness test if tank is 1,001-2,000 gallons

5.3.1.4 Automatic Tank Gauging (ATG)

Last 12 monthly test results (conducted at least at a 0.2 gph leak rate)

5.3.1.5 Vapor Monitoring

Site assessment verifying site is suitable for the chosen method and that monitoring wells are installed properly

Monthly results for last 12 months

5.3.1.6 Interstitial Monitoring

Last 12 monthly leak check results (ex: "Sensor Normal" printout from ATG)

Verification monitoring device is functional

5.3.2 Provide access to the Division of Underground Storage Tank's database to indicate information entered is correct and provide information to update the database, if necessary

5.3.3 Provide access for the inspector to examine the spill and overspill prevention devices

5.3.3.1 UST System Inspection Logs: Monthly spill bucket log

5.3.4 Provide access to the dispenser area



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5.3.4.1 UST System Inspection Log: Quarterly dispenser log

5.3.5 Provide access to the corrosion protection system, if applicable

5.3.6 Provide access to lines for leak detection. Depending on the piping system at each facility, the following records are required:

5.3.6.1 Suction System

If the system has a check valve located at the tank, then a line tightness test is required every 3 years and the results will be reviewed during the inspection

If the system has only one check valve which is located immediately below the dispenser, then a line tightness test is not required

5.3.6.2 Pressurized System

Last annual line tightness test results, if required

Last annual line leak detector functionality test result

If electronic line leak detector is used, monthly (.2 gph) or annual (.1 gph) release detection records must be provided

5.3.7 Provide access to vent lines to ensure proper caps are in place

5.3.8 If the system has had any repairs/upgrades:

5.3.8.1 Meter and dispenser repair records

5.3.8.2 Tank and/or line records

5.3.8.3 Release detection equipment records

5.3.8.4 Any other repair/upgrade records or alterations to the tank system

5.3.9 UST System Installations:

5.3.9.1 Manufacturer's Installation checklist for tanks and lines

5.3.9.2 Type of equipment installed

5.3.9.3 Installer's certification, if required

5.3.9.4 System tightness test results

5.3.10 Corrosion Protection System, if applicable. Depending of the type of corrosion system installed at facility, the following records are required:

5.3.10.1 Documentation of tank and piping material of construction

5.3.10.2 Galvanic (STI-P3)



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Last two test results (3 year) by cathodic protection tester

All installation and testing documentation if additional anodes added later

5.3.10.3 Impressed Current:

Last two results (3 year) by cathodic protection tester

Rectifier inspection 60 day log; last 3 inspection results available

Corrosion expert analysis and design of system

Tank tightness test results, if required

Tank assessment, if internal inspection not conducted

5.3.10.4 Lined Interior Inspection Results

Results from the periodic inspection of interior lining. Lining is to be inspected within 10 years of installation and every 5 years thereafter

Type of lining material

Tank assessment report

Certification of Installer

Tank tightness test results

5.3.10.5 Flex Connectors, if applicable

Documentation indicating that each flex connector is cathodically protected

Results of last two cathodic protection tests (3 year) if required

5.4 After examining the records and equipment, representative must be available for the inspector to review the findings and explain the next step in the compliance inspection process. The inspector will send a letter informing CMCSS with all findings summarized. If a non-compliance is identified, a schedule will be presented in order to provide sufficient time to bring the deficiencies into compliance. If the compliance deadline is not met, the case may be referred for other action and substantial civil penalties or fines could be assessed.

6.0 ASSOCIATED DOCUMENTS:

8.1 Compliance Guidance Document (CGD)-108 Interstitial Monitoring

8.2 Rule 1200-1-15-.02(2)(a) 2 and b(2)

8.3 Division policy memo dated July 15, 2008

8.4 Rule 1200-1-15-.04(3)(g)



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- 8.5 Rule 1200-1-15-.03(2)(b)4
- 8.6 Rule 1200-1-15-.04(5)
- 8.7 Form CN-1340 Monthly Electronic Interstitial Monitoring Report
- 8.8 Form CN-1339 Annual Electronic Interstitial Monitoring Test Report
- 8.9 Rule 1200-1-15-.04(4)

7.0 REVISION HISTORY:

Date:	Rev.	Description of Revision:
4/13/11		Initial Release
9/12/19	A	2.1 Changed "Supervisor" to "Manager"; 4.2 Changed "VMS" to "VMM", changed "Supervisor" to "Manager"; 5.2.1 "VMS" to "VMM"; Deleted 6.0 and 6.1; Deleted 11.0 and 11.1.

***** End of Procedure *****