

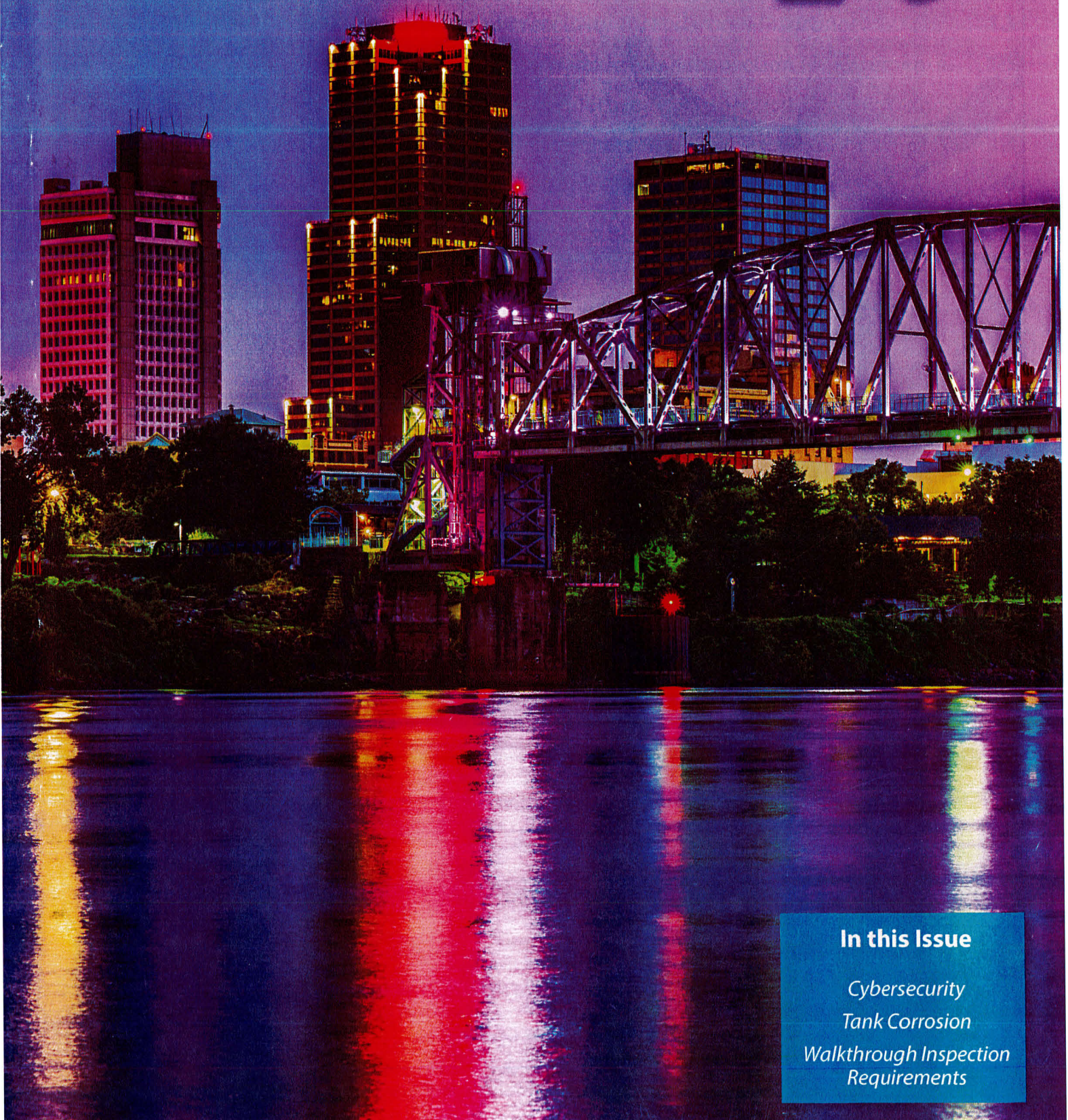
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Covering the Wholesale Petroleum, Convenience Store,  
Truck Stop & Service Station Industries in Arkansas

# Canopy



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# Walkthrough Inspection Requirements

ADEQ Regulation 12, Storage Tanks, is being revised to reflect the EPA's 2015 changes to underground storage tank regulations. Although Regulation 12 will be revised to meet the federal October 13, 2018, deadline, ADEQ is exercising discretion, as a state approved program, and is providing until October 13, 2021 to comply with the new requirements. Any new equipment or procedures must be in operation prior to October 13, 2021, to avoid being red tagged. ADEQ is eager to assist with any questions you may have. Contact your district inspector or call us at 501-682-0999.

The following article provides an inspector's perspective on the new requirements for monthly walkthrough inspections. Attached to the article is a sample checklist you might use at your facility.

One of the more beneficial requirements of the 2015 federal UST regulations is the ground-level inspection of the underground storage tank (UST) systems. All owner/operators will be required to conduct a walkthrough inspection at their facilities every thirty days.

For those who think this is an unnecessary regulatory requirement or a waste of time, consider the benefits of doing these walkthrough inspections every thirty days. The equipment used to deliver fuel and the equipment used for monitoring the system is prone to degradation, damage, and malfunctioning. It will now be inspected regularly so small problems can be found before they become big problems. You will find that many items on the walkthrough inspection checklist are already being checked to meet monthly requirements. So instead of the many miscellaneous reports you are required to keep up with, you will now have only one 30-day document. A walkthrough inspection should not take more than five to thirty minutes, depending on the size of the facility.

There are some hazards associated with doing the 30-day walkthrough inspection, such as traffic safety, injury when opening up sumps and dispensers, exposure of

skin and eyes to liquid petroleum, and improper disposal of contaminated waste. Proper training, knowledge of your equipment, safety preparation, and common sense will make most of these hazards less.

So, what does the walkthrough inspection consist of? The first thing you need to check will be the release detection system. Your release detection system must be able to identify a leak in any part of your UST system. If you are using an Automatic Tank Gauge (ATG) to test your tank system, you need to make sure the ATG is turned on, no warning lights are flashing, no alarms are sounding, and there is paper in the printer. You should be able to print a report showing 0.2 gallons per hour (GPH) pass results. If your release detection method is interstitial monitoring and the ATG is attached to sensors in the pump sumps and dispenser sumps, then you should be able to print a report showing a pass result for each sensor.

If your release detection method is statistical inventory reconciliation (SIR) or manual tank gauging, you will need to check the gauge stick and make sure it is in good shape. If you use groundwater or vapor monitoring, you will need to check your monitoring well to make sure the caps are tight and that the covers are bolted down and painted to be more visible. The bailer used to check groundwater monitoring wells should be clear, clean, and in good working condition.

Next, you need to check your spill buckets. Spill buckets need to be clean, in good condition, and empty of any liquid or debris. If you see any damage to your spill buckets you must contact a licensed contractor who will either repair or replace the spill bucket. The spill buckets must be repaired or replaced in a timely manner, to prevent a release into the environment.

You will then need to check for water in each tank you have at your facility. This can be done by checking the ATG or spreading Kolor Kut Water Finding Paste on your gauge stick. You also need to make sure all the covers

and caps are secured and tightly sealed to prevent water from entering the tank.

Your facility must have site-appropriate response supplies available in case there is a spill or overflow. Spill kits can be purchased from several environmental companies or, if you want to save some money, you can make your own. All spill kits must have an absorbent, such as Oil Dri Premium<sup>™</sup> Absorbent, to pour on the spill to prevent it from spreading. Absorbent pads and booms are also good to have in your spill kit. Once you have absorbed the spill, you must dispose of the used absorbent product properly. You will not be able to put the absorbent or pads in your regular trash container. You will need a container and a shovel to complete the cleanup. When conducting your walkthrough, you need to make sure your spill kit is fully supplied and ready in case of an emergency.

Conducting the walkthrough is a great time to look at the dispenser hoses, nozzles, and breakaways. These items are pulled, twisted, and bent every time someone receives fuel. Inspecting for loose fittings, deterioration, improper functioning, and signs of leakage could prevent a much bigger problem down the road.

You will need to open and look into every sump during the walkthrough inspection to check all visible piping, fittings, and couplings for any sign of leakage. The only exception is if there are sensors in the sumps and the sensors are getting a pass reading through the ATG. Different fuel systems have different types of sumps that need to be inspected. The more common sump types are the Submersible Turbine Pump (STP) sumps, the dispenser sumps, and the piping sumps. If your fuel system was installed after July 1, 2007, the STP sump and the dispenser sump must be kept dry at all times. If the sumps have sensors and each sensor has a PASS monthly reading, then the sumps will not need to be opened and checked during the walkthrough inspection. Sumps without sensors will need to be opened and checked during the walkthrough inspection.

One of the most commonly asked questions has been about who can perform the walkthrough inspections. The new federal UST regulation language is not specific about who can and cannot conduct 30-day walkthrough inspections, allowing state programs to use discretion. The person who would know the most about your facility would be the trained class A/B operator. Some facilities may choose to hire a qualified third-party contractor to conduct the walkthrough. Facilities that already use a

third-party contractor for monthly release detection monitoring can add the new 30-day walkthrough inspection requirements for an additional cost. Anyone with sufficient knowledge, training, and experience is able to do the 30-day walkthrough inspection.

Another frequent question has been what forms can be used. Attached to the article is a sample checklist you might use at your facility. Facilities are welcome to use this form in their inspections but are not required to adhere to this particular form. It is an educational tool to assist in planning and compliance. As long as you meet the inspection requirements and appropriately maintain records, you will satisfy the new requirements. Some companies have developed their own 30-day walkthrough inspection checklist. These forms will be accepted as long as the item on the checklist contains the requirements asked for in the new federal UST regulations. You can also use the PEI/RP900: UST Inspection and Maintenance form, which can be downloaded free of charge from the Petroleum Equipment Institute (PEI).

How long should you keep these records? It would be good practice to keep the records for the lifetime of the facility, but it is recommended to keep them for at least three years. Though Regulation 12 does not specify the length of time records must be stored, they must be maintained through your inspection cycle because records are required to be available during inspections to demonstrate compliance status. Section 1523 of the Energy Policy Act of 2005 requires ADEQ to conduct on-site compliance inspections at least once every three years. Therefore, a facility should maintain compliance records for at least three years. Records demonstrating that a repaired or upgraded UST system was properly repaired or upgraded must be kept for the remaining operating life of the UST system.

ADEQ hopes this will help you better understand how to comply with walkthrough inspection requirements. Our goal is that these inspections will help catch little problems before they become big problems. If you have already been conducting walkthrough inspections at your facility, this should be a breeze! For those who have not yet started, remember to check off each item as you inspect them on your checklist, do the walkthrough inspection every thirty days, and keep these records available on site. Your ADEQ Inspector will need to see these documents during an ADEQ compliance inspection.

### 30-DAY WALKTHROUGH INSPECTION CHECKLIST

Facility Name:	Facility ID Number:
Facility Address:	Phone Number:
<p><b>Initial each column below the date of inspection to indicate that the device/system was inspected and found to be satisfactory on that date. For those items not applicable for this facility, please indicate "N/A". Keep this record for no less than one (1) year.</b></p>	

Date of inspection (mm/dd/yy)																				
<b>REQUIRED EVERY 30 DAYS</b>																				
Visually check spill prevention equipment for damage. Remove any liquid and/or debris.																				
Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present.																				
For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.																				
Check for and remove obstructions in the fill pipe.																				
Check the fill cap to make sure it is securely on the fill pipe.																				
Ensure release detection records are reviewed and current.																				
<b>REQUIRED ANNUALLY</b>																				
For double-walled containment sumps with interstitial monitoring, check for leaks in the interstitial area.																				
Visually check containment sumps for damage and leaks to the containment area or a release to the environment.																				
Remove any liquid or debris from containment sumps.																				
Check hand-held release detection equipment, such as groundwater bailers and tank gauge sticks, for operability and serviceability.																				

**Note:** Spill prevention equipment at UST systems receiving deliveries at intervals greater than every 30 days may be checked prior to each delivery.

Document in the space below any issues that were found during the 30-day walkthrough inspection and the action taken to correct the issues.

Date	Issue	Action Taken