

INSPECT--DETECT--REPAIR

Repair

The above are words by which today's UST operators must live. Most leaks are still found by humans and not leak detection equipment making it even more important to inspect UST facilities on a regular basis. Site inspection is such an important issue it is in the proposed EPA rule changes. Some states have made it mandatory and most large operators have made it part of their Standard Operating Procedures (SOP).

Any spills or overfills must be taken care of immediately. In order to stay in compliance any broken equipment or other issues with leak detection must be addressed as soon as possible.

Most facilities do this daily inspection now as part of operation procedures but don't fill out an inspection sheet; however, as a UST level A or B operator with others responsible for the daily inspection, documentation is proof that required steps are being taken to prevent and detect contamination.

Inspect – daily checklist

1. Leak Detection Equipment:

Automatic Tank Gauge (ATG)

- Is it on?
- Are there any warning lights flashing?
- Does it show a liquid measurement?
- Is there paper in the printer?

Manual

- Is your stick flat at the bottom?
- Is it marked in 1/8 inches?
- Is the 1 inch mark 1 inch from the bottom of the stick?
- After sticking the tank can you read the stick?
- Are you using the right tank chart for the right tank?

2. Inventory Control:

- Is the measurement logged and the over/short calculated correctly on the inventory control monthly sheet or manual tank gauging sheet?

3. Spills or Overfills:

- Are there any obvious signs of a spill or overfill and if so has it been logged or reported?

Inspect – monthly checklist

1. Daily inspections:

- Have you reviewed and followed up on possible open issues?

2. Leak Detection:

- Has the inventory control monthly sheet been filled out and the EPA leak check completed?
- If site uses SIR has it been sent to SIR provider and last month's PASS/FAIL report filed?
- If site uses ATG do you have a passing test and is it filed?
- If site uses vapor monitoring do you have passing results logged and filed?

3. Water check:

- Is the water check for the month done and recorded in the water check log?

4. Rectifier check: *(If you do not have a rectifier move to 5.)*

- Is the rectifier on?
- Do all meters have a reading above zero?
- Is it recorded in monthly log?

(KDHE requires rectifier be checked every 60 days but best practice is to check monthly)

Detect

Have you found any issues, broken equipment, spills or overfills?

5. Spill buckets:
 - Is lid in good shape, not broken or cracked allowing water or trash in bucket?
 - Is bucket clean with no product, water or trash? (This should be checked after each delivery.)
 - Is drain plug sealed tight and not broken?
 - Are there any cracks, bulging or loose fittings?

6. Turbine sump:
 - Does the lid seal tight and is it in good shape?
 - Are there signs of product or leaking equipment or lines?
 - Are all wires contained in sealed conduit?
 - Is there water, dirt and/or sand in connection with unprotected metal of flex pipe?
 (If site has safe suction it will not have a turbine sump.)

7. Dispensers:
 - Are there **ANY** signs of product or leaking equipment or lines, old fuel filters or trash under the dispensers?

Reminder: It is very important for you as an operator or your service company to use some sort of absorbent or take other precautions to prevent product from leaking or spilling on the ground when changing filters, hoses, nozzles, breakaways or when repairing or testing equipment.

- Is there any staining around dispensers? Large stains should be viewed as evidence of a failing auto shutoff nozzle or a leaking swivel, hose or breakaway.
8. Overfill: (Know what type you have!)
 - If there is an outside electronic horn or buzzer can the delivery driver hear it? Test horn if you can.
 - If there is a fill lever does it appear to be in drop tube of each tank? Make sure there is no obstruction.
 - If there is a ball float can it be visually verified by you or the Kansas Department of Health and Environment (KDHE) inspector? If not a letter needs to be on file from your service company stating it is in place and that it functions properly.

By following the above checklist you will have taken the steps to avoid a very expensive cleanup. You can get a monthly inspection sheet at our website tankmgmt.net/inspection in a PDF or an excel version so you can edit it for your site. So remember: **Inspect, Detect, and Repair.**

Note on E15

On October 13, the U.S. Environmental Protection Agency (EPA) waived a limitation on selling fuel containing more than 10 percent ethanol for model year 2007 (MY2007) and newer cars and light trucks. The waiver applies to fuel that contains up to 15 percent ethanol (E15). A decision on the use of E15 in model year 2001 to 2006 (MY2001-2006) vehicles will be made after EPA receives the results of additional Department of Energy (DOE) testing, which is expected to be completed in early next year. No waiver is expected any time soon for E15 use in model year 2000 and older cars and light trucks or in any motorcycles, heavy-duty vehicles, or non-road engines because currently there is no testing data to support such a waiver.

Several steps are being taken to help consumers easily identify the correct fuel for their vehicles and equipment. First, EPA is proposing E15 pump labeling requirements, including a requirement that the fuel industry specify the ethanol content of gasoline sold to retailers. There would also be a quarterly survey of retail stations to help ensure their gasoline dispensers are properly labeled.

It is important to note that EPA's waiver decision allows but does not require the use of E15 in MY2007 and newer cars, light-duty trucks, and SUVs. Moreover, a multitude of other decisions have to be made at both the federal and state levels before E15 can actually be distributed to consumers. EPA is expected to issue a final rule on its pump labeling requirements in 2011.

Operator Training

Register now for operator training while there is a good selection of classes available. To register go to our website tankmgmt.net. Click on, "Operator Training". Our next class is February 1, 2011 at the Salina BiCentennial Center, 800 The Midway, Room 203AB, Salina, KS.

***All of us at TMS wish you a
Happy and Safe Holiday Season!***

WHAT IS TANK MANAGEMENT SERVICES?

TMS provides loss control and risk management assistance to UST owners who have third party liability insurance through Great American Custom as part of the Kansas Underground Storage Tank Liability Plan.

TMS can provide you with information on USTs -leak detection methods, and Federal and State regulations. Call TMS toll free at 800-530-5683 during normal Central Time Zone office hours (8-5). In the Topeka area, please call 233-1414. On the web go to tankmgmt.net. David Engelken is available to answer your questions. *This service is free.*

To have the advisor E-mailed to you go to tankmgmt.net click on Advisor.

Tank Management Services, inc. (TMS) has provided the written information in this newsletter for educational purposes to assist UST owners and operators in complying with current UST regulations and to assist them in reducing losses associated with releases from UST's. The information is an outline and may not be complete. Owners and operators are responsible to insure that they are in compliance with all applicable laws. The Kansas Department of Health and Environment can provide detailed information on compliance. The application or use of the information provided is the responsibility of the individual user.