

3 Underground Storage Tank (UST) Compliance Inspection Deficiency Summary

On September 8, 2022 the United States Environmental Protection Agency conducted an underground storage tank (UST) inspection of your facility to determine compliance with the Federal Underground Storage Tank regulations, 40 C.F.R. Part 280. During the inspection, potential record-keeping deficiencies were identified. You may resolve the below-cited deficiencies by providing documentation indicating that the facility had no areas of concern at the time of the inspection with the items listed below. Please return the documentation within **5** business days. **Failure to provide the requested documentation within the specified timeframe may result in the issuance of a formal information request pursuant to Section 9005 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6991d.**

Notification

- ☐ Document the notification to the state of a previously unregistered existing underground storage tank.
- ☐ Provide documentation of the notification and investigation of a suspected release to the state implementing agency per the requirements defined in 40 C.F.R § 280.50.

Cathodic Protection

- ☐ Document the installation or repair and testing of a cathodic protection system for unprotected piping, flex connectors, buried metallic components, etc.
- ☐ Document the installation or repair and testing of a cathodic protection system for an unprotected steel or composite UST.
- ☐ Document an internal tank lining integrity test.
- ☐ Document a field test of the cathodic protection (CP) system by a qualified protection tester to determine that the CP system adequately provides the required corrosion protection for all components as required by 40 C.F.R. § 280.31(b). (Required every 3 years following the initial testing after the CP system's installation)
- ☐ Provide documentation demonstrating that the impressed current cathodic protection system has been inspected at least every 60 days. Such documentation may be in the form of a system rectifier inspection log or other such record demonstrating compliance with 40 C.F.R. § 280.31(c). Provide the records for the months of _____.

Release Detection

- ☐ Document product line tightness testing using an approved method for annual line leak detection.
- ☐ Document an operational integrity test (annual) on line leak detector (LLD) in accordance with the manufacturer's requirements.
- ☐ Document a tank tightness test using an approved method.
- ☐ Document an approved form of monthly release detection monitoring, e.g., statistical inventory reconciliation (SIR), automatic tank gauging (ATG), etc
- ☐ Provide the following documentation that the leak detection method has been implemented:
 - ☐ Automatic tank gauge data (e.g. CSLD, SCALD, "Leak Check").
 - ☐ Inventory Control, ☐ SIR, ☐ Document monthly interstitial sensor/probe status data
- ☐ Document the performance of a release detection operability test.

Spill and Overfill Protections

- ☐ Document the installation or repair of an approved overfill prevention device(s), e.g., outside overfill alarm, automatic shutoff device (flapper valve), etc.
- ☒ Document the installation or repair of an approved spill prevention device(s), e.g., spill bucket, catchment basin, etc.
- ☐ Document the performance of one or both of the following
- ☐ Triennial Spill Bucket Test
 - ☐ Triennial Overfill Equipment Test

Temporary/Permanent Closure

- ☒ Document placement the UST(s) in temporary out-of-service status, including documentation of the removal of all product to below one-inch, in accordance with 40 C.F.R. § 280.70.
- ☐ Document the proper permanent closure of the UST(s) in accordance with 40 C.F.R. §280.71, and any applicable state regulations.

Financial Responsibility

- ☒ Provide documentation of financial responsibility for underground storage tank system in accordance with 40 C.F.R. 280, Subpart H.

Other

- ☐ Under Dispenser Containment (Visual inspection or electronic monitoring)
- ☐ Documentation of Compatibility for UST Systems
- ☐ Documentation of Periodic Walk-through Inspection
- ☐ Walkthrough Inspection Records – Monthly and Annually
- ☐ Documentation of Containment Sump Testing
- ☐ _____
- _____

Submit all documentation to:

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