Tribal Lands Forum -- Compliance Assistance Scenarios

An underground storage tank (UST) compliance inspection was conducted at a facility that contained three tanks. Two of the tanks (Tank 1 and Tank 2) were installed in November 1988 and the third tank (Tank 3) was installed in January 1989. The tanks and piping are composed of single wall steel and the product piping is an “American” suction system type. An impressed current system was installed in December 1998. The latest corrosion protection CP test for all tanks was conducted in December 2004. No other operational records are available for review. What is/are the potential violation(s) and what action must the tank owner now take?

An aboveground storage tank storing gasoline is installed on a hill side of a golf course which is used to fuel maintenance vehicles used by the golf course. The dispenser island is located 1000 below the elevation of the AST. The product piping from the AST is located underground and is suction type. A check valve is located in the dispenser. The volume of product that continuously remains in the piping is approximately 15 percent of the total capacity of the AST. What is required of the tank owner?

On June 1, 2010, a UST owner receives a Notice of Inspection from the implementing agency one week in advance of the scheduled compliance inspection. In anticipation of the inspection, the owner orders a product line tightness test and ALLD functionality test for the pressurized piping. At the time of the inspection, the inspector notices that the line tightness was conducted two days before arrival. However, the previous line tightness and ALLD functionality test was conducted 390 days prior to the date of the inspection. What is expected of the tank owner?

An automatic tank gauge (ATG) is used for inventory control and monthly tank monitoring. The ATG is at a 0.2 gal/hr leak rate. Upon request by the UST inspector, the UST Owner/Operator provided ATG monthly monitoring printouts which were stored unraveled in a cardboard box. After some effort, 12 months of monitoring data was found. Three consecutive months of ATG data denoted “inv” for one of the three tanks at the location. How could have the ATG records been better organized and what was the requirement of the UST O/O for the “inv” ATG test results?

A UST facility is relying on an automatic tank gauge for monthly tank monitoring for four different USTs at the site. During the winter months, however, the facility does not sell enough diesel or premium gasoline to purchase enough fuel to keep the tanks more than 50% full. This results in six consecutive months (from November 2011- April 2012) for each of these USTs in which the ATG 0.2 gallon per hour leak test does not pass. The owner has keep meticulous inventory control records for each month.
during this time period for both tanks and the inventory control method does not indicate that a loss or gain over the regulatory limits occurred in either tank. Has the UST owner met tank leak detection requirements?

A UST owner is relying on interstitial monitoring to meet their pressurized piping leak detection requirements. During the records review during an inspection, the inspector finds that there are 12 months of liquid status sensor “normal” records available for all underground STP sump sensors and dispenser sump sensors. The sensor alarm records were also saved and each alarm situation was quickly resolved. Upon visual inspection of the sumps, however, it is discovered that the double-walled piping boots in each sump are sealed with the pressure test valves that were left in place from the previous line tightness test. Is the owner providing adequate line leak detection via interstitial monitoring?

A facility has a three tank system with Tanks constructed of steel and piping made of fiberglass. The Tank 1 and Tank 2 stores gasoline with a pressurized system and Tank 3 stores kerosene with a suction system. The pump and line leak detectors are buried in dirt with the surface of the line leak detector barely visible. An inspector notified the owner of a scheduled inspections. When the inspector arrives at the facility and presented his credentials, the owner has a surprised look of why is an inspector here at his facility. During the inspection, the owner was asked what kind of cathodic protection he has at the facility. The owner response was "what is cathodic protection? During the inspection the inspector found a rectifier unit with the cover crusted and spider-web all over the unit. What are the requirements for compliance at this facility and what are the potential violations. One Hint. Pay attention to the buried pumps.

A facility with four UST systems perform their 3-yr CP test on March 20, 2000. All tanks pass, except Tank 4. Because Tank 4 is an older tank used for storing diesel, the facility owner decides to temporarily close the tank on September 22, 2000. A routine compliance inspection, performed on August 10, 2001, reveals that Tank 4 contains 10 inches of product. What are the possible violations and what action must the tank owner take? What if the compliance inspection was performed on November 8, 2001?

On June 14, 2010, a routine compliance inspection was performed at a facility that was closed. State records show that the tanks were emptied and placed in temporary closure on July 18, 2008. At the time of inspection, the facility was locked and the inspectors were unable to view the rectifier inside the building. Outside the building there was no electrical box. The facility representative provides the inspectors with the last passing CP test that was performed on June 1, 2007. What is/ are the possible violation(s) and what must the tank owner do to get back into compliance? What if, the last CP test failed for all tanks?