

# New EPA UST Regs – Get Ready for Monthly Inspections: A Service Providers Perspective



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EPA Webinar on Monthly Inspections  
06/27/2016



# What's Required Per the Feds

- Must inspect the fill spill bucket for damage and remove liquid & debris including checking for any obstructions in the fill pipe (tank gauge sticks)
- If the bucket is double walled construction and you plan not to periodically test your spill bucket, you must inspect the interstitial space and document that there are no issues with the interstitial space
- Check the fill cap to ensure it fits securely to the fill adapter
- Must check your release detection equipment (typically an automatic tank gauge system) for alarms or unusual operating conditions
- Make sure your release detection records are reviewed and current (monthly records are being properly maintained)

Excellent O & M document from EPA:

[https://www.epa.gov/sites/production/files/2016-02/documents/om\\_final\\_2-17-16\\_508\\_0.pdf](https://www.epa.gov/sites/production/files/2016-02/documents/om_final_2-17-16_508_0.pdf)





# What's NOT Required Per the Feds (on a monthly basis)

- A common misconception is that tank sumps and under dispenser containment sumps must be checked monthly. This is NOT the case. This equipment must be checked on an annual basis per the federal regulations. Just be aware that some states may require this equipment to be inspected monthly as well. Check with the AHJ in your area!!





# State vs. Fed Requirements

Owners need to be very aware that a state may have a more stringent monthly inspection requirement than what's required by the federal regulations which can include checking more than just what the feds want checked monthly.

Some examples (not inclusive): CT, NJ, MA, DE, TN, SC



Connecticut Department of  
Energy & Environmental Protection  
Bureau of Materials Management & Compliance Assurance  
Emergency Response & Spill Prevention Division

## UST Monthly Visual Inspection Report -

RCSA Section 22a-449(d)-108(c)(2) requires monthly visual inspections by or under the direction of the Class A or B Operator at each Underground Storage Tank (UST) facility. These inspections must be documented including all findings and repairs made and the inspection reports maintained on-site for no less than 3 years.

### Part I: Facility Name, ID, and Address

UST Facility Name:	UST Facility ID:
UST Facility Address:	



# Sample Inspection to meet the federal requirement

## Sample Walkthrough Inspection Checklist

Date Of Inspection							
<b>Required Every 30 Days</b> (exception: if your UST system receives deliveries at intervals greater than 30 days, you may check your spill prevention equipment prior to each delivery.)							
Visually check spill prevention equipment for damage. Remove liquid or debris.							
Check for and remove obstructions in fill pipe.							
Check fill cap to ensure it is securely on fill pipe.							
For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.							
Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present.							
Review and keep current release detection records.							
<b>Required Annually</b>							
Visually check containment sumps for damage and leaks to the containment area or releases to the environment.							
Remove liquid in contained sumps or debris.							
For double-walled containment sumps with interstitial monitoring, check for leaks in the interstitial area.							
Check hand-held release detection equipment, such as groundwater bailers and tank gauge sticks, for operability and serviceability.							
<b>Recommended Activities</b>							
Fill and monitoring ports: Inspect all fill or monitoring ports and other access points to make sure that the covers and caps are tightly sealed and locked.							
Spill and overfill response supplies: Inventory and inspect the emergency spill response supplies. If the supplies are low, restock the supplies. Inspect supplies for deterioration and improper functioning.							
Containment sump areas: Look for significant corrosion on the UST equipment.							
Dispenser hoses, nozzles, and breakaways: Inspect for loose fittings, deterioration, obvious signs of leaks, and improper functioning.							

Your initials in each box below the date of the inspection indicate the device or system was inspected and satisfactory on that date.

In the following table, explain actions taken to fix issues.

Date	Action Taken

Keep this record for at least one year after last inspection date on the form.



# Who Can Do These Inspections?

- Some States – anyone
- Some States – individual must be under the direction of the A/B Operator
- Some States – must be the A/B operator

Many operators are now choosing for a 3<sup>rd</sup> party vendor to conduct their monthly walkthrough inspections.





# Why Hire Someone to Perform the Inspection? Advantages:

- These individuals are familiar with the equipment, what they're looking at, where to find the potential issues and help with follow-up needed
- Often times these vendors will be more thorough than a typical store employee and look out for the owners best interest
- Better at documenting their findings using sophisticated electronic inspection systems and including photos on detailed reports



# Why Hire Someone to Perform the Inspection? Disadvantages:

- Another cost of doing business...\$\$\$\$
- Often times they will be more thorough and will find more issues that need to be addressed than a typical class C store employee (another \$\$\$ cost but maybe be money well spent in the long run)
- Less reputable vendors could easily “pencil-whip” an inspection and provide no added value (know your vendor!!!!)



# Some Statistics From a Company That Does Monthly Inspections

Everyone loves data.....

- Only 6 months worth of routine inspection data and this data includes containment sumps and spill buckets only (not recordkeeping):

482 inspections performed

391 inspections with issues reported (81%)

- The following data goes back about 5 years and is only STP sump and dispenser containment sump inspections for a specific customer:

3818 inspections performed

1292 inspections with at least 1 reported issue (34%)





## QPS Monthly Inspection Data:

Monthly inspections performed between January 1, 2013 – June 1, 2016 (New England Area):

- 6,036 inspections performed
- Approximately 35% of inspections have at least 1 “defect” that needs attention
- Once the states started cracking down and owners started responding to deficiencies noted on the monthly inspections and getting needed repairs done, the number drops to between 8% – 10% for defects



# Notable Trends

- It's no surprise.....
  - the first couple monthly inspections by a vendor are rough, issues are discovered and reported to the owner
  - once the monthly inspection program is up and running, the inspections get better over time and less defects are found
  - the private dealers (1-2 site operators) are seeing more issues than the larger owner/operators on a program and are less likely to act on a defect discovered
  - most common issue – liquid in containment (sumps, buckets, UDC's) spill buckets #1



# QUESTIONS?

