

*UST Inspections 101

What To Look For Before You Leave the Office

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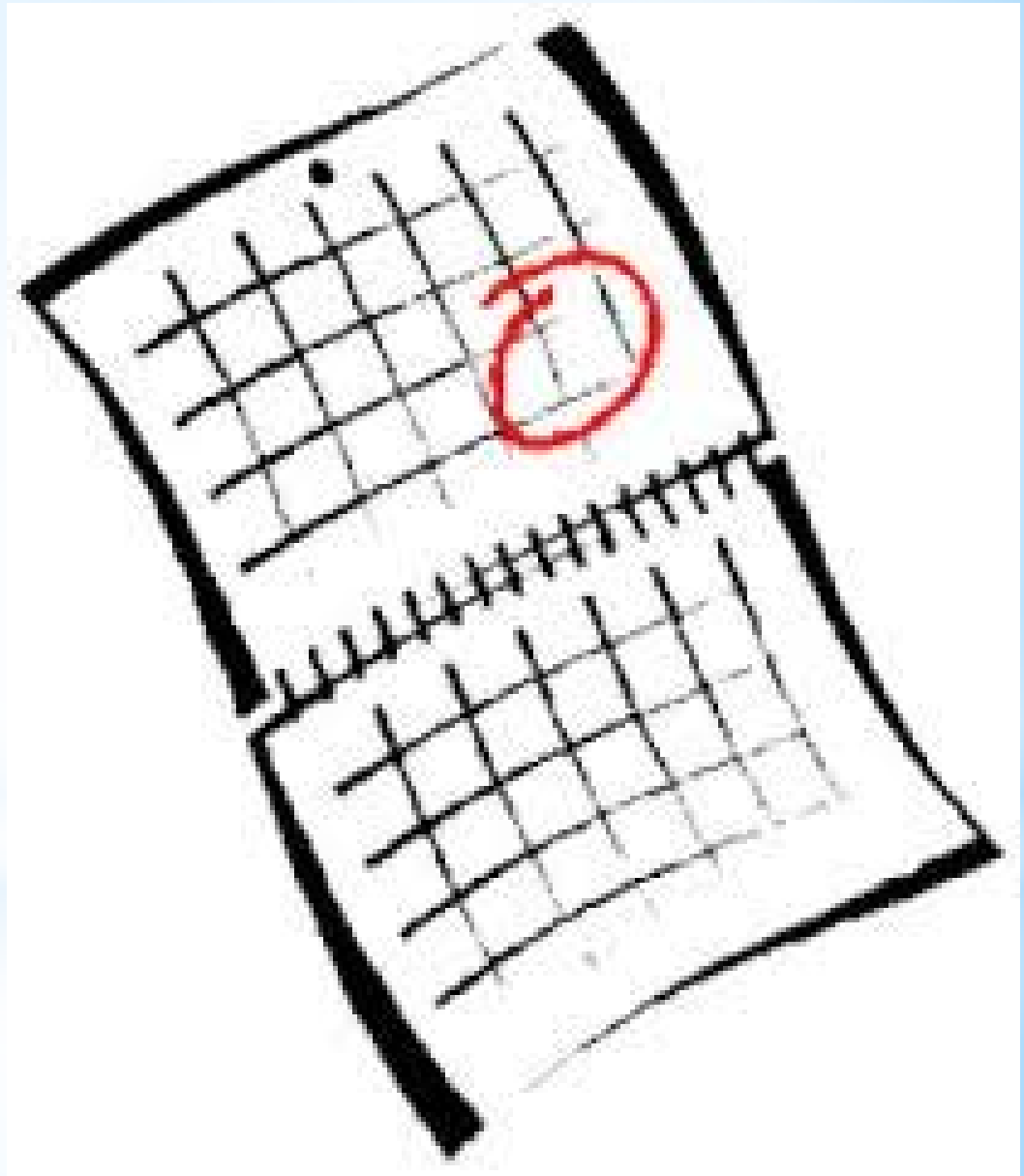


*Mandatory Disclaimer

- *This presentation contains some general recommendations and suggestions for ways to plan your inspections efficiently.
- *But – If anything in this presentation differs from your state's set policy or protocols **follow your state's procedures!** What works in Vermont may or may not work in your state.

*Pre-Inspection Trip Planning

- First, figure out when the inspection must be done:
Under the UST Compliance Act, every regulated facility must be inspected once every 3 years.
- If a station was last inspected on, say, September 25, 2011, the feds require that it be inspected no later than September 24, 2014.



* Pre-Inspection Trip Planning (continued)



* Once you know which stations must be inspected by which dates, plan out a route that makes sense from a time-management and mileage point of view:

- All inspections clustered in one geographic area; or
- All facilities inspected on a given day owned by one company, so they can assign a technician to accompany you for the full day. (Obviously, this applies to pre-announced inspections only.)

*Pre-Inspection File Review

Look at your database for information on:

- *Tank system (steel, fiberglass, combination; single or double wall, etc.)
- *Piping
- *Delivery system (pressurized, suction, etc.)
- *Release detection system
- *Corrosion protection
- *Overfill protection, etc.

*Pre-Inspection File Review (continued)

Knowing what type of tanks and equipment you will encounter in the field will help you plan out which tools to bring, and how much time to allocate for each inspection

- *Small country store with 1 or 2 tanks, and suction dispensers; 30-60 minutes.

- *Large, high-volume station with 5 or more tanks, and many dispensing islands: 3-4 hours (maybe more!)

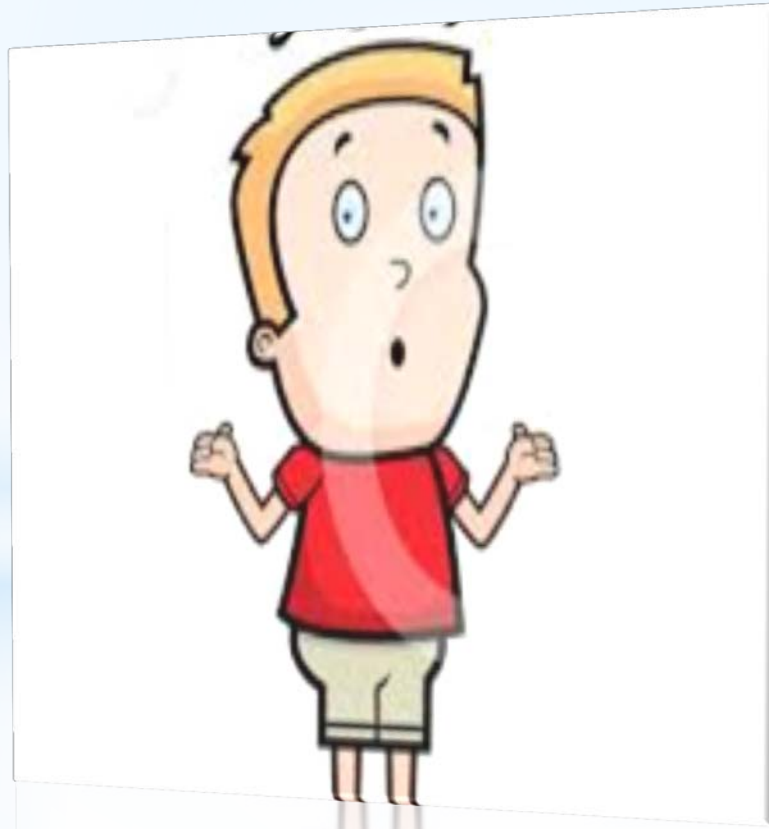
*Pre-Inspection File Review (continued)

Review the checklists and inspectors' notes from previous inspections – this will often contain a lot of helpful information on special things to look for.

*Pre-Inspection File Review (continued)

- *If you're dealing with a new owner or operator, allocate some extra time. An inspection should be an educational opportunity for owners and operators.
- *There is no better time or method to teach someone about their tank system as when the sumps are open and you can point to all the components, explain what they do and why they are important.

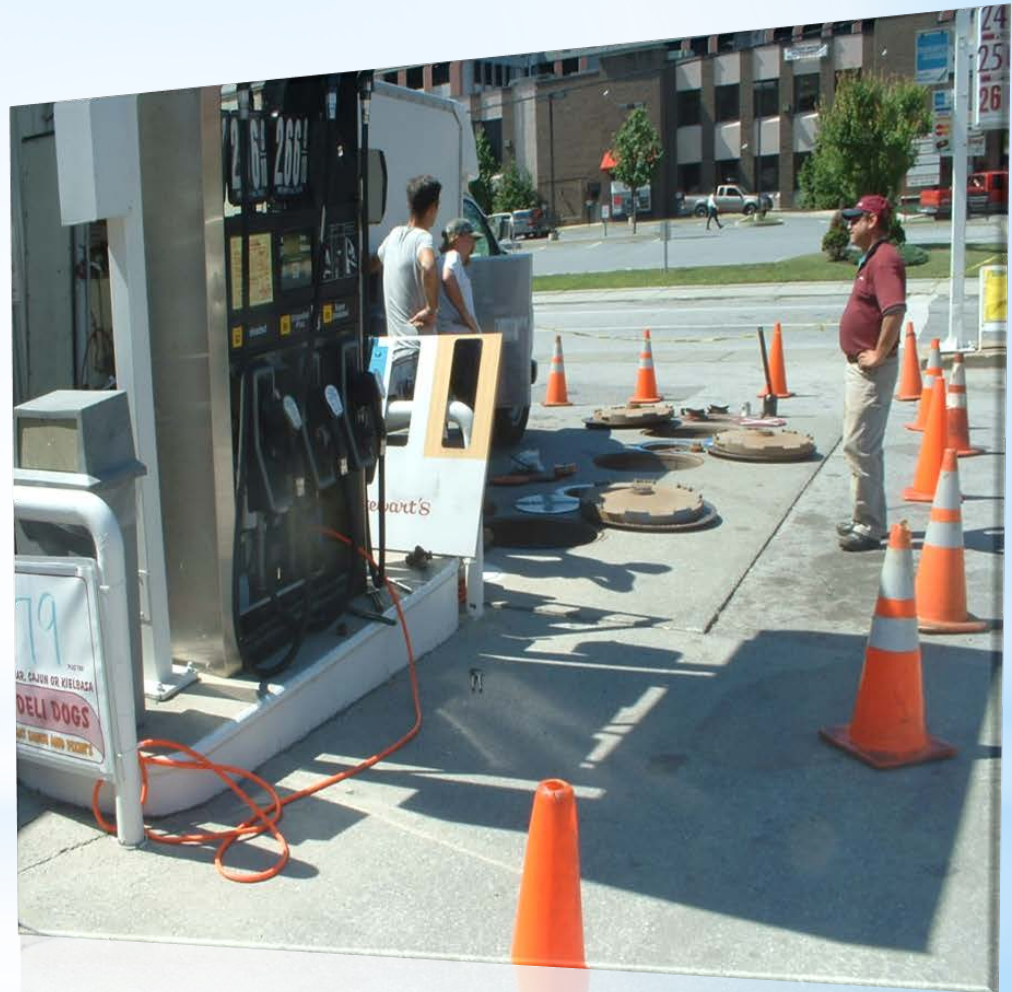
* Announced or Unannounced Inspections?



* THERE IS NO RIGHT ANSWER. Both have advantages and drawbacks.

* Announced Inspections

- * Much more time efficient. Often, a tank owner will have a technician present.
- * Occasionally, I arrive on site, and traffic cones are already up, sump lids are open, dispenser skirts have been removed, and all records are already laid out on a table or desk! (It doesn't happen very often, though.)



* Announced Inspections

Announced inspections can give a sloppy tank owner the opportunity to clean up their facility before you arrive, which could hide compliance problems. This is what I expected when we began pre-announcing our inspections in Vermont:

Announced



Unannounced



*Unannounced Inspections

When you don't pre-announce an inspection, you get a more realistic idea of the compliance status of each facility.

But, it's much more time-intensive, and often required records are not even at the facility.

*Unannounced Inspections

- * Large chains often have records at their central office.
- * Small mom & pop proprietors often keep their records at home.
- * If you do unannounced inspections regularly, be prepared to spend a lot of time chasing down required records.

*Thank you for listening

* Any questions?

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