

# Inspecting High Throughput Facilities



## An Inspector's Challenge

- Schedule appropriately (Sundays seem best) and allow for a full day
- Avoid pre- and post- holiday work days
- Site security is usually good: open, well-lit, lots of foot and vehicle traffic

- Introduce yourself upon arrival and obtain keys for fill ports and diesel dispensers
- Check the ATG while in the store
- Many have a maintenance/manager that is expected to accompany an inspector
- Wear an orange vest and use safety cones and inspection vehicle for traffic control

- Take an additional person to help
  - Significantly reduces field time and its another pair of eyes to watch traffic
  - Often 20 plus dispensers, and 6 or more USTs



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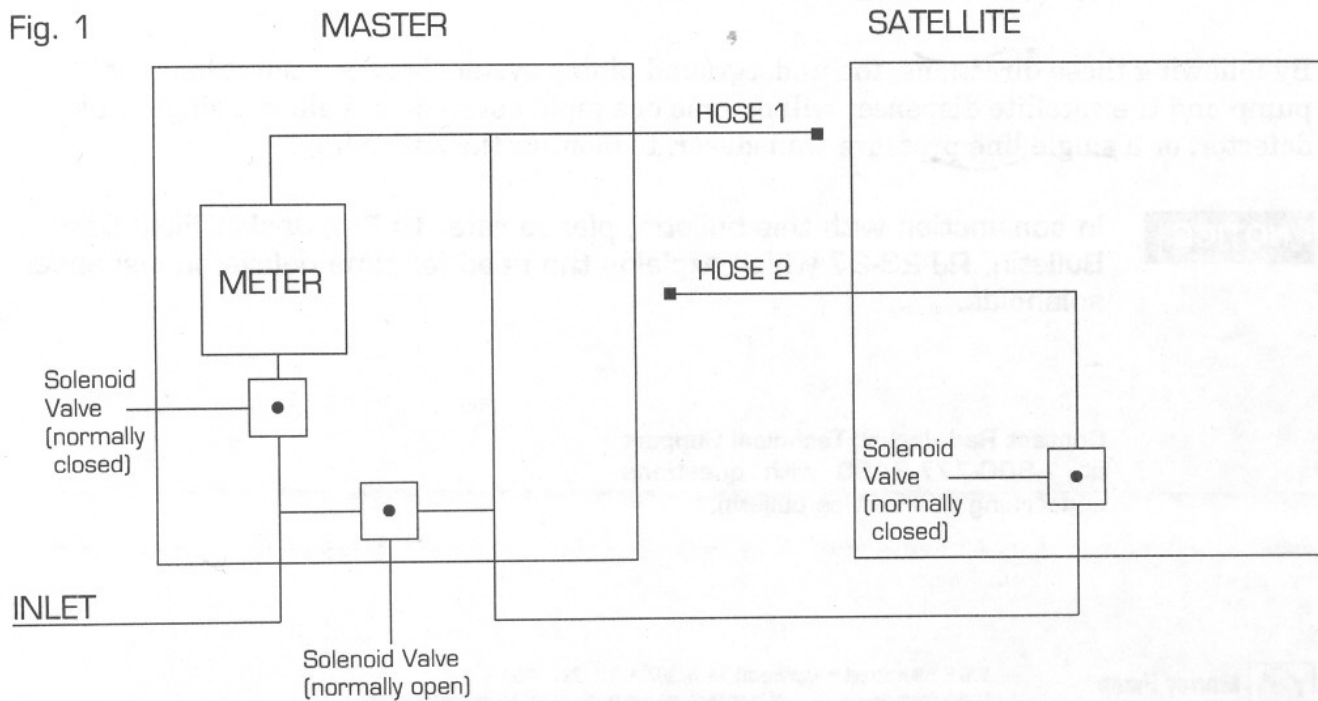
Security on diesel dispensers, multiple padlocks and bars or a single pin all through the dispenser cabinet with padlock



# Release Detection- What to look for?

- Piping release detection
  - Is it running 3.0 g/h checks? 0.2 g/h monthly tests? 0.1 g/h annual tests?
  - Is the pump running constantly?
  - Is ALL piping being monitored? From the master to the satellite dispenser?

Fig. 1







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- Can the ELLD monitor the product line through and beyond the meter?
- Recommend operability tests be performed at the satellite dispenser to verify

- When using Red Jacket BIG-FLO Submersible Pump Models P100H1, P200H1, P200H3, P300H3, P500H3, the PLLD only performs 3.0 gph testing and not precision (0.2 and 0.1 gph) testing.







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# High-throughput facilities

- Over 800,000 gallons per system per month
  - System is an independent tank OR a system of manifolded tanks
  - 1 month in- 12 months out
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- CITLDS (Continuous in tank leak detection system)
  - Interstitial monitoring- electronic/continuous
  - Chemical/Vapor monitoring every 15 days

# Spill prevention

- Many have drains/ oil water separator in lieu of spill basins





Check concrete for cracks that will allow  
product into the environment





Where does the oil go for storage?





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# Check for runoff or discharge from OWS



# Overfill Prevention

- Check to see if appropriate for system type
- Evaluate effectiveness for operation
- Ensure it is in working order

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Overfill Prevention Inoperable - Confirm tank overfill alarm is properly programmed and operational for all tanks.



## Other things to look for:

- Unusual or atypical configurations
- Some facilities may have piping that may or may not be a part of the UST system depending on your state interpretation
- This piping can be the source of a large unnoticed release due to lack of monitoring

# Bulk supply systems





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