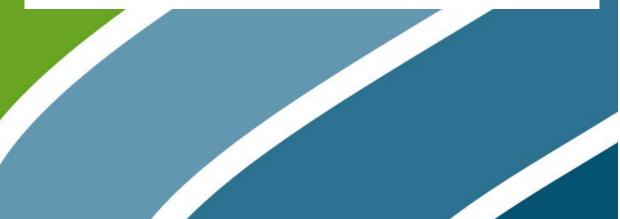


UST INSPECTOR TRAINING WEBINAR SERIES:

UST OVERFILL PREVENTION



12/15/2021



Russ Brauksieck | U.S. EPA

TODAY'S SPEAKERS

Spruce Wheelock | retired, formerly with New Hampshire DES

David McKamie | DATZ UST Management, LLC

Underground Storage Tanks: Overfill Prevention

NEIWPCC December 15, 2021

Russ Brauksieck EPA Office of Underground Storage Tanks



Overfill Prevention

What does 40 CFR Part 280 say about:

- Equipment that can be used
- Installation requirements
- Inspection requirements
- Repair requirements

Types of Overfill Prevention Equipment Gallons 1075 Inches 975 mma Fill Pipe Fitted to Vent Line Shutoff Automatic Tank Gauge Valve Float In Tank Ball Inventory Float Probe Overfill Alarm Q

Automatic shutoff/ flapper valve High Level Alarm

Ball Float Valve

*may not be installed or replaced after October 13, 2015 3



Regulatory Requirements

Overfill Prevention Devices must:

- Alert/restrict flow when the tank is no more than 90% full or shut off flow into the tank when the tank is no more than 95% full; or
- Restrict flow 30 minutes prior to overfilling, alert with a high level alarm one minute before overfilling, or automatically shut off flow into the tank so that none of the fittings located on top of the tank are exposed to product due to overfilling [280.20 (c)(ii)(C) or Option C]

Using Option C allows the tank to be filled to a higher level



Regulatory Requirements

Two activation options for each device:

- Flapper valve Shutoff at 95% of tank capacity or (option C) so that none of the fittings on top of tank are exposed to product
- High level alarm Alert at 90% of tank capacity or (option C) 1 min before overfill
- Ball float Alert by restricting flow at 90% of tank capacity or (option C) 30 min before overfill



Installation Requirements

- Installation to be completed in accordance with a code of practice <u>and</u> manufacturer's instruction. [40 CFR 280.20(d)]
- Some (but not all) manufacturers provide instructions for option C levels.



Installation Requirements

Example manufacturer instructions for option C

- Flapper valve must be installed with at least 6.5 inches to the top of the tank and at least 250 gallons of ullage
- High Level alarm needs to know the flow rate of the delivery in order to determine level to set alarm (usually 100 – 300 gpm)
- Ball Float valves need 308 gallons of ullage



Installation Requirements

- Code of Practice/Certification of Installation [40 CFR 280.20(d) & (e)]
- Current Codes of Practice reference 90% of tank capacity for alerting/restricting and 95% of tank capacity for flapper valves
- Implementing agencies can allow for the option C levels under option 6 of certification of installation [40 CFR 280.20(e)]

(6) The owner and operator have complied with another method for ensuring compliance with [Requirements for Installation] that is determined by the implementing agency to be no less protective of human health and the environment.



Inspection Requirements

The inspection [40 CFR 280.35(a)(2)] must

- ensure overfill prevention equipment is set to activate at the level specified in § 280.20(c) and
- will activate when regulated substance reaches that level
- The inspection must be conducted in accordance with
 - requirements developed by manufacturer, a code of practice, or requirements determined by implementing agency to be no less protective
- Current code of practice does not recognize option C
 - the manufacturer or implementing agency may need to establish inspection requirements



Repair Requirements

- Repair means to restore to proper operating condition ... overfill prevention equipment ... that ... has failed to function properly
- 40 CFR 280.33(a) Repairs to UST systems must be properly conducted in accordance with a code of practice
- No current code of practice available
- When devices fail inspection, are they repaired or replaced?



Questions?



Overfill Prevention Training

Spruce C. Wheelock Retired Engineer and State Inspector



Content

 Dealing with owner • 2 Delivery methods Installation/Testing • Problems/Bad signs • Remove for inspection !! Tools

Dealing with Owner

 Contact owner prior to inspection
 Explain items to be removed
 Suggest Class A & B Operator – be on site.

Follow-up inspection letter

Gravity Delivery Method





Loose

300 gal./min.

4" hose 20' long = 14 gallons

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Regular

Spill Containment Bucket not enough

Pressure Delivery Method

Pumped (30-75 psi) Up to 100+ gal./min.













OPW 61SO / 71SO

Drop Tube Overfill





EBW

Auto Limiter II

UNIVERSAL <u>Not !!</u> Flow Stop device

OPW Instructions

2 sets of instructions:

Complete shutoff @95%!

Initial shutoff @95%!

Cardboard cut out

HOW TO LOCATE THE POSITION OF THE 71SO AT 95% TANK CAPACITY

Usingth of the upper tube and the placement the 71SO valve toop determine the structure point. Hollowing the obsolve it estimations much DPW 71SO will provide for tailiet abuteff at 95%. In all cases, the upper tube length must be a minimum of 6-1/2° plus the rangth of the riser pipe. All longth measurements are in indires.

INSTRUCTIONS

(Find tank capabity (in gallons) from tank stillmation chart provided by tank menufacturer

2.) Calculate 95% of capacity.

3.) Locate the S5% volume number on the tank collibration chart.

4.) Find the dipstick number (X) which corresponds to the 95% task volume. And, find the dipstick number (Y) which corresponds to the 100%volume.

 Subtract the dipatick number (X) from the tank diameter (Y) to find the upper tube reference aumber (Z).
 (Y) -(X) = (Z)

6.) Subtract 2" from (Z) to find the upper tube depth (C), $(Z) * 2^n \cong C$

7.) Is C less than 6-1/212

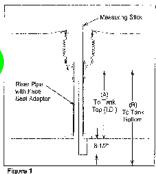
NO Upper tube length is C plus the distance from the top of the Face See! Adaptur installed on the riser pipe to the inside, top up of the storage (A).

Upper Tube Length = C + (A)

Upper Tube Length = $6-1/2^{n} + (A)$

NOTE: You must think the actual tank capacity number that correlates to the 6- $1/2^{*}$ + (A) depth for the station records. This number may also be used for the perpensional calibrating an electronic tank level system.

-S Registered L.M. Owens Daming Eberglass Constration



-iĝona i

EXAMPLE 1.) For an Owens-Coming Model G-3 Floerglass® Tank Calibration Chart: Tank Capacity - 10,000 gal., rousinal 9,403 gal. NOTE: Ose actual capacity only

 95% of actual tank capacity = 0.95 x 9400 gal = 5903 gal.

3.) The closest number which is less that 3933 gal, is 85/31 gal. Choosing the closest number less than 85% of actual capacity ensures that the initial shuff will occur when the fank is no more than 96% full.

- 4.) The deliveration chart /carding of 8910 gal, corresponds to a dipst of measurement of 82*.
- $\begin{array}{lll} 5 & D & assick number (X) \approx 82^n \\ & Tank diameter (Y) \approx 92^n \\ & (Y) (X) = (Z) & (92.7 82^n = 10^n) \\ & (Z) = 10^n \end{array}$

7.) Is 0" loss than 0-1/2"?

NO Measure the distance from the top of the FSA 400 Face. See Acaptor installed on the riser pupe to the inside, top lip of the storage tank and obtain measurement (A).

Upper tube length > C + (A)

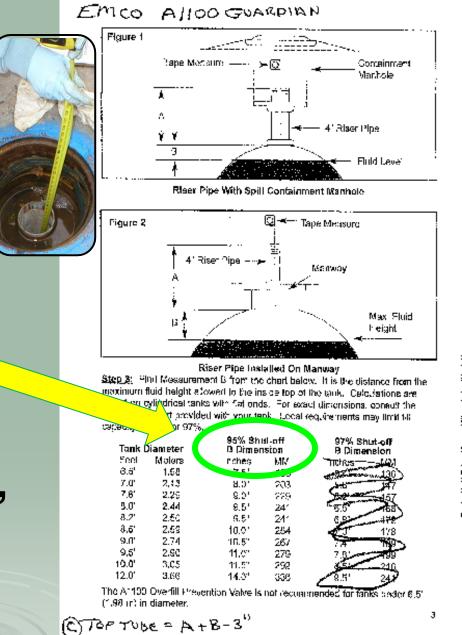
****OPW complete shutoff #H15524PA****



C= Top tube length A= Nipple length B= 95% Fill level to

top

C= **A** + **B** + manway – 3"







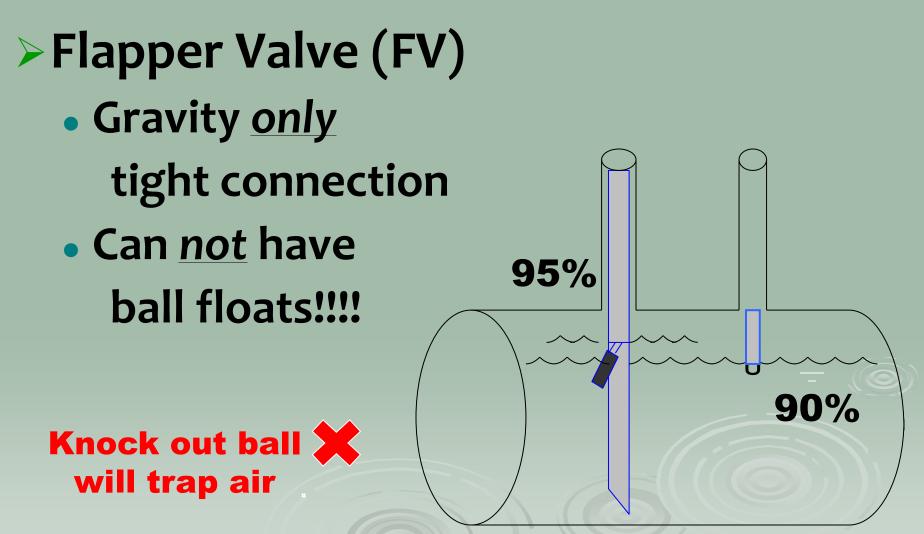


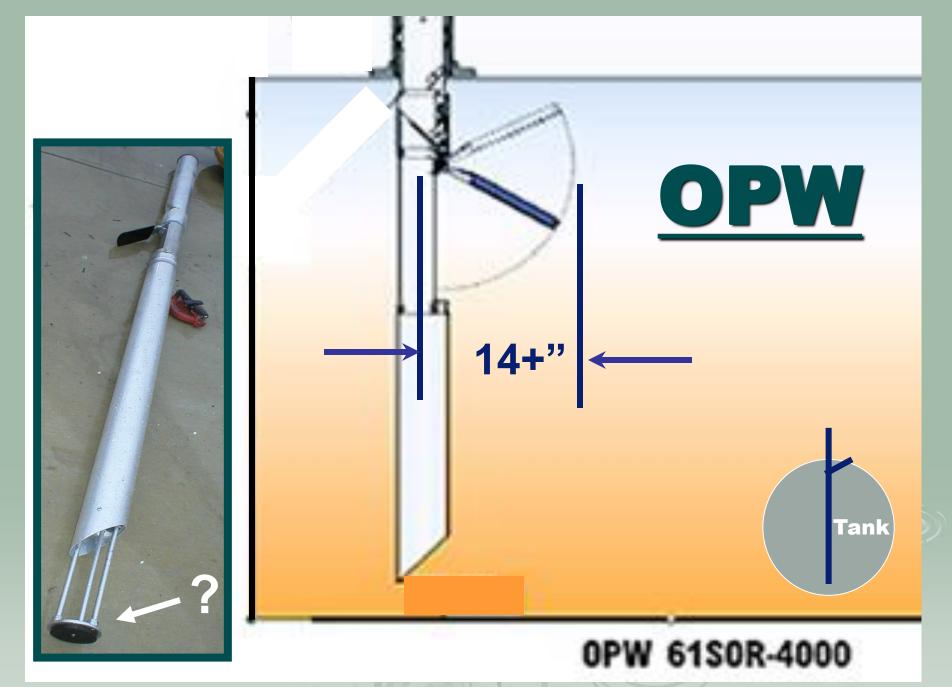
Cut away

Approximate Tank Top

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Device-Delivery Compatibility







EMCO

Allen

7/64"

Plug

1/8"

Pivot

Remove plug to access and operate flapper valve

Philips Screw



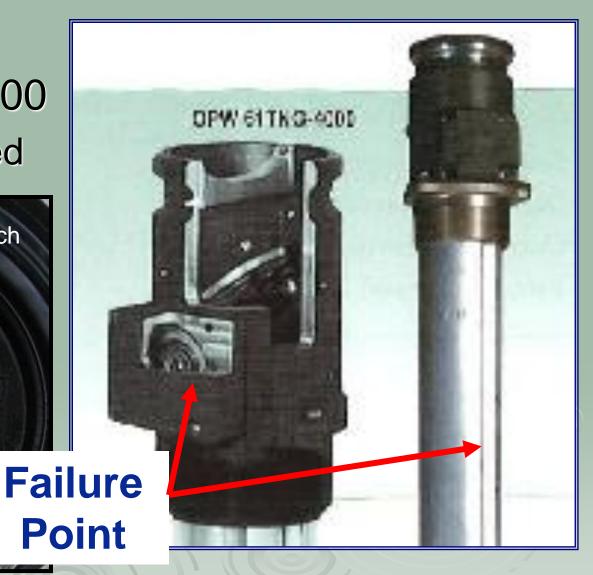


> OPW 61TNG-4000

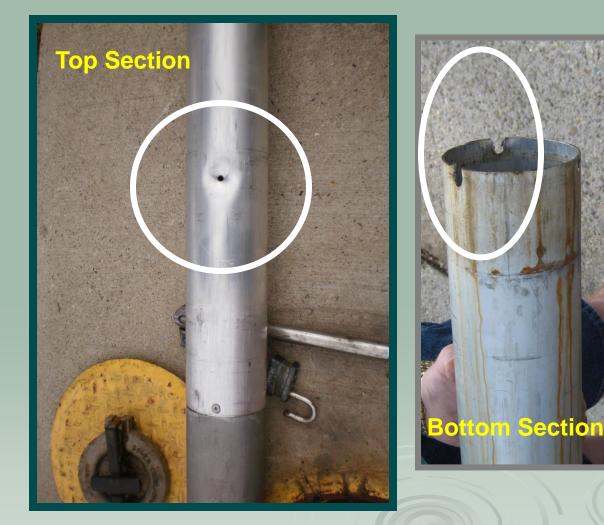
Vacuum operated

Found during Peer Match



















Problems



Inside fill drop tube

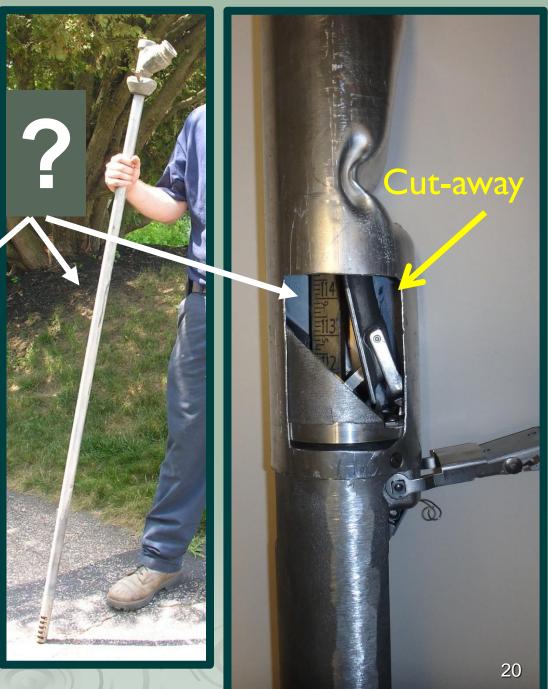
What's This?

Short or broken inventory sticks

What NOT to do



Delivery with flapper valve



Overfill Alarm=90%



Device-Delivery Compatibility

> Audible/Visual Alarm (AA)

The only device type for **both** gravity and pressure deliveries!



Primary High Level Alarm

Audible/Visual alarm for each compartment if filled at the same time



Only one AA -- then test each compartment without moving float down to clear last alarm



Primary High Level Alarm

- Visual until manually reset
- Audible minimum 10 seconds.





Inventory & ATG probe

Piping sump

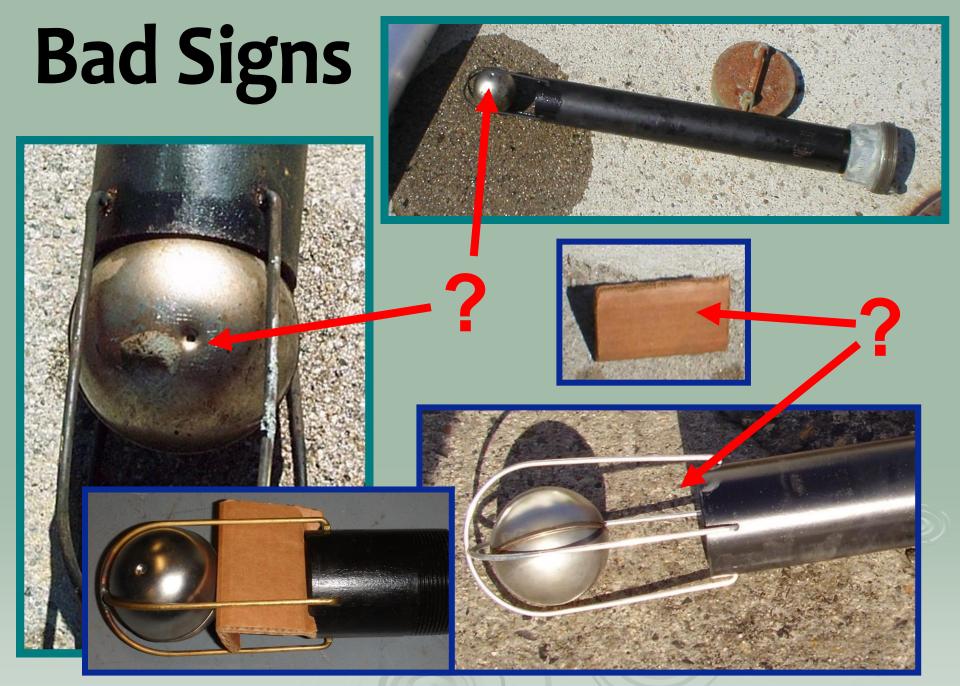
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Gasoline







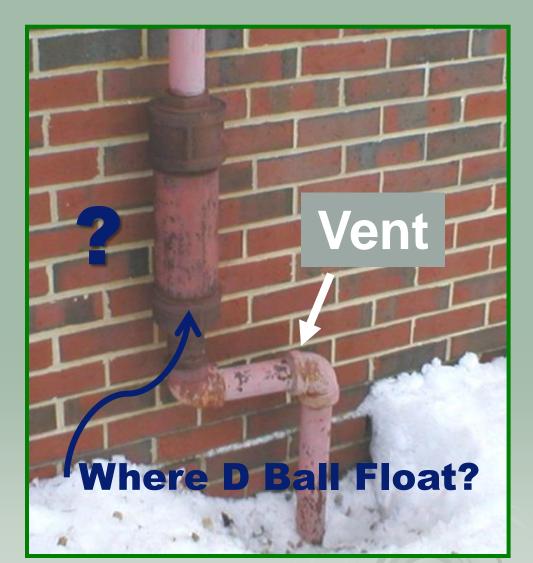




Bad Signs



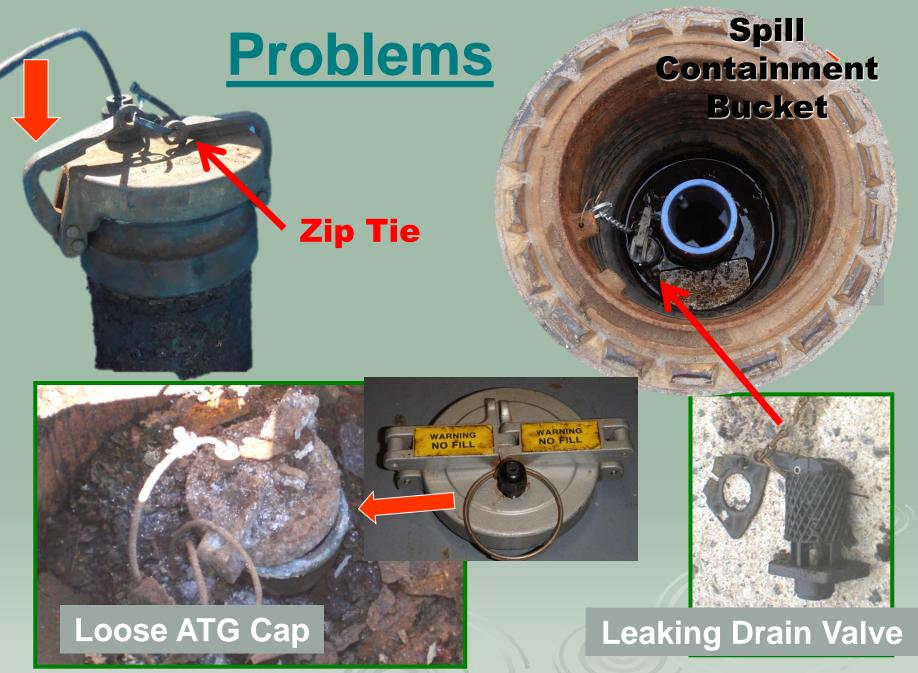
Diesel Tanks



Bleed hole corroded

6 yrs. old in Fiberglass Tank

Cage corroded





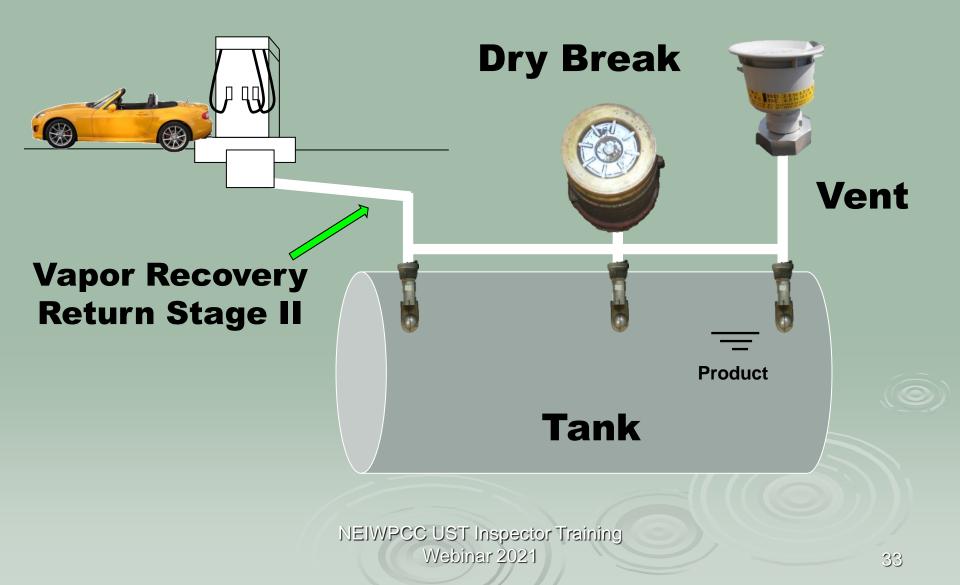
Look for open bleed hole

Bleed Holes

Drill new Plug the old



Inspect all Locations



Device-Delivery Compatibility

> Ball Float (BF)

- Gravity <u>only</u> tight connection
- Multiple BF per tank

Can not use with:

- Coaxial drop tube -
- Suction pump-dispenser



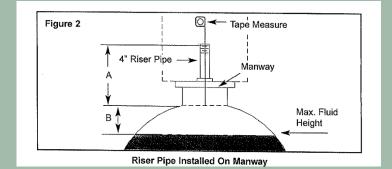
- (air eliminator)





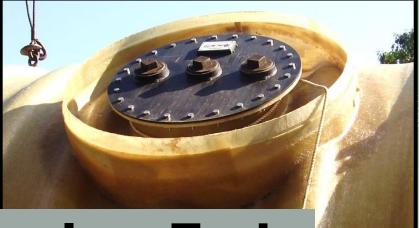
Tanks with Manway











Fiberglass Tank

Prior to wetting the inside top of the tank

Vent Pipe

Tank Removal



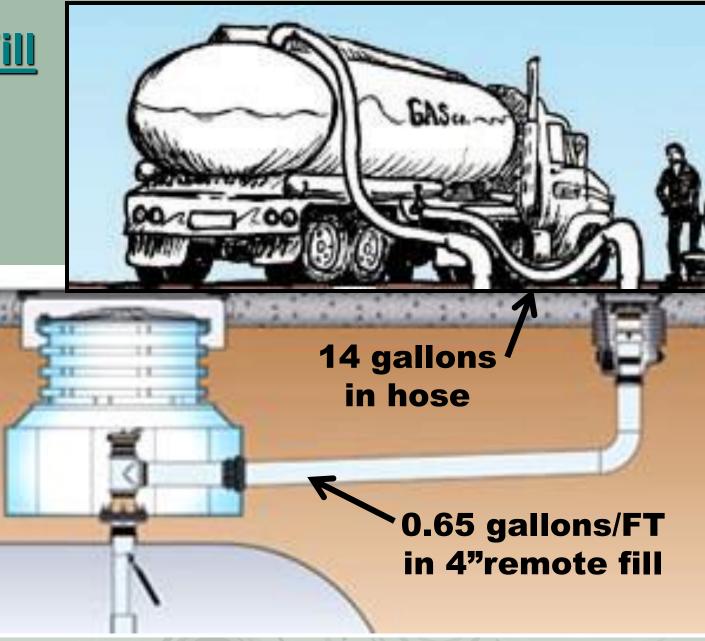
fal agent

Manway

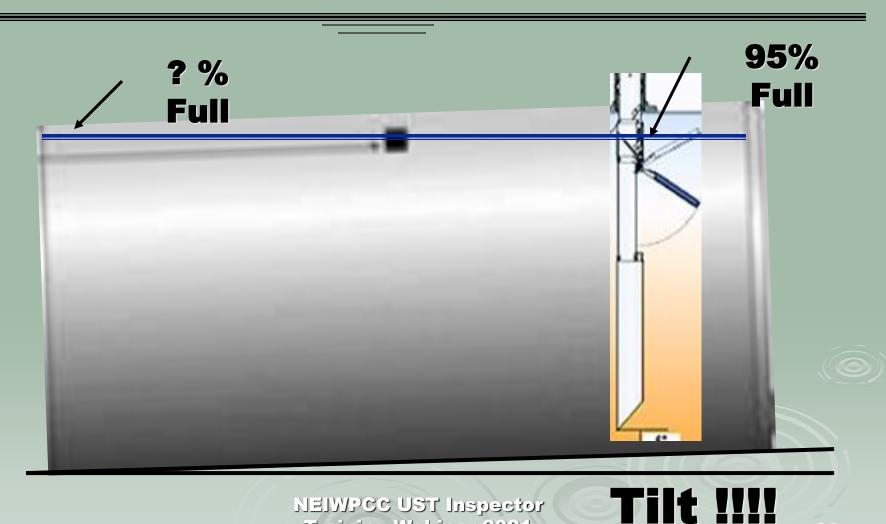
1 20

NEIWPCC UST Inspector Training Webinar 2021 **Fill Riser**

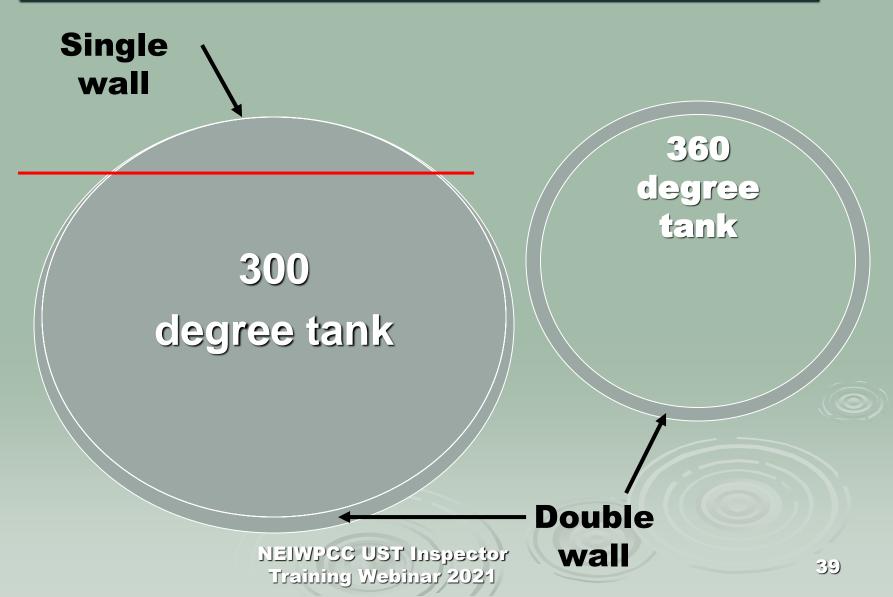




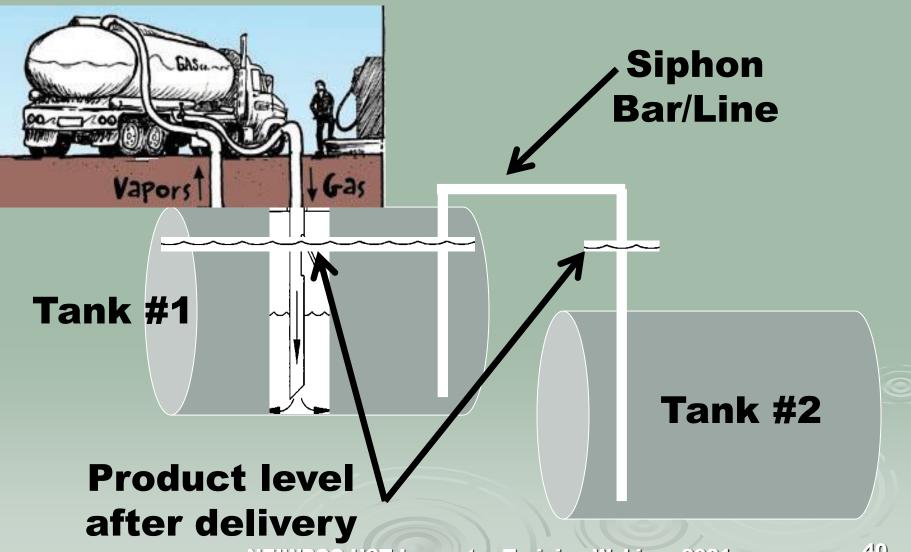
FILL TO ??



Double Wall Tank 300 vs 360



Tanks Installed Different Elevations









<u>Restrictive – Moving Forward</u>

- > EPA -- End of flow restrictors on vents
 - Flow restrictors on other locations such as the fill.





- Verify closure
- Check resistance of float (will it float?)
- Still waiting for a requested -
- Spruce Spring Scale to measure acceptable hinge resistance (currently just estimate)



43



Overfill Sensor Testing

NFPA code – National Fire Protection Association.



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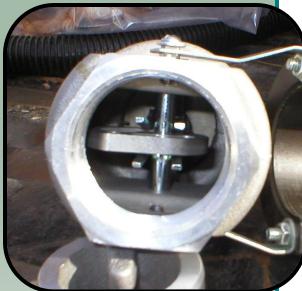
Above Ground Tank

Device

> OPW 61FSTOP

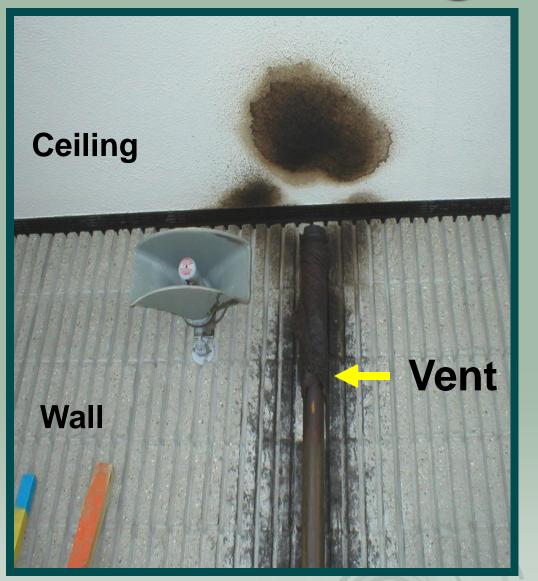
- May get approved buy agency for UST
- Pressure delivery
 - heating oil
 - kerosene
 - diesel

• Can not stick tank!





Overfilling - Vents

















Drop Tube Removal









Ball Float Access





















	Delivery Method		Fill Connection	
<u>Overfill</u> <u>Device</u>	Peddle Truck (Pressure)	Tanker (Gravity Drop)	Tight (Gravity Drop)	Loose
AA 90%	Yes	Yes	Yes	Yes
FV 95%	Νο	Yes	Yes	No
BF 90%	No	Yes	Yes	No

Some States allow Vent Whistle on small tanks

Compatible Devices

	<u>Tank System</u> <u>Pump Type</u>		<u>Vapor</u> <u>Recovery</u>	
<u>Overfill</u> <u>Device</u>	(Pressure)	Suction with (dispenser)	Two Point	Coaxial
AA 90%	Yes	Yes	Yes	Yes
FV 95%	Yes	Yes	Yes	Yes
BF 90%	Yes	No	Yes	No

Mindful



Testing without removal

- Testing in place -- miss many operational items.
- First inspection -- 50% of the devices were installed incorrectly or non-operatable.

Rule Writing

- Register primary overfill
- > Product change -- plan review
- > Alarm signage
- > Lumens & alarm times
- Day tanks
- > Testing (upon-removal)
- > Pressure delivery remove ball float/flapper
- Compatible delivery method

Summary

- Conditions and issues
- Not removed and inspected
 - Properly Installed?
 - Operational ??



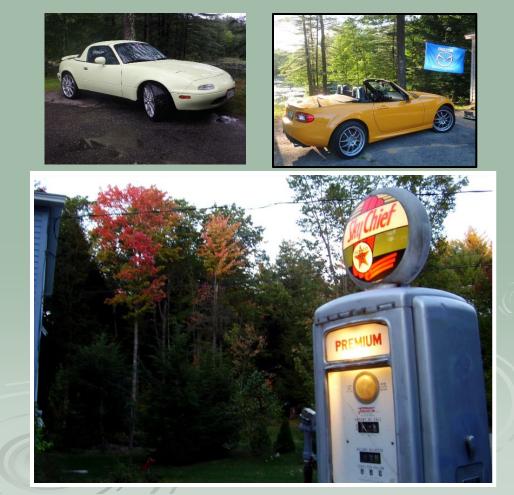


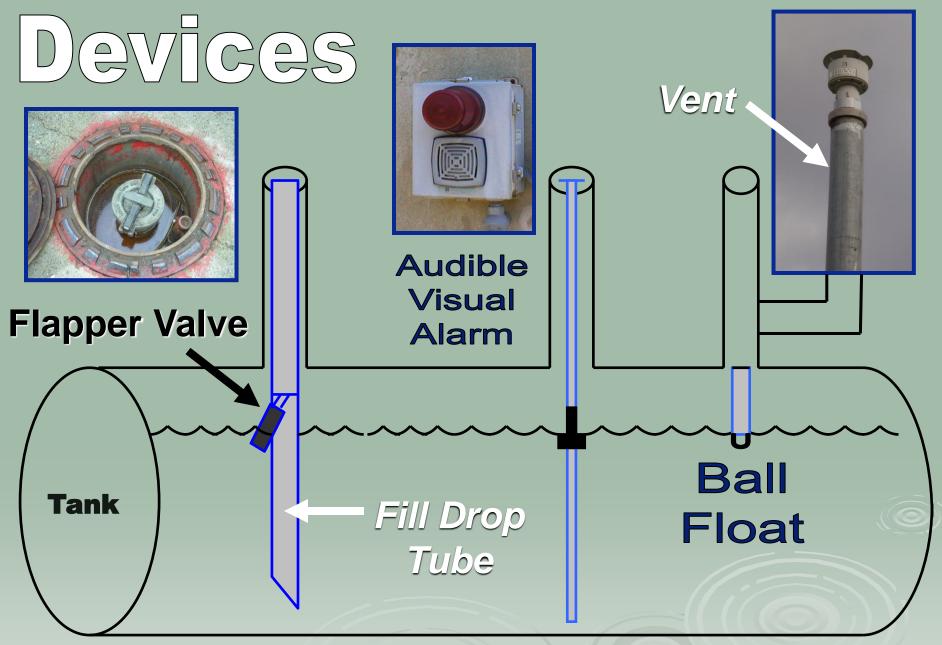


Spruce C. Wheelock Retired

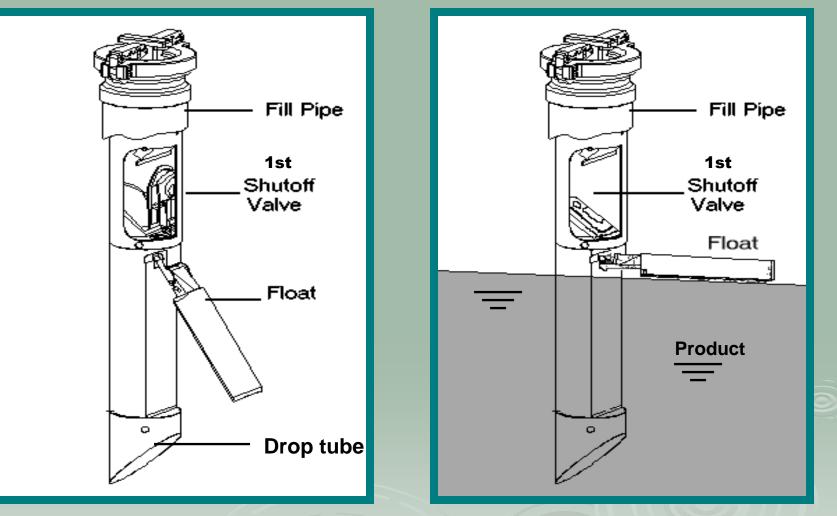
sprucew54@comcast.net



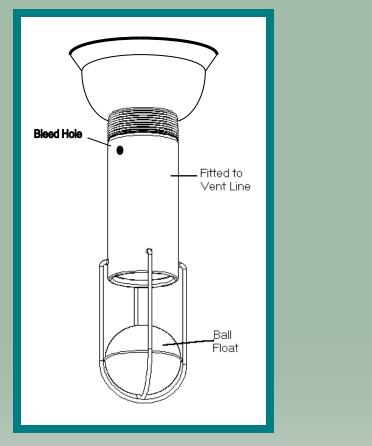


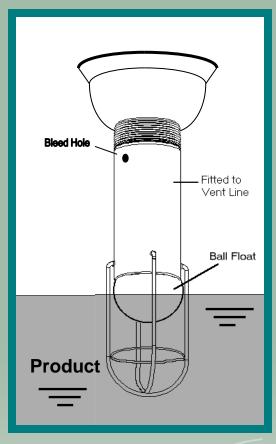


Flow <u>Stop</u> Device =95% max level Flapper Valve (fill drop tube)

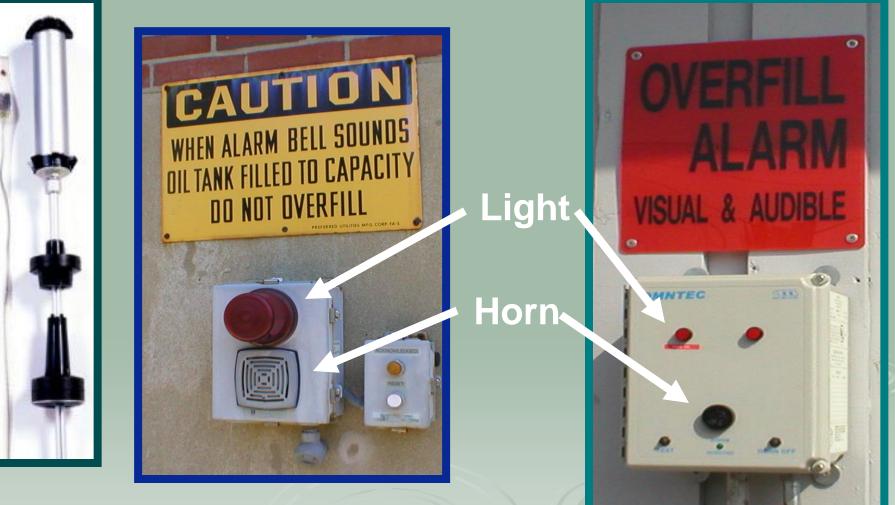


Flow <u>Restricting Device = 90% fill level</u> Ball Float (vent locations)





Alert Device = 90% fill level High Level Audible/Visual Alarm





Old EBW

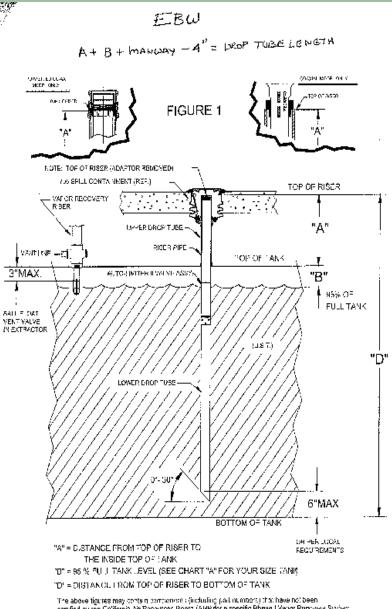
Without the 95% mark

C= Top tube length

A= Nipple length

B= 95% Fill level to top

C= A + B + manway – 4"



The above figures may tonts n contraction ((including (Ail Including (Ail Includer)) that have not been over first by the Collection Air Reportions Board (ARB) for a specific Phase I Vasor Reporting System . Please relies to School to the expropriate CARB Phase I Excerding Order for a list of Phase I Vasor Recovery System Equipment.

Field Measurement Generic

Ball Float Measurements Install at 90% : Alert or alarm

OPW

Tank Diameter	Tube Length	Add 2" D.W.	Man way 5"
<u>48" (4")</u>	7-1/2"	91/2"	12 ½"
64" (5.33')	10~	12"	
72" (6')	12"]4"	17"
92" (7.66')	j°i÷⇔		\°9÷⊷
<u>96" (8")</u>	15-1/2" to 16"	18"	21"
120" (10')	18" to 19"	21"	24"

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Ball Float

Form for contractor or owner

> OPW 53VML <u>http://www.opwglo</u> <u>bal.com/Product.a</u> <u>spx?pid=85</u> City:_____ UST # ____

New Hampshire Department of Environmental Services (NHDES)

Field Verification

BALL FLOAT VENT VALVES

90% flow restriction device

The Ball Float Pipe must be equal to or be longer than the calculated (F) below.

A= Distance from a reference point to the top end of the ball float pipe.

 \mathbf{B} = Distance from the reference point to the inside top of tank.

D= Distance, 10% of total tank capacity (NHDES requirement) to be determined from appropriate tank chart.

F= Minimum length of Ball Float Pipe.

Site:

Ball Float in a tank manway requires additional length (4"+-).

Check vent orifice (bleed hole), 1/8" must be open and located near top of tank +-.

Check the ball for holes, cracks and movement.

 Tank:
 , Size

 B + D - A = F

 B + D - A = F

 What is currently installed (F) =

 Circle: Ball Float PASS or FAIL

 Ball Float replaced YES or NO

 Tank:
 ______, Size

 B + D - A = F

 B + D - A = F

 What is currently installed (F) =

 Circle: Ball Float PASS or FAIL

 Ball Float replaced YES or NO

 4" Tank

 B + D - A = F

 B + D - A = F

 B + D - A = F

 B + D - A = F

 Circle: Ball Float PASS or FAIL

 Ball Float replaced YES or NO
 PIPE

 Inspector:
 THREADS

 Company:
 Val calibrated

 Date:
 Hawkelockball/loatmeasurement.doc 2/12/04

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R"

VENT

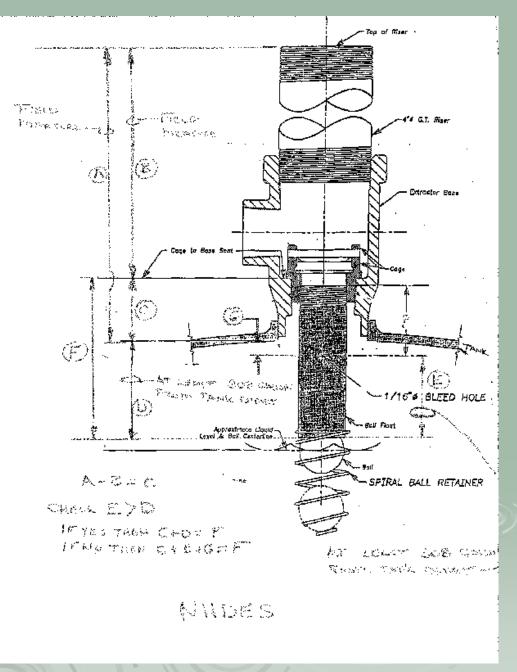
30 MIN. BALL FLONT

Field Use 30 Min. Ball Float

REFERENCE POINT I BAR Ð € zkg 2[×]8[°] ≖(Y) CAGE INSIDE OF TANK m= JOE GALLONS ENID OF TUBE M.T.S. RP TO BAR 💆 KP TO INSIDE OF TANK INSIDE OF TANK TO END TUBE .2%" ± $L = \Pi + \Pi - (I + Y)$

30 Min. Ball Float

Complicated



Fuel Compatibility Matrix

Revised 12/1/2010

		Unleaded	Petroleum	Up to 15%	E85 /	Bio-Diesel			lange at	Kerosene/	
ENVIRONMENTAL	Description	Fuel	Diesel	Ethanol	E100	B2	B 5	B20	Av-Gas	Jet Fuel	Fuel Oil
1-2100 Series	Spill Containers	ULC			X	·X	Y	×	X	~	ULC
1-3100 Series (Edge)	Double Wall Spill Container	ULC	ULC	ULC	x	×	×	×	×	×	ULC
60V Series	Vapor Line Shear Valve	UL/ULC	UL/ULC	UL/ULC	x	x	х	×	×	×	UL/ULC
10 Series	Emergency Shut Off Valve	UL/ULC	UL/ULC	UL/ULC	×	×	×	×	×	×	UL/ULC
10 Plus Series	Emergency Shut Off Valve	UL/ULC	UL/ULC	UL/ULC	×	x	x	x	×	×	UL/ULC
61SALP-1020-EVR	Fill Swivel Adaptor	×	×	×	×	×	×	×	×	×	×
633T-8076	Fill Adaptor	×	×	×	x	×	x	×	x	×	×
61VSA-1020-EVR	Vapor Swivel Adaptor	×	×	×	x	x	x	×	×	×	×
1611AVB-1625	Vapor Adaptor	×	×	×	х	x	x	x	×	×	×
634TT-7085-EVR	Fill Cap	×	×	×	×	×	×	×	×	×	×
1711T-7085-EVR	Vapor Cap	×	×	×	x	x	x	x	x	×	×
634LPC-040	Low Profile Fill Cap	×	×	×	×	×	×	x	×	×	×
1711LPC-0300	Low Profile Vapor Cap	x	×	×	х	х	x	x	x	×	×
62MBB Series	Monitoring Place Cap	UL	UL	X ·	×	×	×	X	X	×	UL
61SO Series	overfill Valve	ULC	ULC	ULC					×	x	ULS
61SOM Series	Overfill Valve Anodized	ULC	ULC	ULC	×	×	×			×	×
61T Series	Drop Tubes	×	×	×					×	×	×
71SO Series	Corfill Valve	ULC	ULC	ULC					x	×	111C
2.2 Series	Extractor Valve	×	×	×	×	x	X	X		X	×
FCXX Series	Stainless Flex Connectors	UL/ULC	UL/ULC	UL/ULC	×	×	×	×	x	×	UL/ULC
53VML/30MV Series	Ball Floats	×	×	×	x	×	×	×	x	×	×
523V Series	Pressure Vacuum Vent	UL	UL	UL	×	×	×	×	×	×	UL
623V Series	Pressure Vacuum Vent	UL	UL	UL	×	×	×	×	×	×	UL
UL - UL listed X - Compatible ULC - UL Canada											

Inspectors Think Safety

Do not shoot the messenger





We are targets

DAVID MCKAMIE DATZ UST MANAGEMENT, LLC

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WWW.DATZUST.COM

OVERFILL INSPECTIONS

INSPECTIONS: WHAT DOES IT TAKE TO OPERATE A SUCCESSFUL INSPECTION PROGRAM

CONSISTENCY

- Consistency with Frequency
- Consistency with Evaluation
- Consistency with Oversight
- Everything Fails Until Proven
 Otherwise

QAQC/OVERSIGHT

- Third Party
- Operator Management
- Regulatory
- From the Greatest to the Least, We all benefit from oversight.

OVERFILL PREVENTION TYPES:

Automatic Shutoff

Flow Restriction

Audible/Visual Alarms

OVERFILL PREVENTION TYPES:

Delivery/Dispatching



Delivery/Dispatching 🖈

Automatic Shutoff

Flow Restriction

Audible/Visual Alarms

DISPATCHING/DELIVERY



Dispatching/Delivery

How Do Fuel Orders get Calculated?

- Average Usage
- Current Fuel Inventory
- Ullage Space (Remaining Capacity)
- Spikes or Lulls in Usage.

DISPATCHER INFO:

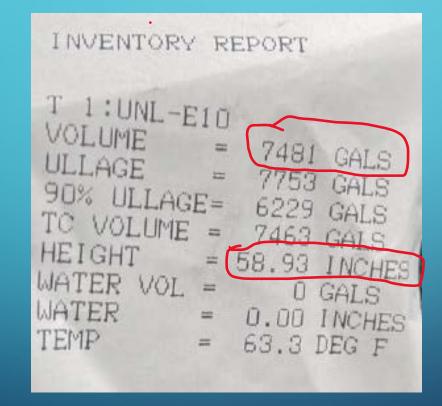
MAX OR LABEL VOL	(8068 90% 7261
HIGH PRODUCT		95% 7664
DELIVERY LIMIT		12% 1000
LOW PRODUCT LEAK ALARM LIMIT SUDDEN LOSS LIMIT TANK TILT	: : : :	550 50 50 0.00

INVENTORY R	EPORT
T 1:UNL-E10	7481 GALS
VOLUME =	7753 GALS
ULLAGE =	6229 GALS
90% ULLAGE=	7463 GALS
TC VOLUME =	7463 GALS
HEIGHT =	58.93 INCHES
WATER VOL =	0 GALS
WATER =	0.00 INCHES
TEMP =	63.3 DEG F

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TRANSPORTER/SITE MANAGEMENT



WHO CALCULATES THE FUEL CAPACITY PRIOR TO A DROP?



• Dispatcher?

- Transport Driver?
- Site Personnel?

 Should the Fill be tagged with Overfill Shutoff %?

	All accessible tank top fittings are tight	Yes No	Yes No	Yes	No	Yes No
	Tank does NOT have a suction or tank syphon line installed	Yes No	Yes No	Yes	No	Yes No
	Standard drop tubes are installed & in good condition	Yes No	Yes No	Yes	No	Yes No
	Length of Ball Float Valve (inches)					
	Height of tank top manway (if applicable) (inches)					
Float Valve	Distance below top of tank that ball float valve is set (inches)					
at	Indicate tank capacity when flow restriction occurs (%)					
Ball Flo	ATG Overfill Limit Matches Capacity at Flow Restriction (%)	Yes No	Yes No	Yes	No	Yes No
	Complete shut off occurs below any ball float nipple in the tank	Yes No	Yes No	Yes	No	Yes No
	Assembly and all gaskets/seals in good condition(confirm correct adapter for coaxial)	Yes No	Yes No	Yes	No	Yes No
	Length of upper tube to the "Reference Point" (inches)					
	Length of Fill Riser pipe (Seating position to tank top) (Inches)					
	Height of tank top manway (if applicable) (inches)					
	Distance below tank top where "Reference Point" is located (Inches)					
	Distance between Reference Point and Complete Shut off Point					
evice	Distance below tank top where complete shut off occurs (inches)					
Drop Tube Device	Indicate tank capacity when complete (2 nd Stage) shut off occurs (%)					
Drop T	ATG High Product Limit Matches Capacity at Shutoff (%)	Yes No	Yes No	Yes	No	Yes No

THIRD PARTY CERTIFICATION.

- How can we assist the operator and the transport company?
- Go beyond reporting.
- Reprogram and Tag

Q & A ?

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OVERFILL PREVENTION TYPES:

• Automatic Shutoff



Delivery/Dispatching

Automatic Shutoff

Flow Restriction

Audible/Visual Alarms

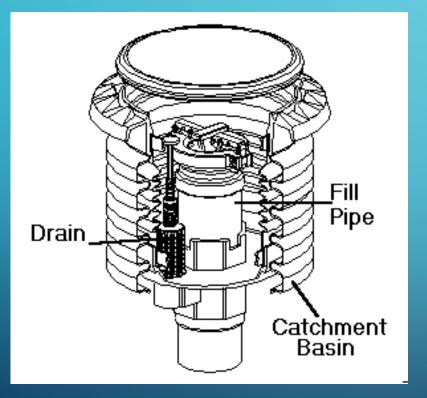
COMMON FAILURES: (NON-MECHANICAL) AUTO SHUTOFFS Improper Installation

Tampering

COMMON FAILURES: (NON-MECHANICAL) AUTO SHUTOFFS Improper Installation

Tampering

FILL PIPE MANIPULATION:



- Fill Adaptors change by Brand and profile.
- When contractors change fill adaptors, they may also change the fill pipe.
- Changing the fill pipe will raise or lower the position of the shutoff.

SWAPPING OVERFILLS



- Overfills can be removed for tank cleaning and other.
- Overfills rarely are the same size for each tank on site.
- Overfills installed in the wrong tank after maintenance.

BUILT INCORRECTLY:



- In the photo here, you can see the OPW overfill was installed at 95%.
- Unfortunately, the installer did not measure the flapper correctly and installed at 97%.
- Further, due to a tank tilt, the overfill device should have been at 93%.



COMPENSATION FOR NON REMOVED BALL FLOATS

- Calculate based on ball float percentage.
- Calculate tank tilt to ensure correct shut off measurement.
- Construct shutoff 2% below ball float tube for vapor space.

COMMON FAILURES: (NON-MECHANICAL) AUTO SHUTOFFS Improper Installation

Tampering



TAMPERING

WHY REQUIRE REMOVAL TO INSPECT?



OVERFILL PREVENTION TYPES:

• Flow Restriction



Delivery/Dispatching

Automatic Shutoff

Flow Restriction

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Audible/Visual Alarms

COMMON FAILURES: FLOW RESTRICTORS (NON-MECHANICAL) Tank Integrity $\overleftarrow{}$ System Design Length Of Ball Tube Tank Tilt **Tank Deflection**

1. TANK INTEGRITY

- Cracked caps.
- Stripped Riser Threads
- Broken Wire Grommets
- Bad drain Valves





COMMON FAILURES: FLOW RESTRICTORS (NON-MECHANICAL)

Tank Integrity	
System Design	\bigstar
Length Of Ball Tube	
Tank Tilt	
Tank Deflection	

SYSTEM DESIGN

- Dual Fills on Single Product Tanks
- Manifolded Tank Systems



COMMON FAILURES: FLOW RESTRICTORS (NON-MECHANICAL)

Tank Integrity	
System Design	
Length Of Ball Tube	7
Tank Tilt	
Tank Deflection	





WHERE DOES THE BALL FLOAT SIT IN THE EXTRACTOR?



LENGTH OF TUBE

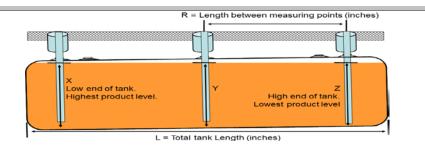
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DOES ANYONE SEE WHERE THIS TUBE RESTS ON THE TANK TOP?



COMMON FAILURES: FLOW RESTRICTORS (NON-MECHANICAL) Tank Integrity System Design Length Of Ball Tube Tank Tilt **Tank Deflection**



TANK TILT/TANK DEFLECTION

- Overall Tank Tilt = (Difference between product levels) * (L/R)
- Tank Deflection = Tank Diameter from tank chart (-) The measured tank diameter
- Ullage (Inches) at low end when device is at high end = Distance below tank top at <u>High end</u> (-) <u>Tank Tilt</u> (-) <u>Deflection Ullage (inches) at low</u> end when device is at middle = Distance below tank top at Middle of tank (-) Half of Tank Tilt (-) <u>Deflection</u>

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THANK YOU, SPEAKERS! Russ Brauksieck | U.S. EPA



David McKamie | DATZ UST Management, LLC



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UST INSPECTOR TRAINING WEBINAR SERIES:

UST OVERFILL PREVENTION

Thank you for your participation!

12/15/2021