

**SOLID & HAZARDOUS WASTE DIVISION  
STORAGE TANK PROGRAM (STP)  
GUIDANCE DOCUMENT #24**

**SUBJECT:** INSPECTION DEFINITIONS

**SCOPE:** The STP completes inspections as required for active and inactive facilities, affected third party properties, and wherever state-owned property is used to identify or remediate petroleum contaminants at STP-eligible sites. The frequency of these required inspections is dependent on the type of property as specified herein. Whenever an inspection is completed, it must be tracked in the database for DEQ and EPA reporting. There are 14 inspection categories in the database. One of these 14 categories must be selected when entering an inspection into the database.

**INTRODUCTION:** This document provides guidance for STP staff in selecting the correct inspection category when entering an inspection into the database. Selecting the correct category ensures accurate reporting to both DEQ and EPA in accordance with established inspection definitions. All inspections recorded are on-site inspections; file or report reviews are not considered an “inspection.”

**GUIDELINES:**

Select the inspection category that best fits the description of the inspection completed. If unsure of which category to choose, the supervisor should be consulted. You may need to use a process of elimination when determining which category to report an inspection under. Some inspection categories may overlap (e.g., complaint based and emergency response). Use your best judgment and place the inspection in only one category that best fits the type of inspection completed.

**1. Complaint Based.** This category is used for inspections that are conducted in response to a complaint from the public. These inspections may be conducted in response to reporting of erratically operating equipment, spills, off-site impacts, water in fuel, or for other reasons that indicate a possible danger to public safety or the environment.

**2. Construction Bid Site Walk.** This category is for use by the Remediation Section only. This category is used whenever a pre-bid site walk is conducted for remediation alternative construction. Every site visited during the pre-bid site walk should be entered as an inspected site.

**3. DEF Tank Installation.** This category is used by anyone conducting an inspection of a diesel exhaust fluid (DEF) tank installation. These tanks are not regulated by the STP. However, if the tank owner wants to convert the DEF tank to an STP-regulated use in the future, the owner must have the installation inspected by the department.

**4. Emergency Response.** This category is used by anyone conducting an emergency response at any facility. The category is used when responding to an emergency, such as but not limited to: vapors in a building or utility, product in a drinking water well or surface water, catastrophic tank or piping failure, etc. If the emergency exists at a site that is in a remediation project, the inspection should be reported under this category so that it is distinguished from a routine operation & maintenance (O&M) or other project-specific inspection.

**5. Followup.** This category is used for inspections completed to determine if a violation has been resolved. This is not a full inspection and will not be reported to EPA as a scheduled inspection.

**6. Phase 1.** A Phase 1 inspection is defined in STP Guidance Document # 18. This category is used when an inspection is completed to determine if new or replacement tank(s) is/are installed properly.

**7. Phase 2.** A Phase 2 inspection is defined in STP Guidance Document #18. This inspection is conducted to determine if new or modified piping, sumps, valves, and/or fittings that are connected to a tank are installed properly.

**8. Phase 3.** A Phase 3 inspection is defined in STP Guidance Document #18. Phase 3 inspections are conducted to determine if any modified or new (if not a new facility; see bold text below) tank system components, not included in a Phase 1 or Phase 2 inspection, are properly installed and operational. Inspected items may include leak detection equipment, overfill prevention equipment, and/or leak prevention equipment. Final integrity testing of modified piping is also conducted during a Phase 3 inspection. **A Phase 3 inspection for a new tank system installation, where a full inspection is completed to issue an authorization to operate, should not be put into this category for a new facility. Phase 3 inspections for new tank system installations at new facilities should be put into the “Scheduled Inspection” category because these inspections set up the facility for the 3-year EPA required (scheduled) inspection cycle.**

**9. Remediation Maintenance.** This category is used by the Remediation Section and includes all site visits for a remediation project except construction bid walks (see Construction Bid Site Walk) and annual inspections to meet the site visit PMI goal (see Remediation Project). This category should be used for such activities as meeting with property owners or consultants, site walks to prepare site descriptions, witnessing construction or O&M activities, etc.

**10. Remediation Project.** This category is used by the Remediation Section and includes only visits conducted to complete the annual PMI goal for site visits. This category is used for inspections of state-owned property at active and inactive facilities, third party sites, and wherever state-owned property is used to identify or remediate petroleum contaminants at STP-eligible sites. A Remediation Project inspection must include a thorough walk of the site; a visual inspection of well completions, buildings, and equipment; and verification of the equipment inventory list for the site. Equipment inventory verification does not include matching model numbers, etc.; it only includes verification that, for example, there are two blowers in the building if the inventory shows two blowers are in use, a product recovery tank is on site if a tank is shown on the inventory, etc. A Remediation Project inspection is required annually for all state property that has been in operations and maintenance for at least 6 months or is available to decommission. A Remediation Project inspection is not required for any contaminated site that is classified as “resolved” based on subsurface investigation data (i.e., the site was closed during the SSI phase of the project). Ensuring that state property has been decommissioned is NOT a Remediation Project inspection.

**11. Scheduled.** This category includes only those inspections that meet the EPA definition of a scheduled inspection. AST facility inspections that meet the EPA definition for an UST inspection are included in this category. To meet the definition, a complete inspection of the entire facility operation must be conducted including a review of applicable records. Every facility must be inspected at least once every 3 years. Note that the STP is striving for a 2-year inspection cycle to meet the EPA definition of a scheduled inspection. Scheduled inspections include Phase 3 new tank system installation inspections at new facilities where an authorization to operate will be issued. Entering the inspection in

this category sets up a new facility for the 3-year inspection cycle required by EPA. To meet the definition of a scheduled inspection, the inspection must assess compliance with:

- Notification (failure to notify)
- Corrosion protection (tank and piping, and testing, inspections, and other records [as applicable])
- Overfill prevention in place and operational
- Spill prevention in place and operational (appropriate method and documentation of monitoring and testing)
- Reporting suspected releases
- Tank and piping repair records
- Secondary containment where required
- Financial responsibility

**12. Surprise.** This category is not used. The STP does not perform “surprise” inspections. Owners/operators are provided notice of all inspections to be conducted.

**13. Tank Removal.** This category is used for inspections conducted when a tank is removed or closed in place.

**14. Testing.** This category is used when STP personnel witness a test after a suspected release has been reported or after an emergency repair has been completed.