

**SOLID & HAZARDOUS WASTE DIVISION
STORAGE TANK PROGRAM (STP)
GUIDANCE DOCUMENT #22**

SUBJECT: UNDERGROUND STORAGE TANK COMPLIANCE INSPECTIONS

SCOPE: The Energy Policy Act requires that all underground storage tanks (UST) be inspected once every 3 years at a minimum. The STP attempts to inspect every facility at least once every 2 years.

INTRODUCTION: This document provides guidance for STP inspectors completing UST inspections.

GUIDELINES:

1. Determine the Facilities Due for Inspection and Travel Planning. At the beginning of each calendar year, STP personnel query the database for all facilities that were not inspected in the previous year and the facilities are divided among the inspectors by the Compliance Supervisor. The STP attempts to inspect every facility once every 2 years at a minimum. For increased efficiency, sites that are geographically close together or en route to other sites requiring inspection are given to the same inspector. Where possible, inspectors combine sites into one field trip that can be completed within a week.

2. Facility Notification. A notice of inspection is generated using the STP database and sent to the owner at least 7 working days prior to the inspection. The inspector generally calls the facility the week prior to the inspection as a courtesy reminder of the upcoming inspection.

3. Pre-inspection Research. The inspector generates a facility summary from the database and reviews the summary to determine if the facility is in violation of any rule, regulation, or statute. Violations are highlighted on the summary. The inspector determines if the Class A operator is over more than 1 facility, which triggers the monthly inspection requirement.

4. Travel. The inspector travels to the site. Safety is a top priority. All speed limits are observed, seat belts are worn, and cell phones are not used while driving unless connected to a hands-free device.

5. Arrival at the Site. The inspector reviews the facility summary before entering the facility. Upon entry, the inspector introduces him/herself to facility personnel.

6. Inspection. The inspection is divided into two parts; indoor and outdoor. If a joint inspection is being conducted with two inspectors, the inspectors will split up with one covering the indoor inspection and the other covering the outdoor inspection. Personal

protective equipment (steel-toed shoes, safety vest, and gloves) is worn while working outdoors. Cones are placed around the tank basin during the inspection.

A. Outdoor

- (i) Inspect all tank top sumps, check line leak detection equipment, check if line leak detection equipment has been disabled, look for leaks, determine if sumps contain liquid or have penetrations, and identify the position of the sump sensor (if present).
- (ii) Inspect other tank risers, such as automatic tank gauge (ATG) risers and interstitial monitoring risers, check wiring condition and riser cap condition.
- (iii) Inspect spill buckets, drop tubes, and look for overflow devices.
- (iv) Inspect dispensers for leaks and damaged equipment (hoses, filters, or liquid in under-dispenser containment).
- (v) Check safety equipment (vents, emergency shutoffs, and fire extinguishers).
- (vi) Check impressed current cathodic protection (CP) equipment (if applicable); verify that the rectifier is on; and verify that the amperage meter, volt meter, and hour meter are all in place and working.
- (vii) Check for stage I vapor recovery equipment.
- (viii) Take photos of all equipment.

B. Indoor

- (i) Check ATG monitor (if applicable) to determine if it is in alarm mode.
- (ii) Check for last three operator annual inspections (OAI), which include line leak detector function testing and line tightness testing records.
- (iii) Check tank leak detection records for the previous year.
- (iv) Check for the last two CP tests (if applicable).
- (v) Verify that CP rectifier readings are being documented every 60 days and that there are at least three readings (if applicable).
- (vi) Verify that the facility has licensed Class A and B Operators.
- (vii) Verify that monthly inspections are being conducted (only required if the Class A or B operator is responsible for more than 1 facility).
- (viii) Verify that there is documentation of Class C Operator training (applies to gas stations only).
- (ix) Provide a verbal summary of the findings to facility personnel.
- (x) Take photos of all equipment.

7. Travel. Inspector travels to next facility scheduled for inspection or returns to the office following step 4 above.

8. Database Entry. The inspector enters the inspection findings and violations (if applicable) into the STP database.

9. Inspection Reports

(i) If no violations were found, the inspector sends an inspection report to the owner that includes the findings.

(ii) If violations were found, the inspector sends a Letter of Violation (LOV) to the owner that includes the findings.

(a) If violations were resolved prior to the inspector writing the LOV, resolution is noted in the LOV.

(b) If violations were not resolved prior to writing the LOV, a deadline for resolution is given in the LOV.

(c) The inspector may also note in the LOV any safety issues or violations of other laws, codes, or regulations that are not enforced by the STP.

(iii) The inspector discusses violations discovered with the Compliance Supervisor to determine whether or not further enforcement action is needed. If further enforcement action is needed, the Compliance Supervisor prepares a Notice of Violation.

10. Inspection Tracking Sheet Entry. The inspector enters the following inspection data on the inspection tracking sheet:

(i) Inspection date;

(ii) Inspection report/LOV date;

(iii) If the facility has unresolved violations, the timeframe for resolution;

(iv) If a Notice of Violation is needed; and

(v) Notice of Compliance when the violations are resolved.



Department of Environmental Quality

To protect, conserve, and enhance the Quality of Wyoming's environment for the benefit of current and future generations



STP Compliance Inspection Checklist

Facility Name: _____ Facility Number: _____

Inspector (s): _____ Time In: _____

Who Did you Introduce Yourself to: _____

Turbine Sumps

Type of Line Leak Detectors: _____

Comments: _____

ATG Probes

Condition of Probes: _____

Condition of Electrical Connections: _____

Spill Buckets

Condition: _____

Is There Liquid in Them: _____

Are There Drop Tubes: _____

Type (s) of Overfill Prevention: _____

Interstitial Probes

Condition of Equipment (Electrical/Riser Cap): _____

Dispensers

Condition of Hanging Hardware: _____

Are Fire Valves Anchored: _____

Comments: _____

Safety Items

Is There an Emergency Shutoff: _____ Are the Vents OK: _____

Is There a Fire Extinguisher: _____



STP Compliance Inspection Checklist

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Paperwork

Is There a Passing ATG/SIR/Tank Leak Detection Result for Each Month for The Year Prior to Inspection:

Compartment 1: Jan-Feb-Mar-Apr-May-Jun-Jul-Aug-Sep-Oct-Nov-Dec

Product: _____

Compartment 2: Jan-Feb-Mar-Apr-May-Jun-Jul-Aug-Sep-Oct-Nov-Dec

Product: _____

Compartment 3: Jan-Feb-Mar-Apr-May-Jun-Jul-Aug-Sep-Oct-Nov-Dec

Product: _____

Compartment 4: Jan-Feb-Mar-Apr-May-Jun-Jul-Aug-Sep-Oct-Nov-Dec

Product: _____

Comments: _____

Is Inventory Control Being Performed Properly: _____

Are The Records of the Last Three Operator's Annual Inspections Onsite (Leak Detector Function Test Results/Line Tightness Tests Etc.): _____

Are Results of The Last Two CP Tests Onsite/ If impressed Is There a Log: _____

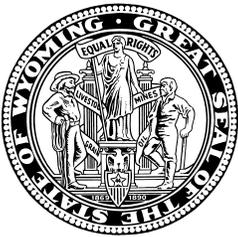
Who Are the Facility's Licensed Operators and When do Their Licenses Expire: _____

Are There Records of Class C Operator Training: _____

Is the Facility Required to Have Stage I Vapor Recovery, What Type of Stage I Vapor Recovery System is Used, And When Was The System Last Tested: _____

GPS Coordinates: _____

Additional Comments



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Matthew H. Mead, Governor

Todd Parfitt, Director

June 27, 2014

Re: Compliance Inspection Conducted (Date) at (Facility Name), Located at (Street Address), (City).
Underground Storage Tank Facility #0-00XXXX

This letter will serve as the inspection report and **letter of violation** for the compliance inspection conducted on (Date) at the above referenced facility. I would like to thank you for assisting with the inspection.

Please note, there were violations discovered during the inspection. Failure to rectify these violations within the next (timeframe for compliance) days will result in the department taking further enforcement action.

INTRODUCTION: (Inspector's Name) with the Wyoming Department of Environmental Quality Storage Tank Program (WDEQ/STP), arrived at approximately (Time of Inspection) and introduced himself to management personnel. Equipment inspected, included overfill and spill protection, tank leak detection, and pump dispensers. The inspector also reviewed the appropriate compliance records.

VIOLATIONS:

RECOMMENDATIONS:

COMMENDATIONS:

MINIMUM SITE ASSESSMENT REQUIREMENT:

FEES:

SPILL AND OVERFILL PROTECTION:

TANK LEAK DETECTION:

LINE LEAK DETECTION:

CORROSION PROTECTION (CP):



UST Tank Facility 0-00XXXX

(Date of report)

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OPERATORS ANNUAL INSPECTION (OAI):

DISPENSERS:

OPERATORS:

CLASS "C" OPERATOR TRAINING:

VAPOR RECOVERY:

DIESEL THROUGHPUT:

GPS COORIDINATES:

(Closing Paragraph)

Sincerely,

(Name)

(Title)