


What to Expect from the County Inspector

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Pinellas County Health Department



Some Items to Consider

- Who we regulate
 - Assurance versus Insurance
 - Less Than Perfect
 - County variations
-



Before the Annual Facility Inspection

Notification

- Letter, phone call, email, or site visit

Tank programs may accept submittal of some or all records needing review prior to site inspection

- Electronic or mail
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During the Annual Facility Inspection

- Physical inspection of visible portions of tank system
 - ie – Sumps of every kind, spill containment units, overfill protection devices, dispensing systems, product piping, release detection devices, cathodic protection, etc
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During the Annual Facility Inspection (continued)

□ Review of records

- ie – Proof of financial responsibility, CoFR, monthly release detection, annual operability tests, precision tests, repair, maintenance, placard, registration, etc.
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After the Annual Facility Inspection

- A copy of the inspection
 - A letter
 - A response time frame
-

Inspection Form



Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-2400
Division of Waste Management
Bureau of Petroleum Storage Systems

Storage Tank Facility Annual Site Inspection Report

Facility Information

Facility ID:	8623590	County:	PINELLAS	Inspection Date:	02/04/2008
Facility Name:	HESS #09269			Facility Type:	A - Retail Station
	3225 34TH ST			# Of Inspected ASTs:	0
	SAINT PETERSBURG, FL 33713			USTs:	4
Latitude:	27° 48' 4.3448"			Mineral Acid Tanks:	0
Longitude:	82° 40' 45.2595"				
L/L Method:	DPHO				



Inspection Form

Inspection Result

Result : Major Out of Compliance

Description: Facility is out of compliance

A re-inspection will be scheduled on or after 90 days to verify correction of the non-compliance items noted.

Financial Responsibility **Over Due**

Financial Responsibility: INSURANCE

Insurance Carrier: ZURICH-AMERICAN

Effective Date: 10/08/2007

Expiration Date: 10/08/2008

Inspection Result

Result : In Compliance

Description: Facility is in compliance

A re-inspection will be scheduled on or after 90 days to verify correction of the non-compliance items noted.

Financial Responsibility

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 04/30/2008

Expiration Date: 04/29/2009



Inspection Form

System Tests

Type	Date Completed	Results	Reviewed	Next Due Date
To be completed				
Tank Tightness Test			03/21/2007	11/30/2009
Completed Tests				
Tank Tightness Test	11/30/2006	Passed	03/21/2007	11/30/2007
Line Tightness Test	11/30/2006	Passed	03/21/2007	11/30/2006
Annual Inline Leak Detector Test	11/30/2006	Passed	03/21/2007	11/30/2005
Overdue Tests				
Line Tightness Test			03/21/2007	11/30/2007
Annual Inline Leak Detector Test			03/21/2007	11/30/2007



Inspection Form

Reviewed Records

Record Category	Record Type	From Date	To Date
Two Years	Certificate of Financial Responsibility	02/01/2007	02/04/2008
Two Years	Electronic Release Detection Equip. Monthly Checks	02/01/2007	01/31/2008
Life Time	Written Release Detection Response Level Info	02/01/2007	02/04/2008
Two Years	Monthly Maint. Visual Examinations and Results	02/01/2007	01/31/2008
Two Years	Repair, Operation and Maintenance Records	02/01/2007	01/31/2008



Inspection Form

New Violations

Significance Name: SNC-B

Rule Number(s): 62-761.400(3)(a)1.

Violation Text: No financial responsibility.

Explanation: Need proof of financial responsibility for UST systems up to the date of removal (5/21/09).

Corrective Action: Please provide proof that financial responsibility was in effect until May 2009 for recently removed UST systems.

Outstanding Violations

Significance Name: SNC-B

Rule Number(s): 62-761.600(1)(d)

Violation Text: Release detection not performed at least once a month.

Explanation: The monthly visual inspection records, the monthly pressure line leak test results, and the daily CSLD tapes were not available for review for the months of May 2008 through March 2009.

Corrective Action: Please provide missing monthly release detection records.

Significance Name: Minor

Rule Number(s): 62-761.600(1)(a)2.

Violation Text: Not installed, calibrated, operated, and maintained per manufacturer's specifications.

Explanation: Results to the annual line leak detector function test, and automatic tank gauge sensor operability test were not available for review.

Corrective Action: Please provide missing test results.



Inspection Form

Site Visit Comments

- 02/21/2008 2008Feb20_JAS: Physical Inspection (Field)
- single wall spill buckets within sumps
 - flow shut off in fills - OPW
 - double wall ameron pipe
 - mechanical LLDs
 - Bravo dispenser containment
 - inspected SCU, fills, stp sumps, dispensers and dispenser sumps
 - Diesel dispenser containment appears to contain a water/product mixture; please remove and properly dispose
- 02/04/2008 2008Feb04_JAS: Paperwork Review (Field)
- FR - CFO letter (4/30/07 to 4/30/08)
 - CoFR - ok
 - Placard - ok
 - RDRL - ok, posted on VR box
 - Annual Operability Testing - 5/07; sensors and LLDs by Crompco; STP Sumps EQ#197; wet interstice #614
 - Monthly RD results - Liquid status tapes ok 2/07 to 1/08 L1 to L8; tank interstices and STP sumps
 - Monthly visual inspections - 2/07 to 1/08 for dispenser exteriors and spill containment
 - Repair and Maintenance Records - ok for 2/07 to 1/08
 - TLS system - all systems normal at time of visit
 - Registration appears to be incorrect; please review and verify; facility appears to have "flapper" overfill devices but they do not appear on the registration
 - facility does not appear to have conducted monthly visual inspection of dispenser liners; liners appear to be isolated from STP and therefore require monthly visual inspections (no sensors); Please begin to conduct and record results of monthly visual inspections of dispenser liners

Inspection Form

Inspection Attachments

01. 2008Feb20_JAS: water/product
mixture in diesel dispenser
containment





Re-Inspection of Facility

- When is it required?
 - What do we look at?
-



Closure Inspections

- Different “levels”
 - Resolution of outstanding violations
 - Current Financial Responsibility
 - Observe site activities
-



Closure Inspections

Inspection Comments

05/26/2009 2009May26_JAS: Review of facility information indicates that there are three reported discharges (6/19/85, 4/19/90, and

05/26/2009

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JOSEPH A SOWERS

Inspection Comments

6/29/92). The 6/19/85 discharge appears to be eligible for EDI and the latter two discharges appear to be combined with the first. It appears that a full closure assessment is not required. However, a Closure Report is required to be submitted to this office along with required documentation and forms.

It appears that a source removal was conducted, administered by FDEP Tallahassee.

There appears to be outstanding violations from previous annual compliance inspection. These violations will need to be resolved with James Barnett.

05/26/2009 2009May26_JAS: A review of Pinellas County Property Appraiser records appear to show that facility was purchased in October 2008 by O P M - 1 LLC with an address of: 1830 26th Street North; St Petersburg, FL 33713-4946. Previous compliance inspection requested that owner information be updated but it would appear that it has not yet been completed.

Site Visit Comments

05/21/2009 2009May21_JAS: Visited site; Norris and Samon (PCC 046053) removing four UST Systems. Tanks are fiberglass and appear to be Xerxes. Piping appears to have already been removed.

05/22/2009 2009May22_JAS: Tanks have been removed from excavation and except for portion of one tank of have been transported off site.



Installation Inspections

- Different “levels”
 - Complete System Installs
 - What we look at
 - Final inspection
 - Common issues
-



Installation Inspections

Inspection Comments

09/16/2008 2008Sept16_JLL: Site visit for primary line air soap test of DW Smith 3/2 FRP (EQ-252). Primary lines at 50 to 52 psi, no apparent leaks. No integrity testing observed at this visit.

Site Visit Comments

09/04/2008 2008Sep04_JAS: Two 20,000gal Containment Solutions DWT-6 Type II tanks installed. One compartmented 12,000 and 8,000. Don Stine Petroleum - PCC 053991 - contractor. Tanks appear to be properly tied down, awaiting back fill.

09/05/2008 2008Sep05_JAS: Site visited by Randy Strauss, backfilling of tank excavation has been completed.

09/17/2008 2008Sep17_JAS:
Viewed air / soap test on secondary pipe; all appeared to pass.
Viewed hydro testing of STP sumps and dispenser liners; all appeared to pass.
Spill containment units to be vacuum tested by Crompco; all maintaining "brine" level at time of inspection.

10/02/2008 2008Oct02_JAS: Final Install Inspection with Ernest Roggelin
- Tanks, Lines, Electronic LLDs, Sensors, and SCU's tested by Crompco 10/1/08 - all passed
- Fills properly marked
- Flow shut off in fills, OPW 61SO
- Bravo double wall spill buckets 375-FD-FL EQ#688
- shear valve assemblies appear to be properly anchored
- hoses and nozzles in good condition
- all sensors appear to be properly positioned (Smart sensors in Stp's)
- electronic line leak detectors, set up to complete only 3.0gph test, 0.2gph not required
- Brine filled interstice
- Release detection response level (RDRL) posted on VR unit
- all sensors placed in "alarm" and appear to be functioning as designed; total of 13 sensors (2 interstice, 8 dispenser, 3 STP "Smart Sensors")



When Issues Arise

- ❑ Do your “home work” first
 - ❑ Speak to inspector to get clarification and attempt establish good communication
 - ❑ Speak to Supervisor or Program Manager within the county
 - ❑ Speak with appropriate district office
 - ❑ Speak with FDEP Tallahassee
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Valuable Links

- FDEP PST Compliance Main Page

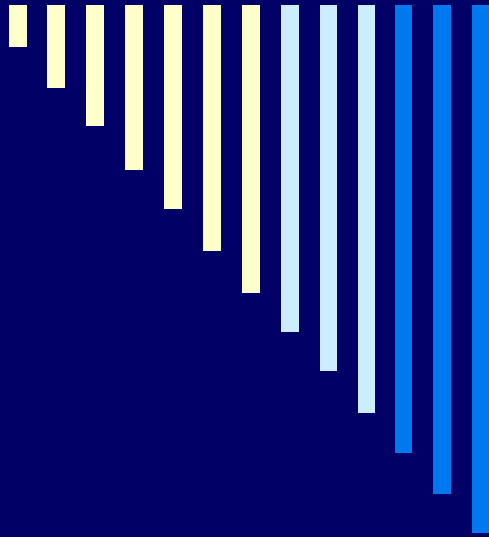
<http://www.dep.state.fl.us/waste/categories/tanks/default.htm>

- FDEP FIRST Information Portal

<http://epic229.dep.state.fl.us/WasteFirst/index.jsp>

- FDEP PST Storage Tank Registration

<http://www.dep.state.fl.us/waste/categories/tanks/pages/registration.htm>



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