

# What to Expect When Being Inspected

## ADEQ Underground Storage Tank Inspections and Compliance

Presented By:

Cynthia Ribitzki, ADEQ UST Inspector

# Inspection Procedures

1. Meet with the Manager or On-Site Contact to review Inspection Rights.
2. Overview of the facility's capabilities
3. Review of compliance material
4. Physical Inspection
5. Review inspection results with Manager/On-Site Contact

Inspections are unannounced and can happen at any time of the day.

# Reviewed Documentation

1. Notification Form
2. Operator Training Documentation
3. Financial Assurance Mechanism/Pollution Liability Insurance
4. Maintenance documentation of any work done on the UST System(s)
5. 12 months of monthly release detection records
6. Annual Maintenance and Calibration Certificate of the Monitoring System (if needed)
7. Annual line leak detector test (If needed)
8. Annual line tightness test (If needed)
9. Cathodic Protection Documents (if needed)
  - 9A. 3-yr cathodic protection test results
  - 9B. 60-Day cathodic protection log



Beginning August 9, 2012, UST system operators are required to complete Class A, B, and/or C operator training.

Operator training is valid for up to 3 years unless retraining is required by ADEQ in response to non-compliance and in accordance with ARS § 49-1083(D).

**CLASS A: Individuals have primary management responsibility for the operation, maintenance, and recordkeeping of the facility. Class A operator training must include:**

- 1) Notification under ARS § 49-1002
- 2) Release detection under ARS § 49-1003
- 3) Reporting requirements under ARS § 49-1004
- 4) Financial responsibility under ARS § 49-1006
- 5) Closure under ARS § 49-1008
- 6) UST performance under ARS § 49-1009
- 7) Delivery prohibition under ARS § 49-1023
- 8) Training requirements under ARS § 49-1083

**CLASS B: Individuals have a daily responsibility for the operation, maintenance, and record keeping of the facility. Class B operator training must include:**

- 1) Release detection under ARS § 49-1003
- 2) Reporting requirements under ARS § 49-1004
- 3) UST performance under ARS § 49-1009
- 4) Delivery prohibition under ARS § 49-1023
- 5) The training requirements for Class C individuals under ARS § 49-1083

**CLASS C: Individuals have daily responsibility for the initial response to an alarm or other indication of an emergency caused by a release or suspected release. Class C operator training must include:**

- 1) Initial response procedures to an alarm or other indication of an emergency caused by a release or suspected release from a UST at the facility, including procedures for contacting a Class A or Class B individual and any emergency responder.

# Annual Testing

- Automatic Tank Gauge (ATG)
- Line Tightness Test
- Line Leak Detector Test

All need to be performed by an ADEQ-certified contractor.

## MONITORING SYSTEM CERTIFICATION

This form must be used to document testing and servicing of monitoring equipment. A separate certification or report must be prepared for each monitoring system control panel by the technician who performs the work. A copy of this form must be provided to the tank system owner/operator. The owner/operator must submit a copy of this form to the local agency regulating UST systems within 30 days of test date.

**A. General Information**  
 Facility Name: BARNETT'S #38  
 Site Address: 824 N 1ST AVE City: SAN LUIS, AZ Zip: 85349  
 Facility Contact Person: MANAGER Contact Phone No.: (928) 627-1790  
 Make/Model of Monitoring System: GILBARCO EMC Date of Testing/Service: 3/24/10

**B. Inventory of Equipment Tested/Certified** FORM # PA0262010000  
 Check the appropriate boxes to indicate specific equipment inspected/serviced: SERIAL # 5023 097820500

Tank ID: <u>UNLEADED</u> <input checked="" type="checkbox"/> In-Tank Gauging Probe. Model: <u>PA0262010000</u> <input checked="" type="checkbox"/> Annular Space or Vault Sensor. Model: <u>79430-120</u> <input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <u>PA0262010000</u> <input checked="" type="checkbox"/> Fill Sump Sensor(s). Model: <u>PA0262010000</u> <input type="checkbox"/> Mechanical Line Leak Detector. Model: <u>LD 2000</u> <input type="checkbox"/> Electronic Line Leak Detector. Model: _____ <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: _____ <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).	Tank ID: <u>PLVS</u> <input checked="" type="checkbox"/> In-Tank Gauging Probe. Model: <u>PA0262010000</u> <input checked="" type="checkbox"/> Annular Space or Vault Sensor. Model: <u>79430-120</u> <input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <u>PA0262010000</u> <input checked="" type="checkbox"/> Fill Sump Sensor(s). Model: <u>PA0262010000</u> <input type="checkbox"/> Mechanical Line Leak Detector. Model: _____ <input type="checkbox"/> Electronic Line Leak Detector. Model: _____ <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: _____ <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).
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1 - OVERFILL ALARM - 790091-001  
 1 - ACKNOWLEDGEMENT SWITCH - 790095-001

If the facility contains more tanks or dispensers, copy this form. Include information for every tank and dispenser at the facility.

**C. Certification** - I certify that the equipment identified in this document was inspected/serviced in accordance with the manufacturer's guidelines. Attached to this Certification is information (e.g. manufacturer's checklist) necessary to verify that this information is correct and a Plot Plan showing the layout of monitoring equipment. For any equipment capable of generating such reports, I have also attached a copy of the report (check off that report):  System set-up  Alarm history report

Technician Name (print): Steve Scott Signature: Steve Scott  
 Certification No.: A30379 License No.: L05-ROC122847  
 Testing Company Name: Cochise Petroleum Equipment Co., Inc. Phone No.: (602) 272-0911  
 Address: 333 N. Black Canyon Hwy, Phoenix, AZ 85009 Date of Testing/Service: 3/24/10



# Monthly Release Detection

## Not all ATG's are the same

MAR 1, 2007 6:40 AM  
LIQUID STATUS  
MAR 1, 2007 6:40 AM

L 1: DISP 1-2  
SENSOR NORMAL

L 2: DISP 3-4  
SENSOR NORMAL

L 3: UNLEAD SUMP  
SENSOR NORMAL

L 4: DIESEL SUMP  
SENSOR NORMAL

L 5: UNLEAD BRINE  
SENSOR NORMAL

L 6: DIESEL BRINE  
SENSOR NORMAL

\* \* \* \* \* END \* \*

CSLD TEST RESULTS  
02-01-13 8:00

T 1: DIESEL  
PROBE SERIAL NUM 75081

0.2 GAL/HR TEST  
PER: 02-01-13 PASS

T 2: SUPER  
PROBE SERIAL NUM 75081

0.2 GAL/HR TEST  
PER: 02-01-13 PASS

T 3: UNLEADED  
PROBE SERIAL NUM 75081

0.2 GAL/HR TEST  
PER: 02-01-13 PASS

JUN 6, 2019 12:13 PM

LEAK TEST REPORT

T 1: UNLEADED  
PROBE SERIAL NUM 109757

TEST STARTING TIME:  
JUN 6, 2019 1:00 AM

TEST LENGTH = 2.0 HRS  
ESTD VOLUME = 2862.7 GAL

START TEMP = 78.9 F  
END TEMP = 79.2 F

TEST PERIODS 2-4  
0.01 0.00 0.00

LEAK TEST RESULTS  
RATE = 0.00 GAL HR  
0.20 GAL HR TEST PASS

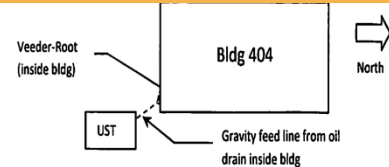
\* \* \* \* \* END \* \* \* \* \*

### 30-Day UST Release Detection Monitoring Record

UST Facility ID 0-0

iE, 1000-gallon Used Oil Tank

Interstitial Monitoring by Veeder-Root, "Liquid Status" report



Date	Time	Name	Results	Comments
8/16/2010	0920	ALAN C. THOMAS	NORMAL/PASSED	PRINTED OUT
9/29/2010	1056	ALAN C. THOMAS	NORMAL/PASSED	PRINTED OUT

2007 MONTHLY MONITORING # 82019

	JAN	FEB	MARCH	APRIL	MAY	JUN	JULY	AUG	SEPT	OCT
UNL			GREEN	GREEN						
PLS			RED	GREEN						
PREM			GREEN	GREEN						
ANDY			ANDY 3/7/07	ANDY 4/4/07						

Annual system testing: \_\_\_\_\_ date \_\_\_\_\_ tester \_\_\_\_\_ results

Annual system testing: \_\_\_\_\_ date \_\_\_\_\_ tester \_\_\_\_\_ results

Keep this piece of paper and any associated printouts on file for at least 3 years from date of the last entry

# Monthly Release Detection

Some methods are more labor intensive

## MONTHLY STATISTICAL INVENTORY RECONCILIATION (SIR) REPORT

Location:	Simmons	Richardson TX	Phone: (800)848-8378
Version:	SIR 5.7 - Version 5.7.L.M		Date of SIR Report: 10/06/11
Effective Date:	8/11	What is the required number of usable inventory days per tank? 30	

### MANUAL TANK GAUGING RECORD

Circle your tank size, test duration, and weekly/monthly standards in the table below:

Tank Size	Minimum Duration Of Test	Weekly Standard (1 test)	Monthly Standard (4-test average)
up to 550 gallons	36 hours	10 gallons	5 gallons
551-1,000 gallons (when tank diameter is 64")	44 hours	9 gallons	4 gallons
551-1,000 gallons (when tank diameter is 48")	58 hours	12 gallons	6 gallons
551-1,000 gallons (also requires periodic tank tightness testing)	36 hours	13 gallons	7 gallons
1,001-2,000 gallons (also requires periodic tank tightness testing)	36 hours	26 gallons	13 gallons

Compare your weekly readings and readings with the standards shown

If the calculated change exceeds the Also, the monthly average of the 4 the monthly standard in the same

If either the weekly or monthly standard is exceeded, or if a suspected leak and get further instructions

*Amnt. Shawn Morris*

Tank Identification Person Completed Facility Name

Name:				Cust Site ID:	Simmons Site ID: NCLPAAA			
Address:							Phone:	
City:	PHOENIX	State:	AZ	Zip:	85021	Fax:		
Name:							Phone:	
Address:							Phone:	
City:	PHOENIX	State:	AZ	Zip:	85021	Fax:		
Name:							Phone:	

Leak Threshold	Minimum Detectable Leak Rate(6c)	Calculated Leak Rate(6b)	This Month			Last Month			Two Months Ago								
			P	F	I	P	F	I	P	F	I						
gph	gph	gph															

Start Test (month, day, and time)	First Initial Stick Reading	Second Initial Stick Reading	Average Initial Reading	Initial Gallons (convert inches to gallons)	End Test (month, day, and time)	First End Stick Reading	Second End Stick Reading	Average End Reading
FR. Date: 6/22/07 Time: 2:00 AM (PM)	16"	16"	16	278	MON Date: 6/25/07 Time: 5:00 AM (PM)	16	16	16
Date: 6/26/07 Time: 2:00 AM (PM)	16 3/8"	16 3/8"	16 3/8	287	Date: 7/6/07 Time: 5:00 AM (PM)	16 3/8"	16 3/8"	16 3/8
Date: 7/14/07 Time: 2:00 AM (PM)	16 5/8"	16 5/8"	16 5/8	294	Date: 7/19/07 Time: 5:00 AM (PM)	16 5/8"	16 5/8"	16 5/8
Date: 7/13/07 Time: 2:00 AM (PM)	16 7/8"	16 7/8"	16 7/8	300	Date: 7/16/07 Time: 5:00 AM (PM)	16 7/8"	16 7/8"	16 7/8

N/A indicates No Analysis Performed  
 G indicates Gaining trend  
 Negative Calculated Leak Rates Indicate Gain  
 m indicates Manifolder tank

KEEP THIS PIECE OF PAPER ON FILE FOR AT LEAST 1 YEAR

To see how close you are to the monthly standard, divide the sum of the 4 weekly readings by 4 and enter result here >	<i>290</i>	YES or NO	<input checked="" type="radio"/> YES <input type="radio"/> NO
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# Cathodic Protection

If metal is in contact with earthen material, cathodic protection is required.



## Physical Inspection:

- Secure area for inspection and walk area for any problems
- Inspect Spill Buckets
- Inspect Turbine Sumps
- Inspect dispensers
- Inspect overfill device

# Physical Inspection

**Are Spill Buckets clean and able to be inspected?**



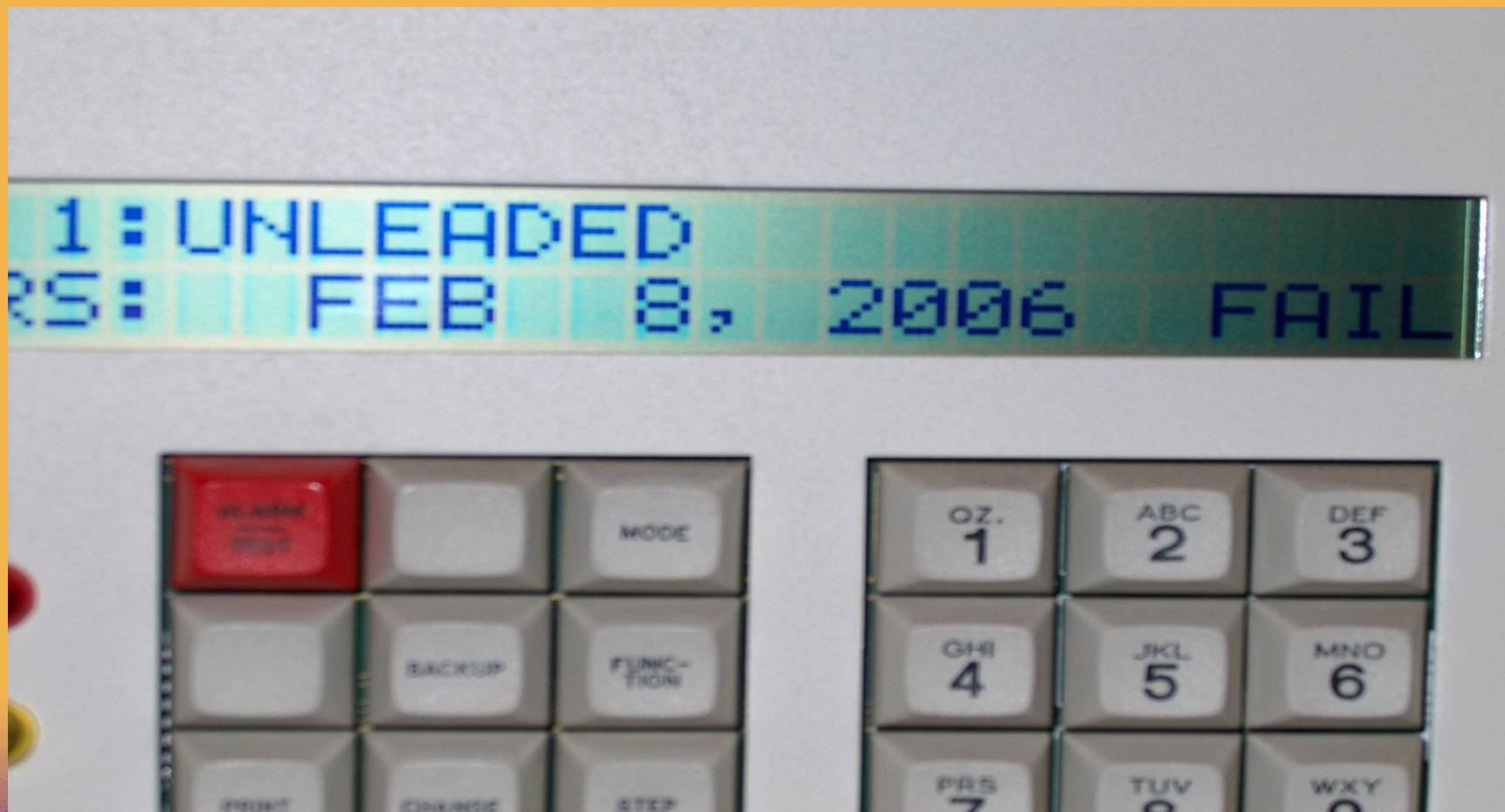
# Physical Inspection

**Are Spill Buckets free from cracks and/or breaks?**



# Physical Inspection

Is the ATG working properly and not alarming?





# Physical Inspection

**Is the Turbine Sump clean?**



# Physical Inspection

Is Turbine Sump free of product?



# Physical Inspection

**Are sensors securely mounted per manufacturer's specifications?**







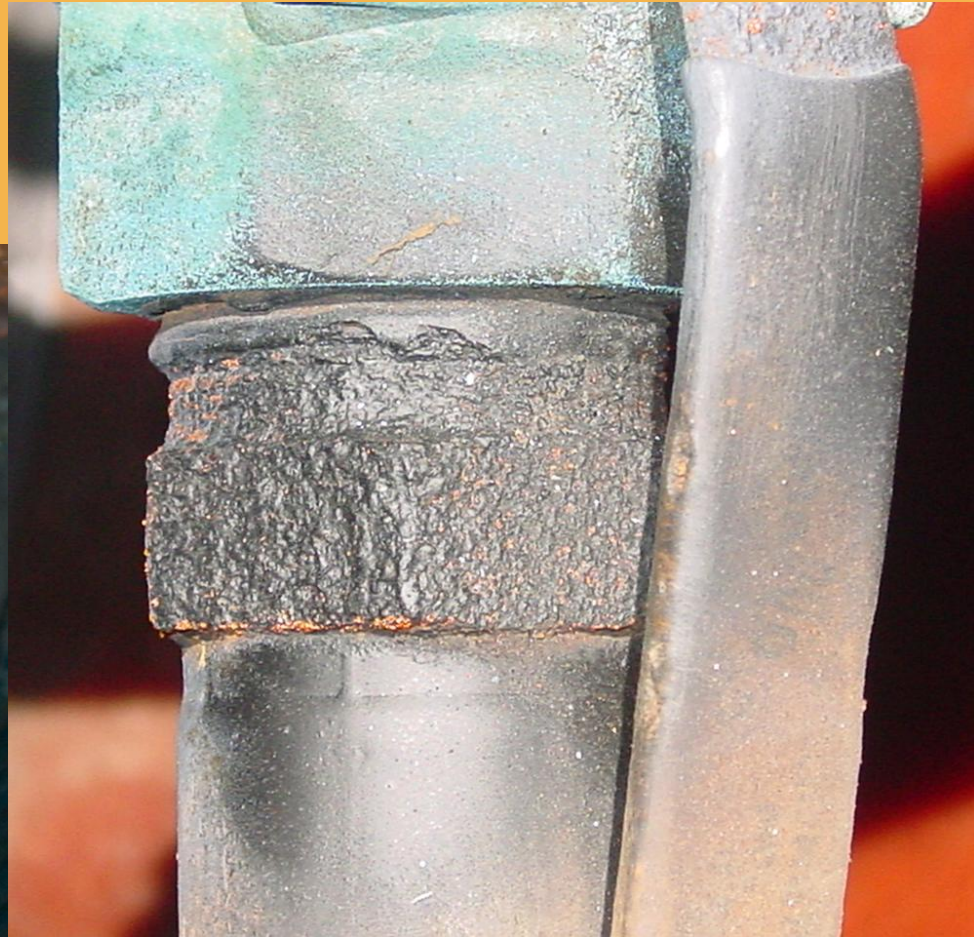
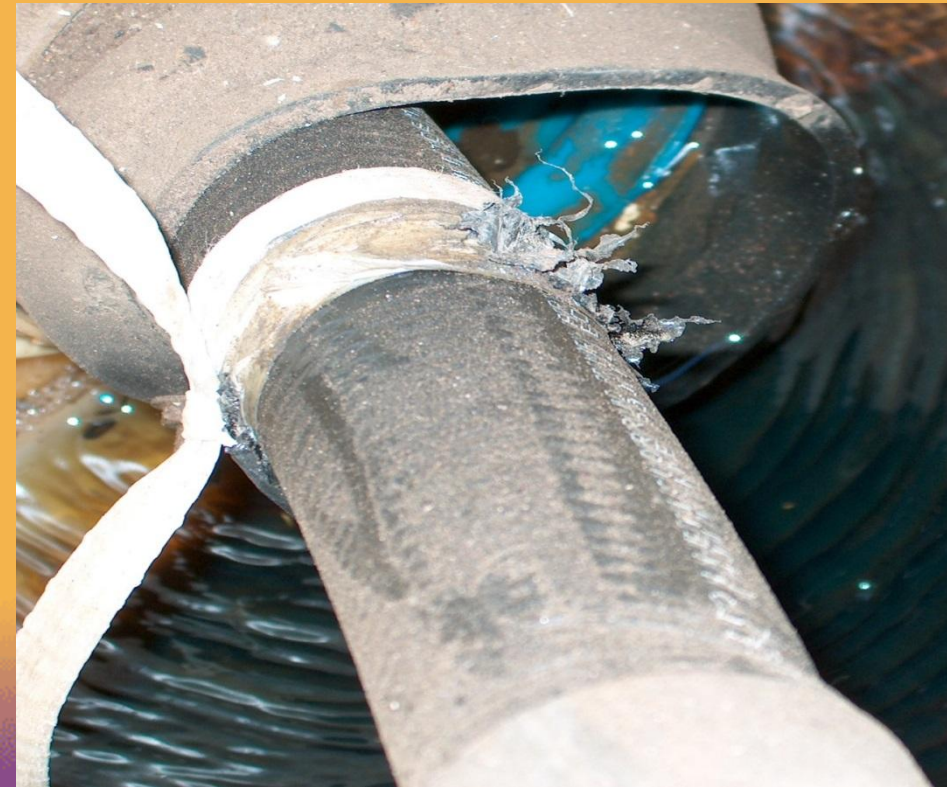
# Physical Inspection

**Are sumps free from corrosion?**



# Physical Inspection

Are repairs made to industry standards?



# Physical Inspection

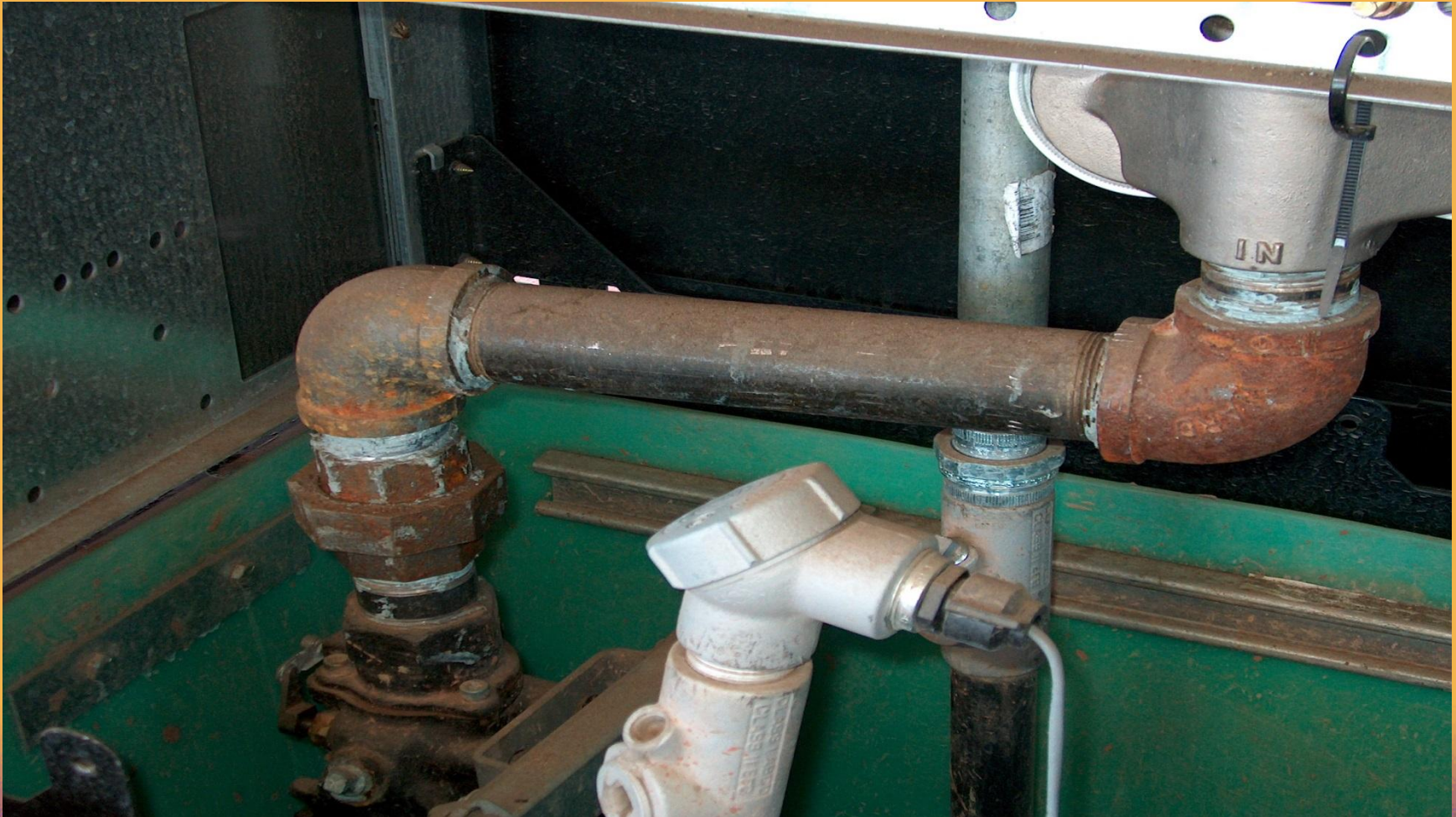
**Are tanks sticks in good shape?**





# Physical Inspection

**Are Dispensers clean and not leaking?**



# Physical Inspection

**Are overfills working correctly?**



# Physical Inspection

**Is the area free from active spills?**



# Physical Inspection

**Is there a spill going in the street or in drains?**



# Inspection Results

There are three results that can happen from a ADEQ UST Compliance Inspection

1. **IC** or In Compliance-This is issued when no violations are found.
2. **NOC** or Notice of Correction-This is issued when there are violations found, but they are not significant violations. Facilities are given 45 days to correct these issues. Note: After 45 days the case is given to Compliance Officer and it can be escalated to a NOV and/or administrative order.
3. **NOV** or Notice of Violation-This is issued when at least one significant violation is found. When a NOV is given and not addressed immediately, an administrative order enforceable in Superior Court can be issued, and violation of this order as found in ARS 49-1013(C) can be assessed with civil penalties of up to \$25,000 per day of violation.

NOTE: All results are public record and accessible by the media and EPA.



Don't be confused!



You are not alone!!!



# Our Inspectors are here to help!





WPD Financial Responsibility Program

# Underground Storage Tank Financial Responsibility Requirements

NISTM 2013 Arizona Storage Tank Conference

Presented By:

Denise L. McConaghy, P.E.

ADEQ WPD Financial Responsibility Program Manager

The FR rules require UST owners/operators to demonstrate FR for the corrective action costs and compensation of third parties arising from the releases of petroleum from USTs.

- 40 CFR Part 280, Subpart H - Federal
- A.R.S. §49-1006 – State statute (law)
- A.A.C. R18-12-300 to 325 (Article 3) – State rule

Federal/state governments and their agencies are not required to demonstrate FR if their debts/liabilities are the debts/liabilities of a state or the United States.

Local/county government entities must comply with FR requirements for any USTs they own/operate.

FR coverage to cover sudden and non-sudden accidental releases is needed.

- It covers the cost of both on-site and off-site corrective action.
- It covers both on-site and off-site third-party compensation - bodily injury and property damage.

Exhibit 2-2 REQUIRED AMOUNTS OF FINANCIAL RESPONSIBILITY		
Group Of UST Owners and Operators	Per Occurrence Coverage	Aggregate Coverage
<b>Group 1:</b> Petroleum producers, refiners, or marketers	<b>\$1 million</b>	<b>\$1 million</b> for 100 or fewer tanks <b>or</b> <b>\$ 2 million</b> for more than 100 tanks
<b>Group 2:</b> Nonmarketers	<b>\$500,000</b> if throughput is 10,000 gallons monthly or less <b>OR</b> <b>\$1 million</b> if throughput is more than 10,000 gallons monthly	

The required amounts of coverage depend on the owner/operator's type of business, the amount throughput and the number of tanks.

NOTE: The owner or the operator may provide FR coverage - but both are responsible if FR requirements are not complied with by either party!

**Exhibit 2-2  
REQUIRED AMOUNTS OF FINANCIAL RESPONSIBILITY**

<b>Group Of UST Owners and Operators</b>	<b>Per Occurrence Coverage</b>	<b>Aggregate Coverage</b>
<b>Group 1:</b> Petroleum producers, refiners, or marketers	<b>\$1 million</b>	<b>\$1 million</b> for 100 or fewer tanks <b>or</b> <b>\$ 2 million</b> for more than 100 tanks
<b>Group 2:</b> Nonmarketers	<b>\$500,000</b> if throughput is 10,000 gallons monthly or less <b>OR</b> <b>\$1 million</b> if throughput is more than 10,000 gallons monthly	

A large number of options are available to owners/operators to demonstrate that they comply with FR requirements. In Arizona the allowable financial assurance mechanisms are as follows:

### All Owners/Operators:

- Financial test of self-insurance
- Corporate guarantee\*
- Insurance/risk retention group coverage
- Surety bond\*
- Letter of credit
- Certificate of deposit\*
- Trust fund

\*These mechanisms require that a standby trust fund be established.

### Additional Mechanisms for Use by Local/County Governments:

- Local government financial test
- Local government guarantee
- Local government fund

Owners/operators may use one mechanism or a combination of mechanisms to meet FR obligations.



Documentation showing compliance with FR requirements must be submitted to ADEQ on an annual basis.

- All documentation must include a schedule of covered tanks.

### Insurance policy:

- The endorsement or certificate (whichever is applicable) must be worded as specified in 40 CFR §280.97.

**★★★NOTE: An ACORD is NOT acceptable documentation of FR compliance!!★★★**

### Certificate of Deposit:

- The certification and agreement must be worded as specified in Appendix A of A.A.C. Title 18, Chapter 12.

### All other mechanisms :

- Pertinent documents must be worded as specified in the applicable sections of 40 CFR Part 280, Subpart H.

## **Further Information/Questions:**

### **ADEQ UST Inspections and Compliance:**

**Nick Velasquez (Manager): (602)771-4315**

**Matt Garcia (UST Inspector): (602)771-4773**

**Jason Rushmeyer (UST Inspector): (602)771-4217**

**Cynthia Ribitzki, M.S. (UST Inspector): (602)771-4466**

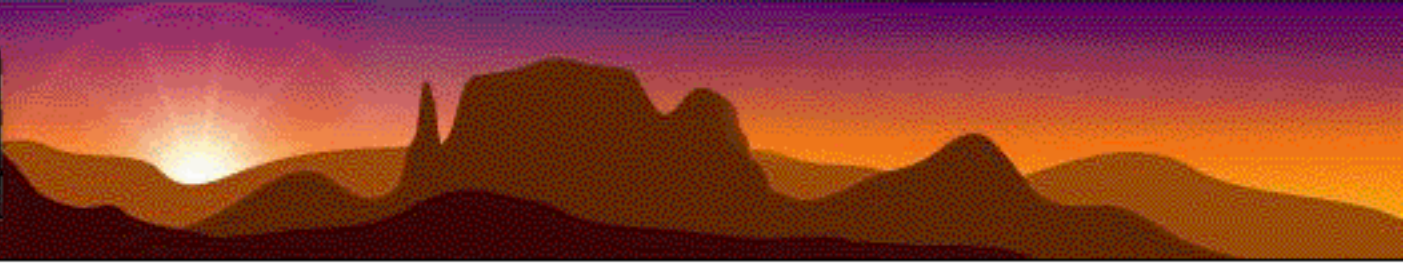
### **Financial Assurance Mechanisms:**

**Denise L. McConaghy, P.E.**

**ADEQ WPD FR Program Manager**

**(602) 771-4110**

**[d1m@azdeq.gov](mailto:d1m@azdeq.gov)**



**Questions?**