Underground Storage Tank Monthly Walkthrough Inspections

Southern Nevada Health District

UST Walkthrough Inspections

On October 13, 2018, Nevada UST regulations went into effect that included monthly and annual walkthrough inspections. Items in the checklist(s) are important preventative steps owners and operators can take towards ensuring potential releases to the environment are prevented.

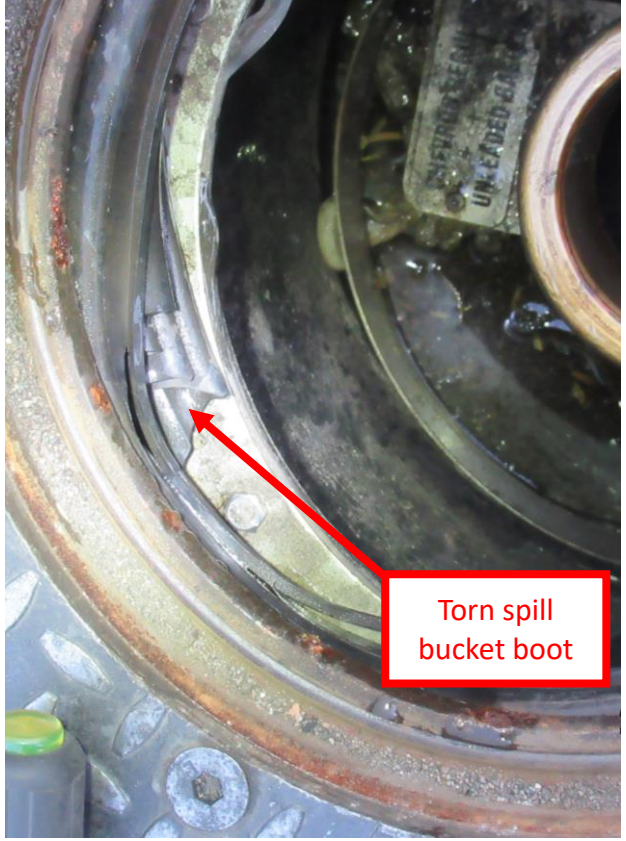
This presentation will highlight situations and/or instances that individuals conducting monthly walkthrough inspections should be aware of.

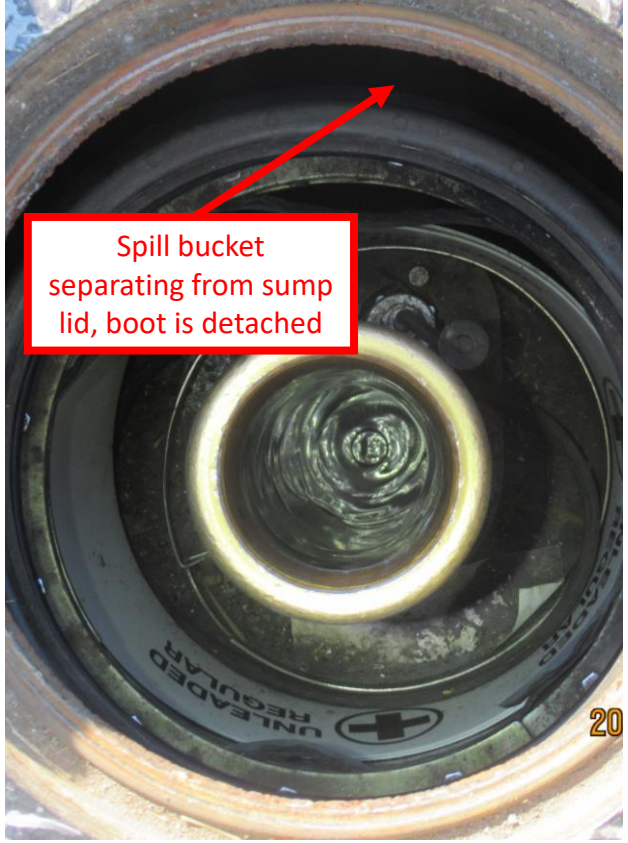
PLEASE NOTE: *This presentation is not all inclusive as to what you have or may encounter during your walkthrough inspection(s). It is not meant as an endorsement of services or materials. This is simply a tool to assist operators/owners while training their personnel on how to properly conduct a monthly walkthrough inspection. If you have site specific questions, please contact your local UST inspector or your petroleum contractor.*

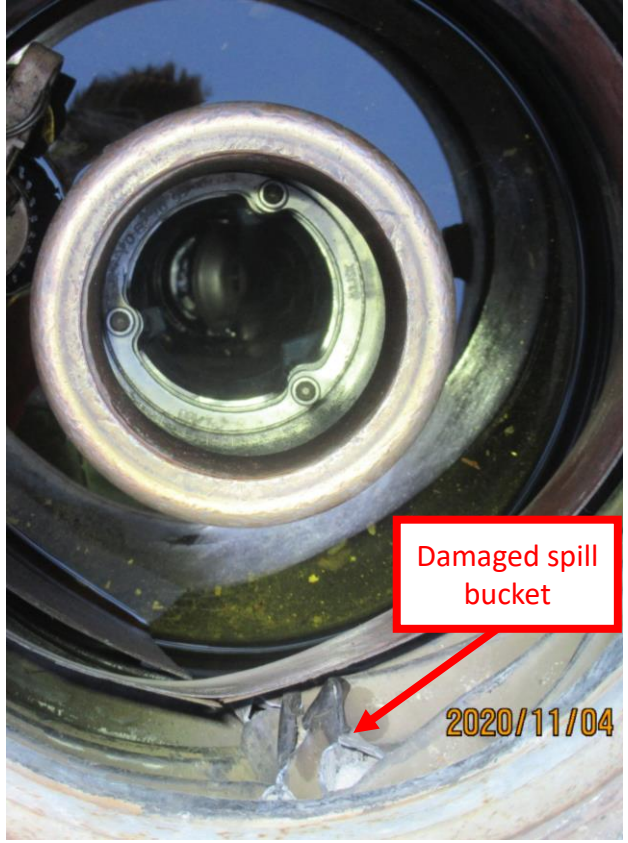
NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SNHD Southern Nevada Health District



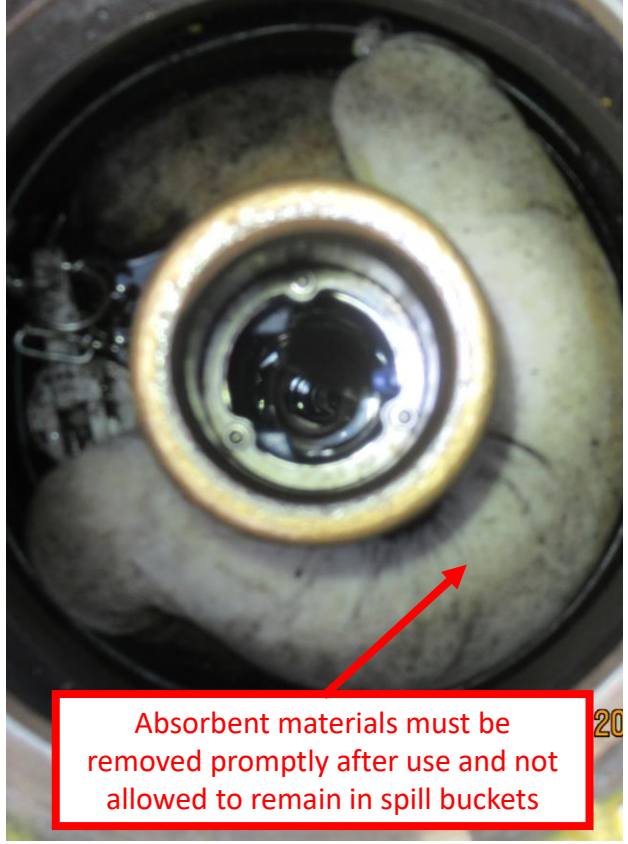




Monthly Walkthrough Inspection Item # 1

"Spill buckets are free from damage, cracks, or separation"

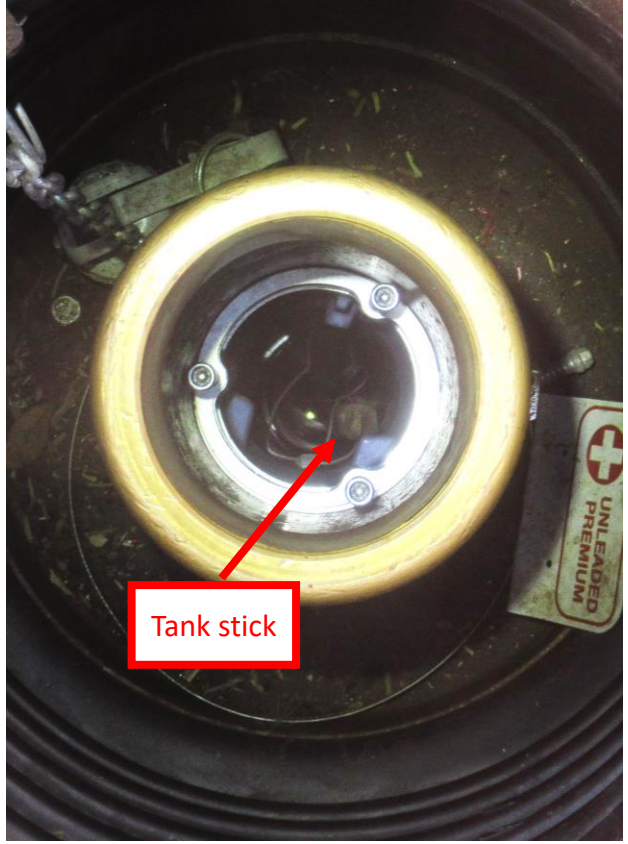
- A spill bucket must hold at least 5 gallons of liquid. If a spill bucket is damaged it must be repaired/replaced to prevent releases to the environment.



Monthly Walkthrough Inspection Item # 2

"Spill buckets do not contain any liquid or debris"

- Petroleum contaminated debris and/or liquid should be removed and properly contained prior to appropriate disposal. **DO NOT DUMP LIQUID OR DEBRIS ON THE GROUND**.
- Spill buckets are designed to temporarily hold liquid until it can be removed. It is NOT designed to hold liquids for extended periods of time. Absorbent materials (socks, towels, pig mats, etc.) must not be left in the spill bucket.



Monthly Walkthrough Inspection Item # 3

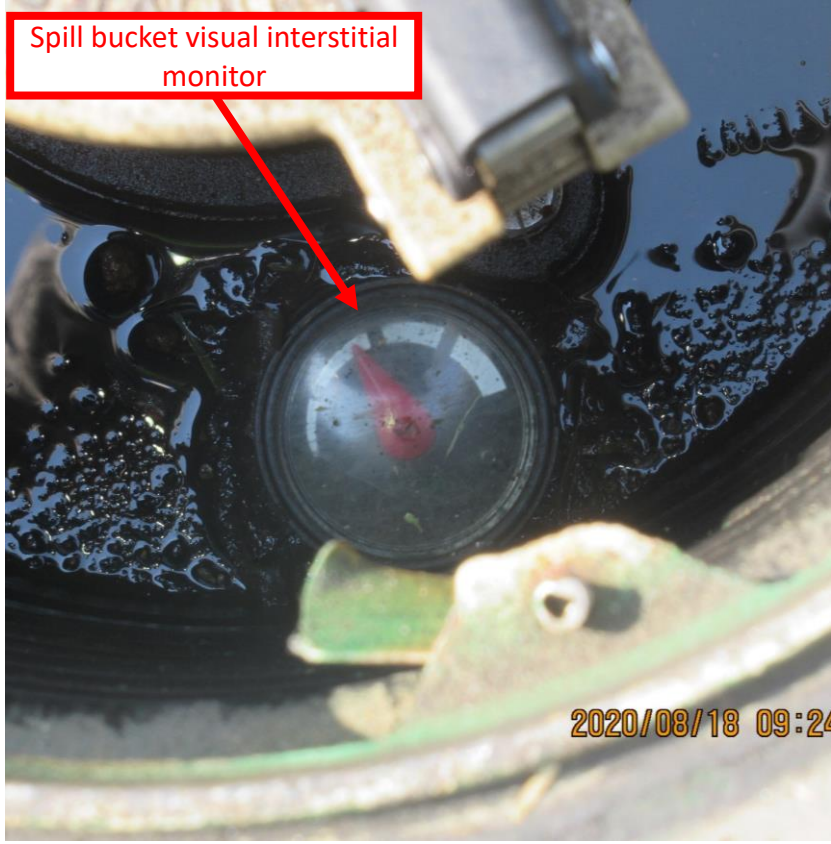
"Fill pipes are free from obstructions"

- **Tank sticks are often found in the fill pipe**. Automatic shut off devices cannot function if it is obstructed which could cause an overflow.
- Contact management and/or your local petroleum contractor to determine how best to remove the obstruction. Forcefully removing obstruction could damage an automatic shut off device.

Monthly Walkthrough Inspection Item # 4

"Fill caps securely attach to fill pipe"

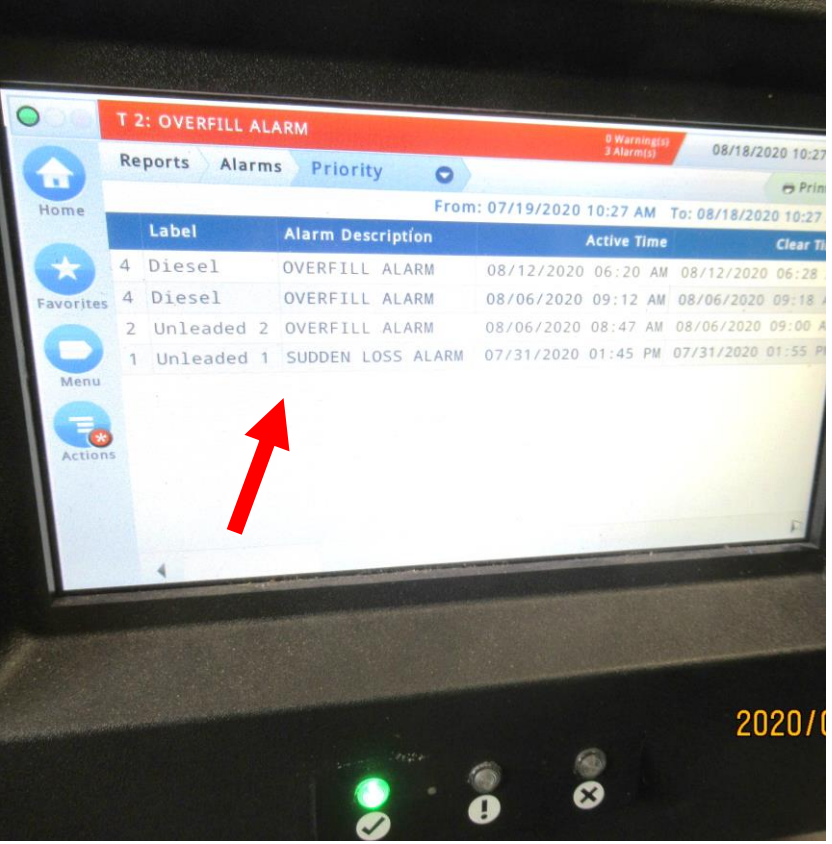
- Fill caps can rust closed.
- Fill caps that are broken or are missing gaskets will not allow the fill cap to securely attach to the fill pipe and must either be fixed or replaced.

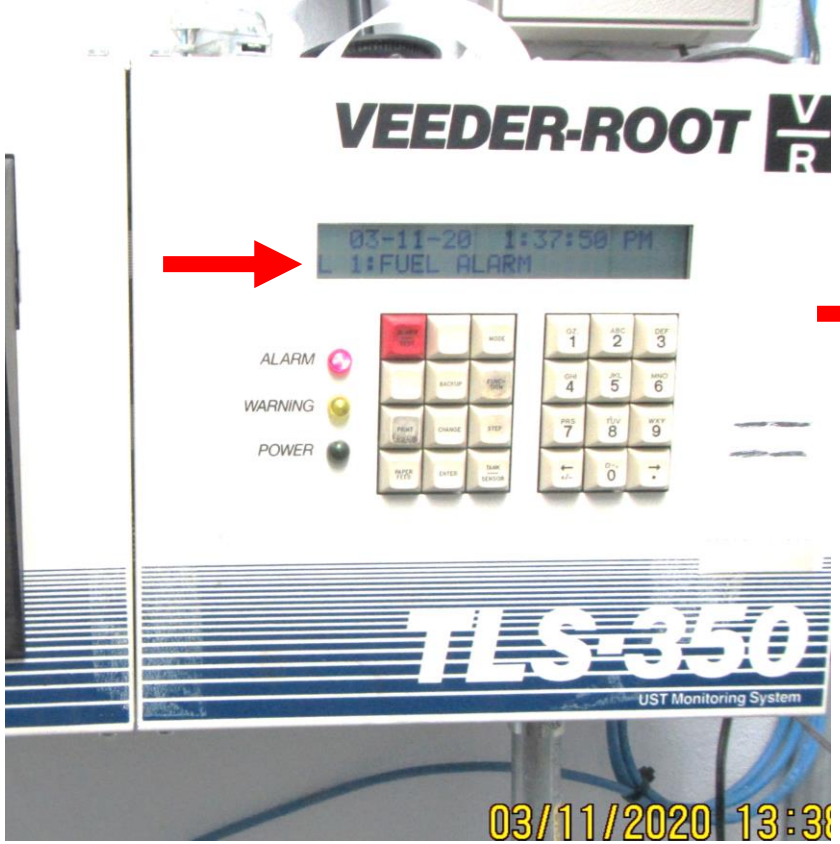


Monthly Walkthrough Inspection Item # 5

"No leaks observed in double-walled spill buckets with interstitial monitoring"

- Two types of interstitial monitoring commonly used for double-walled spill buckets:
  - Interstitial liquid sensor-check Automatic Tank Gauge to determine if there is a leak in the interstitial area.
  - Visual interstitial monitor-check your owner's manual to determine how you should read the monitor to know if liquid is present.
- NOTE: If you don't have double walled spill prevention equipment, don't check the box. Check with management and/or your petroleum contactor if you are unsure.

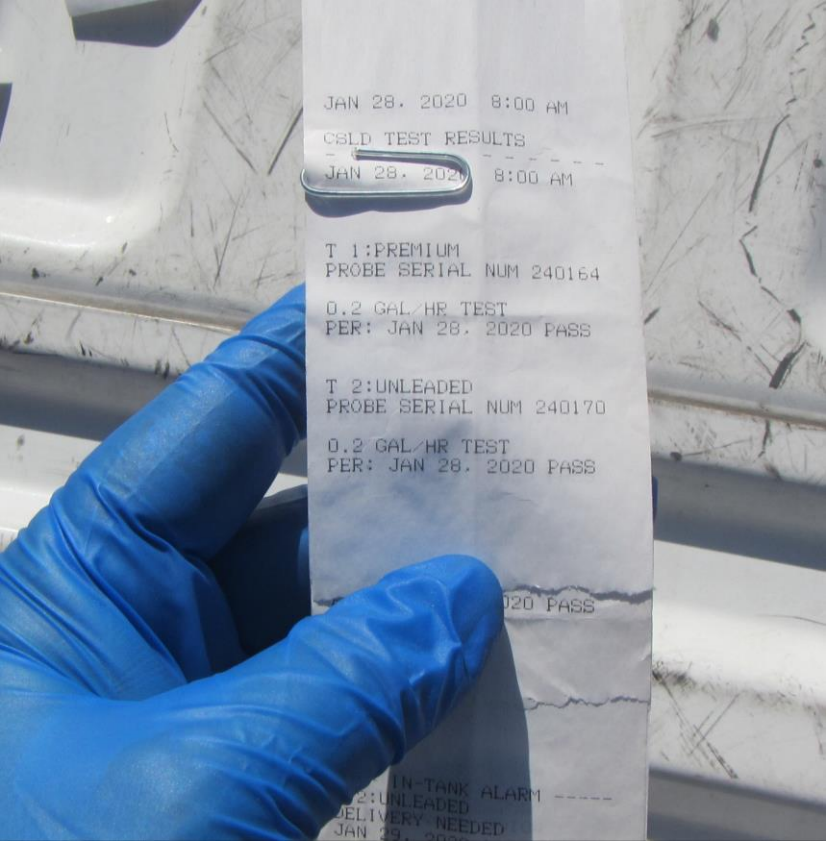


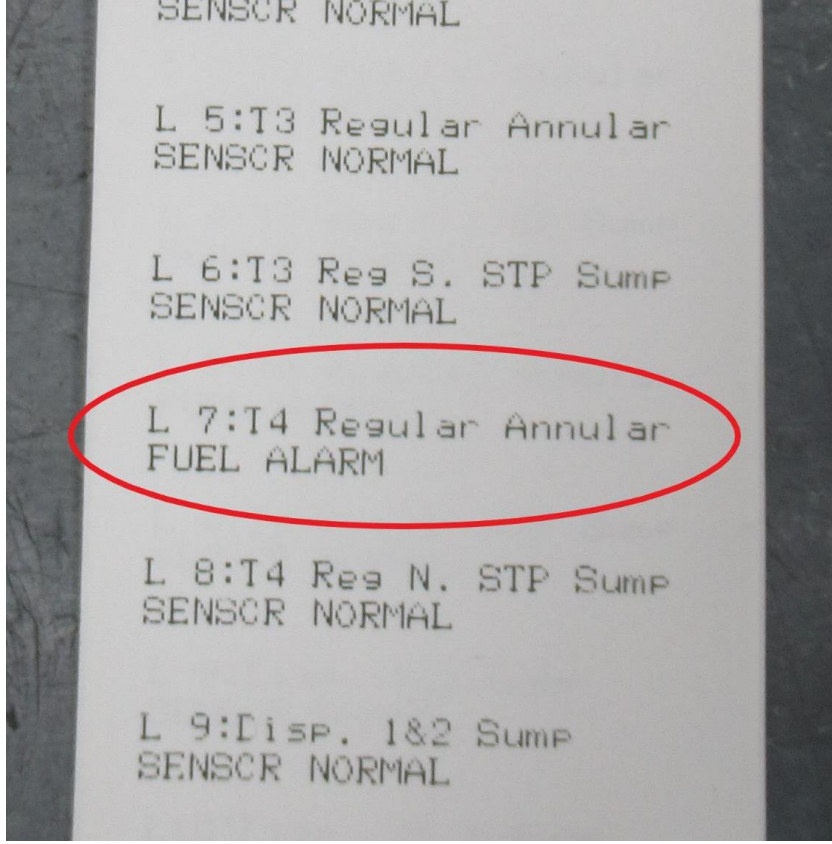


Monthly Walkthrough Inspection Item # 6

"Automatic Tank Gauge (ATG) is operating with no alarms or unusual operating conditions"

- Common alarms include: Fuel Alarm, Sensor Out, Probe Out, Overfill Alarm
- Document any alarms and/or any warning and contact management and/or your petroleum contractor immediately. **DO NOT DISREGARD OR SILENCE ALARMS** as this could pose a severe environmental or safety risk.

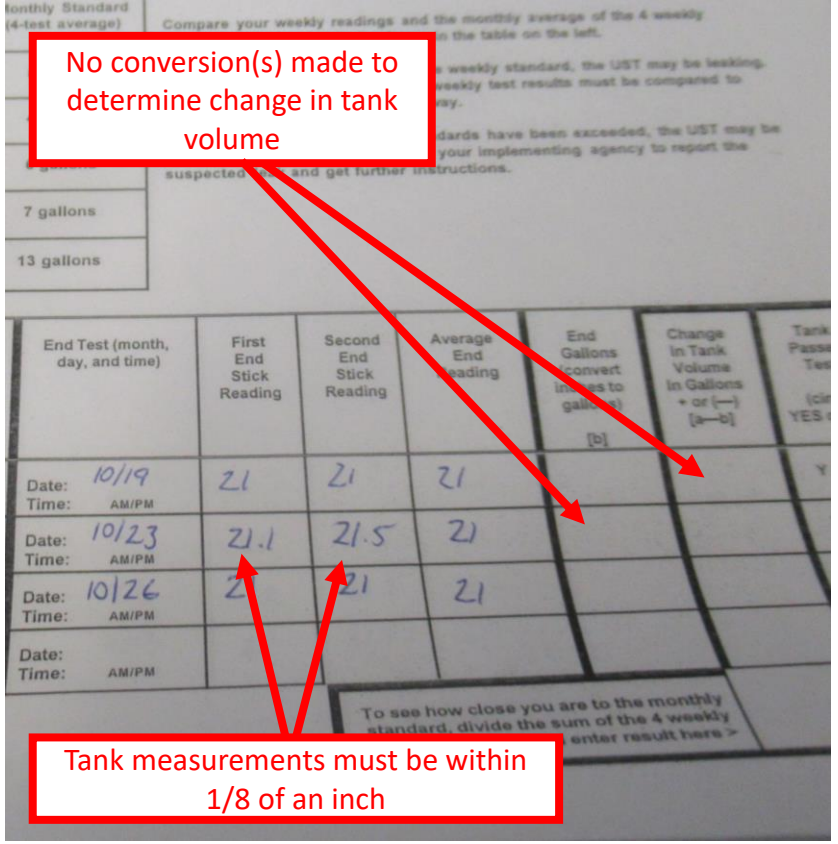




Monthly Walkthrough Inspection Item # 7

"Leak detection records were reviewed and kept current"

- Review the testing results and print and/or keep a digital copy of your release detection record. **If you don't know** what type of leak detection method your site uses or how to interpret the results, consult management and/or your petroleum contractor.
  - NOTE: Providing a 12-month leak detection report summary or the equivalent as a result of a compliance inspection doesn't meet the intent of the regulation nor does it prove the leak detection testing was reviewed.
  - NOTE: If your leak detection records indicate failing results, contact management and/or your local petroleum contactor and investigate the reason for the failure.



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 46")	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

Monthly Walkthrough Inspection Item # 7 Continued

"Leak detection records were reviewed and kept current"

- When using <u>manual tank gauging for leak detection</u>, ensure records are correct, complete, and up to date. **If you don't have a tank chart** you cannot accurately determine if your tank is leaking without knowing the size and diameter of your tank. Consult management and/or your petroleum contractor for assistance.

Resources

- SNHD
  - UST Website
  - Monthly Walkthrough Inspection Checklist
- NDEP
  - UST Website
  - Nevada Environmental Activities Website
- EPA
  - 2015 Revised Underground Storage Tank Regulations-Final Rule
  - Operating and Maintaining UST Systems: Practical Help Checklist
  - Musts for USTs
  - Introduction to Statistical Inventory Reconciliation
  - Manual Tank Gauging for Small Underground Storage Tanks