Welcome to the 2019 Administrative & Underground Storage Tank Inspector Seminar

Tom Wolf, Governor

Patrick McDonnell, Secretary
Central Office Staff

- **Joshua Blanco** - Solid Waste Program Specialist - Supervisor of UST Unit
- **Cheryl Mauch** – Environmental Trainee – UST Unit
- **Chantelle King** - Environmental Trainee - UST Unit
- **Anne Toth** - Solid Waste Program Specialist - Supervisor of Certification Unit
- **Wendy Davis** – Certification Unit
Regional Office Staff
Ground Rules

• Please turn all cell phones and electronic devices to vibrate or silent mode.

• If there is an emergency, proceed to the closest emergency exit and gather outside.

• There will be 2 short breaks of 10 to 15 minutes.

• We are all guests in this building. Please respect the building and the grounds. Please dispose of all garbage and take all of your belongings when leaving.
Questions!

• We understand there are many, many questions regarding regulation amendments and the new/revised forms.

• Today’s presentation is designed to answer as many questions as possible in the time allotted.

• We will do our best to manage the time and presentation flow while answering questions from the group.

• Our contact information is provided at the end of the presentation for any remaining questions.
Let’s start with:

Administrative Information
Administrative Training
2019

For Tank Handlers holding certification categories: UMX, UMR, UTT, AMMX, AMNX, AMR, AFMX, AFR, AMEX, ACVL, TL
Changes to PA Chapter 245 (Administration of the Storage Tank and Spill Prevention Program) were published in the Pa Bulletin on December 22, 2018.

• Items to be covered in administrative training:
  – Certification
  – Standards of Performance
  – Permitting
  – Registration
  – Online Initiatives and Administrative Reminders
Certification (§ 245.110 and § 245.111)

Certification
• **New Certification Category: UMI**
  
  – **Allowed Activities:**
    
    • Minor modifications to UST systems
    
    • Evaluation and Testing of overfill prevention equipment, containment sumps, spill prevention equipment, and release detection equipment
  
  – **Qualifications:**
    
    • 2 years experience
    
    • Technical Training (UMX initial course)
    
    • 10 minor modifications
  
  – **Obtaining Certification:**
    
    • Application, Attachment A, Training Course Certificate
    
    • Pass Administrative and UMX Exams
Certification

• Minor Modification
  – Does not alter the design of the storage tank system or facility but may affect the integrity of the tank system or facility

• Maintenance
  – Normal operational upkeep to prevent a storage tank system or facility from releasing regulated substances

• Guidance Document
  – Storage Tank Modification and Maintenance Issues
  – Document No. 263-0900-001
  – March 29, 2014
• **UMX and AMMX**
  – The activity requirement to apply is now 10 complete installations or major modifications (at least 5 installations)
  – Reminder: if you already hold UMX then no activities are required to apply for AMMX

• **IAF/IAM**
  – Once certified must complete a Department-provided training prior to conducting inspections

• **Exams**
  – Passing exam scores are valid for 2 years
  – Exam fee currently $80 per test
Certification

• Companies and Individuals
  – Certification can be suspended for violations of The Clean Streams Law, the Air Pollution Control Act or the Solid Waste Management Act even if it’s not part of a tank handling activity

• Study Guides
  – Study guides have been updated and are available on the website
  – Hard copies were mailed to all individuals with current exam eligibility
Standards of Performance (§ 245.132)

Standards of Performance
A company that employs an individual certified in the UMX, UMR, UMI or UTT category or an individual certified in the UMX, UMR, UMI or UTT category who is not employed by a certified company shall participate in the Tank Installer Indemnification Program (TIIP) as required under section 704(a)(1) of the act (35 P.S. § 6021.704(a)(1)) and shall provide timely payment of TIIP fees as required under section 705(d)(1) and (e) of the act (35 P.S. § 6021.705(d)(1) and (e)) and § 977.19(b) (relating to certified company fees for the Underground Storage Tank Indemnification Fund).
Tank Installers Indemnification Program (TIIP)

• Also applies to companies that employ individuals holding the tank lining (TL) certification which perform certified activities on underground tanks.

• Underground Storage Tank Indemnification Fund (USTIF) regulations, § 977.19, Certified Company Fees, mentions storage tank liner (TL) as a category required to pay the fees if activities performed on underground tanks
The Department WILL be taking enforcement action against companies or individuals who have delinquent TIIP fees.
Inspection activities for modifications must be reported to the Department within 30 days

– Was 60 days
– Still 60 days for other inspection reports
Standards of Performance

• New Regs Clarify the reporting requirements of certified individuals
  – We will go into details during the technical seminar part of today’s training
Training Course Approval
• New regs clarify what must be submitted for approval of technical training courses:
  – Application with general information
  – Instructor information
  – Test information
  – Other Information:
    • Copies of presentations
    • Presenter notes
    • Training handouts
    • References
Permitting (§ 245.201)
Permitting

• Operating Permits

  – Sections of the regulations having to do with “Permits-by-Rule” (§ 245.211) and “General Operating Permits” (§ 245.212 and § 245.211) were removed. These are now called “Operating Permits.”
Site Specific Installation Permits (§ 245.231)

- Required for:
  - New aboveground storage tank systems with a capacity greater than 21,000 gallons at an existing large aboveground storage tank facility
  - New large aboveground storage tank facilities
  - New tank systems (UST or AST) storing highly hazardous substances
  - New UST field constructed storage tank systems not installed within a previously registered underground storage tank system

- No SSIP needed for “Tank within a Tank”
  - Applies only to USTs where a new tank is built inside of the old one
  - Does not apply to any other field constructed underground tanks
  - Does not apply to aboveground tanks
SSIPs will expire 5 years from the date of issuance unless the Department receives an extension request in writing and grants the request.

- Spill Prevention Response Plan must include the proposed storage tanks.
Registration (§ 245.41)
• New regs clarify that information for operators of underground tanks must be included with registration forms

• New regs clarify that a person who sells a regulated tank or property with a regulated tank must notify the purchaser, in writing, of a tank owner’s obligations
TOS for Underground Storage Tanks:

- New regs clarify that owners and operators must empty a tank being placed temporarily out-of-service prior to submitting the amended registration form.
  - The Department will ask for a statement or proof that this has been done

- Clarify that the Department may require testing to verify tightness, compatibility, and operability of tanks being taken from Temporary Out-of-Service status to operating status.
  - Department technical staff will review requests to put tanks back into operating status and determine what needs to be done
Registration – Temporarily Out of Service

TOS for Large Aboveground Storage Tanks

• New regs clarify and add language to conditions of out of service status.

• TOS period is 5 years unless Department receives extension request in writing and grants the request
  – Previous variance provision removed

• The Department may impose conditions and require submission of documentation for TOS extensions

• Required inspections may be delayed if agreed upon by the Department
TOS for Small Aboveground Storage Tanks

- Added section for TOS for small aboveground tanks
- Tanks must be empty
- TOS period is 5 years unless Department receives extension request in writing and grants the request
- The Department may impose conditions and require submission of documentation for TOS extensions
- Required inspections may be delayed if agreed upon by the Department
Online Initiatives

www.dep.pa.gov

Businesses ➔

Land ➔

Storage Tanks

• What’s new in storage tanks
• Most forms have been updated
• Online registration fee payment for tank owners (current)
• Online submittal of forms, applications, etc. (in progress)
• “Revisions to Storage Tanks Regulations” page
For a comprehensive list of the changes made to 25 Pa. Code, Chapter 245, please visit the new “Revisions to Storage Tank Regulations” page on the Storage Tanks Website.
2018 Revisions to Pennsylvania's Storage Tank Regulations

The DEP Division of Storage Tanks published revisions to storage tank regulations (25 Pa. Code, Chapter 245) on December 22, 2018. Here you’ll find a summary of the changes, new and updated forms, and helpful information about the revisions to assist in maintaining regulatory compliance. If you have any questions, please contact the DEP Division of Storage Tanks at 1-800-42-TANKS (toll-free in PA) or 717.772.5599 (local and out-of-state) or by email at ra.tanks@pa.gov.

New and Updated Forms

Underground Storage Tank Testing Forms

- Overfill Prevention Evaluation Form (2630-FM-BECB0008) [Word and PDF]
- Automatic Line Leak Detector Functionality Testing Form (2630-FM-BECB0001) [Word and PDF]
- Pressure/Vacuum Monitoring Functionality Testing Form (2630-FM-BECB0007) [Word and PDF]
- Groundwater/Vapor Monitoring System Functionality Testing Form (2630-FM-BECB0009) [Word and PDF]
- Sensor Functionality Testing Form (2630-FM-BECB0020) [Word and PDF]
- Automatic Tank Gauge Functionality Testing Form (2630-FM-BECB0019) [Word and PDF]
- Spill Prevention Equipment/Containment Sump Integrity Testing Form (2630-FM-BECB0016) [Word and PDF]

Inspection Forms

- Aboveground Storage Tank Inspection Summary (2630-FM-BECB0050) [Word and PDF]
- Aboveground Storage Tank Lining Inspection Summary (2630-FM-BECB0014) [Word and PDF]
- Underground Storage Tank Facility Operations Inspection Form (2630-FM-BECB0501) [Word and PDF]

Release Reporting Form

- Notification of Release - Notification of Contamination Form (2630-FM-BECB0082)

Educational Material

- 25 Pa. Code, Chapter 245
- DEP Storage Tanks Fact Sheets
- DEP Storage Tanks Technical Guidance Documents
- Presentation on Amendments to Chapter 245
- US EPA Technical Compendium
- DEP Storage Tanks Technical Compendium

Summary of Regulatory Changes

Subchapter A: General Provisions
Subchapter B: Certification Program
Subchapter C: Permitting
Subchapter D: Corrective Action
Subchapter E: Technical Standards for USTs
Administrative Reminders

• Know your certification expiration date
• Start to schedule training 12 – 18 months before expiration
• Don’t forget to submit application form and training certificates when ready to renew
• If you need to take an exam submit application at least 60 days before the exam date
• Make sure you let us know when changes occur (address, employer, email address, etc.)
• Signatures
• Check website for updated forms, applications, etc.
• Stay current with TIIP fees
Any Questions?
Let’s move onto the:
UST Technical Information
245.1 Definition Additions, Amendments, Deletions

- **Added** the following terms:
  - Aboveground Storage Tank System
  - Containment Sump
  - Environmental Covenant
  - Immediate Threat of Contamination
  - Release
  - Repair
  - Spill Prevention Equipment

- **Amended** Definitions
  - Tank Handling Activities
  - Underground Storage Tank

- **Deleted** definitions
  - Actively involved
  - Interim certification
  - Reportable Release
245.1 Definitions

Release - Spilling, leaking, emitting, discharging, escaping, leaching or disposing from a storage tank into surface waters and groundwaters of this Commonwealth or soils or subsurface soils in an amount equal to or greater than the reportable released quantity determined under section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C.A. § 9602), and regulations promulgated thereunder, or an amount equal to or greater than a discharge as defined in section 311 of the Federal Water Pollution Control Act (33 U.S.C.A. § 1321) and regulations promulgated thereunder. The term also includes spilling, leaking, emitting, discharging, escaping, leaching or disposing from a storage tank into a containment structure or facility that poses an immediate threat of contamination of the soils, subsurface soils, surface water or groundwater.
245.1 Definitions

• More on “Immediate Threat of Contamination”
  – Equal to or greater than reportable released quantity (Hazardous)
  – Any amount (Petroleum)

Except

  – Less than 25 gallons of Petroleum spilled in a liquid tight containment sump or emergency containment structure as a result of a tank handling activity where the Certified Installer has complete control over the regulated substance and prior to the Certified Installer leaving the site, the total volume of the regulated substance is recovered and removed.
Immediate Threat of Contamination: Yes or No?
Amended Definition: Tank Handling Activities

*Tank handling activities*—Activities to install, modify, perform change-in-service or close all or part of a storage tank system or storage tank facility. The term does not include maintenance activities.
The definition of Underground Storage Tank was amended. The following UST systems are now regulated under Chapter 245:

- A wastewater treatment tank system
  - Wastewater treatment tank systems not part of a wastewater treatment facility regulated under Section 307(b) or 402 of the Clean Water Act
- A UST containing radioactive material
  - UST systems containing radioactive material or coolants that are regulated under the Atomic Energy Act of 1954
- A UST emergency generator system at a nuclear power generation facility
  - USTs that are part of an emergency generator system at a nuclear power generation facility licensed by the Nuclear Regulatory Commission and subject to NRC requirements regarding design and quality criteria
Amended UST Definition

“New” USTs

Must Register with DEP no later than February 20, 2019:

- A wastewater treatment tank system
- A UST containing radioactive material
- A UST emergency generator system at a nuclear power generation facility

<table>
<thead>
<tr>
<th>Install Date</th>
<th>Is not required to comply with:</th>
</tr>
</thead>
<tbody>
<tr>
<td>On or After May 7, 1985</td>
<td>Inspections, spill and overfill, water checks, operator training, and release detection</td>
</tr>
<tr>
<td>Before May 7, 1985</td>
<td>Inspections, spill and overfill, water checks, operator training, release detection, AND performance standards AND corrosion protection</td>
</tr>
</tbody>
</table>
The definition of Underground Storage Tank was amended. The following UST systems are now regulated under Chapter 245:

- Field-constructed hazardous substance underground storage tanks at facilities regulated under the Safe Drinking Water Act
  - These tanks were installed prior to October 11, 1997
  - They were previously regulated under the Safe Drinking Water Act by policy
  - The policy was rescinded on January 19, 2019 when the recession was published in the *PA Bulletin*
“New” USTs

Must Register with DEP no later than February 20, 2019:

• Field-constructed hazardous substance underground storage tanks at facilities regulated under the Safe Drinking Water Act
Corrective Action Regulation Amendments

Owner or Operator Reporting Requirements

- Owner or Operator Reporting
  - Shall report a Release
  - Shall report a Suspected Release if investigation cannot determine whether a release has occurred (15 days from indication of a release)
  - Shall report a non-release if removal of the regulated substance cannot be accomplished within 24 hours. (telephone or email)
When is an owner or operator NOT required to report a release to DEP?

• Release Reporting to DEP is **not required** if:
  - 1) The release is under control
  - 2) The substance is completely contained
  - 3) The substance is completely recovered and removed within 24 hours of the release

• **AND** it is one of these two types of release:
  - A release of petroleum to an aboveground surface, including within an emergency containment structure, that is less than 25 gallons
  - A release of petroleum to a containment sump if the total volume of the release is contained below the lowest sump penetration
Corrective Action Regulation Amendments

Remedial Actions

• Added reporting requirements on Responsible Party
  – No later than 24 hours notify the Department:
    • after the initiation of interim remedial actions
    • of providing an alternate source of water
    • after the initiation of site characterization activities
Remedial Actions

- Added posting requirements in the *PA Bulletin* to the Department
  - Following submission of a complete remedial action plan (and completion report) selecting the background or Statewide health standard or site-specific standard
  - A notice of DEP’s final action

- Added authority to the Department
  - The Department may require the responsible party to suspend remedial action and notify the Department, by telephone or e-mail, within 24 hours of suspension
Release Reporting for Certified Individuals

Remember: Owner and Operator reporting requirements are not the same as the reporting requirements for certified installers and certified inspectors.

245.132 Standards of Performance require:

(4) Report the following to the Department while performing services as a certified installer or certified inspector:

  (i) A release of a regulated substance.
  (ii) Suspected or confirmed contamination of soil, surface or groundwater from regulated substances.
  (iii) A regulated substance observed in a containment structure or facility.

(5) Report to the Department a failed test of spill prevention equipment, containment sumps and overfill prevention equipment conducted as required in this chapter.
Release Reporting for Certified Individuals

**Remember:** Owner and Operator reporting requirements are not the same as the reporting requirements for certified installers and certified inspectors.

**Note:** The revised reporting form has been renamed to: Notification of Release - Notification of Contamination 2620-FM-BECB0082

As with all forms, please use the most recent revision.
Release? Required to Report to DEP?
Changes to Release Detection Requirements

• 245.441(e) required monthly monitoring of existing tank systems (installed prior to 11/10/2007) with double-walled pressurized piping and containment sumps at the piping junctures and dispensers
  – The monthly sump check requirement has been removed.
  – There is NO monthly sump check requirement unless the piping installation date (after 11/10/2007) requires that the facility conduct interstitial monitoring.

• European (Safe) suction piping systems must maintain clear documentation showing the piping system meets safe suction installation requirements. No other piping release detection is required regardless of installation date.
  – Newly installed systems must be double-walled
  – The exemption of conducting piping release detection is NOT dependent on installation date
Release Detection Changes

Changes to Release Detection Requirements

- Pressurized piping systems require line leak detectors.

<table>
<thead>
<tr>
<th>Install Date</th>
<th>Line Leak Detectors Shall</th>
</tr>
</thead>
<tbody>
<tr>
<td>On or Before 11/10/2007</td>
<td>Restrict or Shutoff flow of regulated substances through the piping if unattended and open for business</td>
</tr>
<tr>
<td>After 11/10/2007</td>
<td>Automatic Pump Shutoff that shutoffs flow of regulated substances through the piping</td>
</tr>
</tbody>
</table>

(see upcoming slide for emergency generators LLD exceptions)
Emergency Generator USTs are no longer deferred from release detection

<table>
<thead>
<tr>
<th>Install Date</th>
<th>Release Detection Required By</th>
</tr>
</thead>
<tbody>
<tr>
<td>After December 22, 2018</td>
<td>At Installation</td>
</tr>
<tr>
<td>After November 10, 2007</td>
<td>On or Before December 22, 2019</td>
</tr>
<tr>
<td>On or Before November 10, 2007</td>
<td>On or Before December 22, 2020</td>
</tr>
</tbody>
</table>

USTs used solely with an emergency generator that have pressurized piping:

- **NOT** required restrict or shutoff flow of regulated substances
- An audible or visual alarm must be installed and configured in lieu of regulated substance flow restriction or shutoff
SIR results must be provided at the conclusion of the 30-day monitoring period.

- There is **NO** longer a 20 day grace period (after the 30-day monitoring period) for the return of results.

- From EPA’s Technical Compendium (discussion on next page):
Changes to Release Detection Requirements
Statistical Inventory Reconciliation (SIR)

– Owners and operators of underground storage tanks using SIR to meet the federal tank release detection requirement must determine the leak status of their underground storage tanks within the 30-day monitoring period.

– For UST system owners and operators who use SIR methods that have difficulty meeting the tank release detection requirement, owners can address this by:
  • Conducting a more frequent analysis;
  • Sending data more expeditiously by electronic means;
  • Using a SIR vendor that currently meets the 30-day requirement;
  • Discussing changing method or data collection procedures with their SIR vendor in order to meet EPA’s release detection requirement; or
  • Using another type of release detection method.

Note: SIR Vendors have been aware of this change since 2015 or earlier.
UST Testing and Walkthroughs

Periodic Testing and Walkthrough Inspections
245.31 -- 245.437 -- 245.438

• Required Periodic Walkthrough Inspections by Operators
• Required Periodic Testing of UST Components
  • DEP-certified individuals required to conduct periodic testing
  • Valid Periodic Testing is documented on DEP provided forms
UST Testing Activities

245.31 Testing Activities
(new title, formerly Tightness Testing Activities)

• Added 245.31(f) indicating that the periodic testing required in 245.437 must be conducted by **DEP-certified individuals** holding the appropriate certification and documented on a **DEP form**.

• The following periodic testing may be required:

<table>
<thead>
<tr>
<th>Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overfill Prevention Equipment</td>
</tr>
<tr>
<td>Containment Sumps</td>
</tr>
<tr>
<td>Spill Prevention Equipment</td>
</tr>
<tr>
<td>Release Detection Equipment</td>
</tr>
</tbody>
</table>
245.31 Testing Activities

- 245.31 (a)-(e) continue to provide requirements for Tightness Testing Activities
- Tightness Testing required by 245.442 or upon DEP request must be conducted by DEP-certified UTT and documented appropriately based on manufacturer’s guidance for the written test report
## UST Testing Certifications

<table>
<thead>
<tr>
<th>Equipment</th>
<th>UMX/UMI</th>
<th>UTT</th>
<th>IUM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spill Prevention Equipment</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Containment Sumps</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Overfill Prevention Equipment</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Release Detection Equipment</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Tank/Piping Tightness Testing</td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
Questions:

Is a DEP-certified UTT allowed to conduct overfill prevention equipment evaluations?

My company has our own overfill prevention equipment evaluation form. Can we still use our form to meet the DEP requirements?
### UST Periodic Testing Requirements

<table>
<thead>
<tr>
<th>New <strong>Periodic</strong> Testing Requirements</th>
<th>Timeframe</th>
<th>Exceptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spill Prevention Equipment</td>
<td>3 Years</td>
<td>X</td>
</tr>
<tr>
<td>Containment Sumps</td>
<td>3 Years</td>
<td>X</td>
</tr>
<tr>
<td>Overfill Prevention Equipment</td>
<td>3 Years</td>
<td></td>
</tr>
<tr>
<td>Release Detection Equipment</td>
<td>Annual</td>
<td>X</td>
</tr>
</tbody>
</table>

- Some designs of double-walled Spill Prevention Equipment and Containment Sumps can be monitored by periodic walkthrough inspections & not have to conduct periodic testing.
- Containment Sumps must routinely contain product and be used for **Interstitial Monitoring** to require periodic testing.
- Handheld Release Detection Equipment (Bailers and Gauge Sticks) are checked during periodic walkthrough inspections.
## UST Periodic Testing Requirements

<table>
<thead>
<tr>
<th></th>
<th>FOI Before December 22, 2019</th>
<th>FOI after December 22, 2019 and on or before December 21, 2021</th>
<th>FOI after December 21, 2021</th>
</tr>
</thead>
</table>

* Piping Release Detection **Line Leak Detector Operability Testing** was required prior to December 22, 2018 and is required for all FOIs.
Overfill Prevention Equipment Evaluations

– Ball Floats
  • **NO** installs, repairs, replacements, or upgrades after **December 22, 2018**
  • Ball Floats that **FAIL** an Overfill Evaluation or cannot be evaluated shall be replaced with another form of overfill prevention equipment.
  • During the installation of different type of overfill prevention equipment (e.g. drop tube shutoff valve or overfill alarm), the entire ball float assembly must be removed.

– Current Overfill Prevention Options must be able to:
  • Automatically shut off flow at no more than 95% full  **OR**
  • Alert the transfer operator at no more than 90% full
    – Alternative Methods for both options were deleted.

– Overfill Prevention Equipment must be **permanently installed**.

– Newly installed Overfill Prevention Equipment must be tested at installation.

– **New Form**: Underground Storage Tank Overfill Prevention Evaluation Form **2630-FM-BECB0018**
# UST Periodic Testing – Overfill Prevention Equipment

## UNDERGROUND STORAGE TANK OVERFILL PREVENTION EVALUATION FORM

### I. FACILITY INFORMATION
- **Type of print (in ink):**
- **Facility ID #:**
- **Facility Name:**
- **Facility Street Address:**
- **County:**
- **Municipality:**

### II. TESTER INFORMATION
- **Tester Name:**
- **Tester Cert.:**
- **Tester Telephone:**
- **Company Name:**
- **Company Cert.:**
- **Test Date:**

### III. TANK AND DEVICE INFORMATION
- **Tank Number:**
- **Tank Capacity:**
- **Tank Diameter:**
- **Product Stored:**
- **Overfill Manufacturer:**
- **Overfill Model:**
- **Product Delivery Method:**
- **Overfill Type:**

### IV. TEST INFORMATION

#### A. DROP TUBE SHUTOFF DEVICE
- **Drop tube and float free of debris?**
- **Float and poppet move freely?**
- **Poppet enters flow path when float is engaged?**
- **Tank capacity when flow is stopped (%)**

#### B. OVERFILL ALARM
- **Visible or audible to delivery driver?**
- **Probe and float in good condition?**
- **Float moves freely?**
- **Does simulated overfill trigger alarm?**
- **Tank capacity when alarm is triggered (%)**

### C. BALL FLOAT VALVE
- **Straight drop tube installed?**
- **Is the only fill present a direct fill?**
- **Ball and cage present and in good condition?**
- **Ball moves freely in cage?**
- **Is the bleed hole unobstructed?**
- **Tank capacity when flow is restricted (%)**

### D. WHISTLE VENT ALARM
- **Permanently installed?**
- **Applies to delivery driver?**
- **Tank capacity when whistle stops (%)**

### V. TEST RESULTS

#### VI. COMMENTS

The comments section should be used to note additional information discovered or actions taken during testing that affect compliance at the facility. For example, inside estimates removing any obstructions made by the tester that would affect the test results.

### VII. OWNER’S REPRESENTATIVE CERTIFICATION
- **Signature:**
- **Date Signed:**

### VIII. TESTER CERTIFICATION
- **Tester’s Signature:**
- **Date Signed:**

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[Image of the form with the Pennsylvania Department of Environmental Protection logo at the bottom.]
UST Overfill Prevention Evaluation
UST Overfill Prevention Evaluation Form

- The form should be **complete**
- Failed tests should be reported to appropriate regional office within 48 hours
  - Submission of a copy of the report form is required
- YES, we expect the owners or owner’s representative to sign the form.
  - Other than failures report distribution is:
    - DEP-certified individual maintains a copy
    - Copy is provided to the owner/operator
- Note: Overfill evaluations involving the removal or installation of the overfill prevention device have always been and will continue to be a tank handling activity requiring the use of a UMX or UMI DEP-certified individual.
Break
Spill Prevention Equipment & Containment Sump Evaluations

- Containment Sumps used for Interstitial Monitoring must be evaluated periodically.

- **Some designs of double-walled** spill prevention & containment sumps when properly monitored by periodic walkthrough inspections **are not required to test for liquid tightness.**
  
  - The periodic walkthrough inspection documentation should specifically document checks to verify that the interstice on each double-walled component is free of leaks.
  
  - If walkthrough inspections are discontinued, evaluations are due within 30 days.

- Newly installed Spill Prevention Equipment & Containment Sumps must be tested at installation.

- **New Form:** Underground Storage Tank Spill Prevention Equipment/Containment Sump Integrity Testing Form **2630-FM-BECB0016**
Spill Prevention Equipment & Containment Sump Evaluations

- Evaluations performed **after December 22, 2018** must be completed by the appropriately DEP-certified individual to be recognized by DEP as valid.
  - This includes tests performed:
    - At Installation
    - Following a repair
    - To meet the 3 year testing requirement
    - For a suspected release investigation

- Preventive maintenance tests of spill prevention equipment:
  - Can be done without a certified individual
  - Will **NOT** be recognized by DEP as valid
  - Any failures constitute a suspected release and must be investigated by the tank owner.
Spill Prevention Equipment & Containment Sumps

Double-Walled Spill Prevention Equipment:

- **Inspecting the gauge every 30 days during walkthrough inspections does not exempt it from periodic testing**

- **Double-walled spill prevention equipment and containment sumps with a sensor in a dry interstice must do periodic testing**

- If owner/operators were able to check vacuum, pressure, or liquid interstitial integrity indicators every 30 days they would be exempt from periodic testing
  - Spill prevention equipment would need to have a gauge and be under constant pressure or vacuum or
  - Spill prevention equipment would have to have a brine filled interstice with a level gauge
Double-Walled Spill Prevention Equipment?
Double-Walled Spill Prevention Equipment?

- This does not get them out of the 3 year testing requirement.
  - Would have to have a single-walled spill prevention equipment and a double-walled larger containment sump with the ability to conduct constant interstitial monitoring on the larger containment sump in order to get out of the 3 year testing requirement.
- Both need 30 day walkthrough inspections
- Either one needs to be tested every 3 years
Spill Prevention Equipment & Containment Sumps

Adequate Spill Prevention Equipment?
Spill Prevention Equipment & Containment Sumps

# UNDERGROUND STORAGE TANK

## SPILL PREVENTION EQUIPMENT/CONTAINMENT SUMP INTEGRITY TESTING FORM

<table>
<thead>
<tr>
<th>I. FACILITY INFORMATION</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility ID #</td>
<td>Facility Name:</td>
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</tr>
<tr>
<td>Facility Street Address:</td>
<td>County:</td>
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<tr>
<td>Facility Telephone:</td>
<td>Municipality:</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>II. TESTER INFORMATION</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Tester Name:</td>
<td>Tester Cert. #:</td>
<td></td>
</tr>
<tr>
<td>Company Name:</td>
<td>Company Cert. #:</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>III. TEST METHOD</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Method Used</td>
<td>Hydrostatic¹</td>
<td>Vacuum</td>
</tr>
<tr>
<td>Other Method</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>Method Developer</td>
<td>Manufacturer</td>
<td>Industry Standard</td>
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<table>
<thead>
<tr>
<th>IV. VISUAL INSPECTION INFORMATION</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Tank Number</td>
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<tr>
<td>Product Stored</td>
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</table>

<table>
<thead>
<tr>
<th>Containment Type</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Dispenser</td>
<td></td>
</tr>
<tr>
<td>Tank Top Sump</td>
<td></td>
</tr>
<tr>
<td>Fill Spill Bucket</td>
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</table>

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th></th>
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<tbody>
<tr>
<td>Model</td>
<td></td>
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<table>
<thead>
<tr>
<th>VI. TESTING RESULT</th>
<th></th>
</tr>
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<tbody>
<tr>
<td>Pass/Fail</td>
<td></td>
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</tbody>
</table>

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<thead>
<tr>
<th>VII. TEST RESULT</th>
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<tr>
<td>Pass/Fail</td>
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</table>

<table>
<thead>
<tr>
<th>VIII. FAILURE DESCRIPTION</th>
<th></th>
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</table>

1. Designate each device tested, numerically or by code, on the site drawing in Section II.
2. Failed test results constitute a suspected release. Certified individuals must report confirmed or suspected contamination to DEP within 48 hours of observing it. This form must be submitted to the appropriate regional office with the notification of contamination form. Facility operators must investigate suspected releases within 7 days. If a release is observed, it must be reported to the DEP by telephone within 24 hours and in writing within 15 days.

---

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Spill Prevention Equipment & Containment Sumps

IX. COMMENTS

The comments section should be used to note additional information discovered or actions taken during integrity testing that affect compliance at the facility. For example, include comments concerning any observations made by the tester that would affect the test results.

Indicate actions taken to repair or replace failed devices. Requires of containment sumps and spill prevention equipment requires the use of a DEP certified individual.

If additional comment sheets are needed, label each sheet with the report header information and attach the sheet(s) to this form.

<table>
<thead>
<tr>
<th>HYDROSTATIC TEST LEVEL MEASUREMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>If devices were tested using a hydrostatic test, describe how level measurements were taken (i.e. from the bottom up, from the top down, from a mark on the sump wall)</td>
</tr>
</tbody>
</table>

X. SITE DRAWING

Provide a detailed site drawing of the applicable USTs, product piping, fill lines, and containment device layout in the space below (or attach a detailed site drawing prepared on a separate sheet). Indicate clearly which devices were tested. Label each device tested with a unique number or code used in Sections IV and VI, above. Any other pertinent information should also be included.

VII. OWNER’S REPRESENTATIVE CERTIFICATION

I have reviewed this report. I certify under penalty of law as provided in 18 PA C.S.A. Section 4004(a) relating to unsworn falsification to authorities, that the information provided by me is true, accurate, and complete to the best of my knowledge and belief.

Signature: __________________________ Date Signed: _______________________

VIII. TESTER CERTIFICATION

By signing this document as the Tester, I certify under penalty of law as provided in 18 PA C.S.A. Section 4004(a) relating to unsworn falsification to authorities, that the information provided by me is true, accurate, and complete to the best of my knowledge and belief.

Tester’s Signature: __________________________ Date Signed: _________________________
UST Spill Prevention & Containment Sump Evaluation Form

- The form should be **complete**

- Visual Inspections should be conducted **FIRST**
  - When a visual inspection fails, a liquid test should not be conducted until repair or replacement is conducted

- Tests shall be conducted according to manufacturer requirements or a nationally recognized standard (see 245.437(b))
  - Validity of the test will be evaluated based on the method noted on the test form.

- Failed tests, including visual inspection fails, must be reported to appropriate regional office within 48 hours
  - Submission of a copy of the report form is required with the Notification of Contamination Form

- **YES**, we expect the owners or owner’s representative to sign the form.
UST Periodic Testing – Release Detection Equipment Evaluations

- **New Forms**: Underground Storage Tank
  - Automatic Line Leak Detector Functionality Testing Form
    - 2630-FM-BECB0021
  - Automatic Tank Gauge Functionality Testing Form
    - 2630-FM-BECB0015
  - Groundwater / Vapor Monitoring System Functionality Testing Form
    - 2630-FM-BECB0019
  - Pressure / Vacuum Monitoring Functionality Testing Form
    - 2630-FM-BECB0017
  - Sensor Functionality Testing Form
    - 2630-FM-BECB0020
Release Detection Equipment Evaluations

What should the facility be testing?

<p>| | | | | | |</p>
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</thead>
<tbody>
<tr>
<td>20.</td>
<td>Tank release detection</td>
<td></td>
<td></td>
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<tr>
<td>21.</td>
<td>Piping small release detection (0.2 gph monthly or 0.1 gph annually)</td>
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<td></td>
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</tr>
<tr>
<td>22.</td>
<td>Pressure (line 13 is C or D) piping line leak detector (LLD Function - 3 gph at 10 lbs psi or equivalent within 1 hr)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23.</td>
<td>LLD function includes a positive turbine pump shutoff ($)</td>
<td></td>
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</tr>
</tbody>
</table>

- Any Release Detection Equipment necessary to accomplish the methods of Release Detection reported on page 2 of the FOI report form.
  - Any additional release detection methods reported and used to establish release detection compliance within the 12 months of release detection reviewed for the FOI.
  - Newly installed release detection equipment must be tested at installation.
- Back up methods NEVER intended to accomplish release detection regulatory compliance do not need to be tested.
**UST Periodic Testing – Release Detection Equipment**

**Release Detection Equipment Evaluation Forms**

### UNDERGROUND STORAGE TANK

#### AUTOMATIC LINE LEAK DETECTOR FUNCTIONALITY TESTING FORM

<table>
<thead>
<tr>
<th>I. FACILITY INFORMATION – Type of leak on tank (all items)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility ID*</td>
</tr>
<tr>
<td>Facility Street Address:</td>
</tr>
<tr>
<td>Facility Telephone:</td>
</tr>
</tbody>
</table>

#### II. TESTER INFORMATION

- **Tester Name:**
- **Tester Cert. #:**
- **Tester Telephone:**

- **Company Name:**
- **Company Cert. #:**
- **Test Date:**

#### III. TEST PROCEDURE – Brief description of procedure used to test the line leak detector(s) (i.e., PE/CRP manufacturer’s testing procedure, etc.)

#### IV. LINE LEAK DETECTOR TESTING INFORMATION – When more than one LLDs are tested at a facility, use additional testing forms

- **Tank Number:**
- **Product Stored:**
- **Line Number:**
- **Manufacturer:**
- **Model:**

- **Leak Detector Type:**
  - Electronic
  - Mechanical

- **Operating Pressure:**

#### A. MECHANICAL LINE LEAK DETECTORS

- **Check Valve Holding Pressure:**
- **Metering Time:**
- **Opening Time:**

- **Simulated leak causes a drop in pressure:**
  - Yes
  - No

- **Leak detector reacts when the pressure is restored to zero:**
  - Yes
  - No

#### B. ELECTRONIC LINE LEAK DETECTORS

- **Simulated leak causes an alarm:**
  - Yes
  - No

- **Simulated leak disables the STP:**
  - Yes
  - No

#### V. TEST RESULT

- **Pass:**
- **Fail:**

---

**VII. SITE DRAWING**

- "Provide a detailed site drawing of the underground storage tank, product piping and containment vessel layout in order to track all necessary locations."
- "Other pertinent information must be included.

---

**VIII. OWNER’S REPRESENTATIVE CERTIFICATION**

- "I have reviewed this report. I certify under penalty of law as provided in 46 P. C. S. Section 606 relating to unworn falsification to authorities, that the information provided by me is true, accurate, and complete to the best of my knowledge and belief.

---

**Signature:**

---

**VIII. TESTER CERTIFICATION**

- "By signing this document as the Tester, I certify under penalty of law as provided in 46 P. C. S. Section 606 relating to unworn falsification to authorities, that the information provided by me is true, accurate, and complete to the best of my knowledge and belief.

---

**Tester’s Signature:**

---

**Notes:**

1. Designate each product line, on which is the leak detector was tested, accurately or by code on the site drawing.
2. Required for pressurized piping systems installed after November 10, 20X3, using LLDD for 3gph piping release detection.
3. Failed the leak detectors must be repaired or replaced immediately.
Did you see footnote #3?

It said, “Failed line leak detectors must be repaired or replaced immediately.”

Any UST system with a pressurized piping product delivery system must operate continuous piping release detection capable of detecting a release of 3 gallons per hour at all times.

If a release detection evaluation has found that equipment responsible for continuous monitoring is failing, is a facility able to continue to operate in compliance prior to repair or replacement?

**Note:** Some release detection component replacements are not considered tank handling activities. Examples: Sensor replacements and like-for-like line leak detectors replacements.
**UST Periodic Testing – Release Detection Equipment**

**UNDERGROUND STORAGE TANK AUTOMATIC TANK GAUGE FUNCTIONALITY TESTING FORM**

<table>
<thead>
<tr>
<th>I. FACILITY INFORMATION</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility ID #:</td>
<td>Facility Name:</td>
</tr>
<tr>
<td>Facility Street Address:</td>
<td></td>
</tr>
<tr>
<td>Facility Telephone:</td>
<td>County, Municipality:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>II. TESTER INFORMATION</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Tester Name:</td>
<td>Tester Cert. #:</td>
</tr>
<tr>
<td>Company Name:</td>
<td>Company Cert. #:</td>
</tr>
<tr>
<td>Tester Telephone:</td>
<td>Test Date:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>III. AUTOMATIC TANK GAUGE</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Pass</td>
<td>Fail</td>
</tr>
<tr>
<td>ATG Manufacturer:</td>
<td>ATG Model:</td>
</tr>
</tbody>
</table>

- Detected leak will trigger an alarm? [ ] Yes [ ] No
- Battery Backup Functional? [ ] Yes [ ] No
- ATG software properly programmed? [ ] Yes [ ] No
- Is the ATG equipped with CITLOS? [ ] Yes [ ] No

<table>
<thead>
<tr>
<th>III. TEST PROCEDURE</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Briefly describe procedure(s) used to test the probes (i.e. FEIRP1200, manufacturer’s testing procedure, etc.)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>IV. PROBE AND TESTING INFORMATION</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank Number</td>
<td></td>
</tr>
<tr>
<td>Product Stored</td>
<td></td>
</tr>
<tr>
<td>Manufacturer</td>
<td></td>
</tr>
<tr>
<td>Model</td>
<td></td>
</tr>
<tr>
<td>Measured Product Level (l.)</td>
<td></td>
</tr>
<tr>
<td>ATG Product Level (l.)</td>
<td></td>
</tr>
<tr>
<td>Measured Water Level (l.)</td>
<td></td>
</tr>
<tr>
<td>ATG Water Level (l.)</td>
<td></td>
</tr>
</tbody>
</table>

- Measured product and water levels match ATG values? [ ] Yes [ ] No
- Is the probe in a good state of repair? [ ] Yes [ ] No
- Is the ATG console clear of alarms? [ ] Yes [ ] No
- Float(s) move freely? [ ] Yes [ ] No

<table>
<thead>
<tr>
<th>V. TEST RESULT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Pass</td>
<td>Fail</td>
</tr>
</tbody>
</table>

1. Any “No” answer in a required row indicates the probe fails. Failed probes and ATGs must be repaired or replaced immediately.
# UST Periodic Testing – Release Detection Equipment

## UNDERGROUND STORAGE TANK

**GROUNDBASED VAPOUR MONITORING SYSTEM FUNCTIONALITY TESTING FORM**

### I. FACILITY INFORMATION

- **Facility ID #**: [Type or print in ink]
- **Facility Name**: [Type or print in ink]
- **Facility Street Address**: [Type or print in ink]
- **Facility Telephone**: [Type or print in ink]
- **County**: [Type or print in ink]
- **Municipality**: [Type or print in ink]

### II. TESTER INFORMATION

- **Tester Name**: [Type or print in ink]
- **Tester Certification #:** [Type or print in ink]
- **Tester Telephone**: [Type or print in ink]
- **Company Name**: [Type or print in ink]
- **Company Certification #:** [Type or print in ink]
- **Test Date**: [Type or print in ink]

### III. TEST PROCEDURE

(Describe procedures used to evaluate the ground water or vapor monitoring system.)

### IV. GROUNDBASED VAPOUR MONITORING SYSTEM TESTING INFORMATION

<table>
<thead>
<tr>
<th>Tank Number</th>
<th>Product Stored</th>
<th>Site Evaluat</th>
<th>Written Site Evaluation</th>
<th>Name of Professional</th>
<th>License Number</th>
<th>Well Installation</th>
<th>A. GROUNDWATER MONITORING</th>
<th>B. VAPOUR MONITORING</th>
<th>Date Sampling Equipment was last calibrated</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
<td>yes/no</td>
</tr>
</tbody>
</table>

**SITE DRAWING**

Provide a detailed site drawing of the applicable UST(s), product piping, and monitoring well locations. Attach a detailed site drawing present on a separate sheet. Any other pertinent information should also be included.

**VI. COMMENTS**

The comments section should be used to note additional information discovered or actions taken during testing that affect compliance at the facility. For example, include comments concerning any observations made by the tester that would affect the test results.

*Valve actions taken to repair or replace failed devices.
*If additional comment sheets are needed, label each sheet with the report holder's information and attach the sheets to the back of this form.

**VII. OWNER'S REPRESENTATIVE CERTIFICATION**

I have reviewed this report. I certify under penalty of perjury that all information provided by me is true, accurate, and complete to the best of my knowledge and belief.

**VIII. TESTER CERTIFICATION**

By signing this document as the Tester, I certify under penalty of perjury that all information provided by me is true, accurate, and complete to the best of my knowledge and belief.

**Signature**: [Type or print in ink]

**Date Signed**: [Type or print in ink]

---

*Any No answer in Section IV indicates the Groundwater or Vapor monitoring system fails. Failure of a release detection method may constitute a suspected release. Certified individuals must report confirmed or suspected contamination to the Department within 48 hours of observing it. Facility owner/operators must investigate suspected releases within 7 days. If a reportable release is confirmed, it must be reported to the Department by telephone within 24 hours and in writing within 15 days requires immediate repair or replacement.*
# UST Periodic Testing – Release Detection Equipment

## UNDERGROUND STORAGE TANK PRESSURE / VACUUM MONITORING FUNCTIONALITY TESTING FORM

### I. FACILITY INFORMATION
- Type origin (in ink) all items.
- Facility ID:
- Facility Name:
- Facility Street Address:
- Facility Phone:
- Municipality:

### II. TESTER INFORMATION
- Tester Name:
- Tester Cert. #:
- Tester Telephone:
- Company Name:
- Company Cert. #:
- Test Date:

### III. TEST PROCEDURE
- Briefly describe procedure(s) used to test the probe(s) (i.e., PED/130, manufacturer’s testing procedure, etc.)

### IV. PRESSURE/VACUUM MONITORING
<table>
<thead>
<tr>
<th>Tank Number</th>
<th>Product Stored</th>
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### V. TEST RESULTS
- Pass
- Fail

1. Designate each product line that has its interconnection under pressure or vacuum by PV system separately or by code on the site drawings.
2. Required for pressurized piping systems installed after November 10, 2007, using PV monitoring for 30-day piping release detection.
3. Any "No" answer in a required row indicates the PV system fails. Failed leak detection systems must be repaired or replaced immediately.

### VI. COMMENTS
- The comments section should be used to note additional information discovered or actions taken during functionality testing that affect compliance of the facility. For example, include comments concerning any observations made by the tester that would affect the test results.
- Include actions taken to prevent or correct issues found.
- If additional comment sheets are needed, staple each sheet with the report header information and attach the sheet(s) to the back of the form.

### VII. SITE DRAWING
- Provide a detailed site drawing of the applicable HRTs, product piping, and containment structure layout in the space below or attach a detailed site drawing printed on a separate sheet. Any other pertinent information should also be included.

### VIII. OWNER’S REPRESENTATIVE CERTIFICATION
- I have reviewed this report. I certify under penalty of law as provided in 18 PA C.S.A. Section 6014 (relating to unsworn falsification to authorities), that the information provided in the report is true, correct, and complete to the best of my knowledge and belief.
- Signature: [Signature]
- Data Signed: [Date]

### VIII. TESTER CERTIFICATION
- By signing this document as the Tester, I certify under penalty of law as provided in 18 PA C.S.A. Section 6014 (relating to unsworn falsification to authorities), that the information provided in the report is true, correct, and complete to the best of my knowledge and belief.
- Tester’s Signature: [Signature]
- Data Signed: [Date]
## UST Periodic Testing – Release Detection Equipment

### UNDERGROUND STORAGE TANK SENSOR FUNCTIONALITY TESTING FORM

#### I. FACILITY INFORMATION
- **Type or print (or ink) all items.**
- **Facility ID #:**
- **Facility Name:**
- **Facility Street Address:**
- **County:**
- **Municipality:**

#### II. TESTER INFORMATION
- **Tester Name:**
- **Tester Cert. #:**
- **Tester Telephone:**
- **Company Name:**
- **Company Cert. #:**
- **Test Date:**

#### III. TEST PROCEDURE
- **Briefly describe procedure(s) used to test the sensors (i.e., PEERPG00, manufacturer's testing procedure, etc.)**

#### IV. SENSOR AND TESTING INFORMATION
- **Sensor Location:**
- **Sensor Number:**
- **Manufacturer:**
- **Model:**
- **Sensor Type:**
  - [ ] Discriminating
  - [ ] Non-Discriminating
- **Test Liquid:**
  - [ ] Water
  - [ ] Product
- **Is the ATG console clear of alarms?**
  - [ ] Yes
  - [ ] No
- **Is the sensor properly positioned?**
  - [ ] Yes
  - [ ] No
- **Is the sensor in a good state of repair?**
  - [ ] Yes
  - [ ] No
- **Does the sensor trigger an alarm when placed in the test liquid?**
  - [ ] Yes
  - [ ] No
- **Is the sensor correctly identified on the ATG?**
  - [ ] Yes
  - [ ] No
- **Does a sensor alarm automatically disable the pump?**
  - [ ] Yes
  - [ ] No

#### V. TEST RESULTS
- **[ ] Pass**
- **[ ] Fail**

---

1. Designate each sensor tested numerically or by code on the site drawing.
3. Failed sensors must be repaired or replaced immediately.

---

![Pennsylvania Department of Environmental Protection Logo]
UST Release Detection Evaluation Form(s)

– These forms should be complete

– YES, we expect the owners or owner’s representative to sign the form.
  • The owner’s representative signature proves the form was received by the appropriate individuals at the facility.

– DEP considers DEP-certified Installers and Inspectors to act as extensions of the DEP
  • During tank handling, testing and inspection compliance documentation should be generated for tank owners/operators
  • Making the tank owner/operator aware of compliance requirements including maintaining records provided as part of certified activities
UST Periodic Testing – Release Detection Equipment

UST Release Detection Evaluation
**UST Periodic Testing – Questions**

My Testing was completed before the forms are available, what should we do?

<table>
<thead>
<tr>
<th>Yes, we need the testing to be considered <strong>VALID</strong> by DEP</th>
<th>No, we don’t need it to be considered <strong>VALID</strong> by DEP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer your data to the appropriate DEP-provided forms. Be sure to complete the form including required signatures.</td>
<td>Take no additional actions; documentation will not be used for compliance.</td>
</tr>
</tbody>
</table>

**Note:** This discussion only applies to periodic testing. Any repair or installation required testing conducted after December 22, 2018 **MUST** be completed on the DEP-provided form.
If I have 2 forms of Overfill Prevention Equipment or Release Detection Equipment, do I need to test it all?

1. Equipment must be tested to be valid
2. Equipment reported on the FOI form as being used to accomplish Release Detection or Overfill Prevention shall be tested (phase-in date appropriate)
3. Other equipment DOES NOT need to be tested
   1. Equipment that is not tested would not be considered valid as an alternative method in situations where the primary method fails.

Examples on Next Slide
### UST Periodic Testing Questions – Multiple Options

<table>
<thead>
<tr>
<th>Overfill Prevention Example</th>
<th>Release Detection Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop Tube Installed</td>
<td>Listed on FOI Form</td>
</tr>
<tr>
<td>High Level Alarm Installed</td>
<td>Not Listed</td>
</tr>
<tr>
<td>The Drop Tube must be tested.</td>
<td></td>
</tr>
</tbody>
</table>
## UST Testing Certifications

Review: Who can do each type of testing

<table>
<thead>
<tr>
<th></th>
<th>UMX/UMI</th>
<th>UTT</th>
<th>IUM</th>
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<tbody>
<tr>
<td>Spill Prevention Equipment</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Containment Sumps</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Overfill Prevention Equipment</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Release Detection Equipment</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Tank/Piping Tightness Testing</td>
<td></td>
<td></td>
<td>X</td>
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# UST Periodic Walkthrough Requirements

<table>
<thead>
<tr>
<th>New Periodic Walkthrough Requirements</th>
<th>Start After</th>
<th>Timeframe</th>
<th>Exceptions</th>
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<tbody>
<tr>
<td>Spill Prevention Equipment</td>
<td></td>
<td>Monthly</td>
<td>X</td>
</tr>
<tr>
<td>Release Detection Equipment Operation</td>
<td>December 22, 2019</td>
<td>Monthly</td>
<td></td>
</tr>
<tr>
<td>Containment Sump</td>
<td></td>
<td>Annual</td>
<td></td>
</tr>
<tr>
<td>Handheld Release Detection Equipment</td>
<td></td>
<td>Annual</td>
<td></td>
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**Spill Prevention Equipment** receiving deliveries less often than 30 days may check prior to each delivery. **Delivery records should be maintained as part of log.**

**Containment Sumps and Spill Prevention Equipment** that is double walled must have interstitial area checked for leaks in lieu of periodic testing requirements. **Failure to conduct these checks will trigger the periodic test requirement within 30 days.**
## UST Periodic Walkthrough Requirements

<table>
<thead>
<tr>
<th>New <strong>Periodic</strong> Walkthrough Requirements</th>
<th>Check For</th>
<th>Resolution</th>
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<tbody>
<tr>
<td>Spill Prevention Equipment</td>
<td>Damage</td>
<td>Repair or Replace</td>
</tr>
<tr>
<td></td>
<td>Liquid or Debris</td>
<td>Clean</td>
</tr>
<tr>
<td></td>
<td>Fill Pipe Obstructions</td>
<td>Remove</td>
</tr>
<tr>
<td></td>
<td>Fill Cap is Secure</td>
<td>Repair or Replace</td>
</tr>
<tr>
<td>Double Wall Spill Prevention</td>
<td>Leak Free Interstitial Space</td>
<td>Repair or Replace</td>
</tr>
<tr>
<td>Release Detection Equipment Operation</td>
<td>Alarms</td>
<td>Suspected Release Investigation</td>
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<tr>
<td></td>
<td>Records</td>
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# UST Periodic Walkthrough Requirements

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<th>Resolution</th>
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<td>ALL Containment Sumps</td>
<td>Damage</td>
<td>Repair or Replace</td>
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<td>Liquid or Debris</td>
<td>Clean</td>
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<td>Leak Free Interstitial Space</td>
<td>Repair or Replace</td>
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<tr>
<td>Handheld Release Detection Equipment</td>
<td>Operability and Serviceability</td>
<td>Repair or Replace</td>
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</table>

**Note:** Periodic walkthrough inspection requirements for containment sumps are **NOT** restricted to containment sumps conducting interstitial monitoring. All containment sumps shall be checked at a minimum every 12 months.
Break
## Tank Handling Notification Requirements

Notification shall be submitted to DEP (the appropriate regional office) **30 Days Prior** to commencing certain Tank Handling Activity and all Closure Activities

<table>
<thead>
<tr>
<th>Installation - 245.421(a)(2)</th>
<th>Permanent Closure and Change-in-service</th>
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<tbody>
<tr>
<td>Tank</td>
<td>Tanks</td>
</tr>
<tr>
<td>Piping System</td>
<td>Replacement, Removal and Closure-in-place of underground product piping or remote fill lines</td>
</tr>
<tr>
<td>Replacement Dispenser (new to the facility)</td>
<td></td>
</tr>
<tr>
<td>Additional Dispenser</td>
<td>Major Modification involving removal of a dispenser*</td>
</tr>
</tbody>
</table>
Tank Handling Notification Requirements

Notification shall be submitted to DEP on the most recent revision of the Underground Storage Tank System Installation-Closure Notification Form 2630-FM-BECB0127.

Note: After December 22, 2018, if a dispenser is removed and a major modification is performed involving excavation beneath the dispenser, it is also a partial system closure requiring a 30-day Closure Notification and sampling. These requirements apply in all cases including when the original dispenser is reinstalled.
Compatibility Requirements

• All UST components have been required to be compatible with the substance store; however, the regulation amendments make clear DEP can request verification.

• DEP has provided a required form for documenting this verification.
  – Alternative Fuel Storage Tank Installation/Conversion Form 2630-FM-BECB0608

• DEP has provided a fact sheet for understanding equipment compatibility requirements in particular when storing biofuels or biofuel blends.
245.433 Compatibility

Compatibility Requirements

• Prior to issuing an operating permit to a newly installed storage tank or existing storage tank changing the substance stored, if it will store:
  – Gasoline-ethanol blends containing greater than 10% alternative fuel
  – Biodiesel or biodiesel blended fuel containing greater than 5% biodiesel

• The Alternative Fuel Storage Tank Installation/Conversion Form shall be submitted, reviewed, and approved.
The most recent revision of the Fact Sheet can be found in the Storage Tanks Facts Sheets section of the DEP website.

Provides resources available for:
- understanding compatibility issues
- finding manufacturers’ statements of compatibility
- other related information.
Provides checklist of actions for:

1. Prior to placing alternative fuels in the storage tank system
2. In conjunction with the first delivery
3. For ongoing maintenance of the storage tank system
Alternative Fuel Storage Tank Installation / Conversion Form

• The form is signed by the tank owner or owner’s representative.
• The form is signed by a Professional Engineer for any components that have unknown compatibility, is unlisted, or the manufacturer’s certification is not available.
• Finally, the form is signed by the PA DEP certified installer (UMX or AMMX).

- The ultimate responsibility lies on the UMX/AMMX to ensure that all system components are compatible with the substance stored.
Alternative Fuel Storage Tank Installation / Conversion Form

This form is to be completed and signed by the storage tank owner (or owner’s representative) and DEP certified tank installer when installing a new storage tank system, or when converting an existing storage tank system. For storage of alternative fuel blends, such as gasoline-ethanol blends containing greater than 15% alternative fuel, or biodiesel or biodiesel blended fuel containing greater than 5% biodiesel. For abandoned storage tank systems, this form only applies to tank systems used for motor vehicle fueling. See the bottom of page 2 for form submission and recordkeeping requirements.

DEP recommends that UST owners and operators follow the procedural checklist provided in the Storage Tank Program Fact Sheet 263-58-DEP-P4447R Underground Storage Tank (UST) Equipment Compatibility & Storage of Biofuels and Biofuel Blends.

I. FACILITY INFORMATION

- Type or print (in ink) all items. When completing this form for a new facility, omit the Facility ID.

- Facility ID

- Facility Name:

- Facility Street Address:

- Facility Telephone: County:

- Municipality:

II. STORAGE TANK & PIPING INFORMATION

- Sections (a) and (b) should be completed in full by the storage tank system owner and DEP certified tank installer. Type or print (in ink) all items. Provide the model/brand and equipment manufacturer for each storage tank component. Write “NA” and check the corresponding box if the tank/piping/system does not have the component.

- Write “UNK” if the model/brand or equipment manufacturer cannot be determined. Check the appropriate boxes to indicate whether or not the component has been confirmed by a Nationally Recognized Testing Laboratory (NRTL), such as Underwriters Laboratories (UL), and/or has been verified by the component manufacturer for use with the substance change. Only check “No” if the component is not manufactured verified. Only one storage tank system per form may be listed.

- DEP will not approve an operating permit for an alternative fuel storage tank system with “unknown” components, or components that are not NRTL listed or manufacturer verified for use with the substance change, unless a licensed professional engineer (P.E.) who has knowledge, experience, and training in materials science determines that the components satisfy the compatibility requirements listed in the Storage Tank Regulations in 25 Pa Code, Chapter 245. The P.E. must sign the certification statement in Section IV. DEP may request documentation supporting the P.E. determination.

- Tank Orientation: Ground or Aboveground

- Capacity (gallons):

- New Tank

- Existing Tank → DEP Tank #: __________

- Method of Substance Change: __________

- Alternative Fuel Blend (5%) Stored:

- Biodiesel (8%) Stored:

- Date of Substance Change:

- Storage Tank

- Internal Tank Lining

- ATG Probe / Float / Sensor

- Interstitial Sensor

- Ball Float Valve

- Drop Tube

- Skimmer / Float Valve

- Product Pipe Information: New Existing Mixed (New & Existing)

- Product Pipe Configuration: Single wall Double wall

- Product Pipe

- Pipe Fitting / Valve Material

- Pipe Sealant / Adhesive

- Gas Vent / Fill / Relief Valve

- Submersible Turbine Pump

- Mechanical Line Leak Detector

- Electronic Line Leak Detector

- Tank Sump

- Tank Sump Sensor

- Sump Penetration Fittings

- Transition Sump

- Transition Sump Sensor

- P.E. Name

- PA License No.

- Phone No.

- P.E. Signature

- Date

IV. PROFESSIONAL ENGINEER CERTIFICATION (Revised)

- Based on my personal observation of the storage tank system and review of the substance compatibility documentation for the storage tank system components, I certify that the storage tank system satisfies the compatibility requirements of Act 32 and Chapter 245. I also certify under penalty of law, as provided in 18 Pa C.S.A. Section 8046 (relating to whimsical fabrication to authorities), that the information provided on this form is true, accurate and complete to the best of my knowledge and belief.

- Signature:

- Date

- Company Name

- Company Cert. No.

- Company Cert. No.
## Alternative Fuel Storage Tank Installation / Conversion Form

### Important Notes when completing the form

1. Model/Brand Information and Equipment Manufacturer information should be based on inspection by the certified tank handler.
   - i. The Installer Certification statement begins: *‘Based on my personal observation’*

2. By selecting a check box of ‘Listed’ or ‘Verified’ the installer is indicating compatibility documentation was reviewed for the listed component on that row.
   - i. DEP has requested copies of documents reviewed for verification when DEP has not already verified a component.
Important Notes when completing the form

1. Please do not waste time for DEP staff, your customer, and yourself by not completing all items on the form.
   i. The instructions make clear DEP will not approve an operating permit for a storage tank system with unknown components
2. Incorrect, inaccurate, and falsified forms can lead to enforcement action against certified installers and their companies.
Compatibility Resource

- The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) has begun a compatibility tool:
  - Allows for searching by component or manufacturer
  - http://astswmo.org/ust-compatibility-tool/
When must under-dispenser containment be installed?

DEP regulations have maintained the existing requirements:

- Under each dispenser of a new or replacement UST system,
- Under each dispenser added to an existing UST system,
- Under an existing dispenser when more than 50 percent of the piping conveying product from the tank to the dispenser is replaced
- If a major modification as defined in § 245.1 (relating to definitions) is performed at the dispenser area involving excavation beneath the dispenser

The regulation amendments have added an additional requirement:

- If an existing dispenser is replaced with another dispenser and all equipment at or below the shear valve needed to connect the dispenser to the underground storage tank system is replaced
- Replaced means new to this dispenser location. The dispenser can be used, refurbished, or new.
Dispenser Replacements
After December 22, 2018, all Cathodic Protection (CP) Evaluations must be documented on:

Underground Storage Tanks Cathodic Protection System Evaluation Form 2630-FM-BECB0610 to be considered valid by DEP.

See 245.432(a)(1)(iii)

Important Considerations:

• If you are an IUM, even if you do not conducted CP Evaluations, you should already be familiar with this form.
• Copies must be attached to FOI Report forms for all evaluations conducted after December 22, 2018.
The Facility Operations Inspection Report Form

• DEP has released a revised (02/19) Underground Storage Tank Facility Operations Inspection Report Form

• The form was previously numbered 2630-FM-BECB0501a. The most recent revision has removed the “a”, so the new form number is 2630-FM-BECB0501.

• ALL FOI Report Forms with a Date of First Site Visit of February 1, 2019 or later must be completed on the most recent revision of the FOI Report Form.
# The Facility Operations Inspection Report Form

## Facility Information
- **ID Number:** [Blank]
- **Name:** [Blank]
- **Location:** [Blank]
- **Address:** [Blank]

## Certified Inspector
- **Name:** [Blank]
- **Address:** [Blank]
- **City, State:** [Blank]
- **Phone:** [Blank]
- **E-mail:** [Blank]

## Tunnel Owner (must be a person or an entity)
- **Name:** [Blank]

## Tunnel Operator (if different than owner)
- **Name:** [Blank]

## Financial Responsibility discussed with owner
- **Yes:** [Blank]
- **No:** [Blank]

## Property description

## Inspection Summary
- **Inspection summary:**

## Facility Information

## Tunnel Construction and Corrosion Protection

## Plume Construction and Corrosion Protection

## Sump Prevention

## Plume Release Detection

## Monthly sampling checks

## Certified Inspector's Signature
- **Name:** [Blank]
- **Date:** [Blank]

---

The DEP Certified Inspector (UM), have inspected the entire above referenced facility including examining manways, sumps, monitoring wells and displays. Based on my personal observation of the facility and documentation provided by the owner, I affirm under penalty of law as provided in 18 PA C.S.A. Section 4904 (relating to unsewn falsification to authorities), that the information provided by me is true, accurate and complete to the best of my knowledge and belief.

Certified Inspector's Signature

As the representative of the owner or operator, I have reviewed the completed inspection report. I certify under penalty of law as provided in 18 PA C.S.A. Section 4904 (relating to unsewn falsification to authorities), that the information provided by me is true, accurate and complete to the best of my knowledge and belief.

Certified Inspector's Signature

---

**Printed by:**
- **Name:** [Blank]
- **Title:** [Blank]
- **Date:** [Blank]
Page 1 Changes

Form # - dropped a from the Form #
Form Title – added Report Form to the Title
GPS Location – added to Facility Information
  Please begin including GPS Location information
Financial Responsibility discussed with owner - removed
Fire/Safety Permit(s) available – added
Inspection Summary – added notes to instructions
  Note: Yes, No, *, N/A, blanks, or any other markings are not acceptable statements for these fields.
Inspection Summary Compliance Categories – additions
  Tank Release Detection Testing
  Piping Release Detection Testing
  Overfill Prevention Testing
  Spill Prevention Testing
  Financial Responsibility
  Walkthrough Inspections
  Operator Training
## The Facility Operations Inspection Report Form

### UNDERGROUND STORAGE TANK FACILITY OPERATIONS INSPECTION REPORT FORM

**Facility Name:**

**Facility ID:**

#### TANK SYSTEM INFORMATION

<table>
<thead>
<tr>
<th>Item</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Tank capacity (name plate gallons)</td>
</tr>
<tr>
<td>2.</td>
<td>Substances currently stored (and grade)</td>
</tr>
<tr>
<td>3.</td>
<td>Installation date (MM/dd/yyyy)</td>
</tr>
<tr>
<td>4.</td>
<td>The dome tank is maintained to tank number</td>
</tr>
<tr>
<td>5.</td>
<td>The storage tank is maintained to tank number</td>
</tr>
<tr>
<td>6.</td>
<td>Tank reading of product level, in inches, at time of inspection</td>
</tr>
<tr>
<td>7.</td>
<td>Tank reading of water level, if any, at time of inspection</td>
</tr>
<tr>
<td>8.</td>
<td>Valve secondary containment on this tank system</td>
</tr>
<tr>
<td>9.</td>
<td>Tank construction and corrosion protection</td>
</tr>
<tr>
<td>10.</td>
<td>Secondary (outer) piping construction (as appropriate)</td>
</tr>
<tr>
<td>11.</td>
<td>Number of tank top sumps</td>
</tr>
<tr>
<td>12.</td>
<td>Number of tank top sumps tested tight</td>
</tr>
<tr>
<td>13.</td>
<td>Number of transition sumps</td>
</tr>
<tr>
<td>14.</td>
<td>Number of interconnected dispensers</td>
</tr>
<tr>
<td>15.</td>
<td>Number of interconnected dispensers with pumps</td>
</tr>
<tr>
<td>16.</td>
<td>Number of dispenser pans tested</td>
</tr>
<tr>
<td>17.</td>
<td>Pipe (product) dispensers system</td>
</tr>
<tr>
<td>18.</td>
<td>Number of spill containment systems must be permanently installed</td>
</tr>
<tr>
<td>19.</td>
<td>Number of spill containment systems tested tight</td>
</tr>
<tr>
<td>20.</td>
<td>Overfill trap (must be permanently installed)</td>
</tr>
<tr>
<td>21.</td>
<td>Current registration certificate displayed/readily available</td>
</tr>
<tr>
<td>22.</td>
<td>Stage I vapor recovery</td>
</tr>
<tr>
<td>23.</td>
<td>Stage II vapor recovery</td>
</tr>
<tr>
<td>24.</td>
<td>Tank release detection</td>
</tr>
<tr>
<td>25.</td>
<td>Piping small release detection (0.2 gph monthly or 0.1 gph annually)</td>
</tr>
<tr>
<td>26.</td>
<td>Pressure line (line 3.3 or 3.4) piping line leak detector (LLD) function</td>
</tr>
<tr>
<td>27.</td>
<td>LLD function includes a positive turbine piping system</td>
</tr>
</tbody>
</table>

*Use of tools indicating a permit is unknown should be accompanied with comments in Section VIII and must be marked Noncompliant for the appropriate tank system compliance status in the inspection summary on Page 3.*

*Indicates equipment model and generation (if applicable) in Section VIII.*

*Indicates manufacturer and construction in Section VIII.*

*Entrapment of piping must have LLD design and must be marked Noncompliant for the appropriate tank system compliance status in the inspection summary on Page 3.*

*Indicates that the LLD function includes positive turbines piping systems installed after 12/31/2007 with pressurized piping systems.*

*Use of tools (K-form) or (K-A) should have comments in Section VIII.*

*Site drawing / manifold schematic (not master system).*

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**pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION**
The Facility Operations Inspection Report Form

Page 2 Changes

Line 5 – split into 5a and 5b; specifically indicates these should be stick readings, water and product levels
Line 8 – split into 8a and 8b; splits piping construction information into primary and secondary
Line 14 – split into 14a and 14b; requests count of Spill Containments and count tested tight
Line 19 - indicate if the UST supplies an emergency generator
Lines 19-22 – shifted to be lines 20-23
Footnotes Section – expanded to include notes on important items are forgotten, confused or mistaken.
DEP Use Column – deleted

Page 2 - 1 Changes

Codes have been added as necessary.
Page 2 Changes: Code 8

- Please make sure to fill out both 8a and 8b
- Include the manufacturer and model information on Page 8
- DEP is looking for clarification on whether or not piping is true double-walled piping for flex piping.
What should be entered for Emergency Generators that are not yet required to conduct release detection?

- Enter codes for the release detection that the facility is planning and able to implement for that tank system.
- If the facility does not have a plan at the time of the FOI, this should be noted in the comments including the date that release detection must be implemented by.
- Mark the release detection categories compliant on Page 1.

<table>
<thead>
<tr>
<th>Install Date</th>
<th>Release Detection Required By</th>
</tr>
</thead>
<tbody>
<tr>
<td>After December 22, 2018</td>
<td>At Installation</td>
</tr>
<tr>
<td>After November 10, 2007</td>
<td>On or Before December 22, 2019</td>
</tr>
<tr>
<td>On or Before November 10, 2007</td>
<td>On or Before December 22, 2020</td>
</tr>
</tbody>
</table>
Release detection recordkeeping questions are contained on Page 3. Release detection equipment evaluation questions are on Pages 4 and 5. Both the release detection recordkeeping section and the appropriate release detection equipment sections should be completed.
**Instructions and Reminders from Page 3 Release Detection Recordkeeping**

- Records may be located at the facility or a readily available alternate site.
- The records include all of the information listed below for chosen release detection methods.
- The inspector has personally reviewed the records.
- If the facility is missing release detection records or if the facility has invalid and/or failing records, enter the dates and results in Section VIII.
- A test with an inconclusive result or failure is an indication of a (suspected) product release and must be investigated within 7 days. Enter the results of any suspected release investigations in Section VIII.
- An empty tank (no more than 1” of product and/or sludge) that is properly registered as temporarily out-of-use is not required to perform release detection. Indicate date emptied in comments.
- Recently installed tank systems must begin performing release detection immediately after receiving product. Indicate date of first product receipt in comments.
Instructions and Reminders for Page 3 Release Detection Recordkeeping
When the FOI Date of First Site Visit is on or before December 22, 2019

- On Page 3, the tank and piping release detection equipment sections can be marked N/A.
- On Page 1, the UST can be marked Compliant for Tank Release Detection Testing and Piping Release Detection Testing.

Pages 4 and 5 cover review of the Release Detection Equipment for the UST System

- Complete the sections associated with the release detection methods being used for each UST system, as reported on Lines 20 through 23 on Page 2.
- Appropriate documentation establishing the construction of a European (Safe) suction system is considered the replacement to monthly monitoring or piping tightness testing for these systems.
  - Explanation of the IUM’s determination of compliance is a required field.
Page 6: New Sections

- **Equipment Testing**
  - Overfill Prevention Testing
  - Spill Containment Testing
  - Containment Sump Testing

- **On-Site Inspection**
  - Water and Maintenance Check

- **IUM Record Review**
  - Financial Responsibility
  - Walkthrough Inspections
  - Historical Records
  - Modification Reports
Page 6: Equipment Testing

- **Equipment Testing** (When the **FOI Date of First Site Visit is on or before December 22, 2019**)
  - On Page 6, the overfill prevention testing, spill prevention testing, and containment sump testing sections can be marked N/A.
  - On Page 1, the UST can be marked Compliant for Overfill Prevention Testing and Spill Prevention Testing.
- **Reminder**: Containment Sump Testing is not required for facilities that do not use interstitial monitoring for release detection.

<table>
<thead>
<tr>
<th>Containment Sump Testing: <em>(Piping release code D and/or I):</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>containment sump testing conducted within the last 5 years and documentation available</td>
</tr>
<tr>
<td>tester name: _______</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OR</th>
</tr>
</thead>
<tbody>
<tr>
<td>containment sump(s) is/are double-walled</td>
</tr>
<tr>
<td>both walls of sump(s) are monitored at least annually</td>
</tr>
</tbody>
</table>
Page 6: On-Site Inspection

• This section covers observations made while the IUM is on-site:
  • These questions previously existed as the water checks checkbox
  • The monthly sump checks checkboxes regard conditions during the Site Visit
  • Note: Monthly containment sump checks are no longer required; therefore, these questions only reflect conditions while the IUM is on-site

Page 6: IUM Record Review

Thoroughly review the facility’s records including installation, modification and upgrade activities, walkthrough inspections, and USTIF coverage. Check the appropriate boxes when the facility has met the condition.
Page 6: IUM Record Review

Financial Responsibility:

- **USTIF Billing & Capacity Fees:**
  - When reviewing USTIF coverage, verify the facility does not have an overdue balance with USTIF via USTIF receipts, cancelled checks, etc.

- **Throughput Fees:**
  - If the facility includes tanks containing substances subject to USTIF throughout fees, verify that a recent bill of lading or other delivery invoice indicates that the throughput fees were paid to the delivery company.
  - If throughput fees were **not** paid to the delivery company, the fees should be paid directly to USTIF.
  - **Examples to follow**
Page 6: IUM Record Review

Financial Responsibility – Capacity Fees

- The inspector can review the most recent Fee Statement issued to the facility by USTIF.
  - If there is a $0.00 Balance or no Past Due amount, the account is most likely current
    - Past Due Amounts Owed will be in RED
  - Compliance Assessment for Capacity Fees:
    - Nothing Past Due – Compliant
    - Past Due Amount – Not Compliant
Page 6: IUM Record Review
Financial Responsibility – Throughput Fees

• The inspector can review a recent Bill of Lading or Sales Invoice.
  • If there is a 0.011 fee assessed per gallon of product this is the USTIF fee

• Compliance Assessment for Throughput Fees:
  • 0.011 fee assessed on the provided Bill of Lading or Sales Invoice - Compliant
  • No 0.011 fee assessed – Not Compliant
    • Unless the facility can show other proof the fee has been paid to USTIF.

• Examples will be provided on the next 2 slides
## The Facility Operations Inspection Report Form

### Sales Invoice

**Page 1 of 1**

**Sold To:**

**Shipped To:**

**Origin:** PITTSBURGH, PA - SPMT

**Freight Terms:** DEL

<table>
<thead>
<tr>
<th>Date</th>
<th>Ticket/BOL</th>
<th>Carrier</th>
<th>Product Description</th>
<th>Octane</th>
<th>Quantity</th>
<th>UOR</th>
<th>Price</th>
<th>US Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/3/2017 05:43:00</td>
<td></td>
<td></td>
<td>87% REGULAR 10% ETH</td>
<td>87</td>
<td>7,901</td>
<td>GG</td>
<td>1.88010</td>
<td>14,354.67</td>
</tr>
<tr>
<td>12/3/2017 05:43:00</td>
<td></td>
<td></td>
<td>93% ULTRA 10% ETH</td>
<td>93</td>
<td>1,100</td>
<td>GG</td>
<td>2.26010</td>
<td>2,496.11</td>
</tr>
</tbody>
</table>

**Total: 17,850.78**

- **Federal Gasoline LUST Tax**
- **Federal Gasoline Tax**
- **Federal Oil Spill Tax Cost Recovery - E10**
- **PA Oil Spill Tax - Gasoline**
- **PA UST Tax - Gasoline**

**This volume of neat or blended ethanol is designated and intended for use as transportation fuel or jet fuel in the 48 U.S. contiguous states and Hawaii. Any person exporting this fuel is subject to the requirements of 49 CFR 80.1430.**

As of March 1, 2017 all

**Please refer to your draft notification**

**Invoice Total:** 24,351.91

For any questions, please email [email protected] with the invoice number, a brief description of your inquiry and a contact name, phone number and email.
## The Facility Operations Inspection Report Form

### INVOICE

<table>
<thead>
<tr>
<th>Item Number</th>
<th>Unit</th>
<th>Ordered</th>
<th>Shipped</th>
<th>Back Ordered</th>
<th>Price</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>UL RFG</td>
<td>EACH</td>
<td>700.00</td>
<td>700.00</td>
<td>0.00</td>
<td>2.5439</td>
<td>1,780.73</td>
</tr>
<tr>
<td>UL RFG GAS 87</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SUPERFUND</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00214</td>
<td>1.50</td>
</tr>
<tr>
<td>LUST</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00100</td>
<td>0.70</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2.54704</td>
<td>1,782.93</td>
</tr>
</tbody>
</table>

FEDERAL LUST AND SUPERFUND TAXES ARE LISTED AS SEPARATE LINE ITEMS FOR ACCOUNTING PURPOSES ONLY. THESE TAXES WERE INCLUDED IN THE PRICE PER GALLON QUOTED.

* IS A QUALIFIED SMALL BUSINESS CONCERN AS DEFINED UNDER THE #4 PA CODE 2.32

[Logo: Pennsylvania Department of Environmental Protection]
Page 6: IUM Record Review

• **Financial Responsibility:**
  • **Page 1 Compliance:**
    • If after review of any required throughput and capacity fees, you can check the checkbox, Page 1 can be marked compliant
    • If after review, you cannot check the checkbox, Page 1 should be marked Noncompliant
      • Please include comments explaining why you were unable to mark the facility compliant
      • The owner or operator should be advised that unpaid USTIF fees for ANY UST at the facility will jeopardize USTIF coverage for ALL USTs at that facility in the event of a release.
    • Any coaching or assistance (informal training) provided to the owner, Class A, or Class B operators in paying USTIF, maintaining financial responsibility records, or understanding USTIF should be recorded on Page 7 in the Operator Training section.
Walkthrough Inspections:

- When the FOI Date of First Site Visit is on or before December 22, 2019:
  - Checkboxes can all be marked N/A
  - Walkthrough Inspections compliance can be marked C on Page 1
- When the FOI Date of First Site Visit is between December 22, 2019 and December 22, 2020
  - The 1st monthly walkthrough inspection should have been no later than January 21, 2020
  - The annual walkthrough inspection may not have been conducted.
    - Required no later than December 22, 2020
- When the FOI Date of First Site Visit is after December 22, 2020 the facility shall fully meet the requirements of this section.

Note: DEP has not provided a form for walkthrough inspections, each facility may create a form appropriate for that facility’s needs.

- Any format that documents all the requirements of 245.435 & 245.438 is acceptable for compliance
Page 6: IUM Record Review

- **Historical Records:**
  - These checkboxes are not associated with any compliance categories on Page 1.

- **Modification Reports:**
  - This list is not directly associated with compliance categories on Page 1.
  - Requesting, checking, and logging modification reports ensures that UST system changes are noted which may require specific actions to meet release detection requirements
    - After November 11, 2007
      - New & replacement piping installations require Interstitial Monitoring
      - Spill prevention equipment and containment sumps require liquid tightness testing
    - After December 22, 2018
      - Installations or repairs of spill prevention equipment, overfill prevention equipment, release detection equipment, and containment sumps require testing by an appropriately certified individual. The testing should be documented on a DEP-provided form.
Page 7: Corrosion Protection Compliance Criteria

• Corrosion Protection Compliance Criteria remains similar to the prior version of the FOI Report Form.
  • **Note**: The UST Cathodic Protection System Evaluation Form(s) (2630-FM-BECB0610) **must** be attached to this report for the two most recent corrosion protection tests, if testing was conducted after December 22, 2018.
• DEP has noticed an increased frequency of errors in Corrosion Protection reporting:
  • Impressed Current Cathodic Protection systems must complete all of the following sections:
    • **Galvanic and Impressed Cathodic Protection**
    • Impressed Current Design and Rectifier Output
    • If Cathodic Protection or supplemental anodes were added to an existing tank system, fill in the following (Information is Required for Compliance)
    • **Both highlighted sections are frequently skipped.**
Page 7: Operator Training

- Operator Training remains similar to the prior version of the FOI Report Form.

- Informal Training Given by the Inspector. **Areas of noncompliance must be discussed** with the owner, Class A, and/or Class B operator(s). When you speak directly to a Class A or B operator concerning noncompliance, describe the activity in the informal training section. Include the date, who was involved in discussion, their operator class, a description of the topics covered, and the approximate depth of the discussion.

  - Informal training provided by the inspector assist DEP in meeting EPA requirements that retraining be conducted for Class A and Class B operators who have areas of noncompliance identified at their facility.
The comments section should:

- Accurately describe any unusual circumstances at the facility
- Explain any checkboxes marked N/A
- Clarify any “other” or “unknown” attributes
- Record release detection information for:
  - Periods the UST(s) were empty
  - Missing, Failing, Invalid records by month
- Provide recommendations to the owner or operator of:
  - Actions necessary for compliance
  - Upcoming dates to note
    - Walkthrough Inspection implementation date
    - Next Annual Walkthrough inspection Date
    - Next Corrosion Protection evaluation
    - Next required test for release detection equipment
    - Next required test for spill prevention, overfill prevention, and/or containment sumps
- Describe changes at the facility since the Date of First Site visit that may affect compliance
• It is required that IUMs document the tank and piping manufacturer and model information
  • If it cannot be determined, write "unknown" and provide comments as to why it couldn't be determined.
Page 1: Compliance Assessment
In the next 3 slides, we will discuss which sections of the FOI report form are associated with each compliance category.

Compliance requires that the appropriate checkboxes be checked or an appropriate explanation provided for a marking of N/A.

Please Note: The absence of checkboxes associated with a compliance category does not mean the inspector should not check the listed components for presence, proper operation and compliance with manufacturer’s specifications.
# The Facility Operations Inspection Report Form

## Page 1: Compliance Assessment

<table>
<thead>
<tr>
<th>Compliance Category</th>
<th>Relevant FOI Checkboxes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration Certificate Display</td>
<td>Page 2 Line 16 should be marked Y - Yes</td>
</tr>
<tr>
<td>Tank Release Detection</td>
<td>Tank Release Detection Testing should be marked compliant and Page 3 Tank Release Detection Recordkeeping should be complete and the Tank Release Detection Equipment section on Page 4 that matches Page 2 Line 20</td>
</tr>
<tr>
<td>Tank Release Detection Testing</td>
<td>Page 3 Tank Release Detection Equipment Testing</td>
</tr>
<tr>
<td>Piping Release Detection</td>
<td>Piping Release Detection Testing should be marked compliant and Page 3 Piping Release Detection Recordkeeping should be complete and the Piping Release Detection Equipment sections on Pages 4-5 that matches Page 2 Lines 20 and 21</td>
</tr>
</tbody>
</table>
# Page 1: Compliance Assessment

<table>
<thead>
<tr>
<th>Compliance Category</th>
<th>Relevant FOI Checkboxes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overfill Prevention</td>
<td>Overfill Prevention Testing should be marked compliant <strong>and</strong> Page 2 Line 15 completed <strong>and</strong> must be permanently installed</td>
</tr>
<tr>
<td>Overfill Prevention Testing</td>
<td>Page 6 Overfill Prevention Testing</td>
</tr>
<tr>
<td>Spill Prevention</td>
<td>Spill Prevention Testing should be marked compliant <strong>and</strong> Page 2 Lines 14a and 14b completed <strong>and</strong> must be permanently installed</td>
</tr>
</tbody>
</table>
### The Facility Operations Inspection Report Form

#### Page 1: Compliance Assessment

<table>
<thead>
<tr>
<th>Compliance Category</th>
<th>Relevant FOI Checkboxes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walkthrough Inspections</td>
<td>Page 6 Walkthrough Inspections</td>
</tr>
<tr>
<td>Tank Construction and Corrosion Protection</td>
<td>Appropriate Page 7 sections are completed based on Tank Construction code entered on Page 2 Line 7</td>
</tr>
<tr>
<td>Piping Construction and Corrosion Protection</td>
<td>Appropriate Page 7 sections are completed based on Piping Construction code entered on Page 2 Lines 8a and 8b</td>
</tr>
<tr>
<td>Operator Training</td>
<td>Page 7 Operator Training should be complete</td>
</tr>
</tbody>
</table>

---

**Pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION**
Page 1: Finalize the Report

After the compliance determinations have been made and marked on Page 1, check the FOI report for completeness and accuracy.

When final checks have been completed:

• Sign the form
• Review the form with the owner or owner’s representative
• Obtain their signature
• Distribute copies of the completed FOI report form.
Information on registered storage tanks is available in several formats for online access or downloading:

- **Active storage tank search**: recently upgraded with the ability to display tank system components such as tank type, piping type, release detection methods

- A new **Inactive Storage Tank Search** was built to return data on tanks that have been closed, removed, exempted, or otherwise removed from registration. This information should be of use to those performing property investigations and environmental assessments

- Storage tank inventory (divided by DEP region) is available to download via Excel spreadsheets

Information is derived from DEP's eFACTS (Environment, Facility, Application, Compliance Tracking System) database.
## What Goes Where?

<table>
<thead>
<tr>
<th>Form</th>
<th>Submission Timeline</th>
<th>Regional</th>
<th>Central</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOI</td>
<td>60 Days</td>
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<td>Lining Inspection</td>
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<td>Mod Report</td>
<td>30 Days</td>
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<tr>
<td>30 day Install/Closure Notice</td>
<td>30 Days Prior</td>
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<tr>
<td>Closure Report</td>
<td>30 Days</td>
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<tr>
<td>Release Reporting</td>
<td>48 Hours</td>
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<tr>
<td>Overfill, Spill Prevention or Containment</td>
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<tr>
<td>Installation Registration</td>
<td>30 Days</td>
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<td>Amended Registration (1 Page)</td>
<td>30 Days</td>
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<tr>
<td>Closure/Removal Registration</td>
<td>30 Days</td>
<td>X</td>
<td>X</td>
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<tr>
<td>TOS Extension Request Letters</td>
<td>Prior to Expiration</td>
<td></td>
<td>X</td>
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</table>
Report Submittal Emails

• Central Office: tanks@pa.gov
• Region 1 (SE): ra-serotanks@pa.gov
  Modification Reports must be mailed.
• Region 2 (NE): ra-nero-tanks@pa.gov
• Region 3 (SC): ra-ep-scro-tanks@pa.gov
• Region 4 (NC): ra-nc-tanks@pa.gov
• Region 5 (SW): ra-pghtanks@pa.gov
• Region 6 (NW): ra-nwro-tanks@pa.gov

*Individual emails must be < 10 MB total*
Printable DEP Brochure detailing regulatory changes for owners – found on our Revisions to Pennsylvania’s Storage Tank Regulations page.
Owner & Operator Education

Release Reporting: When and How

- Owner/Operator suspects release has occurred.
- Investigate suspected release within 7 days.
- Does the release require reporting to DEP? *
  - Yes: Owner/Operator has confirmed release.
  - No: Undetermined
  - No: No reporting required

REPORT!

Owner/operator notifies DEP of suspected or confirmed releases:
- By phone within 24 hours
- In writing within 15 days

* Reporting Not Required IF:
  - Release of petroleum was fully controlled and contained, and the total volume was recovered and removed within 24 hours, AND:
    - Was < 25 gallons in an above ground surface OR
    - Was to containment sump and the total volume was contained below the lowest sump penetration.

Know Your UST:

New Requirements for Underground Storage Tank Systems

DEP Regional Offices

Southeast Region
2 E. Main St., Norristown, PA 19401
Telephone: 484-250-5600 (24 hours/day)
Bucks, Chester, Delaware, Montgomery, and Philadelphia

Northeast Region
2 Public Square, Wilkes-Barre, PA 18701-1915
Telephone: 570-826-2511 (24 hours/day)
Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne, and Wyoming

Southcentral Region
909 Elmerton Ave., Harrisburg, PA 17110
Telephone: 717-705-4700 (business hours)
866-625-0208 (after hours)
Adams, Bedford, Berks, Blair, Cambria, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, and York

Northcentral Region
208 W. Third St., Williamsport, PA 17701
Telephone: 570-327-3638 (24 hours/day)
Bradford, Cameron, Centre, Clearfield, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga, and Union

Southwest Region
400 Waterfront Drive, Pittsburgh, PA 15222
Telephone: 412-442-4000 (24 hours/day)
Allegheny, Beaver, Cambria, Fayette, Greene, Somerset, Washington, and Westmoreland

Northwest Region
230 Chestnut St., Meadville, PA 16335
Telephone: 814-332-6645 (business hours)
1-800-373-3399 (after hours)
Armstrong, Butler, Clarion, Crawford, Elk, Erie, Forest, Indiana, Jefferson, Lawrence, McKean, Mercer, Venango, and Warren

Pennsylvania Department of Environmental Protection
New Requirements for UST Facilities

1. UST systems that store fuel used only for emergency power generation were previously exempt from leak detection requirements, but must now meet the leak detection requirements in the Storage Tank Regulations.
   - USTs installed on or before 11/10/2007 – by 12/22/2020
   - USTs installed after 11/10/2007 – by 12/22/2019
   - New USTs – immediately upon installation

2. Owners/operators must notify DEP 30 days before the installation of piping systems, replacement of dispensers, or installation of new dispensers.

3. Spill and overfill prevention equipment must be permanently installed.

4. After 12/22/2018, ball float valves may no longer be installed or replaced to meet overfill prevention requirements. When a ball float valve is removed, the entire assembly must be removed.

5. When an existing dispenser without under-dispenser containment is replaced with another dispenser, all equipment at or below the shear valve which is needed to connect the product piping to the dispenser is replaced, or, when a major modification involving excavation beneath the dispenser is performed, under-dispenser containment must be installed.

6. Every 3 years, the following components of the UST system must be tested: Containment sumps used for interstitial monitoring, spill prevention equipment, and overfill prevention equipment.

7. Each year, the following components of the UST system must be tested: Electronic and mechanical components of release detection equipment, including sensors, probes, and automatic tank gauges.

8. Owners/operators must check the following:
   - Every 30 days – Spill prevention equipment is free of liquid and debris; fill pipe is not obstructed; fill cap is present and sealed; release detection equipment is on and functioning.
   - Annually – Containment sumps are free of liquid and debris; handheld leak detection equipment is in a good state of repair.

9. UST facilities that are unattended when they are open for retail fuel sales must be equipped with an automatic line leak detector that restricts or automatically shuts off the flow of product if a leak is detected (this does not apply to USTs storing fuel solely for emergency power generation).

www.dep.pa.gov
DEP Regional Emergency Response Phone Numbers

Northwest Region – 1-800-373-3398
Southwest Region – 412-442-4000
Northcentral Region – 570-327-3636
Southcentral Region –
   After July 1st (1-800-541-2050)
Northeast Region – 570-826-2511
Southeast Region – 484-250-5900
Questions?

Kris Shiffer – 717-772-5809 – kshiffer@pa.gov
Randy Martin – 717-772-5828 – ramartin@pa.gov
Alex Eckman (AST) – 717-772-5827 – eeckman@pa.gov
Alex Hess (AST) – 717-783-9767 – alhess@pa.gov
Magen Majeski (AST) – 717-772-5810 – mmajeski@pa.gov
Josh Blanco (UST) – 717-772-5804 – jblanco@pa.gov
Salma Chowdhury (UST) – 717-772-5821 – schowdhury@pa.gov
Chantelle King (UST) – 717-772-5806 – chanking@pa.gov
Cheryl Mauch (UST) – 717-772-5803 – cmauch@pa.gov

Eric Lingle – 717-783-2403 – elingle@pa.gov
Anne Toth – 717-772-5808 – anntoth@pa.gov
Wendy Davis – 717-772-5829 – wendavis@pa.gov