

## **Commonly Asked Questions by Storage Tank Owners Concerning Facility Operations Inspections**

### **-Why must I pay for the operations inspection?**

Pennsylvania's Storage Tank and Spill Prevention Act is designed to limit the need for state employees by making use of the private sector to help implement the program. Conducting facility operations inspections is one area in which private sector support is used. Instead of paying higher fees or taxes to support a large staff of state employed inspectors, owners contract with private sector, third-party inspectors that are certified by the Department of Environmental Protection (DEP) to conduct operations inspections. In this way, the number of state employed inspectors is minimized. It is believed that this is a less costly, more efficient way to accomplish these inspections, and is benefitted by private sector industry expertise.

### **-What is an operations inspection?**

An operations inspection is conducted by a DEP certified third-party inspector to evaluate regulated underground storage tanks (USTs) at a storage tank facility for compliance with storage tank regulations. Relevant components of each UST system are evaluated, including: construction material of tank and piping, cathodic protection or corrosion protection, pump system, spill and overflow prevention devices, piping sumps, and release detection devices. The status of tank system registration is also evaluated. Records regarding tank and piping release detection and corrosion protection are evaluated in detail. Records regarding the following will also be reviewed: overflow and spill containment testing, containment sump testing, financial responsibility, walkthrough inspections, historical records, and modifications reports. Documentation of trained operators will also be reviewed.

### **-What is the goal of an operations inspection?**

The ultimate goal of the operations inspection is to assist the storage tank owner in maintaining compliance with the laws and regulations that govern regulated storage tank systems. The inspector will discuss the results of the inspection with the facility owner/operator representative and, if necessary, offer recommendations for facility or recordkeeping improvements to bring the facility into compliance.

### **-When should I have an operations inspection completed?**

Inspections can be "self-initiated" or "DEP-initiated." The due date of the next regularly scheduled inspection is shown on the facility's *Storage Tank Registration/Permit Certificate*. A storage tank facility owner may choose to have an inspection of the facility at any time prior to the due date. To get credit for a self-initiated inspection, the inspection report must be submitted to DEP; which will reduce the likelihood of DEP initiating an additional inspection. DEP may initiate an inspection by sending a letter to the facility owner to request an operations inspection of the facility. An inspection should be completed by the date specified in the letter or on the *Storage Tank Registration/Permit Certificate*.

### **-How much will an operations inspection cost?**

The cost of an operations inspection will vary with the size, type, and location of a facility. There are also other variables which could impact the cost. We recommend that you obtain several bids from qualified inspectors to get the best price for the best service.

### **-How do I find a DEP certified third-party inspector?**

Information regarding underground storage tanks, including a current list of storage tank certified companies, can be found on our website. Our website can be located by typing [www.dep.pa.gov](http://www.dep.pa.gov) into any internet browser or by typing "PA DEP" into any internet search engine. From the DEP home page, begin by hovering over "Businesses" along the top row of the page. Then, click on "Land" from the drop-down list. Next, locate and click on the link to "Storage Tanks" located in the bottom center of the page. To search for a PA DEP certified inspection company, click on the "Underground Storage Tanks" link in the right column of the Storage Tanks home page. Finally, click on the "Storage Tank Certified Companies Search" link that is located in the center of the webpage to open a searchable listing of PA DEP certified tank handling and inspection companies. You will be able to search for certified inspectors by PA DEP Region and PA County, as well as by inspector certification category. You may select any company on the list with "IUM" certification. You will need to contact the company directly to make arrangements for your operations inspection to be completed.

### **-How long will the inspection take?**

The length of the inspection depends upon the size and type of facility. The inspection may be extended if required records are not immediately available for review by the inspector, or if problems with the operation and maintenance of the facility's USTs are identified during the inspection. Most facilities can be inspected in less than one day.

**-What kind of records do I need to show the inspector?**

- 1) The inspector will need to see records regarding all system components that cannot be verified by visual inspection. For instance, if the tank is constructed of fiberglass, an inspector might not be able to confirm that the tank is in fact constructed of fiberglass because it is covered. An invoice for the tank purchased and a *Storage Tanks Registration /Permitting Application Form* that is signed by the DEP certified installer are the easiest ways to confirm the construction material of the tank.
- 2) The Registration Certificate display – The current certificate should be posted within view of the general public at facilities that dispense fuel for retail sales. Other facilities should have the current certificate readily available for inspection.
- 3) If cathodically protected steel tanks or piping are present, records of cathodic protection testing must be available and will be evaluated. Refer to page 7 of DEP’s *Underground Storage Tank Facility Operations Inspection Report Form* for the cathodic protection compliance criteria.
- 4) Tank and piping release detection records. Refer to page 3-5 of DEP’s *Underground Storage Tank Facility Operations Inspection Report Form* for the release detection method criteria for the release method(s) you use. The inspector will need to see the appropriate records for the type of release detection you use for the tank and piping. These records might include monthly monitoring records, tightness tests, manufacturer’s certification of test performance, construction details for suction piping, or results of annual line leak detector tests on pressurized piping.
- 5) Records related to equipment testing and modifications (if applicable) will be reviewed. Refer to page 6 of DEP’s *Underground Storage Tank Facility Operations Inspection Report Form* for complete details of what is required.
- 6) Walkthrough inspection and financial responsibility documents will also be reviewed.

**-What should I do during the inspection?**

You or a responsible staff person should be present during the inspection to familiarize the inspector with the facility, provide records, answer questions, and assist with access to or operation of system components. These inspections also offer you a great opportunity to increase your own knowledge of your unique tank systems.

**-What happens at the end of the inspection?**

The inspector will review the results of the inspection with you or your staff person and answer questions and will explain the information presented on the form. Violations, if any exist, will be identified. The inspector is available to assist you in determining how to correct these violations. You or your staff person should review the inspection report to make sure that it accurately describes the condition of your facility, includes appropriate clarification comments, and you understand what is documented. The inspector and you or your staff person must sign the report. The completed report is submitted to both the DEP local region and central offices.

**-Who is responsible for sending the report to DEP?**

The certified inspector is, by law, responsible for submitting the completed operations inspection report to DEP within 60 days.

**-Who is allowed to make necessary facility improvements?**

Only DEP certified installers may perform tank handling activities in their area(s) of certification. An inspector who has the required (UMX) certification may make the necessary facility improvements with the owner/operator’s approval. You, as the facility owner, may want to shop for competitive prices by contacting several certified installers or companies qualified to complete the necessary tank handling activities. Directions on how to find a list of DEP certified installers may be found near the bottom of page 1.

**-What if the facility improvements are not completed prior to submission of the operations inspection report?**

The Inspection Summary on the front page of the operations inspection report indicates areas of compliance and noncompliance, as they existed at the start of the inspection process. Areas of noncompliance may be further investigated by DEP to assess whether the appropriate improvements have been completed. There is a possibility that penalty assessments will be issued.

**-Are all underground tank facilities required to complete an operations inspection?**

Yes, the Technical Standards for Underground Storage Tanks, 25 PA Code Chapter 245 Subchapter E, requires that facility operations inspections be conducted at UST facilities at the following frequencies: Routine inspections every three years; within six to twelve months of a facility ownership change; within six to twelve months of the installation of a new underground storage tank system; and finally, any additional inspections as requested by DEP.