Administrative & Underground Storage Tank Inspector Seminar

Tom Wolf, Governor
Patrick McDonnell, Secretary
What to Expect Today

• Underground Inspector (IUM) Information
  • Facility Operations Inspection (FOI) Report Completion
  • Compliance Evaluations
• Administrative Information
  • Document Completion & Submission
  • Reporting Requirements
  • Registration & Permitting
  • Certification Applications & Renewals
### Whom Should I Contact with Questions

**USTs – FOIs, Modifications, and Testing Forms**

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
<th>Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheryl Malloy (Mauch)</td>
<td>717-772-5803</td>
<td>Regions 1 &amp; 2</td>
</tr>
<tr>
<td>Kalynn Conner</td>
<td>717-772-5825</td>
<td>Regions 3 &amp; 4</td>
</tr>
<tr>
<td>Chantelle King</td>
<td>717-772-5806</td>
<td>Regions 5 &amp; 6</td>
</tr>
<tr>
<td>Ashley Grace</td>
<td>717-772-5821</td>
<td></td>
</tr>
</tbody>
</table>

**ASTs – Inspections and Modifications**

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
<th>Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Magen Majeski</td>
<td>717-772-5810</td>
<td>Regions 1, 3, 5</td>
</tr>
<tr>
<td>Susan Nealy</td>
<td>717-783-9767</td>
<td>Regions 2, 4, 6</td>
</tr>
</tbody>
</table>

**Tank Registration and Permitting**

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>Eric Lingle</td>
<td>717-783-2403</td>
</tr>
</tbody>
</table>

**Tank Handler and Inspector Certification**

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone</th>
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</thead>
<tbody>
<tr>
<td>Anne Toth</td>
<td>717-772-5808</td>
</tr>
<tr>
<td>Wendy Davis</td>
<td>717-772-5829</td>
</tr>
</tbody>
</table>
# The Facility Operations Inspection (FOI)

## Proper FOI Report Form Completion

<table>
<thead>
<tr>
<th>Missed Sections</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flammable &amp; Combustible Permits</td>
<td>Manufacturer and Model</td>
</tr>
<tr>
<td>ICCP Records</td>
<td>Code 99 &amp; Unknown Piping Connectors</td>
</tr>
<tr>
<td>Historical Records</td>
<td>Missing Months of Release Detection</td>
</tr>
<tr>
<td>Modification Report Review</td>
<td>Suction Systems &amp; Release Detection</td>
</tr>
</tbody>
</table>

## FOI Compliance Evaluations

<table>
<thead>
<tr>
<th>Evaluations</th>
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</tr>
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<tbody>
<tr>
<td>Walkthroughs</td>
<td>Periodic Testing</td>
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<tr>
<td>Corrosion Protection</td>
<td>Release Detection</td>
</tr>
<tr>
<td>Unknown Components</td>
<td>Financial Responsibility</td>
</tr>
</tbody>
</table>
Successful FOI Reports

Creating FOI reports that communicate effectively with DEP and your customer:

• Make sure all DEP forms are complete prior to distribution.

• When completing an FOI:
  • Provide detailed comments
  • Complete the checkboxes correctly
    • Check box when criteria is met
    • For an unmet criteria, circle the box
    • If N/A, circle box and write N/A
    • If the page is blank, include in submittal and write “nothing on page” if need be

• Please make sure to respond to any inquiries made by the DEP, post submission, in a timely manner.
Almost all USTs regulated by DEP will require a Flammable & Combustible Permit:

- If owner cannot readily produce a Fire/Safety permit, mark **No and explain in detail in the comments section of the FOI (page 8)**.

Owners may inquire about the existence of a Fire/Safety Permit by emailing a written request to boilers@pa.gov

- Will need: Storage tank owner name, facility name, facility address, and DEP facility ID number.

**In All Cases**

The FOI Report form should be received by DEP within 60 days of the first site visit.

*Note: email correspondence was sent to DEP-certified individuals addressing this issue on October 22, 2020.*
FOI Reports – Missed Sections

Impressed Current Cathodic Protection (ICCP)

- FOI Reports for USTs with ICCP systems are frequently incomplete.

**There is more than just rectifier output readings!**

The Highlighted sections below are most frequently missed.

- 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)

```plaintext
If Cathodic Protection or supplemental anodes were added to an existing tank system, fill in the following (Information is Required for Compliance):

Date assessed: ____________________________  Date installed: ______________
Assessment Method: __________________________
```
FOI Reports – Missed Sections

Historical Records & Modification Report Review

Reminder: There are no **OPTIONAL** sections of the FOI Report form.

N/A and appropriate comments should be used for all sections that do not apply to the facility you are inspecting.

1. DEP frequently identifies Modification Reports that have not been received and reviewed because of the detail provided on FOI Reports.
2. The IUM documenting what Modification Reports were provided can help clarify discrepancies in expected compliance standards.
   1. **For Example**: Piping replacements after 11/10/2007. An IUM that is not provided the modification reports will not be aware of the interstitial monitoring requirement. By reporting on Modification Reports provided, the IUM shows this is a recordkeeping error by the facility, NOT a compliance determination mistake by the IUM.
Reminder: There are no OPTIONAL sections.

DEP requests that IUMs document applicable tank and piping manufacturer and model information on ALL inspections.

If it is unknown, any supporting details uncovered during the investigation should be provided.
Attention Inspectors, Installers, and periodic testers!

“Industry Standard”

This phrase is used as shorthand frequently by the DEP reviewers and regional inspectors.

It **DOES NOT** mean what has been done for the last few decades **OR** how you have always done the particular activity in question.

What it **DOES** mean is following a code of practice developed by a nationally recognized association or independent laboratory. For example, PEI RP 1200 for testing of Spill Prevention Equipment.

This applies to all areas in your interactions with DEP:

<table>
<thead>
<tr>
<th>Installations</th>
<th>Modifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>CP Evaluations</td>
<td>All Periodic Testing</td>
</tr>
</tbody>
</table>
“Industry Standard”

Why is this note inserted into the middle of our discussion about Inspections?

§ 245.411. Inspection frequency.

(a) Inspection of underground storage tank systems. Underground storage tank owners or operators shall have their underground storage tank systems inspected by a certified inspector at the frequency in subsections (b) and (c). The inspection shall include release detection, assessment of the underground storage tank system and ancillary equipment, operation of overfill and spill prevention equipment where practicable, corrosion protection testing, or verification that corrosion protection is functional, and release prevention measures.

DEP expects the IUM to assess both during physical inspection and record review that the UST system meets the regulatory requirements including adherence to manufacturers’ installation requirements and/or the appropriate code of practice developed by a nationally recognized association or independent laboratory.
• DEP is looking for clarification on if piping is true double-walled piping for flex piping.

• Manufactured single-walled piping put inside a chase is not considered valid for using interstitial monitoring
  
  • Environ piping must be Geoflex-D or Geoflex-M. Geoflex-S in any of their Geoducts is not acceptable.

• Total Containment single-walled Enviroflex piping in a chase is an exception but should be evaluated on a case-by-case basis. IUMs should mark the piping noncompliant if it is not properly capable of performing interstitial monitoring.
Missing, Invalid, Failing Release Detection

- If less than 12 months of valid and passing release detection results are available:
  - Provide comments on Page 8 with additional detail:
    - Results of interview with Class A or Class B Operator. Did you determine if the release detection was a measurement issue, a recordkeeping issue, or a misunderstanding of the equipment?
    - Did you retrain the Operator?
    - Any actions taken to investigate the failing, invalid or missing release detection.
    - The results: passing, failing, invalid, or missing for each of the past 12 months.

- Please Note: DEP has specific follow-up criteria based on the What and When of noncompliant release detection.
European (Safe) Suction

- A form of documentation is needed as proof - *owner’s word is not good enough*!
  - It must be verified by documentation or physical inspection.
- Explain in remarks how it was determined
- Verify piping slope
  - Installer verified (physical documentation)
  - As built drawings & pictures
  - Observing a check valve only under the dispenser
## The Facility Operations Inspection (FOI)

<table>
<thead>
<tr>
<th>FOI Compliance Evaluations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walkthroughs</td>
</tr>
<tr>
<td>Corrosion Protection</td>
</tr>
<tr>
<td>Unknown Components</td>
</tr>
<tr>
<td>Periodic Testing</td>
</tr>
<tr>
<td>Release Detection</td>
</tr>
<tr>
<td>Financial Responsibility</td>
</tr>
</tbody>
</table>
Walkthrough Inspections

**Monthly** periodic walkthrough inspections are required for:
- Spill Prevention Equipment*
- Release Detection Equipment Operation

**Annual** periodic walkthrough inspections are required for:
- Containment Sumps*
- Handheld Release Detection Equipment

*Exceptions:
- **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 a qualifying double wall design may have the 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.
Walkthrough Inspections

All Active Facilities should have a minimum of 12 months of walkthrough inspection documentation at this point.

It is true that DEP has provided a sample form for walkthrough inspections, however Facilities may use any format that documents all the requirements established sections 245.435 & 245.438:

- **245.435 (21)**: …Records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue and delivery records if spill prevention equipment is checked less frequently than every 30 days due to infrequent deliveries.
- **245.438** states that the following must be checked:

<table>
<thead>
<tr>
<th>Spill Prevention Equipment</th>
<th>Visually check for damage, Remove liquid or debris, Check for and remove obstructions in the fill pipe, Check the fill cap to make sure it is securely on the fill pipe, For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Release Detection Equipment</td>
<td>Check to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present. Ensure records of release detection testing are reviewed and current.</td>
</tr>
<tr>
<td>Containment Sumps</td>
<td>Visually check for damage and the presence of liquid or debris, Remove liquid or debris, For double-walled sumps with interstitial monitoring, check for a leak in the interstitial area, For handheld release detection equipment, check devices such as tank gauge sticks or groundwater bailers for operability and serviceability.</td>
</tr>
</tbody>
</table>

[Source: Pennsylvania Department of Environmental Protection]
All Corrosion Evaluations completed after December 21, 2018 **MUST** be submitted with the FOI Report form.

When reviewing or completing CP Evaluation Forms:

- Document the code of practice from a nationally recognized association used for the evaluation:
  - **STI R051** is a code of practice
  - **STI** is a nationally recognized association

- **Reminder**: Sections of the form may be Not Applicable (N/A) **BUT** none are optional.

- Include a site diagram showing where readings were taken

- DEP (or anyone) should be able to replicate your results by using the code of practice listed and the documentation provided.
Unknown Components

- All USTs, UST piping (primary piping and piping connectors), and UST ancillary equipment must be identified during the FOI.
  - All UST components that can be inspected visually through non-intrusive means should be.
  - Primary records should be used for components that cannot be visually inspected.

- After your investigation: If components are still of unknown construction, that component should be reported as noncompliant on page 1.
  - Details of your investigation should be included in the comments.

<table>
<thead>
<tr>
<th></th>
<th>N</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank Construction and Corrosion Protection</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Piping Construction and Corrosion Protection</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>
FOI Compliance – Periodic Testing

- Testing Compliance and Timing:
  - **Initial** periodic testing is only compliant if it is completed before December 22\(^{nd}\), 2021

<table>
<thead>
<tr>
<th>Date of FOI</th>
<th>Testing Date</th>
<th>Compliant?</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/7/2022</td>
<td>12/21/2021</td>
<td>Yes</td>
</tr>
<tr>
<td>8/7/2022</td>
<td>8/1/2022</td>
<td>No</td>
</tr>
</tbody>
</table>

**Note:** After December 21, 2022, all facilities should be 3 years from the first round of testing, when their FOI occurs

- Information provided on the FOI should be the most recent date of periodic testing
Important things to remember:

– Forms must be complete – **** Owner’s Signatures ****

– Write legibly or Print/Type

– Identify the test method protocol and/or standard that was used

– Review the form before signing and submitting
  • Maintain a copy and provide one to the facility

– Record the manufacturer and model information

– If you are completing the forms during a tank modification, please submit them with the report

– The owner needs to sign the forms
  • The owner’s representative signature proves the form was received by the appropriate individuals at the facility.
Updates to Testing Forms

- Automatic Tank Gauge Functionality Testing Form (2630-FM-BECB0015)
  - Minor updates to formatting and numbering

- Spill Prevention Equipment/Containment Sump Integrity Testing Form (2630-FM-BECB0016)
  - Some of the sections were rearranged to make more space for the Site Drawing and the numbering was corrected

- Sensor Functionality Testing Form (2630-FM-BECB0020)
  - Significant changes were made to this form to allow this form to cover all required annual testing for release detection at facilities where the ATG/Sensor controller does not have a probe and all release detection is completed by interstitial monitoring.
  - The form references a new Site Drawing form for the site drawings related to the sensor testing form.

- Storage Tank Facility Site Drawing (2630-FM-BECB0027)
## FOI Compliance – Periodic Testing

<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.
Overfill Prevention Equipment Evaluations

– 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.
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**.
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.
Reminders

– Testing must have been conducted after 12/21/2018 to be considered valid ::

  • As we move beyond the initial periodic testing phase-in period, recordkeeping requirements will be similar to PRD annual testing recordkeeping requirements.

– Testing must be documented on the DEP-provided forms
Statistical Inventory Reconciliation (SIR):

- SIR results must be provided at the conclusion of the 30-day monitoring period.

**All Pressurized Piping:**

<table>
<thead>
<tr>
<th>Install Date</th>
<th>Upon Detection of a Release, the LLD 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 <em>if unattended and open for business</em></td>
</tr>
<tr>
<td>After 11/10/2007</td>
<td>Shutoff flow of regulated substances through the piping</td>
</tr>
</tbody>
</table>

**Emergency Generator USTs** must implement 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>
Shear Valves and Piping Manifolds
Shear Valves and Piping Manifolds
Shear Valves and Piping Manifolds
Piping Manifolds installed above a shear valve:

- Violation of shear valve manufacturer’s and dispenser manufacturer’s installation instructions.
- Fire safety hazard due to inability to properly shear.

The fix:

- Move piping manifold back to the tank side (double-walled piping, excavation, etc.)
- Move manifold below shear valves.
Concerns: What about Release Detection?

Option 1: Double-walled piping, tank top sumps, dispenser sumps, and conduct interstitial monitoring with sensors in all sumps.
   - Could mean downtime and extensive amounts of money.

Option 2: Electronic line leak detector
   - PLLD should be located on one STP and both STPs should have SwiftCheck valves.

Option 3: Mechanical line leak detector
   - One on each STP may be used, but both STPs cannot run at the same time.
   - Must be wired and/or ATG programmed
   - Will not be allowed on one STP and a check valve on the second STP.
Reviewing Financial Responsibility Records

--- Not required for State and Federal Facilities ---

- **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.

* 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.
# Important Notes for All Certified Individuals

<table>
<thead>
<tr>
<th>Important Notes for All Certified Individuals</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Release Reporting Requirements</td>
<td>Dispenser Replacements</td>
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<tr>
<td>Tank Handling Notifications</td>
<td>Compatibility Requirements</td>
</tr>
<tr>
<td>Document Submissions – When, Where, Why, and How</td>
<td></td>
</tr>
<tr>
<td><strong>Tank Registration</strong></td>
<td></td>
</tr>
<tr>
<td>Common Issues</td>
<td>ePermitting</td>
</tr>
<tr>
<td><strong>Certification</strong></td>
<td></td>
</tr>
<tr>
<td>Overview of the most important reminders from the Certification Unit.</td>
<td></td>
</tr>
</tbody>
</table>
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.
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.
Tank Handling Notifications

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

Underground Storage Tank System Installation-Closure Notification Form
2630-FM-BECB0127 [ONLINE SUBMISSION](#)

<table>
<thead>
<tr>
<th>Installation - 245.421(a)(2)</th>
<th>Permanent Closure and Change-in-service</th>
</tr>
</thead>
<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>

[Image]
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 piping system is replaced
– Replaced means new to this dispenser location. The dispenser can be used, refurbished, or new.
Dispenser Installation or Removal

Remember: All tank handling activities should be carefully evaluated to ensure the facility’s needs are met while adhering to manufacturer’s installation guidance and all relevant regulatory requirements.

<table>
<thead>
<tr>
<th>Event</th>
<th>30 day notice</th>
<th>UMR</th>
<th>UM</th>
<th>UMI</th>
<th>Major Mod</th>
<th>Minor Mod</th>
<th>Site Assessment &amp; Closure Report</th>
<th>UDC Required</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dispenser Installation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Install a new dispenser at a new location</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td>X*</td>
</tr>
<tr>
<td><strong>Dispenser Removal</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Permanent closure of the dispenser</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>During TOS Status</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

*Also requires positive submersible turbine pump shutdown and interstitial monitoring for the length of new piping installed to this new dispensing location.
## Dispenser Replacements

<table>
<thead>
<tr>
<th>Event</th>
<th>30 day notice</th>
<th>UMR</th>
<th>UMx</th>
<th>UMI</th>
<th>Major Mod</th>
<th>Minor Mod</th>
<th>Site Assessment &amp; Closure Report</th>
<th>UDC Required</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dispenser Replacement</strong></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disconnect dispenser at or above shear valve: Simple unbolt/bolt on</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Excavation is required beneath the dispenser (saw cutting, jack hammering, etc.)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>All components between dispenser and underground piping are replaced.</td>
<td>X</td>
<td>X</td>
<td>X*</td>
<td>X</td>
<td>X*</td>
<td>X</td>
<td></td>
<td>X*</td>
</tr>
</tbody>
</table>

*Required if excavation is needed underneath the dispenser

Please see Sections 245.421, 245.422, and 245.452 for additional information about dispenser installation, removal, and replacement.
Dispenser Refurbishments

Service Company:
Hunter Pump Islands

Cleans up: Paint Chipping, concrete deteriorating, rust/corrosion, poor image.

Protects Against: Gasoline, salt, chemicals, rust, corrosion, extreme weather, heat.
Dispenser Refurbishments

- No downtime on pump system.
- Stainless steel set overtop of existing island - 3” out from original.
- Pour new concrete 2” higher than original island.
- New concrete isolated from dispenser by nonmetallic expansion material.
Dispenser Refurbishments: Concerns

Refurbishments and Shear valves
• Concern over shear valves not operating properly due to new island height.

• Two leading manufacturers (OPW and EBW) were tested and approved per UL 842

However: Shear Valve manufacturer opinions differ for approval of use
For all USTs installed to store or will be converted to store:

1. Gasoline-ethanol blend containing **greater than 10%** ethanol
2. Biodiesel or a biodiesel blend containing **greater than 5%** biodiesel

The DEP provided Alternative Fuel Storage Tank Installation/Conversion Form shall be submitted, reviewed, and approved prior to DEP issuing an operating permit.

1. The form should be complete.
   1. Extensive details and instructions are available on the form.
2. The form should be signed by the tank owner or owner’s representative, a Professional Engineer if necessary, and the DEP certified installer.
   
   **1. The ultimate responsibility lies on the UMX to ensure that all system components are compatible with the substance stored.**
   2. Please note that incorrect, inaccurate, and falsified forms have led to enforcement action against certified installers and their companies.

3. PEI, UL, ASTSWMO, and manufacturers all have resources for assessing compatibility of UST components.
Overfill prevention equipment removals: **Minor Modification**

- Should always be completed by a UMI or UMX
- Must be reported on a modification report within 30 days.
- **Only exception:** if a tank is being tightness tested and the UTT removes the overfill drop tube to conduct testing.

(7) Overfill Prevention Installation or Modification (describe status of previous overfill prevention i.e. removed, remains as backup in VII. Comments)

- Helps keep track of tanks with or without overfill drop tubes.
- Overfill drop tubes many times get removed during tank pumping to place in TOS and are never replaced.
- Required information when returning to C status.
Please verify that all forms are completed before submitting to DEP

<table>
<thead>
<tr>
<th>Form(s)</th>
<th>Frequently Forgotten Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>FOI</td>
<td>Detailed comments, manufacturer and model info, complete cp section, equipment testing info</td>
</tr>
<tr>
<td>Modification Report</td>
<td>Site diagram, detailed comments, new install component testing verification, ball float assembly removal verification</td>
</tr>
<tr>
<td>Spill Prevention Testing</td>
<td>Pass/fail threshold, owner’s signature, manufacturer and model info, test method protocol/standard</td>
</tr>
<tr>
<td>All Other Equipment Testing</td>
<td>Owner’s signature, manufacturer and model info, test method protocol/standard</td>
</tr>
<tr>
<td>CP Testing</td>
<td>Nationally recognized standard, site diagram, continuity determination</td>
</tr>
<tr>
<td>Form</td>
<td>Submission Timeline</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>FOI</td>
<td>60 Days</td>
</tr>
<tr>
<td>Lining Inspection</td>
<td>60 Days</td>
</tr>
<tr>
<td>Mod Report</td>
<td>30 Days</td>
</tr>
<tr>
<td>30 day Install/Closure Notice</td>
<td>30 Days Prior</td>
</tr>
<tr>
<td>Closure Report</td>
<td>30 Days</td>
</tr>
<tr>
<td>Release Reporting</td>
<td>48 Hours</td>
</tr>
<tr>
<td>Overfill, Spill Prevention or Containment, and UTT Test Failures</td>
<td>48 Hours</td>
</tr>
<tr>
<td>Installation Registration</td>
<td>30 Days</td>
</tr>
<tr>
<td>Amended Registration (1 Page)</td>
<td>30 Days</td>
</tr>
<tr>
<td>Closure/Removal Registration</td>
<td>30 Days</td>
</tr>
<tr>
<td>TOS Extension Request Letters</td>
<td>Prior to Expiration</td>
</tr>
</tbody>
</table>
DEP is Going Paperless

To assist DEP in reaching this goal, the Division of Storage Tanks is requesting that ALL documents, with the exception of documents submitted through the ePermitting or OnBase applications, be submitted by email.

Documents may be emailed to Central Office and the appropriate Regional Office. The email addresses are:

Central Office: tanks@pa.gov
Region 1 (SE): ra-serotanks@pa.gov
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

NOTE: Please be aware that the maximum file size for attachments is 20MB. Additionally, please note that electronic submittal via these email addresses does not guarantee receipt of the document by DEP. It is recommended that email read receipts are used and properly documented.

DO NOT USE THESE EMAIL ADDRESSES FOR SUBMITTING A FORMAL RIGHT TO KNOW LAW REQUEST TO THE DEPARTMENT.
Storage Tank Registration and Permits are available Online.

Search: **Storage Tank ePermit**

The first result:

*ePermitting*

[link](https://www.dep.pa.gov/Business/Land/Tanks/Pages/ePermitting.aspx)

*Storage tank* owners may now pay annual *Storage Tank* registration fees online through the Department's ePermitting application on Greenport. Follow the steps ...
We Can Accept:

Registration Fee Payments
Existing Clients – New Facility Registration
Add Tank(s)
Remove or Close Tank(s)
Change Tank Status
Change Tank Substance
We Can Accept:

- Updated Facility Contact Information
- Updated Owner Information
- Updated Site Information
- Updated Facility Information

We Cannot Accept:

- Change of Ownership Applications
DEP’s 13-page Storage Tanks Registration / Permitting Application Form is also available.

Most errors are missed fields

The ePermit system provides immediate feedback!
Most frequently missed information:

• Section II (Tank Owner):
  – Employer ID# (EIN)

• Section IV (Facility):
  – Facility Kind
  – Latitude/Longitude
Most frequently missed information:

- **Section VI (Tank Information):**
  - Install Date for New Tanks
  - Change of Status Date
  - Removal Date

- **Section IX (Owner Certification):**
  - Owner’s Signature
  - Date Signed
Most frequently missed information:

- **Section X (Installer Information):**

<table>
<thead>
<tr>
<th>Tank#</th>
<th>Installer/Remover Name</th>
<th>Construction Standard</th>
<th>Individual Certification#</th>
<th>Certification Category</th>
<th>Company Certification#</th>
<th>Installer/Remover Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Missing</td>
<td>Missing</td>
<td>Missing</td>
<td></td>
</tr>
</tbody>
</table>

- **Required Attachments**
  - UST Operator Training Documentation Form
  - Class A/B Operator Certificates
DEP no longer sends registration certificates if invoices are paid online
- Facility owners have access to the certificate right away
- The same applies for if the tank status is changed online

DEP still prints and mails registration certificates if transactions are handled via mail

Security paper will no longer be used for printed registration certificates
- Do not be surprised to run across ones printed on plain paper
- If you question the legitimacy of the certificate, it can be verified on the Active Storage Tank Search (USTs and small ASTs only)
Know your expiration date

• Plan Ahead
  – Start scheduling trainings at 12-18 months
  • Technical Training
  • Administrative Training
  • Exam Dates
Renewal is NOT Automatic

— Submit (Email) the Renewal Application and Technical Training Certificates
DEP communicates frequently by email.

DEP encourages you to communicate with us by email:

tanks@pa.gov

Notify DEP of changes:
Address
Employer
Email
Certification Reminders

Use the most recent revision of DEP’s forms.
Certification Reminders – TIIP Fees

Certified Companies

Pay Your TIIP Fees

https://ustif.pa.gov/

Tank Installers (TIIP)

Installation companies are required to pay an annual fee and activity fees for tank removals, installations and modifications through the fee billing system.

How to Set up An Account

Program Fees

How to File a Claim

Frequently Asked Questions
Submit All Supporting Documents.

Verify your Application is Complete.

Sign your application – no computer fonts.

Submit your Application at least 60 days before the desired exam date.
Attachment A activities must be verified.

<table>
<thead>
<tr>
<th>Facility where the work was completed</th>
<th>DEP Verified</th>
<th>Applicant's employer when work was performed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity No. 1</td>
<td>Approved</td>
<td>Company Name</td>
</tr>
<tr>
<td>Owner Name</td>
<td></td>
<td>Address</td>
</tr>
<tr>
<td>Facility Name</td>
<td></td>
<td>City</td>
</tr>
<tr>
<td>Pa Facility I.D. #</td>
<td></td>
<td>State</td>
</tr>
<tr>
<td>Address</td>
<td></td>
<td>Zip</td>
</tr>
<tr>
<td>City</td>
<td></td>
<td>State and Zip</td>
</tr>
<tr>
<td>State</td>
<td></td>
<td>City</td>
</tr>
<tr>
<td>Zip</td>
<td></td>
<td>State and Zip</td>
</tr>
<tr>
<td>Owner Contact</td>
<td></td>
<td>Contact</td>
</tr>
<tr>
<td>Contact Phone (__)</td>
<td></td>
<td>Phone (__)</td>
</tr>
<tr>
<td>Facility Phone (__)</td>
<td></td>
<td>Verifying Official Signature</td>
</tr>
<tr>
<td>Reported under PA certification ID</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Activity No. 2

| Owner Name                           |              | Company Name                                |
| Facility Name                        |              | Address                                     |
| Pa Facility I.D. #                   |              | City                                        |
| Address                              |              | State                                       |
| City                                 |              | Zip                                         |
| State                                |              | State and Zip                               |
| Zip                                  |              | City                                        |
Modification Inspections
• Required for Major Mods to Field-constructed ASTs and ASTs >21,000 gallons.
  – Inspector must be involved prior to initiation of project, and present at critical times.

Chapter 245 Revisions (December, 2018)
• Small AST inspection interval: 5-year max
• Vaulted AST inspection interval: 6-12 months post-installation; 3-year max, thereafter.
• Emergency containment installed or replaced after 10/11/1997 or for Tanks installed after 10/11/1997 must meet $1 \times 10^{-6}$ cm/s permeability requirement.
• Annual ICCP system test, 60-day rectifier checks; three-year Galvanic test.
• Contractor logs for facilities with aggregate capacity > 21,000 gallons

Facility Recordkeeping
• Record review is a critical part of an AST integrity inspection
  (Installation; Modification; O&M Plan; SPRP; CP; Testing; Piping Inspection; Containment: compatibility, capacity, permeability; etc.)

***If you hold AST certifications, you’re required to comply with AST regulations whether or not you’ve attended the AST-specific training course.
Please use the Chat function. Type your First Name and Last Name into the chat window.

**Remember**
Your chat should be addressed to All Panelists.
Questions?

Josh Blanco
717-772-5804
jblanco@pa.gov

https://www.dep.pa.gov/Business/Land/Tanks/Certification/Pages/Training-for-Certified-Individuals.aspx