UNDERGROUND STORAGE TANK COMPLIANCE INSPECTION CHECKLIST

Periodic Inspection and Compliance Record Keeping

This checklist is designed for the owner or operator of a facility with underground petroleum storage tanks regulated by the Montana Department of Environmental Quality to prepare for their every three-year third-party compliance inspection. Depending on what equipment you have, there may be different kinds of release detection and testing records that you must keep. This checklist is based on standard equipment and testing procedures. Not all of the following items pertain to your facility. Keep this checklist current (check √ each item when appropriate) to ensure that your facility is ready for your third-party compliance inspection.

Review your financial responsibility (FR) paperwork to make sure it is available and current. For more information on financial responsibility, please visit UST Financial Responsibility.

Your facility is required to have at least one Class A, Class B and Class C operator. Make sure that you have at least one Class A, Class B, and Class C operators at your facility. Also check to see if anyone has left who is Class A or B certified. You can look up the current operators by looking up your facility in the Facility Summary Sheets for your county. This is located at Facility Summary Sheets.

You are required to perform a facility walkthrough inspection every 30 days. Check to make sure that you have at least 12 months of inspections available at all times. This is a checklist of things that you need to check each month to ensure your facility is operating the way it should be. You may also download the form at MT DEQ WalkthroughInspectionForm.pdf.

Your automatic tank gauge (ATG) must conduct a 0.2 gallons per hour (gph) or 0.1 gph tank leak test on each tank at least once every 30 days. The last 12 months of these test results must be kept. Make sure that you have these records and that they are passing. Your ATG must also be checked annually for functionality. Make sure you have a copy of the annual test form like the one located here.

Interstitial monitoring for your tanks and piping must be recorded every 30 days. This is typically a LIQUID STATUS or SENSOR STATUS. The monthly records and the annual test must be kept for at least 12 months. You must test all of these sensors annually for operability. Make sure you have a copy of the test results. Retain this record for at least 12 months.

If you are using interstitial monitoring (IM) as your primary method of piping leak detection, your containment sumps must be tested for liquid tightness at least once every 3 years. Make sure you have a copy of the latest test and it is current. The test form for hydrostatic testing is this sump test form.

If you have single wall pressurized piping with mechanical leak detectors, it is required to be line tightness tested every 12 months. Make sure your last line tightness test is current. Each testing technician will be able to provide you with a copy of the test results. Retain this record for at least 12 months.

Your automatic line leak detectors (both Electronic and Mechanical line leak detectors) are required to be tested every 12 months to check to ensure that the line leak detector will detect a leak of 3 gph at 10 psi. Make sure your last leak detector functionality test is current. Retain this record for at least 12 months. The test form for functionality testing is this test form.

Your electronic line leak detectors (ELLDs) must conduct a line tightness test at 0.2 gph or less at least once every 30 days OR conduct a line tightness test at a leak rate of 0.1 gph or less at least once per year. Make sure that you have these records and that they are passing. Retain this record for at least 12 months.

Revised June 2022
UNDERGROUND STORAGE TANK COMPLIANCE SUMMARY

Periodic Testing Requirements and Compliance Record Keeping

_____ If your facility has suction piping, your U.S. suction piping may require a line tightness test every 3 years. Make sure your last line tightness test is current and passing. Each testing technician will be able to provide you with a copy of the test results. Keep these results for at least 3 years.

_____ If your records indicate that you use Statistical Inventory Reconciliation (SIR) as your monthly leak detection method, you must have the last 12 months of records available. Your meter totalizers (in your dispensers or at your POS system) must be recorded each operational day. You must measure inventory, delivery amounts, and dispensing data every operational day and before and after deliveries. These results must be recorded for 30 days or in accordance with your SIR vendor’s requirements. The last 12 months of monthly records must be kept available for inspection.

_____ Check your metal tanks and/or piping to see if they have impressed current cathodic protection. For these systems [i.e. systems that were installed on an existing tank system and uses a rectifier (DC power source)], a log must be maintained at least every 60 days. The log should show that the voltage or amperage gauge on the rectifier has been checked to see that the power is on and it is operating. The following information should be included in the log: voltage and/or amperage reading, the number of hours recorded from an hour meter (if equipped), status of a red or green indicator light, a name or initials, and the date. A cathodic protection test must be performed every 3 years. Make sure you have a current passing test within the last 3 years. The form for the corrosion protection test is this corrosion test form.

_____ Check your metal tanks and/or piping to see if they have galvanic (with anodes) corrosion protection. This is a coated steel tank (or piping) with sacrificial anodes attached to it. These anodes corrode instead of the tank itself. A cathodic protection test must be performed every 3 years. Make sure you have a current passing test within the last 3 years. The form for the corrosion protection test is this corrosion test form.

_____ Your facility has spill buckets for spill containment at the tank fill. You are required to have your spill buckets tested every 3 years to verify that they are liquid tight. Make sure you have a current passing test within the last 3 years. The form for the corrosion protection test is this spill bucket test form. Retain this record for at least three years. This does not apply to aboveground tanks with underground piping.

_____ Check your paperwork to see if your facility has drop tube shut off (DTSO) valves at the tank fills for overfill protection. These valves limit the amount that the tanks can be filled to 95% or less. You are required to have this tested every 3 years to verify that all are functional. Make sure you have a current passing test within the last 3 years. The form for the overfill protection test is this overfill test form. Retain this record for at least three years.

_____ Check your facility to see if it has a high-level alarm for overfill protection. This alerts your delivery driver to stop filling the tank. The maximum amount the tanks can be filled is 90% or less. You are required to have this tested every 3 years to verify that this is functional. Make sure you have a current passing test within the last 3 years. The form for the high level alarm test is this overfill test form. Retain this record for at least three years.

_____ Check your facility to see if it has ball float vent restrictors for overfill protection on your two gas tanks. These close off the tank vents during delivery. This alerts your delivery driver to stop filling the tank. The maximum amount the tanks can be filled is 90% or less. You are required to have these tested every 3 years to verify that this is functional. Many of these vent restrictors cannot be accessed and tested and must be replaced by drop tube shut off (DTSO) valves or high-level alarms. The form for the overfill protection test is this overfill test form. If they can be tested, retain this record for at least three years.

Much of the information for your facility is available online on our Facility Summary Sheets. This information is sorted by county and is available on the Facility Summary Sheet web page.

We recommend that you use a three-ring binder with tabbed dividers to keep all of your records organized. Keep phone numbers for your delivery company, your inspector, your technician, and the UST Leak Reporting Line (1-800-457-0568) handy.

For additional information, contact any of us at the MT DEQ UST program at (406) 444-5300, by email at dequstprogram@mt.gov or visit our website at https://deq.mt.gov/twr/Programs/ust