

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 a triennial third-party compliance inspection. Depending on what equipment you have, there will 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 the following items will pertain to your facility. Use this checklist (check ☒ each item when appropriate) to ensure that your records are up to date and your facility is ready for the inspector to conduct the triennial compliance inspection.

Information for your facility on record with Montana DEQ is available online on your [Facility Summary Sheet](#). Check it out!

- ☐ Make sure your *current* DEQ operating permit is displayed at your facility and is prominent and visible.
- ☐ Make sure each tank fill pipe or another visible part of your tank has a permanent non-expiring green engraved metal tank tag issued to you by DEQ.
- ☐ Review your financial responsibility paperwork to make sure it is current. For more information on financial responsibility, please visit [UST Financial Responsibility](#). This must be kept on site available for the inspector.
- ☐ 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 Operator at your facility. Also check to see if anyone has left who was a Class A or B Operator. Current Class A and B Operators are listed in the [Facility Summary Sheets](#) for your facility. More information is available [here](#).
- ☐ You are required to perform a facility walkthrough inspection **every 30 days** and an annual walkthrough inspection **once a year**. Facility owners, Class A or B Operators, or UST service technicians may perform the walkthrough inspections. The walkthrough inspections help ensure your facility is operating the way it should and helps identify problems early. To record inspections, download the [Montana Walkthrough Inspection Form](#). Keep a record of these inspections for at least 12 months.
- ☐ 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 spill bucket test is [located here](#). Retain this record for at least 3 years.
- ☐ Check your paperwork to see if your facility has drop tube shut off 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 these 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 3 years.
- ☐ Check your facility to see if it has an outside 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% capacity. 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 3 years.
- ☐ Check your facility to see if it has ball float vent valve (BFVV) restrictors for overfill protection. BFVV restrictors close off the tank vents during delivery when the product reaches 90% and alert your delivery driver to stop filling. The maximum amount the tanks can be filled is 90% of capacity. You are required to have these tested **every 3 years** to verify that they are functional. If a BFVV restrictor fails this test, it cannot be repaired and must be replaced by another approved device. Many of these vent restrictors cannot be accessed and tested. If this is the case, it must be replaced by a drop tube shut-off (flapper) valve or outside high-level alarm. The form for the BFVV test is [located here](#). Retain this record for at least 3 years.

- ☐ 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**. Records of tank leak tests must be retained on site for at least 12 months. Make sure that you have these records and that they are passing. Your ATG must also be checked every year for functionality. Make sure you have a copy of the most recent 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 or SENSOR STATUS report. The monthly records must be kept for at least 12 months. You must also test all of these sensors every year for operability. Make sure you have a copy of the most recent annual test form like the one [located here](#).
- ☐ 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 most recent triennial test form like the one [located here](#). Containment sump testing is also known as hydrostatic testing.
- ☐ If your primary leak detection method for single wall pressurized piping is annual precision testing, you need a line tightness test by a certified technician **every 12 months**. Retain records 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 ensure that the line leak detector will detect a leak of 3 gph at 10 psi. Make sure you have a copy of the most recent annual leak detector functionality test form like the one [located here](#). Retain this record for at least 12 months.
- ☐ 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.
- ☐ 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 Point-of-Sale 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 use a rectifier (DC power source)], a log must be maintained at least **every 60 days on the [rectifier checklist](#)**. The log should show that the voltage or amperage gauge on the rectifier has been checked and include: 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**. 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**. The form for the corrosion protection test is [this corrosion test form](#).
- ☐ Check [eStop](#) to ensure you are current on your tank registration fees.

For more information visit our website at <https://deg.mt.gov/twr/Programs/ust>.

We recommend that you use a 3-ring binder with tabbed dividers to keep all your records organized. Keep phone numbers for your delivery company, your compliance inspector, your technician, and the UST Leak Reporting Line (1-800-457-0568) handy.

For additional information, contact the DEQ UST program by phone at (406) 444-5300 or by email at degustprogram@mt.gov.