Memo

To: Montana Licensed Inspectors
From: Brett Smith
Date: May 15, 2006
Re: Monthly Leak Detection Records

Some confusion remains among UST inspectors as to what constitutes a monthly tank release detection record.

For automatic tank gauges that perform monthly tests:

An ATG history printout will not suffice to document monthly leak detection monitoring. The principle behind monthly leak detection is to test and monitor for leaks at least monthly. An ATG printout showing that there were no leaks within the last year does not document monthly checks.

If you don't observe a monthly record in the operators' files, then the operator cannot be performing monthly leak detection. To fully inform the DEQ reviewer of what you have found, you should record on the inspection forms that there are no monthly release detection records. You should also inform the reviewer that you have printed out a history of the leak detection results and what the results are.

For automatic tank gauges that perform continuous testing:

Even automatic and continuous leak detection methods require monthly documentation. The operator must look at the console to ensure it is operational, that all sensors are in communication with the console and that the system is not in alarm. The operator can document this by keeping monthly printouts or by keeping a logbook with entries at least monthly.