

FREQUENTLY ASKED QUESTIONS about Preparing for an Underground Storage Tank Inspection



An inspection of facility _____ by _____
Name & Facility ID Name
_____ will be conducted on _____ at approximately _____
Phone Date Time (a.m. or p.m.)

North Carolina's Underground Storage Tank (UST) regulations, *15A NCAC 2N Criteria and Standards Applicable to Underground Storage Tanks*, were enacted on January 1, 1991.

North Carolina currently has 20 full time UST inspectors to complete inspections, investigations and provide technical assistance to UST owners and operators at approximately 7,600 facilities across the state.

The focus of the UST Section's inspection program is on the proper operation and maintenance of UST equipment.

What is an Underground Storage Tank Inspection?

The UST Section performs two types of operation and maintenance compliance inspections - a compliance assistance inspection and a general compliance inspection. Both are intended to make sure equipment is properly installed, operated, and maintained. This helps you, the owner/operator, protect the environment and your business by ensuring that petroleum leaks are detected early or even prevented, saving possibly thousands of dollars in cleanup and third party liability costs.

The UST Section will conduct a compliance assistance inspection at your request. It also routinely performs compliance assistance inspections for new tank owners and operators. The compliance assistance inspection will cover your entire UST system including examination of your tanks, lines, and leak detection records. If your site is not in compliance with the state standards, you will receive a Notice of Deficiency (NOD). Attached to this notice will be a list of corrective actions that need to be taken along with a time schedule for you to bring your UST system into compliance. During this time frame, civil penalties will not be assessed for the problems found during the compliance assistance inspection.

A general compliance inspection is initiated by a UST Inspector and will cover your entire UST system. At the close of the inspection, a determination will be made regarding operational compliance based on the condition of the UST system. If your UST system(s) are out of compliance, you will be sent a Notice of Violation (NOV) that will identify the issues that need to be resolved, and a corrective action schedule to achieve compliance. If compliance is not achieved within that corrective action schedule or severe violations are found, the UST Section will pursue civil penalties, through enforcement action, as well as placing a hold on your UST operating permit.

How should I prepare for an inspection?

A typical inspection will take approximately one to two hours. Most inspections are scheduled in advance with the owner or operator. However, inspections may be conducted without prior notice.

The UST Inspector will review your records, observe the operation of equipment and go over any compliance issues or questions you may have. The inspector **will not** operate the equipment or open containment covers for you.

Please have the following available at the time of inspection:

- UST operating permit and any UST registration forms (e.g. UST-8).
- Knowledgeable person on site that understands the operation/management of the UST system, including basic information about the tank equipment (e.g., type, model and construction materials), sizes, installation dates, products stored, etc. This will ensure that the UST Inspector can complete the inspection process in an efficient and timely manner.

- Knowledgeable person on site that will remove covers from turbine sumps, probes, fill pipes, and open dispenser cabinets. This person should have all the necessary keys and tools to provide access as required. This will ensure that the equipment at your facility is not damaged in the inspection process and that all lids and covers are replaced properly.
- Equipment to meet OSHA safety requirements. The area above the USTs will need to have barriers (e.g. vehicles, traffic cones) erected while all covers are removed and the areas beneath are inspected.
- Release detection records for tanks and piping for the last 12 months (e.g. statistical inventory reconciliation records, automatic tank gauge leak rate reports, sensor status and alarm history reports for equipment installed on or after 11-01-2007, and tightness test results) and a third-party evaluation for each release detection method. Be prepared to verify the operation of release detection equipment (e.g. automatic tank gauge, interstitial monitors, and groundwater monitoring systems).
- Clean and dry spill buckets and containment sumps.
- All required cathodic protection system records including:
 - ◆ Last two three-year tests of the corrosion protection system (Form UST-7A or UST-7B);
 - ◆ Tests of the cathodic protection system performed after making any repairs to the system;
 - ◆ Last three 60-day readings for impressed current systems;
 - ◆ Certification showing that a field-installed cathodic protection system, including field-installed sacrificial anodes on metal flexible connectors, was designed by a corrosion expert or Professional Engineer.
- Records detailing the installation and any subsequent internal inspections of the internal lining of any lined tanks.
- Records verifying that the tank and piping systems are made of a material that does not corrode, if it cannot be visually observed at time of inspection (if cathodic protection has not been installed).
- Records of any maintenance and repairs to the UST system.
- Records of any suspected release reports and subsequent investigations.
- UST-22A documenting operability of Overfill Equipment.
- UST-22B documenting Annual Leak Detection Equipment Operability.
- UST-22C documenting Annual Sump Visual Inspections.
- UST-6D/23A documenting Triennial UST Spill Bucket Integrity Testing.
- UST-6F/23B documenting Triennial UST Containment Sump & Under Dispenser Containment Sump Integrity Testing (Sites conducting interstitial monitoring of piping).
- UST-6G/23C documenting Triennial UST piping integrity testing (Piping installed on or after 11/1/2007)
- UST-6E/23D documenting Triennial UST tank interstice integrity testing (Tanks installed on or after 11/1/2007 not monitored by pressure, vacuum, or hydrostatic methods)
- UST-27 documenting Monthly Walkthrough Inspections.

Where can I find more information?

Find more information on underground storage tank requirements on the UST Section's website at: <https://deq.nc.gov/about/divisions/waste-management/ust>

Who should I contact?

The UST Inspectors are always available to answer any regulatory questions or provide technical assistance. Each Inspector carries copies of various guidance documents that they will provide to you.

Currently, the UST Section has divided the counties of the state into 20 areas for inspection purposes only. Each Inspector is assigned one of those areas. For a map showing the county assignments for each Inspector along with their address and telephone number go to:

<https://deq.nc.gov/about/divisions/waste-management/ust/pib>