COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS

UNDERGROUND STORAGE TANK FACILITY OPERATIONS INSPECTION REPORT FORM INSTRUCTIONS

The Underground Storage Tank Facility Operations Inspection Report Form (Form) is used to document and report underground storage tank (UST) facility operations inspections (FOI) for the Department of Environmental Protection (DEP). The inspection guidance found in the "Guidelines for Conducting Underground Storage Tank (UST) Facility Operations Inspections (FOI)" (263-3120-003)), should also be followed to complete the FOI. Below are instructions for completing the form.

GENERAL

Print clearly using a ballpoint pen or type all entries on the form. Signatures must be handwritten on the form. Complete all applicable sections of the form following this document, the instructions on the form, and the inspection guidance to help ensure proper form completion. Incomplete or illegible forms can be returned and may subject the inspector to enforcement actions. **Note:** Bulleted items on the form are included to help the inspector complete a thorough inspection.

Number of tanks: When more than five regulated USTs are present at a facility, it will be necessary to use more than one set of forms. In this case, label each set of forms with the letters 'A' (first set), 'B' (second set), etc.

Comments: Provide essential details in the comments section of the form (Section VIII on page 8). Specific areas that require comments are noted on the form, Page 4 of the instructions, and in the inspection guidance document.

Supply additional detail as appropriate. Use as many comments pages as necessary by photocopying the last page of the form (page 8).

Please do not use cover letters. Cover letters are not considered part of the form and hinder form processing. Important information should be included in the comments section (page 8) of the form. Attach additional comment pages as necessary.

Amendments. If pages must be amended after submittal, clearly mark and initial all changes, write "amended" and the amendment date at the top of each modified page, and resubmit them. Only resubmit the amended pages and not the entire form.

Prior to form submittal, call (717-772-5599) or e-mail (tanks@pa.gov) the Division of Storage Tanks if you have questions about proper form completion.

THE INSPECTION REPORT FORM

PAGE 1

Facility Information. Review the Storage Tank Registration/Permit Certificate. Enter the DEP Storage Tank Facility Identification Number (2-digit county, dash and 5-digit serial number), facility name, and the location (911) address, including the municipality in which the facility is located. If available, also include the GPS location of the facility. If the facility information does not correspond to the current Storage Tank Registration/Permit Certificate, inform the owner/operator of the requirement to submit a registration form to amend the information. If possible, provide a copy of the registration form to the owner/operator and submit the amended registration form along with the FOI report form.

Representative Present During Inspection. Enter the name and phone number of the facility representative present during the on-site inspection and check the applicable relationship box. Check "None" if no representative was present during the on-site inspection. If no representative was present during the on-site inspection, list the owner's/operator's representative that scheduled the inspection and their contact information in the comments section (page 8).

Certified Inspector. Enter your name and your DEP certification number (the inspector must be IUM certified). Your email and phone number should be listed on the form as well. DEP staff will use this contact information for any questions about the form. Any updates to the DEP certified inspector's phone number(s), mailing address, or e-mail address must be updated with the certification unit.

Date of First Site Visit. Enter the date you were first on-site to perform the inspection; this date is the inspection date. Your compliance determinations are made based on conditions observed on this date.

PAGE 1 (continued)

Tank Owner. Provide the name of the tank owner and indicate whether they are Class A, B, or C operator trained by writing A, B, or C beside their name. The tank owner must be a person or an entity. If the tank owner's mailing address differs from the facility location address, record the mailing address in the comments section (page 8).

Tank Operator. If different than the tank owner, provide the name of the tank operator (e.g. a lessee), and indicate whether they are Class A, B, or C operator trained by writing A, B, or C beside their name. If their mailing address differs from the facility location address, record the mailing address in the comments section (page 8).

The remaining entries on page 1 should **not** be completed until the on-site inspection is complete and information for pages 2 through 8 has been determined.

PAGE 2

Enter the facility name, inspection date, and the DEP Storage Tank Facility Identification number on the top (header area) of page 2. This information should be the same as the Facility Information from page 1.

***(Section I.)* Tank System Information**

Enter the attributes for each tank system using the codes provided on page 2-1. A copy of the code page (page 2-1) should be included in the owner/operator copy of the report, but does **not** need to be submitted to DEP.

The tank numbers must correspond to those on the Storage Tank Registration/Permit Certificate (i.e. tank 001, 002, 003, etc.) Do not use the six-digit tank numbers on the Storage Tank Registration/Permit Certificate. Each attribute must be verified by personal observation and thorough review of the facility's records.

The inspector shall verify as much of the system as is visible without excavation. The inspector must open all sumps, open all manways, look in all fill openings, and open all dispensers. The inspection is not considered complete until all equipment has been opened and visually inspected.

The tank capacity is the capacity in gallons as stated on the paperwork from the tank manufacturer.

Indicate the substance currently stored in the tank and the grade of fuel; if applicable (e.g. regular, premium, mid-grade, etc.).

Indicate the current product and water level in each tank in inches. Product and water levels must be determined by a gauge stick measurement and be accurate to the nearest 1/8 inch. For systems with an ATG, the product and water level should be compared to the ATG measurements to verify that the ATG is properly calibrated and functional. Note any discrepancies and corrective actions taken in the comments section (page 8).

Indicate if the system has total secondary containment meaning double-walled tank (or single-walled tank in an excavation liner), double-walled piping (or single-walled piping in an excavation liner), sumps at all product piping junctions, and spill prevention equipment. Vapor spill prevention equipment is not required to have total secondary containment.

Describe the tank construction and the piping construction of both primary product piping and secondary piping, if applicable. The manufacturer and model information shall be recorded in the space provided on page 8.

On lines 9b, 10b,11c, and 14b of the form, when counting sumps/pans/spill containments that have been tested tight, only count them if a copy of the last documentation is maintained by the owner and it is passing. Reminder: All testing conducted after 12/22/2018 must be documented on the DEP provided form.

Describe the joints and/or connectors at the tank end of the primary piping and at the dispenser ends of the primary piping runs (i.e. jacketed with a sealed boot, inside a containment sump, cathodically protected, etc.).

Describe the type of overfill prevention device, vapor recovery, tank release detection, and piping release detection being utilized and indicate if the line leak detector has positive turbine pump shutoff installed and is operational. Indicate if a current Storage Tank Registration/Permit Certificate is displayed or readily available and if the tank is connected to an emergency generator.

Provide a site drawing to document the conditions at the site and the layout of the tank systems. Use site drawings to document unique and complex tank system conditions; including, but not limited to, tank and piping manifolds, multiple piping constructions at a facility or in the same piping run. Site drawings should be legible. Tank systems should be labeled with their tank system number on site drawings. If not all containment sumps/pans have sensors, indicate the location of the sensors in the site drawing.

PAGES 3 through 7

Enter the facility name, inspection date, the DEP Storage Tank Facility Identification Number and tank system numbers on the top (header area) of pages 3 through 7. The tank system number is the sequence number that corresponds to the specific tank system, including associated piping.

(Section II.) **Release Detection**

Complete the sections for tank and piping release detection recordkeeping (page 3) based on the records provided by the owner/operator. The records can be located at the facility or readily available from an alternate site.

When examining third-party certifications for release detection equipment, consider the type of system in which the equipment is installed. For example, if the primary product piping is a mixed of flexible and rigid piping, is the installed line leak detector certified for multiple types of piping? Special attention must be paid to pressurized systems that have multiple turbine pumps or multiple types or sizes of piping construction. (e.g. Does the product piping travel overhead to a loading rack or downhill to a dispenser on a dock? Is the automatic tank gauge certified to test 35,000-gallon tanks?)

For inspections of new tank systems that have been in operation for less than 12 months, release detection records are required for each month that a regulated substance is stored in the tank. Note in the release detection recordkeeping block (page 3) and in the comments section (page 8) the date the system began to store regulated substance. Record the compliance on page 1 of the report based on the months of actual operation (i.e. storing product).

For all other systems that are not exempt from release detection, the last 12 operating months of records are required for each system – tank and piping. If a tank system was registered in TOS status and was empty for a portion of the 12 months preceding the inspection, note this information in the comments section (page 8). For all systems, release detection records are required for the most recent 12 months that the tank contained product. Review all records – those demonstrating the tank was empty as well as operating records described above – for a sufficient period to include the last 12 operating months. List in the comments section (page 8), by tank, months with missing release detection records. Also list, by tank, the months with failed or inconclusive release detection tests and the results of any suspected release investigations.

Complete the section(s) for the method(s) being used by the owner/operator to meet the regulatory requirements – both the current (corresponding codes must be entered on page 2) and others used in the last 12 operating months. For previous methods, write the dates they were used next to the header above the corresponding blocks on pages 4 and 5. For example, an automatic tank gauge (ATG) was used from January to August of 2017, the inspection is performed in January 2018 and the owner is currently using statistical inventory reconciliation (SIR) – the inspector would write next to the ATG header on page 4, “January to August 2017,” and next to the SIR header on page 4, “September 2017 to present.”

Before submitting the FOI report, ensure that the documents listed under the release detection recordkeeping (page 3) and the applicable release detection method(s) (pages 4 and 5) were reviewed, the blanks in the applicable section(s) are filled in and the information required in the comments section has been entered.

For a UST to be considered compliant with release detection, each block for the applicable method(s) must be either checked or circled and marked ‘N/A,’ including the recordkeeping subsection on page 3. Each ‘N/A’ must be adequately explained in the comments section (page 8).

(Section III.) **Equipment Testing**

Complete all applicable subsections relating to periodic equipment testing. Only facilities with containment sumps used for interstitial monitoring of piping must meet one of the “Containment Sump Testing” requirements. Describe areas of noncompliance in the comments section (page 8).

(Section IV.) **On-site Inspection**

Complete all applicable lines relating to the condition of the UST system upon arrival at the facility. During the on-site inspection, the inspector must examine all containment sumps and spill prevention devices for the presence of product, water and debris; failure to do so may subject the inspector to enforcement action. After the inspection, the results of the inspector’s examination of the containment sumps and spill prevention devices must be either checked or marked ‘N/A.’ Describe areas of noncompliance in the comments section (page 8). If product is present in any sumps or any other evidence of a release is observed, the inspector must notify DEP within 48 hours via the DEP “Notification of Contamination Form” (2620-FM-BECB0082).

(*Section V.*) IUM Record Review

Thoroughly review the facility's records including installation, modification and upgrade activities, walkthrough inspections, and USTIF coverage. Check the appropriate boxes when the facility has met the condition.

When reviewing USTIF coverage, verify the facility does not have an overdue balance with USTIF via USTIF receipts, cancelled checks, etc. 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.

Provide the requested detail for modification reports and check the boxes for the tank systems impacted by the listed modification report. Describe areas of noncompliance and any additional modification reports in the comments section (page 8).

(Section VI.) Corrosion Protection (CP)

Complete all applicable subsections related to corrosion protection compliance criteria. Ensure all boxes and spaces in the appropriate subsections are filled in accurately and completely.

All CP testing must be conducted in accordance with an applicable industry standard and the DEP's corrosion protection guidance titled, "Guidelines for the Evaluation of Underground Storage Tank Cathodic Protection Systems" (263-4200-002).

For any CP testing conducted after December 22, 2018, the "UST Cathodic Protection System Evaluation Form" (2630-FM-BECB0610) must be submitted with the FOI report form.

If there are any indications that an impressed current cathodic protection system is not operating properly (e.g. odd readings, hour meter broken, broken wiring, etc.) or has been turned off at any time, explain in detail in the comments section (page 8).

When cathodic protection or supplemental anodes have been added to a tank, be sure to enter the date of the shell assessment, date of installation and describe the tank shell assessment method. For supplemental anode addition to an sti-P3® tank, the tank system should be assessed in accordance with STI R972.

Valid assessments of CP upgrades depend on when the upgrade was conducted. Upgrades must be conducted in accordance with the applicable industry standard that was valid at the time the upgrade was completed. If there is a question concerning tank shell evaluation, contact the appropriate regional office.

(*Section VII.*) Operator Training

Review the facility's operator training documentation and the posted and/or readily available emergency procedures. Check appropriate boxes when the facility has met the condition. Describe areas of noncompliance in the comments section (page 8).

Informal Training Given by the Inspector. Areas of noncompliance must be discussed with the owner, Class A, and/or Class B operator(s). When you speak directly to a Class A or B operator concerning noncompliance, describe the activity in the informal training section. Include the date, who was involved in discussion, their operator class, a description of the topics covered, and the approximate depth of the discussion.

PAGE 8

Enter the facility name, inspection date and DEP facility identification number on the top (header area) of page 8 and on any additional comments pages (page 8 photocopied).

(Section VIII.) Comments

Complete the information regarding tank and piping construction specifics. If several makes or types of tanks and piping are present, describe all of them in the remaining space of the comments section.

Describe any unusual circumstances at the facility or any components of the storage tank systems that require further explanation.

The **minimum** areas to comment on are:

explanation of all form entries marked "N/A;"

Tank System Information:

estimated installation date when actual date is unknown

piping installation date when different from the tank installation date

"other" or "unknown" tank system attributes

piping configurations that are unusual such as those incorporating multiple piping sizes or types

additional tank system modifications (with date) to the modifications listed in Section V on page 6

List mailing addresses for the owner and/or operator when different from the facility address.

Inspector Observations On-site:

suspected contamination

improperly closed or unregistered tanks

descriptions of suspected release investigations

Release Detection:

missing months, inconclusive months, and failing months by type (tank or piping) and tank system.

date when product was first deposited in the tank

periods when tank was empty (contained 1" or less of product)

Owner/Operator Communication/Training:

recommendations made to the owner/operator

owner/operator actions needed for compliance

description of technical assistance given to the owner/operator

other information that would be helpful to the owner, operator or DEP when reviewing the inspection

Post-Inspection Comments:

changes at site, that would affect compliance, since initial inspection (with date)

status, if known, of any required amended registration documentation

This listing of descriptive comments is not meant to be exhaustive. The comments section should be used to note additional information discovered or actions taken during the inspection that affect compliance at the facility. For example, include comments concerning improperly closed or unregistered regulated tanks that were found during the inspection and the follow-up actions taken by the owner/operator.

Record phone conversations or email correspondence with DEP personnel that took place concerning the inspection.

If additional comments pages are needed, label each sheet with the report header information and attach the page(s) to the back of the inspection report.

COMPLETING THE INSPECTION FORM

Ensure that the headings on all pages are filled out completely and correctly.

Return to page 1 to complete the observation entries, inspection summary and authentication of the inspection report.

PAGE 1

Financial Responsibility. Indicate whether you reviewed documentation that verified that the facility and all storage tanks at the facility have participated in USTIF.

Contamination. Indicate whether you observed suspected or confirmed contamination during the FOI. If you observe evidence of contamination during the FOI, you must report it to the appropriate regional office in writing within 48 hours of the initial observation via the DEP "Notification of Contamination Form" (2620-FM-BECB0082). Describe in the comments section (page 8).

Improperly Closed or Unregistered USTs. Indicate whether you observed improperly closed or other unregistered USTs during the FOI. Describe in the comments section (page 8).

Fire/Safety permits. If a fire/safety permit is required, document the name and issuing body. If a Fire/Safety is required and the facility does not have one, describe in the comments section (page 8).

Amended Registration. If during the course of the inspection any of the conditions requiring an amended registration were found, check the appropriate box and describe in the comments section (page 8). If possible, provide a copy of the registration form to the owner/operator and submit the amended registration form along with the FOI report form.

Inspection summary. The inspection summary cannot be completed until the facility has been thoroughly evaluated. Complete this entire block at the **end** of the inspection. Providing incorrect, inaccurate, or unsubstantiated information can lead to enforcement actions. The Tank Number is the system sequence number (i.e. tank 001, 002, 003, etc.); it must correspond to the information entered on pages 2 through 8 and on the Storage Tank Registration/Permit Certificate. To be in compliance, applicable check boxes must all either be checked or circled and marked 'N/A'. The nonapplicable items must be adequately explained in the comments section.

Authentication. Handwritten signatures of both the inspector and owner (representative) should be the last entry made on the inspection report. Carefully read the certification before signing the report. Lack of a tank owner or representative's signature is an unusual circumstance (e.g. no one available to sign or refusal to sign) and must be explained in the comments section (page 8). Once signed by the inspector, the report form must be submitted to DEP.

Attachments: Include groundwater or vapor monitoring authentication record. Attach as many comments pages as needed to describe the site, inspection, and the actions the owner has taken to come into compliance. Include corrosion protection evaluation/survey results and rectifier monitoring results (when applicable). If not provided on page 2, include site diagrams/drawings showing unique and complex tank system conditions.

Report Submission. Mail or otherwise deliver the completed inspection report to the DEP addresses shown below and provide a copy to the facility owner or owner's representative.

Copy: Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
Division of Storage Tanks
P.O. Box 8762
Harrisburg, PA 17105-8762

Copy: Owner

Copy: Inspector's file – keep for at least 10 years

Original: Appropriate DEP regional office:

Northwest Region 230 Chestnut Street Meadville, PA 16335-3481 814-332-6648	**Northcentral Region** 208 West Third Street, Ste. 101 Williamsport, PA 17701 570-327-3636	**Northeast Region** 2 Public Square Wilkes-Barre, PA 18701-1915 570-826-2511
Southwest Region 400 Waterfront Drive Pittsburgh, PA 15222-4745 412-442-4000	**Southcentral Region** 909 Elmerton Avenue Harrisburg, PA 17110 717-705-4705	**Southeast Region** 2 East Main Street Norristown, PA 19401-4915 484-250-5900
For additional information on DEP regional offices, or to determine which regional office is responsible for the county in which a facility is located, please visit www.dep.pa.gov and search "Regional Resources."		