

ADEQ TANK TALK

Newsletter

A PUBLICATION OF THE REGULATED STORAGE TANKS DIVISION

Fall 2011

INSIDE

UST Operator Certification.....	1
SIR Leak Detection.....	2
Inspection Preparation Tips.....	2
Licensing Information.....	3
Licensing Exam Schedule.....	3

Don't wait! Get certified now!

As required by the federal Energy Policy Act of 2005, ADEQ established a training and certification program for UST operators. Each UST facility must have trained and certified operators by

AUGUST 8, 2012.

Don't miss the deadline!

You may face fines or civil or administrative actions if you miss the certification deadline. If you assume operation and maintenance responsibility for a UST system after the August 8, 2012, deadline, you must be certified within 30 days.

Operator Certification

Who must be certified?

Know your ABCs

Each UST facility must have trained and certified operators classified as A, B, and C:

Class A is an owner or employee with primary responsibility to operate and maintain the UST system;

Class B is an owner or employee who oversees daily operation and recordkeeping of the system;

Class C is an employee who is the first line of response in an emergency.

Class A and B operators must pass a certification exam administered by ADEQ. Class C operators are trained on site by Class A or B operators. All facilities are required to have three classes of certified operators. One person may hold all three classifications.

Operator Training/Exam Schedule

September 13, 2011
September 29, 2011
October 11, 2011
October 27, 2011
November 9, 2011
November 22, 2011
December 6, 2011
December 20, 2011

All above training/exams held at:

ADEQ Headquarters
5301 Northshore Drive
North Little Rock
8:30 a.m. – 4:00 p.m

Questions should be directed to Gene Little 501-682-0997 or Janet Gay at 501-682-0993

Go to the website for application, study material, directions, or for training/exam venues scheduled in your area.

www.adeq.state.ar.us/rst/branch_programs/ust_cert.htm

Special Thanks to the following facilities that have donated meeting space & testing locations for UST operators in their surrounding communities

***Golden Living - Fort Smith
Kirk Smith**

***Jones Center for Families - Springdale
Debbie Patterson**

***Alma High School - Alma
Michael Bigson**

***Forest Wood Nature Center-Jonesboro
Sean Merril**

***So. AR Comm College - El Dorado
Linda Richardson**

SIR LEAK DETECTION

HOW ADEQ LOOKS AT INCONCLUSIVES

Terry Perry
Manager
Enforcement/Compliance Branch

Statistical Inventory Reconciliation (SIR) is a leak detection method classified as one of the "other methods" listed in 40 CFR 280.43 (h). All of the leak detection methods listed in 40 CFR 280.43 have one common requirement: the tanks must be monitored at least every 30 days for releases (as referenced in 40 CFR 280.41 [a]).

Whenever a monthly SIR analysis report results in an "inconclusive", there is no clear regulatory path for the owner/operator of UST systems to follow. USEPA issued a guidance booklet on SIR ([Introduction To Statistical Inventory Reconciliation For Underground Storage Tanks](#), publication number; EPA 510-B-95-009) in September 1995. This booklet references the issue of how to handle "inconclusives" but advises the owner/operators to check for local regulatory requirements concerning handling "inconclusives". The EPA guidance also states that "an 'inconclusive' means that you effectively have no leak detection for that month".

ADEQ looks at "inconclusives" in this

manner: Although the owner/operator did monitor the system for 30 days to obtain the "inconclusive" report, since the SIR analysis could not make a call of "pass" or "fail" for the month, an "inconclusive" requires, at a minimum, some investigation (possibly in conjunction with the SIR vendor/vendor's protocol) to determine the reason for the "inconclusive". If after investigating the "inconclusive", no explanation for the "inconclusive" can be determined or the investigation results in "fail", a suspected release should be reported to ADEQ (as required in 40 CFR 280.50 [c]). A suspected release is required to be confirmed or denied according to 40 CFR 280.52 by performing a system test and/or a site check (under ADEQ's direction). If after investigating the "inconclusive", the analysis results in a "pass", leak detection for that month is satisfied.

Recurring "inconclusives" throughout the year may be indicative of either poor data collection methods or a leaking system that is just under the "fail" threshold. Owners/operators should work closely with their SIR vendors to determine the reason for the inability of their SIR leak detection method to make the required monthly call on whether their underground storage tank system is leaking or not.

INSPECTION PREPARATION TIPS

Michael Warren
RST Inspector

Often times when conducting a compliance inspection, I meet an underground storage tank (UST) owner or operator who is not prepared for their inspection. Here are the things an inspector will be looking for when he or she calls you to schedule a compliance inspection at your UST facility. First of all, your inspector will want to see your release detection records. Your release detection records will consist of your monthly monitoring records and annual testing records. Regardless of the method of release detection you are using, you are required to have documentation that verifies each underground tank has passed or failed its release detection test for each month the tank is in use. By definition, if your UST contains fuel or another regulated substance then it is in use. Whether your monthly monitoring method is automatic tank gauging, groundwater or vapor monitoring, interstitial monitoring, or some other method, your inspector will want to see at least the past 12 months of monitoring records. If you have pressurized piping, then your inspector will want to see the release detection records for your piping also. Pressurized piping may be precision tested annually or checked monthly by another method.

Your inspector will also want to verify that your UST system meets the applicable release prevention requirements. To meet release prevention requirements, your UST system must be equipped with spill prevention equipment, overfill prevention equipment, and corrosion protection for any metal components. Your inspector will check to see that this equipment is installed and in proper working condition. If your UST system has metal components that are protected by sacrificial anodes or an impressed current system, then your inspector will want to see documentation that verifies you have had your corrosion protection system tested as required within the past three years, as well as other required system checks.

Some other documentation your inspector may want to see is records of any repairs done to your UST system, records to verify your UST system was installed according to recommended practices, and records to verify that your UST system is compatible with the type of substance you are storing (this will apply to those storing biodiesel or ethanol blended gasoline). If you do not have some or all of the above listed documentation, you should call your licensed UST contractor. Your contractor can help you answer questions you have about your UST system. It is also a good idea to have a

routine maintenance program in place to insure your UST system equipment is in proper operating condition. Your licensed UST contractor can assist you in setting up a routine maintenance program. Finally, please call your ADEQ inspector with any questions you have about recordkeeping for your UST system. Inspectors are always happy to see a facility owner or operator who is prepared for their inspection.



UST
INDIVIDUAL INSTALLER
OR TESTER
LICENSING REMINDER!!!

Please remember when submitting a new or renewal application, the required job experience references should be verifiable either by file, inspector for the area in which the work was performed, or by the facility owner. The best way to do this is to submit the 7-day notices and 30-day closure notices as required by Regulation 12. If the references cannot be verified, the license cannot be issued. Also, be sure to list only UST job experience that requires a license to perform.

Continuing Education

When submitting your UST individual license renewal applications, please remember you must complete sixteen (16) hours of continuing education **PRIOR** to your license expiration date. If you have completed the required continuing education, but it was after your license expiration date, ADEQ can accept it but you will be required to re-take the licensing exam.

The Department has approved UST Installer continuing education training from the following providers:

SEA, Inc. (888) 627-8740
PETCON, Inc. (800) 852-8374

You may attend classes presented by these providers at any location that is convenient to you. Please contact the providers directly for a schedule of class dates, locations, and times.



Please include a copy of your continuing education certificate with your renewal application, job experience form, and fee.

2011/2012
LICENSING EXAM
SCHEDULE

The following exam dates have been set for individuals that have submitted, or will submit, applications for UST Individual Licenses through May 2012:

<u>2011</u>	<u>2012</u>
Sep 15	Jan 19
Oct 20	Feb 16
Nov 17	Mar 15
Dec 15	Apr 20
	May 17

All exams are given at:
ADEQ Headquarters,
2nd Floor Conference Room
5301 Northshore Drive
North Little Rock
9:00 a.m. – 12:00 p.m.

The current Regulation 12 can be viewed and/or downloaded from ADEQ's website at www.adeq.state.ar.us.

ADEQ TANK TALK is published by the Regulated Storage Tanks Division of ADEQ as an outreach to persons interested in our program.

Send comments and/or questions to:

ADEQ TANK TALK
5301 Northshore Dr.
North Little Rock, AR 72118-5317
Fax (501) 682-0971
Phone (501) 682-0993

