

Draft Final 55 CES/CEO Tank Owner/Operators - Tank Compliance Documentation

55 CES/CEIE, rev 12 Jun 2024

DAFMAN 32-1067, dated 29 Aug 2023, **Attachment 4**. Tank Inventory Minimum Data Field Requirements, Table A4.1. Tank Inventory Minimum Data Field Requirements.

Data Field	Purpose	Description / Example
Records (<i>Very last row in table</i>)	Important documentation for regulatory compliance and management	Records may include, but not limited to third party engineering studies or inspections; regulatory inspection findings; Photos of tank; UST tightness test results; tank registrations / permits;

Reference **40 CFR 280.34(b) Recordkeeping** below.

Note 1, 55 CES/CEIE is tracking 58 minimum data field requirements from the same table.

Note 2, Compliance documents are part of a tank owner/operator responsibility.

Note 3, Integrated Contingency Plan updates.

- Compliance driven
- Expect another Technical Amendment for new ASTs at B500 and security campus, later awaiting SFM approval
- Report **your** tank removal or adds to CEIE
- This is the tank owner/operators' inventory not CEIE, please do your part for compliance

AST - Owner/Operator

- Key Guidance DAFMAN 32-1067, 40 CFR 280, NE Title 159, STI SP001
- **AST Inspector Qualifications**, the personnel performing these inspections shall be knowledgeable about storage facility operations, the type of AST and its associated components, the spill control system for the facility, and characteristics of the liquid stored. Owner's inspectors must also be familiar with pumping, piping, and valve operations of the AST system. ([STI-SP001, Sect 4 and 4.1.2](#))
- **Status:** Formal Internal and External Inspections
 - CEO has 53 ASTs that are CAT 1 and under 5,001 gal capacity, all have spill control and a continuous leak detection method (CRDM) ref STI-SP001 Table 5.5, Inspection Schedules
 - Key Point: Formal AST inspections are not required for CEO
 - The term Formal tank inspection applies to ASTs only, not USTs.
 - Minot has 221 ASTs, all are 5,000 gal and under
 - Grand Forks has 79 ASTs, only four are 5,001 gal and above
- Monthly inspection by owner/operator document in STAR

- Discrepancies document in STAR
 - Please check signage for product, tank number, NFPA 704 symbol?
- Annual line tightness test save in STAR
 - [Need to know which ASTs have underground fuel piping?](#)
 - [Report any test failures to 55 CES/CEIE, requires 24-hr notification to SFM](#)
 - [Does CEOIU want notification of testing failures?](#)
- Key documents related to overfill protection failure (example: float failure)
 - Repair documents save in STAR
- Annual inspection by 55 CES/CEOIU and/or CEIE document in STAR
 - Discrepancies document in STAR, notify 55 CES/CEIE

UST - Owner/Operator, Nebraska Title 159, 40 CFR 280, and DAFMAN 32-1067

40 CFR 280.20 Performance standards for new UST systems.

40 CFR 280.21 Upgrading of existing UST systems.

40 CFR 280.31 Operation and maintenance of corrosion protection.

40 CFR 280.32 Compatibility.

40 CFR 280.34(b) Recordkeeping. Owners and operators must maintain the following information:

- (1) A corrosion expert's analysis of site corrosion potential if corrosion protection equipment is not used ([§ 280.20\(a\)\(4\)](#); [§ 280.20\(b\)\(3\)](#)).
- (2) Documentation of operation of corrosion protection equipment ([§ 280.31\(d\)](#));
- (3) Documentation of compatibility for UST systems ([§ 280.32\(c\)](#));
- (4) Documentation of UST system repairs ([§ 280.33\(g\)](#));
- (5) Documentation of compliance for spill and overfill prevention equipment and containment sumps used for interstitial monitoring of piping ([§ 280.35\(c\)](#)); (Example: does the sump have a sensor or a work-around in place?)
- (6) Documentation of periodic walkthrough inspections ([§ 280.36\(b\)](#));
- (7) Documentation of compliance with release detection requirements ([§ 280.45](#));

(8) Results of the site investigation conducted at permanent closure ([§ 280.74](#)); and

(9) Documentation of operator training ([§ 280.245](#)).

(c) **Availability and maintenance of records.** Owners and operators must keep the records required either: ([40 CFR 280.34\(c\)](#))

(1) At the UST site and immediately available for inspection by the implementing agency; or

(2) At a readily available alternative site and be provided for inspection to the implementing agency upon request.

(3) In the case of permanent closure records required under [§ 280.74](#), owners and operators are also provided with the additional alternative of mailing closure records to the implementing agency if they cannot be kept at the site or an alternative site as indicated in [paragraphs \(c\)\(1\)](#) and [\(2\)](#) of this section.

40 CFR 280.45 Release detection recordkeeping.

Nebraska Title 159 Underground Storage Tanks, Chapter 6 General Operating Requirements for Existing UST Systems, Section 005 Reporting and Recordkeeping.

005. REPORTING AND RECORDKEEPING

The requirements of 40 CFR 280.34 as they existed on July 15, 2015 are adopted and incorporated by reference.

005.01 **Record-keeping.** Owners and operators must maintain the following information;

005.01A. Inventory control or tank gauging records will be kept for 3 years;

005.01B. Documentation of UST system repairs will be kept for the operating life of the UST system;



005.01C. Results of compliance with release detection requirements will be kept for 3 years;

005.01D. Results of the site investigation conducted at permanent closure will be kept as a permanent record;

005.01E. Results of compliance with release prevention requirements in 40 CFR 280.35 and 40 CFR 280.36 will be kept for 3 years; and

005.01F. For spill prevention equipment and containment sumps used for interstitial monitoring of piping not tested every three years, documentation showing that the prevention equipment is double walled and the integrity of both walls is periodically monitored will be maintained for as long as the equipment is periodically monitored.

005.01G Results of compliance with release prevention requirements in 280.35 and 280.36 will be kept for 3 years.

005.02 Reporting All Owners and operators must report within 24 hours or the next business day any failed test results for required testing for release prevention and release detection including but not limited to the following:

005.02A Tank leak test;

005.02B Line leak detector test;

005.02C Line leak pressure tests;

005.02D Spill bucket test;

005.02E Sump testing; and

005.02D Overfill equipment tests.

ASTs 2,000 gal and larger must have working automatic tank gauging (ATG) (40 CFR 280.41 and 40 CFR 280.43(b)(5))

- Note, 55 CES/CEO has only (9) USTs total, this is not an overwhelming number to document
 - AFCEC enforcing for all CES units
- **Monthly** inspection in STAR

- Discrepancies corrective action document in STAR
- **Annual** inspection in STAR by 55 CES/CEOIU and/or 55 CES/CEIE
 - Discrepancies corrective action document in STAR
- **Every five-years** tank tightness test (40 CFR 280.41(a)(1)(i))
- **Annual** line tightness test (40 CFR 280.41(b)(1)(B))
- **Monthly** inventory control (40 CFR 280.43(a)) save in STAR
 - Include alarm status
 - Discrepancy corrective action document in STAR
- Manual stick gauge nearby in case of power outage
- **Every three years** catchment basin, spill bucket, or other spill containment device (40 CFR 280.35(a)(1))
- **Every three years** overflow prevention equipment, automatically shut off flow, no more than 95 percent full or alert transfer operator when tank is no more than 90 percent full by restricting flow or triggering high-level alarm (40 CFR 280.35(a)(2))
- **Within 6 months of installation and at least every three years** thereafter or another reasonable timeframe established by the implementing agency, cathodic protection systems (40 CFR 280.31(b)(1))

UST's "less than 2,000 gal", manual stick gauging allowed (40 CFR 280.43(b))

- **Monthly** inspection in STAR
 - Document corrective actions in STAR
- **Annual** inspection in STAR by 55 CES/CEOIU and/or 55 CES/CEIE
 - Discrepancies corrective action document in STAR
- **Monthly** manual tank gauging (40 CFR 280.43(b)), save in power home AF Form 487
 - Fuel inventory discrepancy, document corrective action in STAR, notify 55 CES/CEIE
- **Every five-years** tank tightness test (40 CFR 280.41(a)(1)(i))
- **Annual** line tightness test (40 CFR 280.41(b)(1)(B))
- **Every three years** catchment basin, spill bucket, or other spill containment device (40 CFR 280.35(a)(1))
- **Every three years** overflow prevention equipment, automatically shut off flow, no more than 95 percent full or alert transfer operator when tank is no more than 90 percent full by restricting flow or triggering high-level alarm (40 CFR 280.35(a)(2))
- **Within 6 months of installation and at least every three years** thereafter or another reasonable timeframe established by the implementing agency, cathodic protection systems (40 CFR 280.31(b)(1))
- **Repairs allowed** (40 CFR 280.33), save compliance document in STAR
- Manual stick gauge nearby

55 CES/CEO - - - STATUS of TANK COMPLIANCE DOCUMENTS SAVE IN STAR

Tracked by 55 CES/CEIE, Rev 20240808

Tank No	AST / UST	Gallons	Shop	Date	Comments
200-3	UST	15,000	CEOIU	202405/09	Ullage - Inconclusive
					Containment - Failed
					CEIE not notified, no 24-hour SFM notification
					No annual line leak test for CY2024
					No annual line leak test for CY2023
					Five-year spill bucket test, most recent saved in STAR
					Most recent cathodic testing record not saved to STAR
200-3	UST	15,000	CEOIU	20221201	No corrective action documented
					CEIE not notified, no 24-hour SFM notification
					OPV-Overfill Valve Inspection - Failed
					No corrective action documented
					CEIE not notified, no 24-hour SFM notification
354-1	UST	500	CEOIU	20240508	Ullage - Fail
					Containment - Pass
					CEIE not notified, 24-hour SFM notification
					No annual line leak test for CY2024
					No annual line leak test for CY2023
					Five-year spill bucket test, most recent saved in STAR
354-1	UST	500	CEOIU	20221130	Tank tightness test - Failed
					No corrective action documented in STAR
					CEIE not notified, no 24-hour SFM notification
				20221129	OPV-Overfill Valve Inspection - Failed
					No corrective action documented in STAR
					CEIE not notified, no 24-hour SMF notification
					No record of repairs, example: OPV-overfill valve replaced from 20221201 inspection
					Most recent cathodic testing record not saved to STAR
					Monthly stick readings not in STAR
					Monthly stick readings - fuel inventory calculation not in STAR
					Five-year spill bucket test, most recent saved in STAR

507-1	UST	3,000	CEOIU	20240508	- Ullage - Fail - Containment - Fail - CEIE not notified, no 24-hour SFM notification - No annual line leak test for CY2024 - No annual line leak test for CY2023 - Five-year tank tightness test not programmed and saved in STAR - Five-year spill bucket test, most recent saved in STAR - No record of repairs, example: OPV-overfill valve replaced from 20221201 inspection - Most recent cathodic testing record not saved to STAR - Monthly stick readings not saved in STAR - Monthly stick readings - fuel inventory calculation not in STAR
565-3	UST	4,000	CEOIU	20240508	Ullage - Inconclusive
					Containment - Passed
					- No annual line leak test for 2024 - No annual line leak test for 2023
565-3	UST	4,000	CEOIU	20221129	Five-year tank tightness test - Passed
					Annual line leak test - Passed
706-1	UST	560	CEOIU	20240717	Tank tightness test - Passed
706-1	UST	560	CEOIU	20240509	- Ullage - Inconclusive - Containment - Fail - No annual line leak test for CY2024 - Five-year spill bucket test, most recent saved in STAR - Most recent cathodic testing record not saved to STAR
706-1	UST	560	CEOIU	20240417	- Tank tightness test, SFM Written order - No annual line leak test for CY2023
706-1	UST	560	CEOIU	20221201	Line tightness test - Passed
					OPV-Overfill Valve Inspection - Passed
					- Tank tightness test - Failed - No corrective action documented - CEIE not notified, no 24-hour SFM notification
1000-1	UST	30,000	MCDEAN		- ATG, no monthly alarm status saved in STAR - ATG, no monthly fuel inventory saved in STAR - No record of repairs saved in STAR

					• Most recent cathodic testing record not saved to STAR
					• Five-year spill bucket test, most recent saved in STAR
1000-2	UST	30,000	MCDEAN		• ATG, no monthly alarm status saved in STAR
					• ATG, no monthly fuel inventory saved in STAR
					• No record of repairs saved in STAR
					• Most recent cathodic testing record not saved to STAR
					• Five-year spill bucket test, most recent saved in STAR
1000-3	UST	30,000	MCDEAN		• ATG, no monthly alarm status saved in STAR
					• ATG, no monthly fuel inventory saved in STAR
					• No record of repairs saved in STAR
					• Most recent cathodic testing record not saved to STAR
					• Five-year spill bucket test, most recent not saved in STAR
1000-4	UST	30,000	MCDEAN		• ATG, no monthly alarm status saved in STAR
					• ATG, no monthly fuel inventory saved in STAR
					• No record of repairs saved in STAR
					• Most recent cathodic testing record not saved to STAR
					• Five-year spill bucket test, most recent saved in STAR