



# Compliance

Prepared for:





# What this presentation covers



- Who is writing and enforcing the tank regulations?
- Above ground storage tank layout and operation.
- Underground storage tank system layout and operation.



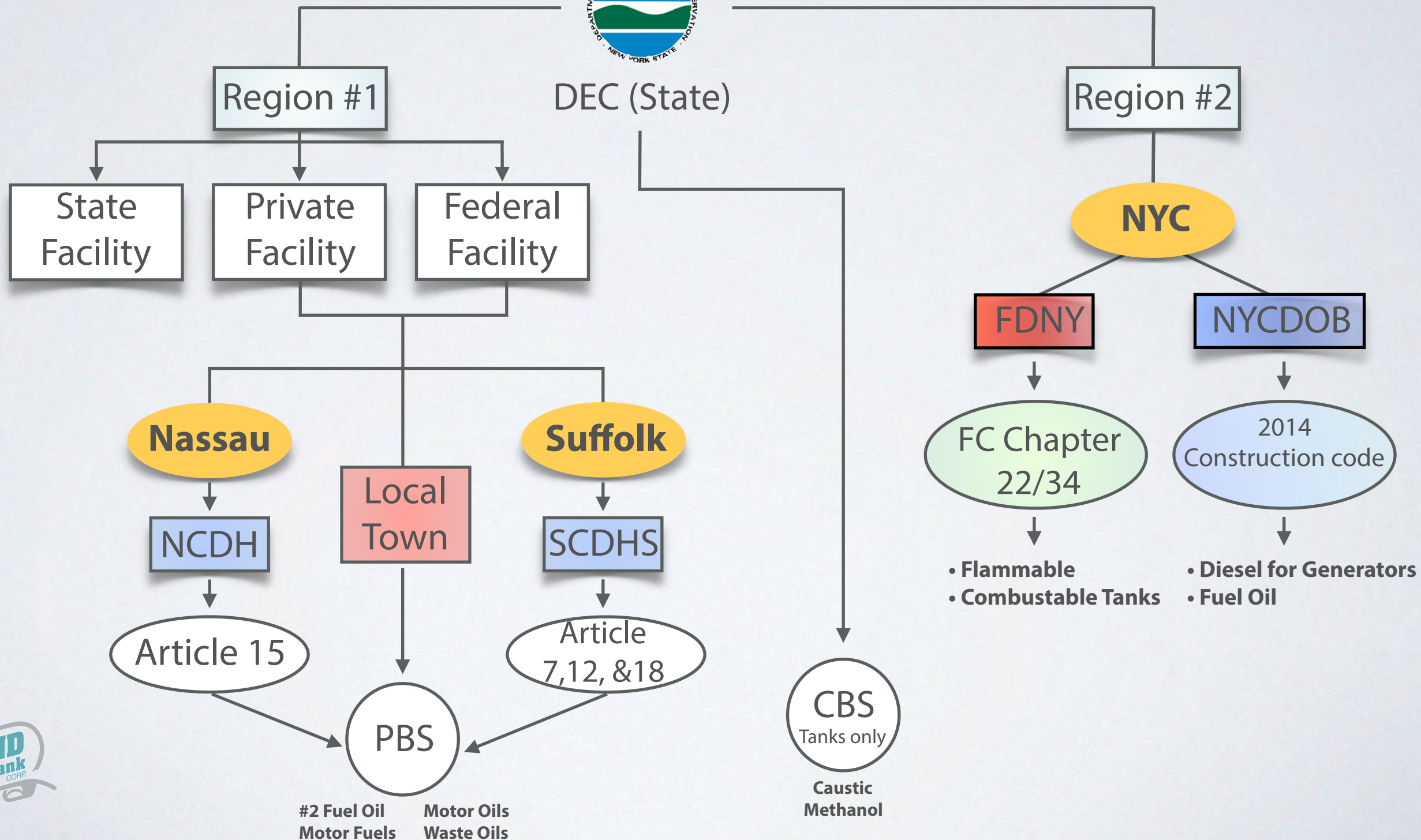
# Regulatory Overview



EPA (Federal)

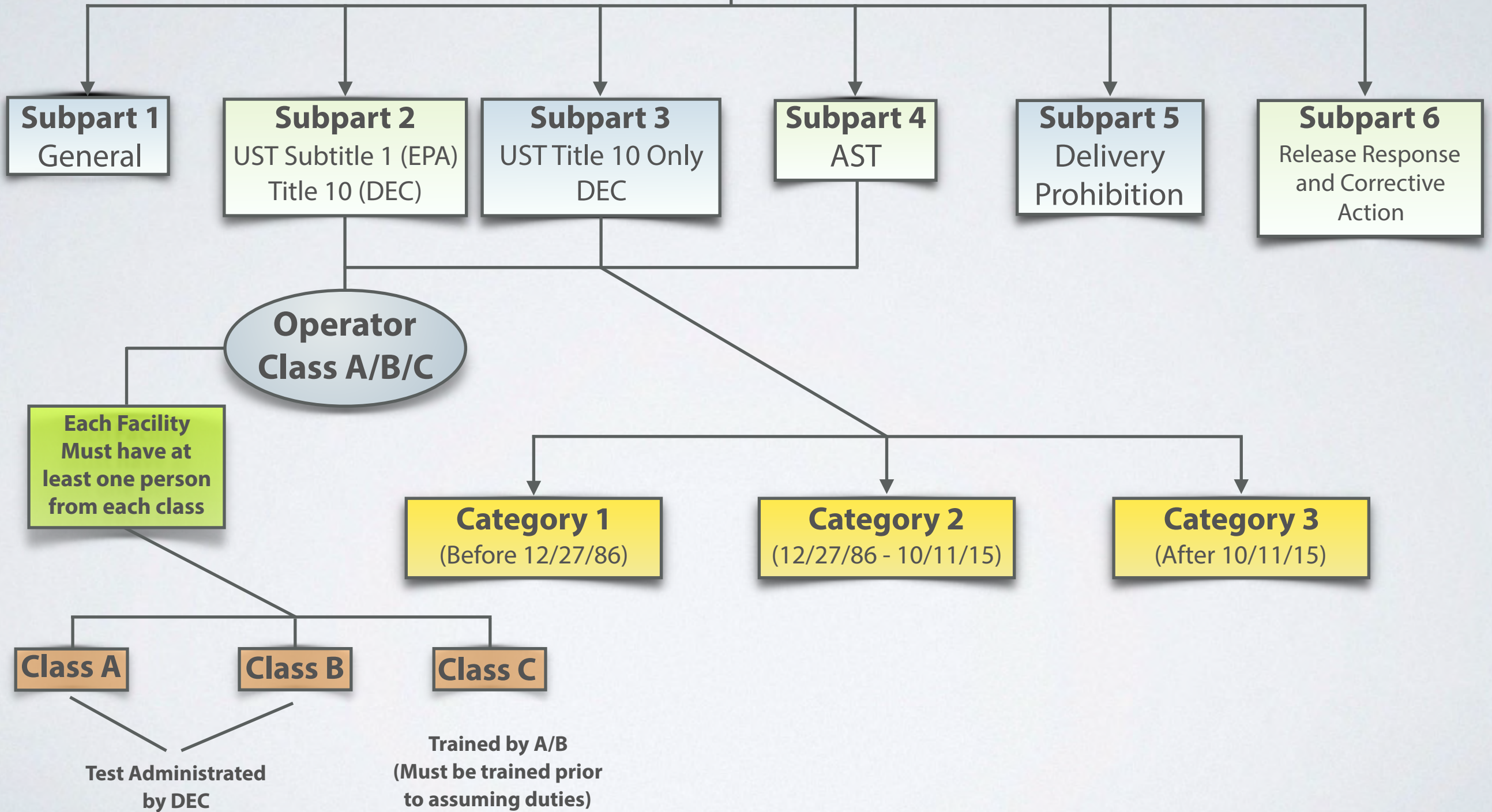


DEC (State)





# PART 613





# What is *Your* Product?

## Petroleum Bulk Storage Regulations



Gasoline  
Diesel  
Motor oil  
Hydraulic oil  
Transmission oil  
Crude oil  
Synthetic Lubricating oils  
Used oil  
Petroleum Mixtures  
(may include non-petroleum products)



6 NYCRR Part 613

## Non-Petroleum



Animal oils  
Vegetable oils  
Most Brake Fluid  
Windshield Washer  
Substances that are gases  
at standard temperatures

## Chemical Bulk Storage

Chemicals listed in  
Part 597



Antifreeze  
(check SDS)



6 NYCRR Parts  
595-599



# Important Times you should know!

## Daily

Check your controller for any/all audio/visual alarms; Log all alarm conditions

## Monthly

Access all area monitored by sensors and probes for visual inspection to verify the absence of alarm conditions.  
As of 10/13/2018, the EPA requires monthly inspections to include all sump components and overfill prevention equipment.

## Yearly

As of 10/13/2018, the EPA requires annual functionality testing on your ATG and Leak Detection Equipment. FDNY and Nassau County will continue to require witnessed functionality testing on a 2 year basis.

## Weekly

Record Sensor Status for 24 hours of continuous interstitial monitoring.  
Weekly sensor status validates your daily alarm log by verifying the sensors and controller are communicating as intended.

## Every 3 Years

As of 10/13/2018, the EPA requires Sump Integrity Testing (vacuum, pressure or hydrostatic) on all:

- Containment Sumps used for 24 hour interstitial monitoring
- Fill Port Spill Containment (Spill Buckets)
- Under Dispenser Containment (UDC)\*

As of 10/13/2018, the EPA requires physical Testing of all Overfill Prevention Devices

- Automatic Shut-Off



Currently NYSDEC require multiple levels of periodic responsibilities regarding the operability of your release detection equipment. Each level subsequently verifies the previous.

\* As of 2015 NYSDEC requires all new installations to be equipped with UDC. For existing systems without UDCs, dispenser repairs involving piping below grade must be retrofitted with a UDC.

## Existing Regulations

New York State Department of Environmental Conservation (NYSDEC) revised and restructured their PBS regulations in 2015, with the general purpose to clarify and reduce redundancies under 6 NYCRR Part 613.

## Class A/B/C Operator Training

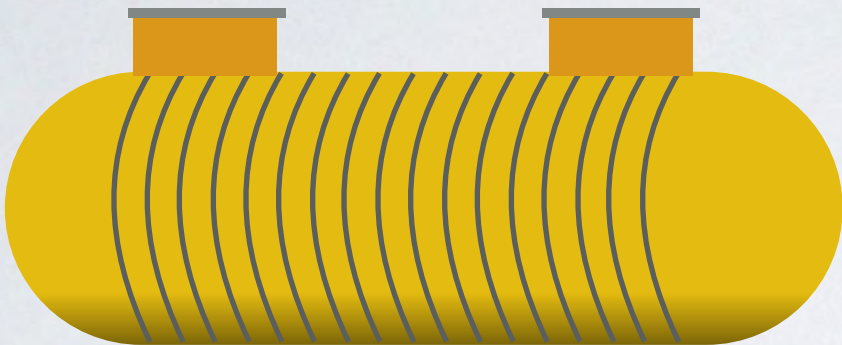
In 2015, NYS adopted an existing Federal (EPA) requirement that all UST owners and operators to be certified as Class A and/or Class B operator. NYSDEC administers free online testing to ensure fulfillment of the training requirements. Class A/B Operators are responsible for training class C operators, typically individuals

who control/ monitors the dispensing or sale of petroleum; how to initially address emergencies. IPT is committed to educating you - our customer and providing comprehensive support to your facility operation.



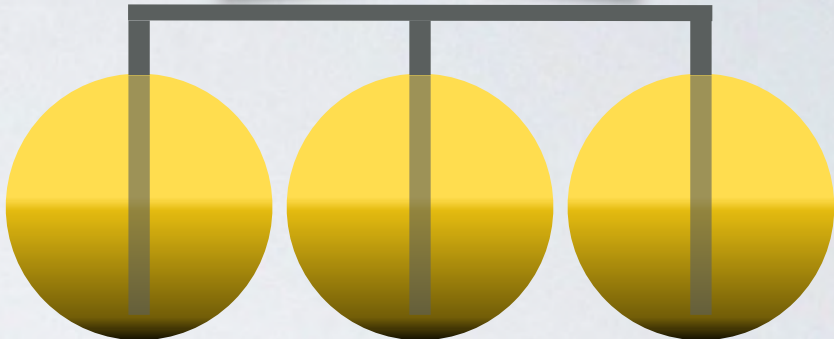
# Types of Tanks

## Single



(1) 12,000 Gallon Underground storage tank  
Tank #1 12,000 Gallons

## Manifolded

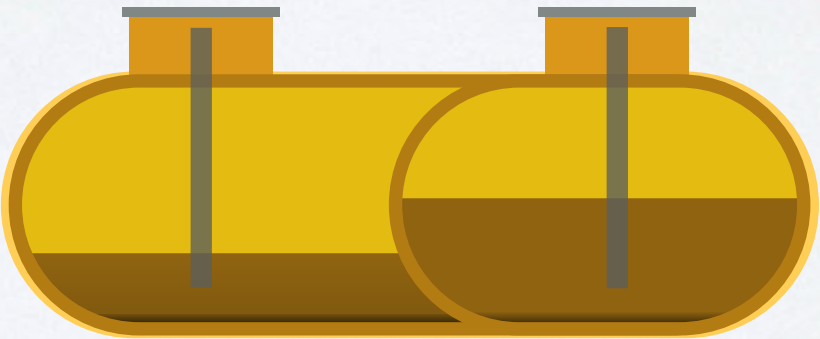


4,000 Gal      4,000 Gal      4,000 Gal

Manifolded System designed as a single holding vessel  
(1) 12,000 Gallon Underground storage tank

Tank #1A 12,000 Gallons      Tank #1C 0 Gallons  
Tank #1B 0 Gallons

## Compartment

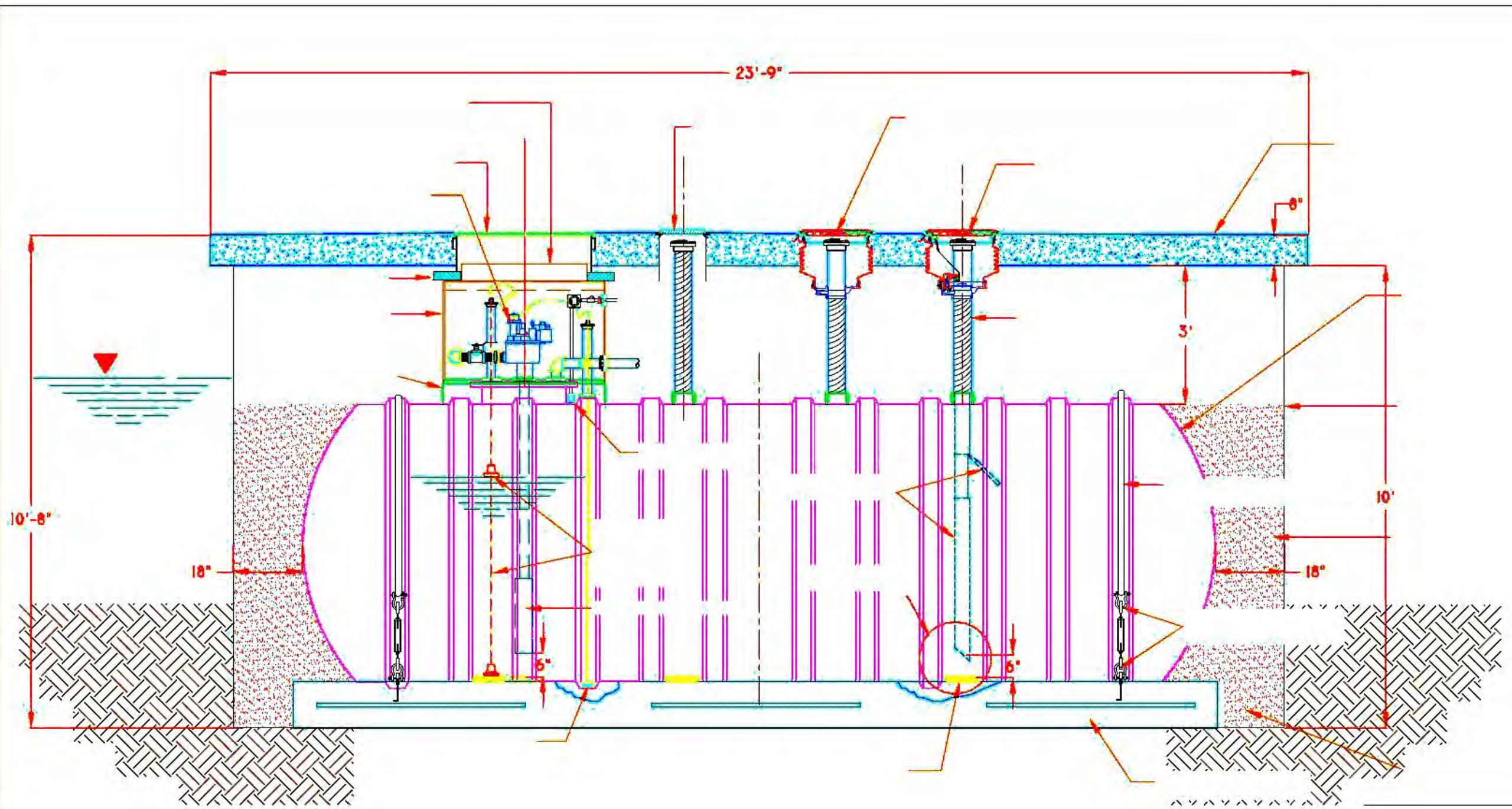


Separate tanks if each compartment  
is same as separate holding vessel  
and cross mixing of product if not possible  
(2) Tanks 8,000 / 4,000 Split

Tank 1A 8,000 Gallons    Tank 1B 4,000 Gallons



# UST Layout





# Functionality Testing

EPA / ATG Certifications





# Leak Detection

Are you keeping leak detection records and operability records?



- Record keeping
- Can be used for 10-Day reconciliation if required or applicable





# Functionality Testing

## EPA / ATG Certifications

### Probes

- Inspect for residual buildup
- Ensure any floats move freely
- Ensure any shafts are not damaged
- Ensure the cables are free of kinks and breaks
- Test the alarm operability and communication with the controller



### Line Leak Detectors (LLD's)

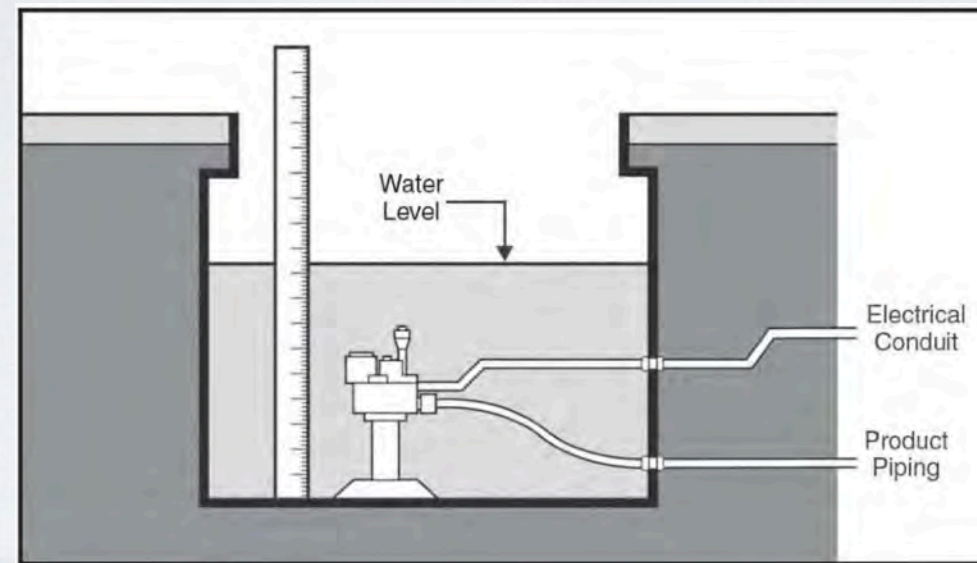
- Ensure the device activates (alarms, restricts flow, or shuts off flow) within an hour when simulating a release equivalent to 3 gallons per hour at 10 pounds per square inch.
- Owners and operators must maintain records of release detection equipment testing for at least three years. The record must include each component tested, whether each component passed the test or needed to have action taken, and any action taken to correct an issue



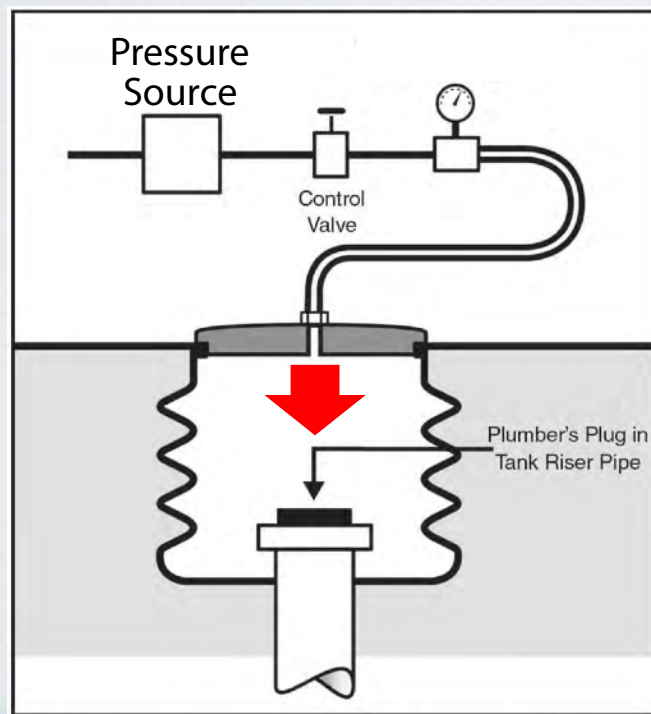


# Sump Integrity Testing

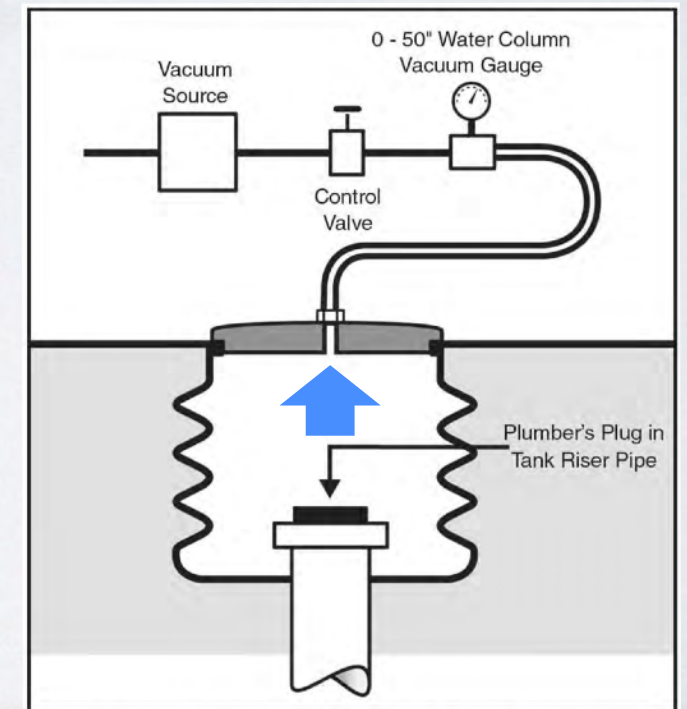
## Hydro



## Pressure

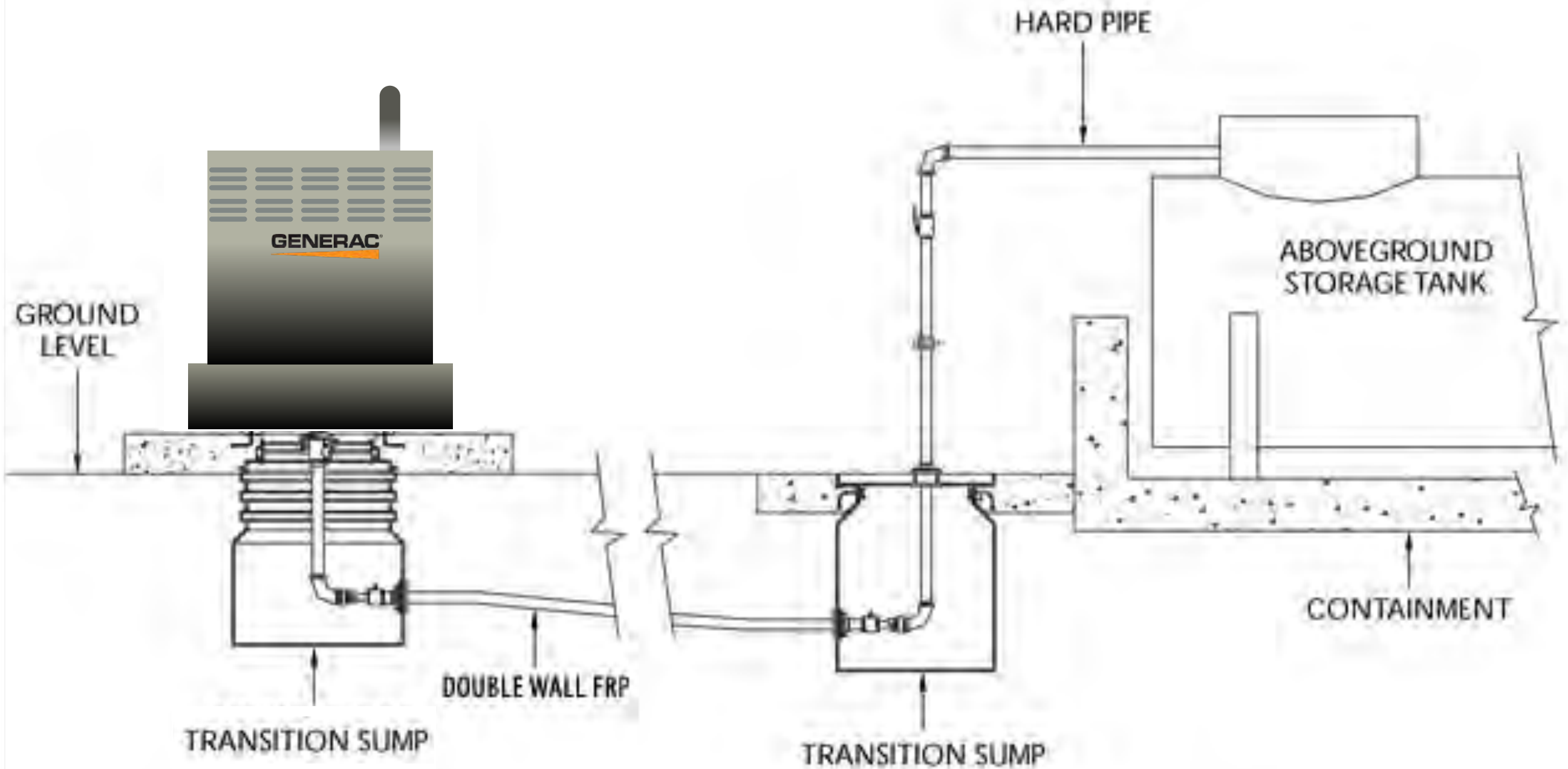


## Vacuum





# AST Layout





# Aboveground Storage Tanks (AST)

Assmann® Tank Vertical  
Chemical— POLY Propylene



Plastic Tank vertical  
Chemical



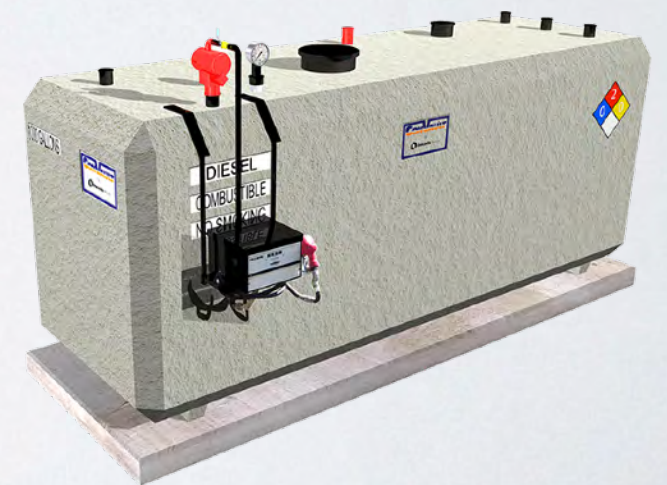
Lube Cube DW



Highland Tank  
Secondary Containment



Convault Concrete Tanks





# Underground Storage Tanks

Fiberglass tank Xerxes



Highland Steel UST



Containment solutions





*“An ounce of prevention is worth a pound of cure.”*

**–Benjamin Franklin**



# Inspections

**NEW YORK STATE DEC PETROLEUM BULK STORAGE (PBS) INSPECTION FORM**

DATE: \_\_\_\_\_ | PBS#: \_\_\_\_\_ or  Unregistered | Inspection #: \_\_\_\_\_

FACILITY Representative, Name & Title: \_\_\_\_\_

NYSDEC Inspector, Name & Title: \_\_\_\_\_

Facility Name: _____	Owner Name: _____
Facility Address: _____	Owner Address: _____
Operator: _____	Emergency Contact: _____
Phone Number: _____	Phone Number: _____

**Facility-Level Information (circle answer; indicate dispenser-specific information in comments section)**

1. Is the <b>registration certificate</b> posted at the facility?	Y / N
2. Is <b>registration information</b> current & correct?	Y / N
3. Are <b>monitoring/observation wells</b> marked and secured?	Y / N / X
4. Have <b>dispenser sumps</b> been properly maintained? Y / N (accumulation of product) / 1 (accumulation of water/debris) / X (no sump)	
5. For motor fuel tank systems with pressurized piping, are <b>shear valves</b> properly installed and operable? Y / N (no shear valve) / 1 (inoperative valve) / 2 (improperly installed) / X (not pressurized piping)	

**Tank Registration Identification Number**

Underground or Aboveground Tank					
Product Stored / Tank Volume if different than registered					
Date Installed					
6. Is the tank properly <b>permanently closed</b> ? Y / N / X (active or temporarily out-of-service tank)					
7. Is the tank properly <b>temporarily closed</b> ? Y / N / X (active tank)					
8. Were any <b>spills</b> observed (also include suspected releases from leak detection equipment and uninvestigated inventory discrepancies)? Y / N					
9. Have <b>tank top sumps</b> been properly maintained? Y / N (accumulation of product) / 1 (accumulation of water/debris) / X (no sump)					
10. Have <b>fill port catch basins</b> (spill buckets), been properly maintained? Y / N (accumulation of product) / 1 (accumulation of water/debris) / X (no catch basin)					
11. Is the <b>fill port properly color coded</b> to identify the product in the tank? For products not explicitly listed in Part 613.3(b), is the tank properly marked? Y / N / 1 (incorrectly color coded or marked) / X (day tank)					

**Underground Storage Tanks**

12. For <b>UST</b> systems installed after Dec. 27, 1986, does the <b>tank system meet standards</b> ? Y / X (tank system installed prior to Dec. 27, 1986) If not, how is the tank system deficient? 1 (tank not corrosion resistant) / 2 (no tank secondary containment) / 3 (no tank leak monitoring) / 4 (no overfill prevention) / 5 (piping not corrosion resistant) / 6 (no piping leak monitoring) / 7 (more than one check valve in suction piping system) / 8 (no tank label) / 9 (no as-built plans or drawings)					
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COMPLIANCE WITH REGULATORY REQUIREMENTS WAS ASSESSED VIA THE FOLLOWING METHODS:  
FIELD OBSERVATION, RECORDS REVIEW, AND/OR INTERVIEW WITH FACILITY REPRESENTATIVE

**New York State Department of Environmental Conservation – Chemical Bulk Storage (CBS) Inspection Form**

DATE: \_\_\_\_\_ DEC INSPECTOR: \_\_\_\_\_

CBS #: \_\_\_\_\_ or  Unregistered FACILITY REP. NAME & TITLE \_\_\_\_\_

FACILITY NAME: \_\_\_\_\_ CLASS A OPERATOR NAME & AUTH #: \_\_\_\_\_

FACILITY ADDRESS: \_\_\_\_\_ CLASS B OPERATOR NAME & AUTH #: \_\_\_\_\_

FACILITY PHONE NUMBER: \_\_\_\_\_

**Registration**

1. Is the inspection announced or unannounced?	---	<input type="checkbox"/> Announced <input type="checkbox"/> Unannounced
2. Is the registration certificate posted at the facility?	596.2(g)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> 1 (no access)
3. Is the registration information current and accurate?	596.2(a)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> 1 (expired registration) <input type="checkbox"/> 2 (unregistered facility) <input type="checkbox"/> 3 (unregistered tank)

**Spill Prevention Report (SPR)**

4. Does the owner/operator have a SPR, and has it been reviewed/revised within the previous calendar year?	598.1(k)(1)	<input type="checkbox"/> Y <input type="checkbox"/> N
Date of the latest SPR?		/ /
5. Current management approval of the report?	598.1(k)(2)(ii)	<input type="checkbox"/> Y <input type="checkbox"/> N
6. Preparer's name/signature/certification?	598.1(k)(2)(iv)	<input type="checkbox"/> Y <input type="checkbox"/> N
7. Copy of the current registration certificate & application?	598.1(k)(2)(i)	<input type="checkbox"/> Y <input type="checkbox"/> N
8. Acceptable site map? (Must include location of tank(s), piping, & transfer station(s).)	598.1(k)(2)(iii)	<input type="checkbox"/> Y <input type="checkbox"/> N
9. Listing, description, and assessment of spills/leaks and releases for past 5 years?	598.1(k)(2)(v, vi)	<input type="checkbox"/> Y <input type="checkbox"/> N
10. Spill response plan?	598.1(k)(2)(x)	<input type="checkbox"/> Y <input type="checkbox"/> N
11. Written site procedures to prevent deliveries to the wrong tank? (N/A if the facility has a single tank or mated connections.)	598.4(b)(7)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
12. Self-audit on status of compliance?	598.1(k)(2)(vii)	<input type="checkbox"/> Y <input type="checkbox"/> N
13. Design and installation certification (must be maintained for 5 years):		
a. For piping?	599.16(e)(4, 5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
b. For ASTs (installed on or after 02/11/95)?	599.11(e)(4, 5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
c. For USTs (installed on or after 02/11/95)?	599.6(e)(4, 5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
14. Designation of useful life:		
a. For piping?	599.13(a)(1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
b. For ASTs, if <30 years?	599.8(b)(1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
c. For USTs, if <30 years?	599.3(c)(1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
15. Site assessment for UST closure or change-in-service?	598.10(a)(2) 598.10(e)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A





# DER 25 PBS

## DER-25 / Petroleum Bulk Storage (PBS) Inspection Handbook

New York State Department of Environmental Conservation

### DEC Program Policy

**Issuing Authority:** Eugene J. Leff

**Title:** Deputy Commissioner, Office of Remediation & Materials Management

**Date Issued:** April 20, 2011

**Latest Date Revised:**

#### I. Summary

This program policy provides guidance for New York State Department of Environmental Conservation (DEC) Division of Environmental Remediation (DER) staff on conducting inspections at Petroleum Bulk Storage (PBS) facilities to determine compliance with New York State (NYS, State) statutes [Environmental Conservation Law (ECL) Article 17, Title 10], PBS regulations [6 NYCRR Parts 612-614] and the United States Environmental Protection Agency federal Underground Storage Tank (UST) regulations [40 CFR Part 280]. The attached PBS Inspection Handbook addresses inspections for both underground and aboveground storage tank systems at PBS facilities.

#### II. Policy

It is the policy of DER to provide guidance and training to promote and achieve consistency and compliance with ECL Article 17, Title 10 and applicable federal and State regulations.

#### III. Purpose and Background

ECL Article 17, Title 10 sets standards and authorizes DEC to promulgate regulations. The PBS regulations have been in effect since December 27, 1985 (revised February 12, 1992). This guidance provides DER staff with consistent procedures for inspecting PBS facilities, as well as consistent interpretation and application of the PBS regulations. It also provides owners/operators of PBS facilities with a clear understanding of which compliance items DER staff will evaluate during PBS inspections.

#### IV. Responsibility

Responsibility for the PBS program is assigned to the Facility Compliance Section within DER's Bureau of Technical Support (BTS) in Central Office. This responsibility includes program oversight, regulatory interpretation, training, evaluation of new technologies, and technical support in connection with appeals. BTS is responsible for maintaining and updating this policy in DER, in consultation with the Office of General Counsel. DER program staff are responsible for implementing this policy, with input from other involved DEC Divisions.





# AST Inspections

Are you performing monthly inspections?

## MONTHLY INSPECTION CHECKLIST

Facility Registration No. \_\_\_\_\_

Date: \_\_\_\_\_

Tank Id. No.: \_\_\_\_\_

Facility Item	Condition	Required Maintenance
<b>STORAGE TANK</b>		
Structural Integrity		
Corrosion		
Cracks/Leaks		
Ports/Connections		
<b>ALARMS</b>		
Tank High Level		
Secondary Containment		
<b>SECONDARY CONTAINMENT</b>		
Structural Integrity		
Coating		
Leaking		
<b>PIPING &amp; VALVES</b>		
Structural Integrity		
Corrosion		
Cracks/Leaks		





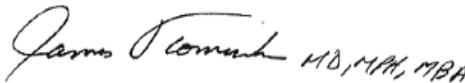
# General Facility Questions

**Suffolk County Department of Health Services**

**PERMIT**

**TO OPERATE A TOXIC OR HAZARDOUS MATERIALS STORAGE FACILITY**

This permit will expire upon the date specified or upon a change of the operator. This permit is not transferable and is granted subject to compliance with the provisions of Article 12 of the Suffolk County Sanitary Code and 6 NYCRR Part 612 - 614. This permit can be revoked upon failure to follow the applicable provisions of these parts or comply with any special conditions of issuance. All unauthorized or accidental releases of toxic or hazardous liquids must be reported to the Suffolk County Department of Health Services at 631-854-2501 and to the NYSDEC Regional Spill Office at 631-444-0323.

FILE REFERENCE NO.	FACILITY REGISTRATION NO.	FACILITY NAME AND ADDRESS		
<b>01201</b>	<b>1-0065</b>	<b>ABC Firm 12 beaver dam drive Holbrook, NY</b>		
<b>CONDITIONS OF ISSUANCE:</b>		<b>OWNER/ CORPORATE MAILING ADDRESS</b>		
<ol style="list-style-type: none"> <li>The listing of storage facilities accompanying latest renewal notice is hereby made part of this permit.</li> <li>The owner/operator is responsible for all storage facilities listed in (1) above and that currently exist on site.</li> <li>All leak detection, overflow and level alarm probes and panel boxes must be maintained in satisfactory working condition at all times.</li> <li>All monitoring wells, alarm systems and emergency equipment must be checked periodically. A log of these checks must be maintained on site.</li> <li>Inventory records and monitoring equipment logs must be maintained on site and presented to a representative of the SCDHS upon request.</li> <li>Access to the site is hereby granted to representatives of the SCDHS for routine compliance inspections during normal business hours.</li> </ol>		<b>ABC Firm 12 beaver dam drive Holbrook, NY</b>		
<b>PERMIT ISSUING OFFICIAL</b>		<b>ISSUING AGENCY AND CONTACT INFORMATION</b>		
 COMMISSIONER		Division of Environmental Quality - Office of Pollution Control 15 Horseblock Place Farmingville, N.Y. 11738 Tel: 631-854-2519 Fax: 631-854-2505		
		<table border="1"> <thead> <tr> <th>DATE OF ISSUE</th> <th>EXPIRATION DATE</th> </tr> </thead> <tbody> <tr> <td><b>07/01/2010</b></td> <td><b>06/30/2012</b></td> </tr> </tbody> </table>	DATE OF ISSUE	EXPIRATION DATE
DATE OF ISSUE	EXPIRATION DATE			
<b>07/01/2010</b>	<b>06/30/2012</b>			

**THIS PERMIT MUST BE CONSPICUOUSLY POSTED**

**Is your registration certificate posted and current?**





# Are your tanks labeled correctly?

- Product
- Tank Number
- Design Capacity (DC)
- Working Capacity (WC)
- Haz 704 Placard





# API Fill Port Color Coding and Symbols



High Grade Gas



Middle Grade Gas



Regular Grade Gas



High Grade Gas with V/R



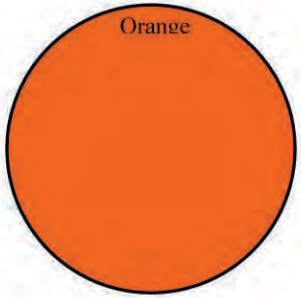
Middle Grade Gas with V/R



Regular Grade Gas with V/R



# API Fill Port Color Coding and Symbols



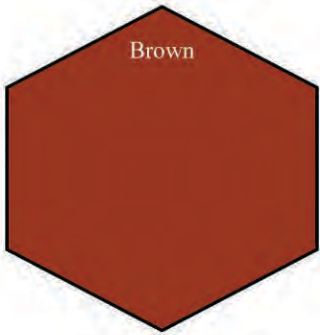
Vapor Recovery



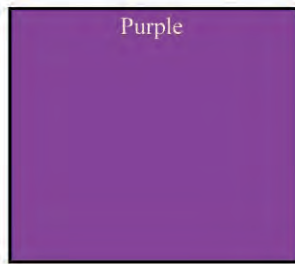
No. 2 Heating Oil



Diesel



Kerosene



Used Oil



Motor Oil



Bio Diesel



E85 Gasoline



Monitoring Well



# Proper Labeling of Above Ground Tanks

Fuel Oil - Waste Oil - Motor Oil- Gasoline

- Product Stored
- Waste Oil Tank - Paint “purple” square on front
- Fuel Oil Tank - Paint “green” hexagon on front
- Tank capacity
- Tank Working capacity - 90% of capacity
- Tank number  
(Registration number on PBS - Petroleum Bulk Storage Certificate usually found on wall of service station)
- Hazard Diamond

**Motor Oil**



**Waste Oil**



**Fuel Oil/ Diesel/ Kerosene**



**Gasoline**



**Key**

- Blue - Health
- Red - Flammability
- Yellow - Reactivity
- White - Special



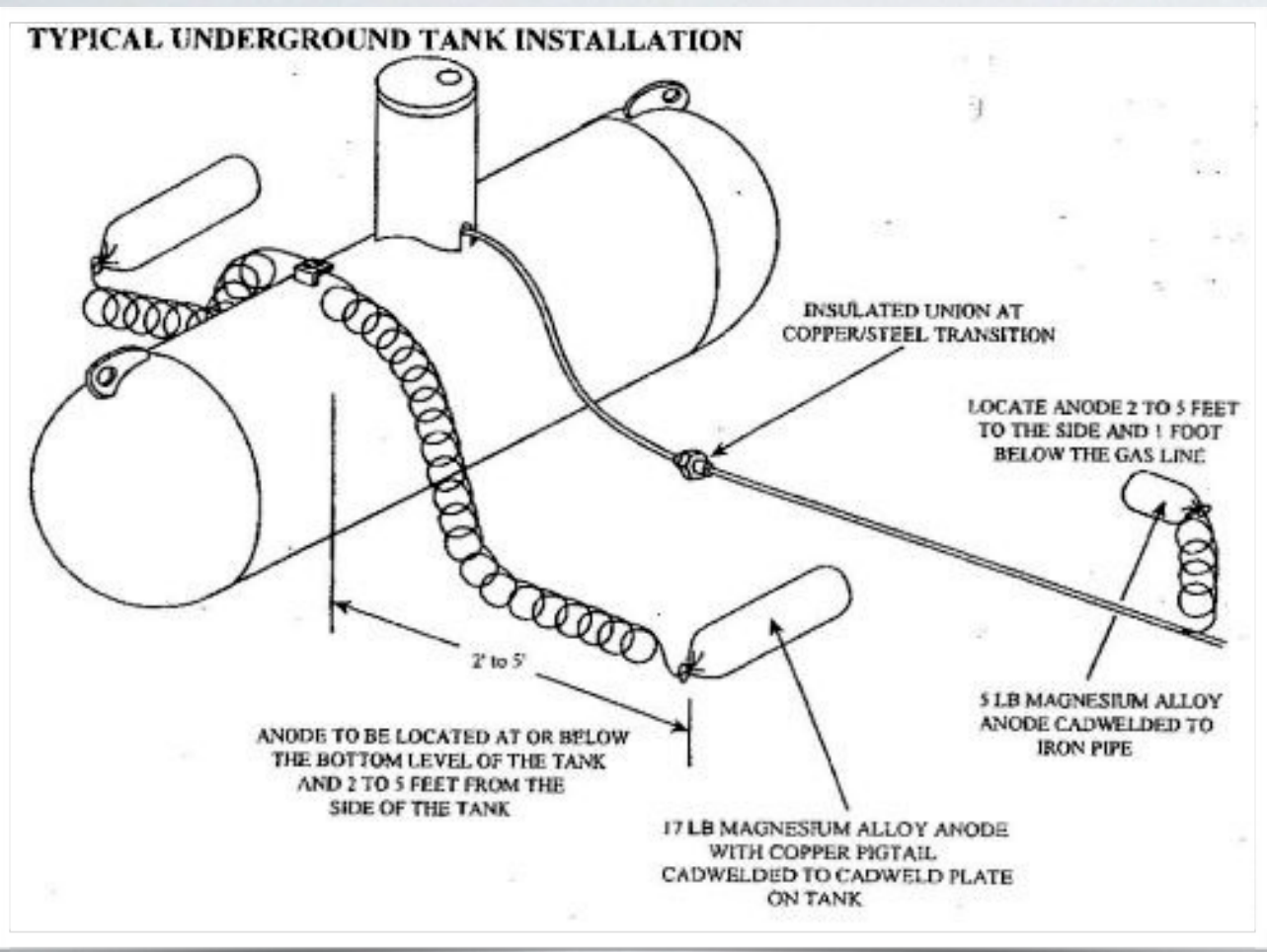
**LI OFFICE**  
40 Doyle Court  
East Northport, NY 11731  
(631) 462 2226

**NYC OFFICE**  
1381 Utica Ave.  
Brooklyn, NY 11203  
(718) 526-6525

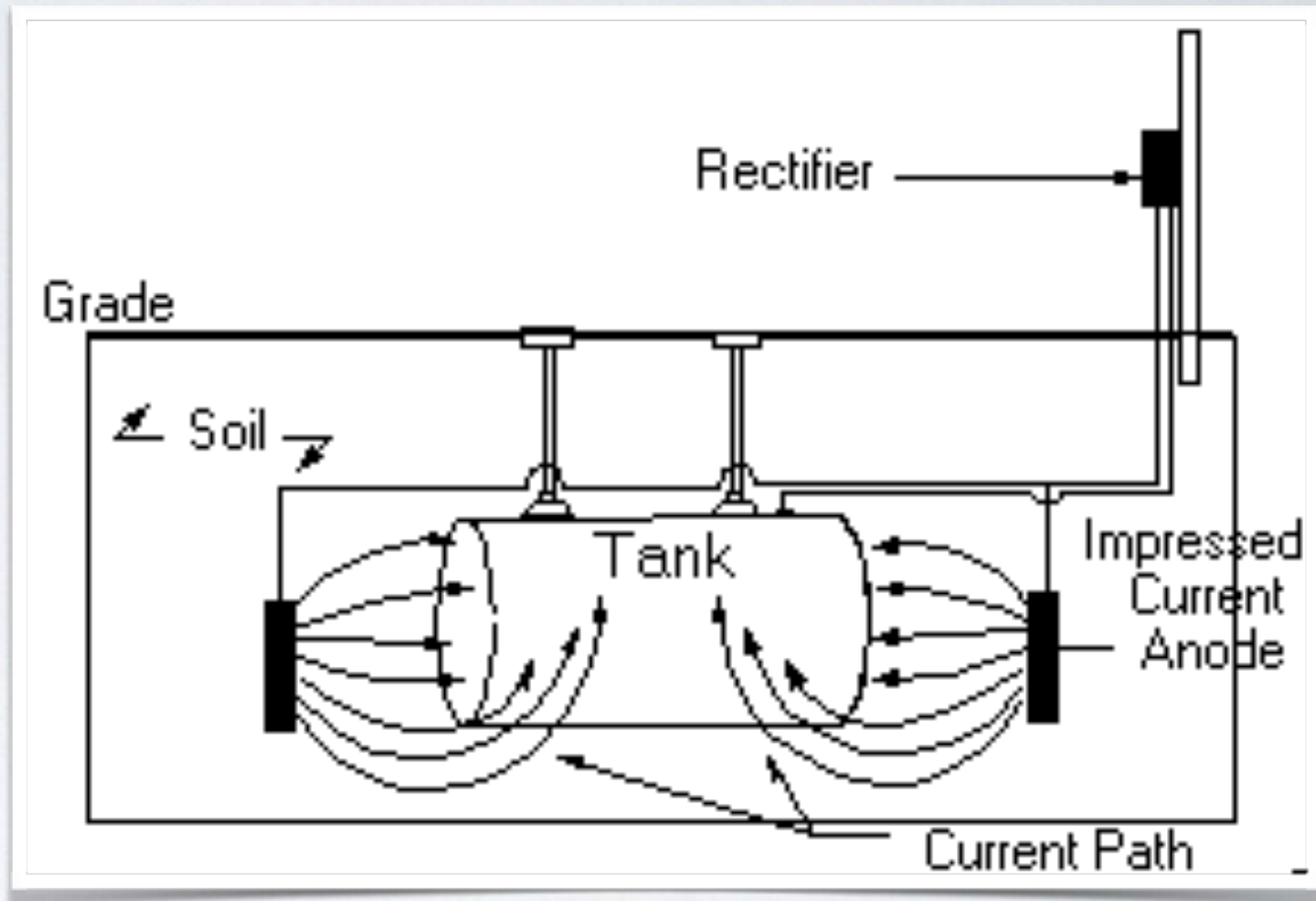
[www.IslandPumpandTank.com](http://www.IslandPumpandTank.com)



# Cathodic Protection Testing



**Sacrificial Anode**



**Impressed Current**



# Compatibility

**Important** to make sure both your **tank** and all your **tank appurtenances** including your **sensors** are compatible with the product stored.





## SUMMARY OF PBS RECORDKEEPING REQUIREMENTS SUBPART 2: UST SYSTEMS REGULATED BY DEC/EPA

The following is a list of recordkeeping requirements for underground storage tank systems (USTs) regulated by **both DEC and EPA**. It is unlikely that any one facility will need to maintain every type of record listed – maintain only those records required for your tank system(s). It is recommended that you, as the facility owner/operator, print this file and highlight the documents/records required for what you have at your facility.

Note that this document does not replace the regulations themselves. This is meant to be a tool to help you prepare for compliance inspections and be an aid for general recordkeeping compliance.

### For TANK SYSTEMS:

6 NYCRR	Type of Documentation	When Required	How Long to Keep Records	What Conditions Require This?
<b>TANK SYSTEM RECORDS</b>				
613-1.9(a, c)	Facility Registration Certificate	Initial Registration; Every 5 Years Thereafter; When Ownership is Transferred	Must Be Current/ Accurate at All Times	You MUST have this
613-2.1 (b)(4)(iii)(a)	As-Built Plan	When a UST System Component <sup>1</sup> is Installed/Replaced	Life of UST System	Only IF you have a Category 2 UST system
	As-Built Plan w/ Attributes List			Only IF you have a Category 3 UST system
613-2.3(e)(4)	Calibration/Maintenance/Repair Records of Leak Detection Equipment	After Completion of Servicing Work	3 Years	You MUST have this
	(Required) Calibration/Maintenance Schedules for Leak Detection Equipment	After Installation of Leak Detection Equipment		
613-2.5(f)	Operator Records	When Operator is Designated	Length of Operator Designation PLUS 3 Years	You MUST have this
613-2.6(c)	Site Assessment Report <sup>2</sup>	Prior to UST System Closure	3 Years After UST System Closure	Only WHEN you permanently close your UST system
613-2.6(e)	Closure Records <sup>3</sup>	At UST System Closure		

<sup>1</sup> A UST system component refers to either the tank or any length of piping.

<sup>2</sup> A copy of the site assessment report must be sent to DEC within 90 days after UST system closure.

<sup>3</sup> A copy of the closure records must be sent to DEC within 30 days after UST system closure.





**For TANKS:**

6 NYCRR	Type of Documentation	When Required	How Long to Keep Records	What Conditions Require This?
<b>EQUIPMENT RECORDS</b>				
613-2.1 (b)(4)(iii)(b)	Installer Certification	When a New UST System Component is Installed	Life of UST System	Only IF you have a Category 3 UST system
613-2.1 (b)(4)(iii)(c)	Manufacturer's Installation Checklist			
613-2.1(c)(2)(i)	Interior Lining Inspection	Within First 10 Years; Every 5 Years Thereafter	5 Years	Only IF you have an internally lined, steel Category 1 UST WITHOUT cathodic protection
<b>REPAIR RECORDS</b>				
613-2.2(d)(3)	Tightness Test for Repaired USTs	Within 30 Days After Repair	Life of UST System	You MUST have this IF your UST is repaired, UNLESS the UST is inspected (API RP 1631) OR is monitored using automatic tank gauging, vapor monitoring, groundwater monitoring, interstitial monitoring, or statistical inventory reconciliation
613-2.2(d)(4)	Cathodic Protection Test for Repaired USTs	Within 6 Months After Repair		Only IF you have a cathodically protected steel UST AND the UST is repaired
<b>CATHODIC PROTECTION RECORDS</b>				
613-2.2(b)(2)	Cathodic Protection Test -- Sacrificial Anodes	Within First 6 Months; Every Year Thereafter	3 Years	Only IF you have a cathodically protected steel UST WITH a sacrificial anode CP system
	Cathodic Protection Test -- Impressed Current	Within First 6 Months; Every Year Thereafter		Only IF you have a cathodically protected steel UST WITH an impressed current CP system
613-2.2(b)(3)	Impressed Current Inspection	Every 60 Days		
<b>LEAK DETECTION RECORDS: CATEGORY 1 TANKS</b>				
613-2.3(c)(1)	Inventory Monitoring	Daily with 10-Day Reconciliations	3 Years	Only IF your UST system stores motor fuel/kerosene that will be sold
613-2.3 (c)(2, 4-6, 8)	Manual Tank Gauging Automatic Tank Gauging Vapor Monitoring <sup>4</sup> Groundwater Monitoring <sup>4</sup> Statistical Inventory Reconciliation	Weekly		You MUST perform AND document any ONE of these leak detection methods <sup>5</sup> UNLESS your UST is double-walled
613-2.3(c)(7)	Interstitial Monitoring <sup>5, 6</sup>	Weekly		Only IF your tank is double-walled
613-2.3 (b)(1)(iii)	Operability Check of Electronic Leak Monitoring Systems	Monthly		Only IF you have an electronic leak monitoring system
<b>LEAK DETECTION RECORDS: CATEGORY 2 &amp; 3 TANKS</b>				
613-2.3(c)(1)	Inventory Monitoring	Daily with 10-Day Reconciliations	3 Years	Only IF your UST system stores motor fuel/kerosene that will be sold
613-2.3(c)(7)	Interstitial Monitoring <sup>5, 6</sup>	Weekly		You MUST have this
613-2.3 (b)(1)(iii)	Operability Check of Electronic Leak Monitoring Systems	Monthly		Only IF you have an electronic leak monitoring system

<sup>4</sup> Vapor monitoring and groundwater monitoring each require a baseline report IN ADDITION to the weekly monitoring records.

<sup>5</sup> Electronic interstitial monitoring must be performed continuously (and needs monthly operability checks); manual interstitial monitoring must be performed weekly.

<sup>6</sup> Continuous electronic monitoring satisfies the weekly monitoring requirement.





**For UNDERGROUND PIPING:**

6 NYCRR	Type of Documentation	When Required	How Long to Keep Records	What Conditions Require This?
<b>EQUIPMENT RECORDS</b>				
613-2.1 (b)(4)(iii)(b)	Installer Certification	When Piping is Installed	Life of UST System	Only IF you have piping installed after 10/11/15
613-2.1 (b)(4)(iii)(c)	Manufacturer's Installation Checklist			
<b>REPAIR RECORDS</b>				
613-2.2(d)(3)	Tightness Test for Repaired Piping	Within 30 Days After Repair	Life of UST System	You MUST have this IF your piping is repaired, UNLESS the piping is monitored using automatic tank gauging, vapor monitoring, groundwater monitoring, interstitial monitoring, or statistical inventory reconciliation
613-2.2(d)(4)	Cathodic Protection Test for Repaired Piping	Within 6 Months After Repair		Only IF you have cathodically protected steel piping AND the piping is repaired
<b>CATHODIC PROTECTION RECORDS</b>				
613-2.2(b)(2)	Cathodic Protection Test -- Sacrificial Anodes	Within First 6 Months; Every Year Thereafter	3 Years	Only IF you have cathodically protected steel piping WITH a sacrificial anode CP system
	Cathodic Protection Test -- Impressed Current	Within First 6 Months; Every Year Thereafter		Only IF you have cathodically protected steel piping WITH an impressed current CP system
613-2.2(b)(3)	Impressed Current Inspection	60 Days		
<b>LEAK DETECTION RECORDS: CATEGORY 1 &amp; 2 PIPING</b>				
613-2.3(d)(1)	Automatic (Mechanical or Electronic) Line Leak Detector Functionality Test	Every Year	3 Years	Only IF you have pressurized piping
613-2.3(d)(2)	Pressurized Line Tightness Test <sup>7</sup>	Every Year	Until the Next Test	You MUST perform AND document one of these methods <sup>6</sup> only IF you have pressurized piping
613-2.3(c)(5-8)	Vapor Monitoring <sup>4</sup> Groundwater Monitoring <sup>4</sup> Interstitial Monitoring <sup>5,6</sup> Statistical Inventory Reconciliation	Weekly	3 Years	
613-2.3(d)(2)	Non-Exempt Suction Line Tightness Test <sup>7</sup>	Every 3 Years	Until the Next Test	You MUST perform AND document one of these methods <sup>6</sup> only IF you have suction piping that is NOT safe suction
613-2.3(c)(5-8)	Vapor Monitoring <sup>4</sup> Groundwater Monitoring <sup>4</sup> Interstitial Monitoring <sup>5,6</sup> Statistical Inventory Reconciliation	Weekly	3 Years	
613-2.3 (b)(2)(iii)	Operability Check of Electronic Leak Monitoring Systems	Monthly	3 Years	Only IF you have an ELECTRONIC line leak detector OR an electronic sensor (i.e., sump sensor)
<b>LEAK DETECTION RECORDS: CATEGORY 3 PIPING</b>				
613-2.3(d)(1)	Automatic (Mechanical or Electronic) Line Leak Detector Functionality Test	Every Year	3 Years	Only IF you have pressurized piping
613-2.3(c)(7)	Interstitial Monitoring <sup>5,6</sup>	Weekly		You MUST have this IF you have either pressurized piping OR non-exempt suction piping
613-2.3 (b)(2)(iii)	Operability Check of Electronic Leak Monitoring Systems	Monthly		Only IF you have an ELECTRONIC line leak detector OR an electronic sensor (i.e., sump sensor)

<sup>7</sup> A copy of the tightness test results must be sent to DEC within 30 days after performance of the test.





# Operational

**ANNUAL**



- **LLD / Shear Valve**
- **Cathodic Protection Testing**
- **ATG Certifications**

**2 YEARS**



- **Witness Functionality Testing FDNY / NCDH**
- **ATG Certifications**

**3 YEARS**



- **Overfill prevention**
- **Sump Integrity**
  - Containment sumps
  - UDC'S
  - Spill Buckets



# Compliance work done by a Qualified contractor

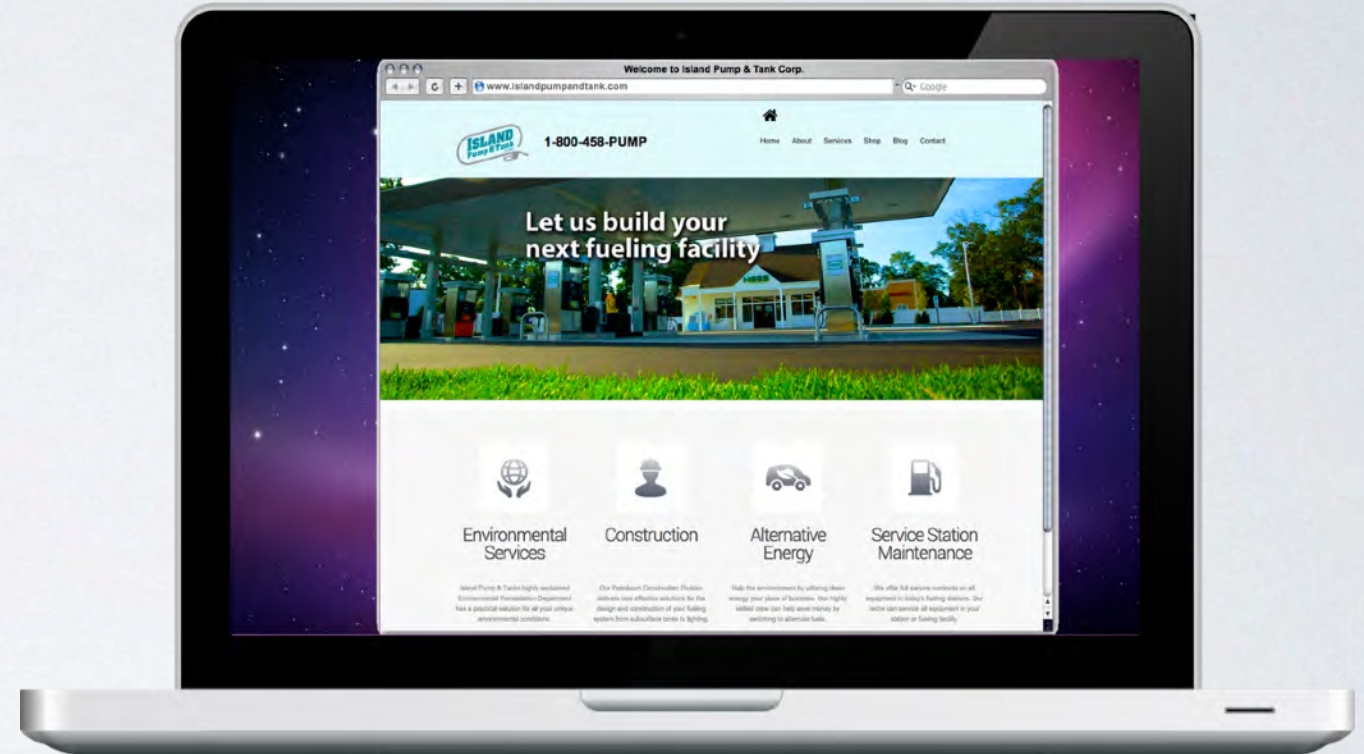




# Questions, Concerns, or Snide Remarks?







[www.Islandpumpandtank.com/liapg](http://www.Islandpumpandtank.com/liapg)





*Thanks!*

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