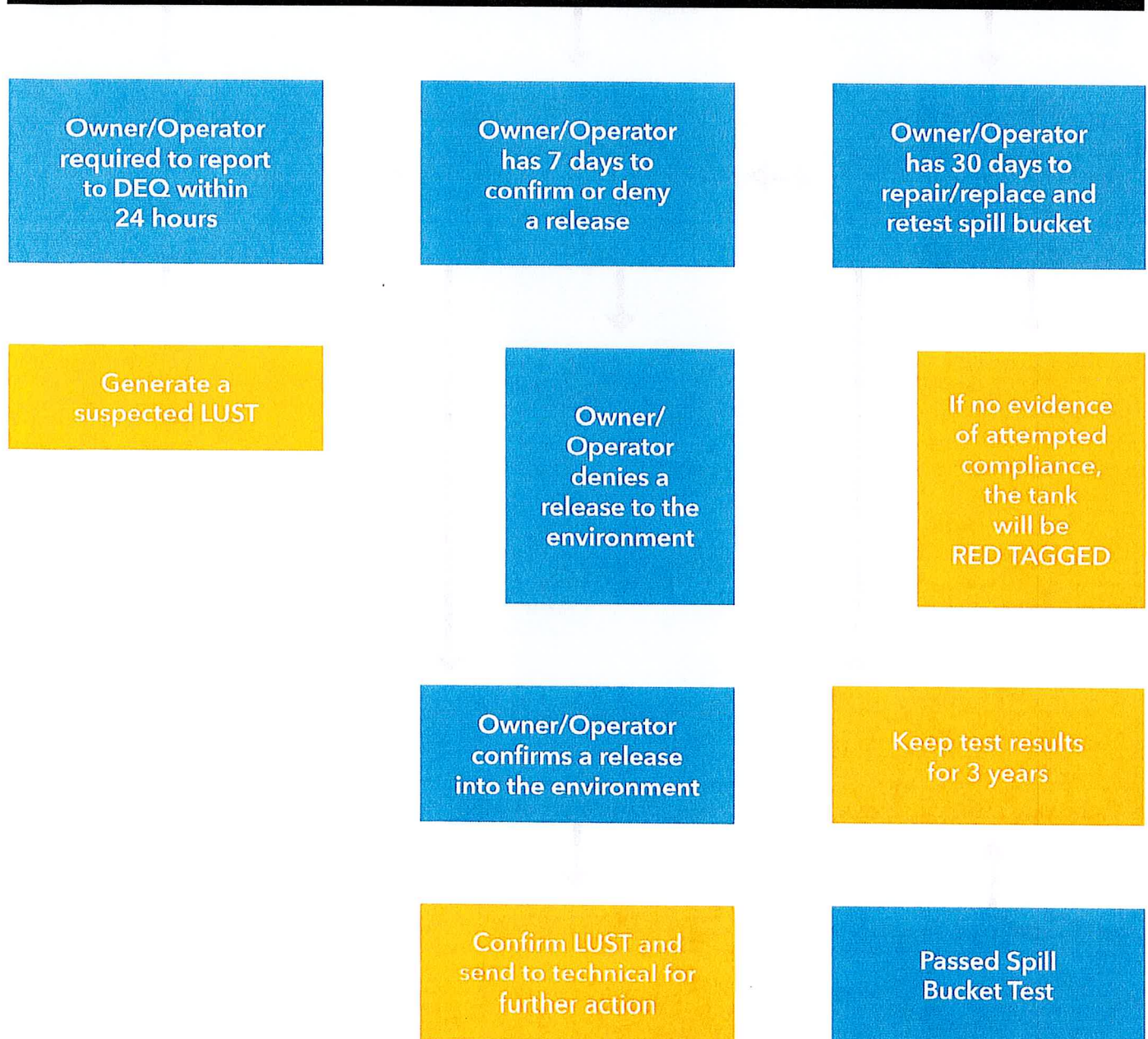




ENVIRONMENTAL  
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# SPILL BUCKET TESTING FLOW CHART

## FAILED SPILL BUCKET TEST





# SPILL PREVENTION AND CONTAINMENT SUMP GUIDELINES

## BACKGROUND

The Underground Storage Tank (UST) federal regulations were revised and became effective October 13, 2015. Arkansas revised APC&EC Rule 12 to adopt the revisions and maintain state program approval. Those rules went into effect September 8, 2018. The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) gave a 3 year grace period, which ends October 13, 2021, for facilities with USTs to become compliant with the revisions. Revision requirements include periodic testing of spill prevention and containment sumps used for interstitial monitoring. All initial testing must be completed by October 13, 2021.

## GUIDANCE

This document outlines guidance for spill prevention equipment testers and what steps owners/operators and contractors should perform after a failed spill prevention or containment sump test.

## SPILL PREVENTION

The 2015 federal revisions state that spill prevention equipment must be tested for integrity at least every 3 years, or be double-walled and periodically monitored. Spill prevention equipment testing must demonstrate that the equipment is liquid-tight by using vacuum, pressure, or liquid (hydrostatic) testing, and must follow the testing procedures set forth by the equipment manufacturer or a code of practice/industry standard such as the Petroleum Equipment Institute (PEI) document RP1200, "Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities."

## FAILED TEST RESULTS

If spill containment equipment fails an integrity test or a visual inspection of spill prevention equipment reveals a problem that could result in a failed test, the owner/operator is required to report a suspected Leaking Underground Storage Tank (LUST) to DEQ within 24 hours, and follow-up with a written notification within 3 business days of discovery.

The facility has seven calendar days to confirm or deny that a release has occurred and should follow steps for release investigation and confirmation found in 40 CFR Subpart E. The facility and/or their third party contractor shall provide evidence to support their claim to confirm or deny a release.

- When replacing a spill bucket, if there are no strong vapors or stained soils, this can be used as evidence to deny a release occurred.
- A groundwater monitoring well assessment also can be used to demonstrate no evidence of a release.

If a release is confirmed, the facility must follow guidelines provided in 40 CFR Subpart F. The facility has 30 calendar days to make a repair or replace the spill prevention equipment. If a repair/replacement cannot be performed in 30 calendar days, the owner/operator must provide evidence to their DEQ inspector that replacement parts have been ordered and/or a repair has been scheduled with a licensed DEQ contractor.

The facility will have 30 days to test spill prevention equipment that has been repaired or replaced. Records of passing spill prevention equipment tests should be maintained for 3 years.

If there is no evidence of attempted compliance by the owner/operator, the UST system will be red tagged for delivery prohibition after the 30-day window, or until a passing test.

## **CONTAINMENT SUMP TESTING**

A failed containment sump test will not require an automatic notification to DEQ for a suspected LUST. Containment sumps used for interstitial monitoring should be kept dry and monitored using sump sensors or monitored visually at least every 30 calendar days. Periodic monitoring should allow time for owner/operators to find and address potential releases.

Periodic visually monitored sumps will need to be hydrostatically tested at least four inches above the lowest fitting. Hydrostatic containment sump testing documentation shall note whether a high-level or low-level test was conducted.

Product found in a containment sump should be investigated as an unusual operating condition. The facility is required to submit a 7-day notice for repairs and replacement of containment sumps.

## **UNUSUAL OPERATING CONDITIONS**

The following are unusual operating conditions that require the owner/operator (or a third-party contractor acting on their behalf) to notify DEQ within twenty-four hours. A suspected LUST case will be generated from this notification. Written notification is required to DEQ within three business days of verbal notification. Unusual operating conditions must be reported unless the condition qualifies for an exemption listed in 40 CFR 280.50. Owners and operators must immediately investigate and confirm or deny the suspected release within seven calendar days using the procedures listed in 40 CFR 280.52.

- Evidence of a release on-site or from off-site indicators (presence of free product or vapor in soils, basements, sewer and utility lines, and/or nearby surface water)
- Unexplained water of an inch or more in the tank
- Erratic behavior of dispensing equipment
- Sudden loss of product
- Liquid in dry interstice
- Statistical Inventory Reconciliation (SIR) failure/inconclusive results for one month
- Failed line tightness test, tank tightness test, or spill bucket test
- Unexplained alarms
- Interstitial alarms

## **LICENSING**

Spill prevention equipment (e.g., spill buckets and sumps) must be tested every three years. These tests shall be performed by a UST tester licensed in the State of Arkansas. Requirements for obtaining an Arkansas tester license are outlined in APC&EC Rule 12.6.

Sumps used for interstitial monitoring are required to be performed by a licensed tester.

Testing results of spill buckets should be recorded on the form provided by DEQ and signed by a licensed tester. The test method should be recorded and certified on the provided form. A manufacturer certificate will not be required for spill prevention equipment testing.



## ENVIRONMENTAL QUALITY

# WHAT THE NEW REGULATED STORAGE TANKS REGULATION WILL MEAN TO YOU:

- Walk-through inspections are required every 30 days.
- Release detection equipment must be tested annually.
- Spill protection (spill buckets) must be tested on or before October 13, 2021, then every 3 years thereafter.
- Sumps and under dispenser containment installed after July 2007 must be tested on or before October 13, 2021, then every 3 years thereafter.
- Overfill prevention equipment must be tested on or before October 13, 2021, then every 3 years thereafter.
- Release detection requirements apply to:
  - emergency generator tanks
  - field constructed tanks
  - airport hydrant systems

This equipment is no longer exempt.

**DEQ's mission is to protect, enhance, and restore the natural environment for the well-being of all Arkansans.**

## CONTACTS

NAME	TITLE	PHONE
Sam McDuffie	Inspector Supervisor	501.682.0973
Robert Morgan	Inspector Supervisor	501 .682.0980
Amy Schluterman	Licensing and Training	501.682.0993
Jacqueline Trotta	Trust Fund Administrator	501.682.0632



ENVIRONMENTAL  
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# 30-DAY WALK-THROUGH INSPECTION CHECKLIST

IMPORTANT: KEEP THIS RECORD FOR NO LESS THAN 1 YEAR. Page 1 of 2

Facility ID Number#	Facility Name:
Phone Number:	Street Address:
	City:
	State:
	ZIP Code:

Write the date of inspection in the GRAY box below. Under the date, in the WHITE box beside the device/system inspected, record one of the following:

- **Your initials**, if the inspected device/system is **satisfactory**.
- A **"U,"** if the inspected device/system is **unsatisfactory**. Then, provide the requested information on Page 2.
- **"N/A"** if the item is **not applicable** for your facility.

DATE OF INSPECTION (mm/dd/yy)																				
<b>REQUIRED EVERY 30 DAYS</b>																				
Visually check spill prevention equipment for damage. Remove any liquid and/or debris.																				
Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present.																				
For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.																				
Check for and remove obstructions in the fill pipe.																				
Check the fill cap to make sure it is securely on the fill pipe.																				
Ensure release detection records are reviewed and current.																				
<b>REQUIRED ANNUALLY</b>																				
For double-walled containment sumps with interstitial monitoring, check for leaks in the interstitial area.																				
Visually check containment sumps for damage and leaks to the containment area or a release to the environment.																				
Remove any liquid or debris from containment sumps.																				
Check hand-held release detection equipment, such as groundwater bailers and tank gauge sticks, for operability and serviceability.																				

**Note:** Spill prevention equipment at UST systems receiving deliveries at intervals greater than every 30 days may be checked prior to each delivery.





# 3-YEAR SPILL PREVENTION EQUIPMENT (SPILL BUCKET) TEST FORM

## UST FACILITY INFORMATION

FACILITY NAME: \_\_\_\_\_  
 STREET ADDRESS: \_\_\_\_\_  
 CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_  
 COUNTY: \_\_\_\_\_ FACILITY ID #: \_\_\_\_\_

## UST OWNER INFORMATION

OWNER NAME: \_\_\_\_\_  
 STREET ADDRESS: \_\_\_\_\_  
 CITY: \_\_\_\_\_ STATE: \_\_\_\_\_ ZIP CODE: \_\_\_\_\_  
 PHONE NUMBER: \_\_\_\_\_

## TESTING CONTRACTOR INFORMATION

TESTER NAME: \_\_\_\_\_  
 TESTER COMPANY: \_\_\_\_\_  
 CONTRACTOR LICENSE #: \_\_\_\_\_ PHONE NUMBER: \_\_\_\_\_

I certify under penalty of law that the testing data provided on this form is true, accurate, and complete.

TESTER SIGNATURE: \_\_\_\_\_  
 SIGNATURE DATE: \_\_\_\_\_

## INSTRUCTIONS

1. Testing may be done in accordance with a nationally recognized code of practice (PEI-1200 or equivalent) or the manufacturer's instructions.
2. A separate form should be used for each facility. If there are more than five spill buckets at this facility, make additional copies of this page.
3. The last test record must be maintained at the UST site or must be readily available during an inspection. Keep a copy of this form for three years.
4. If any test fails, a report must be submitted to DEQ within twenty-four hours as a suspected release.

	TANK #	TANK #	TANK #	TANK #	TANK #
<b>Product stored:</b>					
<b>Test method used:</b>	<input type="checkbox"/> Vacuum <input type="checkbox"/> Pressure <input type="checkbox"/> Hydrostatic <input type="checkbox"/> Manufacturer's Instructions	<input type="checkbox"/> Vacuum <input type="checkbox"/> Pressure <input type="checkbox"/> Hydrostatic <input type="checkbox"/> Manufacturer's Instructions	<input type="checkbox"/> Vacuum <input type="checkbox"/> Pressure <input type="checkbox"/> Hydrostatic <input type="checkbox"/> Manufacturer's Instructions	<input type="checkbox"/> Vacuum <input type="checkbox"/> Pressure <input type="checkbox"/> Hydrostatic <input type="checkbox"/> Manufacturer's Instructions	<input type="checkbox"/> Vacuum <input type="checkbox"/> Pressure <input type="checkbox"/> Hydrostatic <input type="checkbox"/> Manufacturer's Instructions
<b>Is the basin free of cracks or holes?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No



	TANK #	TANK #	TANK #	TANK #	TANK #
<b>Was water, fuel, trash, and debris removed from the basin prior to testing?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Drain Valve operate and seal properly?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Fill pipe cap seals properly?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Hydrostatic testing only: Was enough water added to completely fill the basin?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Begin/End Test time:</b>	____ : ____	____ : ____	____ : ____	____ : ____	____ : ____
<b>Begin/End Reading:</b>	____ : ____	____ : ____	____ : ____	____ : ____	____ : ____
<b>Measured water level drop in inches accurate to 1/16 inch:</b>					
<b>Results of test?</b>	<input type="checkbox"/> Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive	<input type="checkbox"/> Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive	<input type="checkbox"/> Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive	<input type="checkbox"/> Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive	<input type="checkbox"/> Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive
<b>Tester's initials:</b>					
<b>Date tested:</b>					

**TANK REPAIRS**

REPAIRS NEEDED	DATE OF REPAIR	DESCRIPTION OF REPAIRS