

# Aboveground Storage Tank Compliance Seminar

August 16, 2016



**WEST VIRGINIA  
MANUFACTURERS  
ASSOCIATION**

By

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# Summary of Presentation

- Summary of Annual Qualified Inspections
- Summary of O&M Inspections
- Record Keeping Methods

# Summary Annual Qualified Inspections

Inspections PE/API	3 Years (Level 1)	5 Years (Level 2)
1st Qualified Inspection <b>not</b> already PE/API inspected, under INTERPRETIVE RULE (47CSR 62)	Within 180 days of August 1, 2016 <b>(January 28, 2017)</b>	Within 180 days of August 1, 2016 <b>(January 28, 2017)</b>
Owner Inspections intervening years	January 1, 2018 January 1, 2019	January 1, 2018 January 1, 2019 January 1, 2020 January 1, 2021
PE/API Qualified Inspection	January 1, 2020	January 1, 2022
Fit For Service	January 1 Annually	
Fit, but needs repairs	January 1, must submit recommended repair schedule	
Deficient	Taken out of services for repairs	
Annual WVDEP Certifications filed Electronic Submission System (ESS)	January 1 Annually	

# Fit, Fit with Repairs, or Deficient?



# Annual Inspection Form Summary

- Secondary Containment
- Tank Foundation/Support Condition
- Tank Construction Material
- Tank External Coating
- Tank Shell Condition
- Tank Manways, Piping and Equipment
- Tank Roof
- Venting
- Electrical Equipment
- Poly or Fiberglass Rapped Plastic Tank Inspection
- Owner Inquiry
  - Leak Detection Method(s) being used
  - Vent Testing as required by manufacturer
  - Secondary Containment sufficiently impervious (72 hours)
  - Cathodic Protection tested yearly

# Fit, Fit with Repairs, or Deficient?



# Fit, Fit with Repairs, or Deficient?



# Summary of O&M Inspections

Item	Level 1 AST	Level 2 AST
<b>Title 47 CSR Series 63 AST</b>	<b>Effective Date August 1, 2016</b>	
<b>O&amp;M Secondary Containment Inspection (47-63-5)</b>	<b>14 days</b>	<b>1 month</b>
<b>Secondary Containment (sufficiently impervious, 72 hours)</b>	<b>X</b>	<b>X</b>
<b>Release, spill, overflow, or leak</b>	<b>X</b>	<b>X</b>
<b>Deterioration, accumulation of product, or water</b>	<b>X</b>	<b>X</b>
<b>Drains secure and closed</b>	<b>X</b>	<b>X</b>
<b>Rain water must not exceed 10% capacity</b>	<b>X</b>	<b>X</b>
<b>Retain inspection documentation</b>	<b>12 continuous months</b>	

# Fit, Fit with Repairs, or Deficient?



# Repairs



# Summary of O&M Inspections

	Level 1	Level 2
<b>AST Visual Inspection to 1st Isolation Point</b>	<b>1 month</b>	<b>1 month</b>
<b>Monitor Leak Detection Methods (Section 10.3)</b>	<b>X</b>	<b>X</b>
<b>Visual Leak Detection (10.3.c)</b> <b>Double Bottomed designed to channel fluids to an observation area</b>	<b>X</b>	<b>X</b>
<b>Interstitial Monitoring (10.3.g)</b>	<b>X</b>	<b>X</b>
<b>Leak Detection Deficiencies</b>	<b>June 30, 2017</b>	<b>June 30, 2018</b>
<b>Records must contain: Monitors Name, Monitoring Method(s), Monitoring Date, Results</b>	<b>X</b>	<b>X</b>
<b>Coatings (rust, blisters, peeling, cracking, coating bond failure)</b>	<b>X</b>	<b>X</b>
<b>Malfunctioning or deficient equipment <i>Critical</i> repairs</b>	<b>30 days</b>	<b>30 days</b>
<b>Retain Inspection Documentation</b>	<b>12 continuous months</b>	

# Fit, Fit with Repairs, or Deficient?



# Recordkeeping Methods

Inspection Documents	Minimum consecutive 12 months
Customized Hard Copy Paper	Binder to be kept at the facility
Electronic Inspection Sheets in Word	Electronic Files to be kept at the facility
Electronic Inspection Sheets in Excel	Spreadsheet style initial and comment area
Electronic files converted to PDF with electronic signature	
May be scanned with real signature and kept in PDF format	
Ultimately long term files can be kept in database or GIS formats	
Annual Inspection forms kept with a photo log and WVDEP certification and maintenance log, if necessary	



# Discussion and Questions

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