TMS
TANK MANAGEMENT SERVICES, INC.

advisor

Volume 19 Number 1 1st Quarter 2009

Inventory

Owners and operators of USTs will see something new when KDHE mails out 2009 Annual Registration Renewal Invoices the middle part of March.

KDHE has prepared Inventory Control Annual Summary Sheets to help owners keep track of their inventory control over the year. These summary sheets are being sent to all owners and operators of USTs except for those who have standby USTs or who operate tanks containing used oil with capacities less than 2000 gallons.

The summary sheets have columns where owners and operators can record the "Total Gallons Pumped," the "EPA Leak Check," the "Total Over Short," and whether or not they have passed the "EPA Leak Check" calculation for each month of 2009.

The sheets also have blanks for owners and operators to show the "Month with the greatest Total Gallons Pumped" and the amount of fuel pumped during that month. Throughput information is being collected to help another part of KDHE, the Bureau of Air and Radiation (BAR). BAR is determining what parts of the Maximum Achievable Control Technology (MACT) regulations of the Clean Air Act apply to gasoline dispensing facilities and bulk racks and how these UST systems can comply with the regulations. You may contact Mary Mahaffey, Bureau of Air and Radiation (BAR), at 785-296-1548 for more information on the MACT regulations.

Inventory Control Annual Summary Sheets will help KDHE prevent leaks from UST systems by alerting owners and operators where EPA Leak Check Calculations have failed for two consecutive months. Information on how many gallons are pumped during a month will help KDHE determine whether or not owners and operators have exceeded what's allowed for monthly throughput for their method of leak detection. Information on throughput is included on the third party certifications of leak detection methods posted on the National Work Group on Leak Detection Evaluations web site (http://www.nwglde.org/).

Completed Inventory Control Annual Summary Sheets are due to KDHE on February 28, 2010.

Instructions on the correct way to conduct inventory control may be found on the TMS website: www.tankmgmt.net. Click on "SIR."

Inspections

Spill buckets filled with water, product or debris ranked first for deficiencies reported during UST inspections conducted by KDHE between October 1, 2007, and September 30, 2008.

During that time, the Agency completed 926 inspections of facilities where USTs were being used.

Problems with overfill equipment followed in the number two position. Common overfill problems identified by KDHE inspectors included sites where USTs lack overfill equipment or that equipment was not operational.

(Continued on Next Page)

P.O. Box 678
Topeka, Kansas 66601-0678

115 SE 7th Street
Topeka, KS 66603

(785) 233-1414
FAX (785) 354-4374

Items remaining in the top ten list include:

#3 – Water or product in dispenser pans or tank sumps. Dispenser pans and tank sumps are found on newer UST systems. KDHE does not require the installation of dispenser pans and tank sumps.

4 – Broken spill buckets.

#5 (three-way tie) –

- Rectifier log readings for impressed current cathodic protection systems not being recorded every 60 days;
- Release detection equipment not operational (broken automatic tank gauges or bad tank measuring sticks);
- Daily entries missing from inventory control records.

#6 – EPA Leak Check not completed for inventory control.

#7 – USTs lack leak detection or leak detection system not checked every 30 days.

#8 – USTs and/or product lines failed the last cathodic protection test.

#9 – USTs lack drop tubes.

#10 (three-way tie) –

- No cathodic protection for buried metal pipe or flex connectors. Cathodic protection is required for buried metallic pipe risers leading from fiberglass product lines to dispensers when flexible connectors are not used. Otherwise, KDHE does not require but recommends that flex connectors be protected against corrosion;

- Automatic tank gauge has a light flashing because of an alarm;

- Mechanical leak detectors missing parts or removed from the submersible pumps.

Be sure to take care of any deficiencies that KDHE inspectors bring to your attention during UST inspections. While some are a matter of good housekeeping like keeping spill buckets clean, not taking care of some deficiencies could prevent KDHE from issuing UST operating permits. Out of the top ten, KDHE will not print permits for USTs that lack overfill equipment, have broken spill buckets, lack release detection, fail cathodic protection tests or have missing mechanical leak detectors. Additionally, KDHE will not print permits if owners and operators of USTs with impressed current systems have not kept up with rectifier logs.

Taking care of deficiencies in a timely fashion will result in you receiving your UST operating permits in a timely fashion.

TMS Announces Additional UST Operator Training Sessions for 2009

Tank Management Services, Inc. has announced the addition of Operator Training Sessions from April through July. The free training sessions last from 9 a.m.until 5 p.m., and registration is required. Class size is limited to fifty persons; so early registration is suggested.

To register, you may go to the TMS website: www.tankmgmt.net. Newly announced dates and locations are as follows:

April 6 - Topeka
April 8 - Hays
April 9 - Colby
May 6 – Emporia
May 12 – Wichita
May 13 – Wichita
June 3 - Kansas City, KS
June 4 – Manhattan
June 16 – Dodge City
July 7 – Great Bend
July 8 – El Dorado
July 9 – Independence

(*See TMS website for complete details*)

WHAT IS TANK MANAGEMENT SERVICES?

TMS provides loss control and risk management assistance to UST owners who have third party liability insurance through Great American Custom as part of the Kansas Underground Storage Tank Liability Plan.

TMS can provide you with information on USTs --leak detection methods and equipment, inventory reconciliation, tank and line testing, and Federal and State regulations. Call TMS toll free at 1-800-530-5683 during normal Central Time Zone office hours (8-5). In the Topeka area, please call 233-1414. David Engelken is available to answer your questions. This service is free.

Tank Management Services, Inc. (TMS) has provided the written information in this newsletter for educational purposes to assist UST owners and operators in complying with current UST regulations and to assist them in reducing losses associated with releases from USTs. The information is an outline and may not be complete. Owners and operators are responsible to insure that they are in compliance with all applicable laws. The Kansas Department of Health and Environment can provide detailed information on compliance. The application or use of the information provided is the responsibility of the individual user.