

INVESTING IN GEORGIA'S ENERGY, LAND & WATER RESOURCES

The Environmental Protection Division (EPD) CHECKLIST FOR REQUIRED RECORDS – Suction System

As part of the inspection process, The Environmental Protection Division (EPD) must ensure that facility records are maintained to document significant compliance with the GUST Rules. The following outline provides guidance for compiling the records necessary to satisfy the provisions of the GUST Rules. These records must be available for review at the time of the inspection.

I. UNDERGROUND STORAGE TANK (UST) NOTIFICATION REQUIREMENTS

A. Provide a copy of the facility's current ATR Certificate

II. FINANCIAL RESPONSIBILITY ASSURANCE

A. If the facility is a GUST Trust Fund Participant, provide:

1. Copies of gas invoices for the previous 36 months. These invoices must show that the Environmental Assurance Fees (EAFs) have been paid on each gallon of petroleum product purchased. This may also be listed as the GUST Fee or Tax. This is currently a .0075 dollar per gallon fee on the invoice.

and

- 2. Documentation of availability of *\$10,000 deductible, which may include:
 - Cash (must be documentation of cash assets exceeding \$50,000 to use this option)
 - Letter of credit designated for the Georgia Department of Natural Resources
 - Surety bond
 - *DOAS RISK MANAGEMENT

B. If the facility is <u>NOT</u> a GUST Trust Fund participant, provide a copy of <u>one</u> of the following:

- Insurance
- Letter of Credit
- Surety Bond
- Documentation showing that company's net worth exceeds \$10,000,000

III. RELEASE DETECTION FOR TANKS

A. If the facility uses Inventory Control with Tank Tightness Testing, provide all of the following:

- A copy of the monthly report, including the last 36 months of inventory readings and reconciliation results
- A copy of the last tank tightness test report
- The reports should include documentation of monthly water checks

B. If the facility uses Statistical Inventory Reconciliation (SIR), provide all of the following:

- A copy of the reports of last 36 months of SIR results
- The reports should include documentation of monthly water checks

C. If the facility uses Manual Tank Gauging (MTG), provide all of the following:

- A copy of the last 36 months of reports of stick readings and results
- A copy of the last tank tightness test if tank is 1,001-2,000 gallons in capacity

D. If the facility uses Automatic Tank Gauging (ATG), provide a copy of the last 36 monthly test reports (showing that the ATG conducted at least a 0.2 gph leak rate); the records should indicate at least one "pass" test result per month per tank.

E. If the facility uses Vapor or Groundwater Monitoring, provide all of the following:

- A copy of initial site assessment
- Documentation that portable or fixed monitoring device is functional and calibrated
- A copy of the monitoring well log reporting the monitoring wells have been checked at least once per month for the past 36 months

F. If the facility uses Interstitial Monitoring, provide all of the following:

- Documentation that portable or fixed monitoring device is functional and calibrated
- A copy of the interstitial monitoring log reporting that the interstitial space has been checked at least once per month for the past 36 months

IV. RELEASE DETECTION FOR PIPING

A. If the facility uses **Suction Piping**, provide either:

• Documentation that the piping system has only one check valve, which is located beneath the dispenser and the piping slopes back towards the tank.

or

 If the piping system has a check valve at the tank, provide a copy of the last tightness test conducted or a copy of the last 36 monthly reports of the monthly monitoring method used (such as SIR).

B. If the facility uses Pressurized Piping, provide:

- 1. A copy of **one** of the following:
 - The last annual line tightness test result
 - A copy of the last 36 reports of the monthly monitoring results (such as SIR)
 - A copy of the last 36 months of the electronic line leak detection tests conducted (0.2 gph test monthly or a 0.1 gph test annually)

and

- 2. A copy of **one** of the following:
 - The last test results of all mechanical line leak detectors
 - A copy of the electronic line leak detector report verifying that the device is operable and a 3.0 gph test was conducted and passed in the last year

V. REPAIRS - Provide documentation where applicable

- A. All tanks and/or piping repair records
- B. All release detection equipment repairs
- C. All records of tightness tests conducted after repairs

VI. SPILL / OVERFILL PREVENTION INFORMATION

A. If the facility uses ball float valves, provide documentation of installation.

VII. CORROSION PROTECTION FOR TANKS

A. If the facility uses non-corrodible material for tanks, provide documentation of installation.

- B. If the facility uses an Internal Lining, provide:
 - Documentation that an internal lining was applied
 - 10 year and/or five year internal inspection report
- C. If the facility uses an Impressed Current System, provide:
 - A copy of the last Cathodic Protection System test conducted on the tanks
 - A copy of the Rectifier log for the last twelve months showing amperage and voltage checked every 60 days
- D. If the facility uses Galvanic Cathodic Protection System (STI-P3), provide a copy of the last Cathodic Protection System test conducted on the tanks

VIII. CORROSION PROTECTION FOR PIPING

A. If the facility uses non-corrodible material for piping, provide documentation of installation

- B. If the facility uses Impressed Current System, provide:
 - A copy of the last Cathodic Protection System test conducted on the piping
 - A copy of the Rectifier log for the last twelve months showing amperage and voltage checked every 60 days

