

Debunking the Myths Around Compliance

Your service station may not be as compliant as you think

The experts at Crompco debunk six common compliance myths

In today's compliance-focused environment, making sure a service station consistently meets state and federal regulations remains an ongoing challenge for many owner-operators. Keeping track of complex and constantly changing regulatory requirements can be confusing. Not to mention that if you own stations in multiple states, you need to be aware of each state's individual regulations. Of course, non-compliance means stiff penalties. So how do you sort it all out?

In this article, Bob Dee, Executive Vice President at Crompco, the nation's industry leader in compliance testing solutions for underground tank systems, debunks the six top compliance myths to make it easier for you to navigate the most common compliance issues.

Myth #1

My Automatic Tank Gauge (ATG) will monitor my tanks and lines for leaks. All I need to do is sit back and sell candy and cigarettes, and only worry if an alarm should occur.

Regular testing is required! Regardless of whether you are using an ATG, electronic line leak detectors or interstitial monitoring to detect tank release and line leaks, monthly tests must be performed and records must be kept to show passing status. Depending on where your site is located, your state may require you to test your ATG to verify that all probes and sensors are working properly. In addition, your most recent records - often as far back as 12 months - must be available if requested by an inspector.

Myth #2

The spill buckets I had installed in my Underground Storage Tank (UST) fill ports back in 1996 are still fine for spill prevention.

Spill buckets are the most used and abused component of a UST system. Damaged spill buckets are the most common source of underground contamination, especially in the Northeastern United States where snowplows drive over them and cause considerable harm. The useful life of a spill bucket is *five years or less* and they should be kept clean and free of water and fuel at all times. Routine maintenance, including visual inspections before and after every delivery, should be made. In addition, several states are now requiring annual testing of spill buckets to verify their integrity.

Myth #3

I have an impressed current cathodic protection system installed in my underground steel tanks to protect them from corrosion, and I have the system tested according to my state's regulations (annually, every 2 or 3 years). So I needn't worry about corrosion protection, right?

Wrong! Impressed current cathodic protection systems require inspection at least every 60 days (30 days in some states) to verify that the rectifiers are turned on and emitting volts and amps to protect buried tanks. The inspection is as simple as documenting the volts, amps, hour of the meter reading and tap settings, and initialing a form to show that it was done. A written record must be available for inspection.

Myth #4

I have ball floats (a.k.a. vent valves, vent restriction devices, ball checks) installed for overfill protection in my UST system, so I must be in compliance with overfill protection requirements.

You may not be in compliance depending on your site's configuration, as ball floats are incompatible with certain systems. A ball float can be used as a backup or secondary means of overfill protection but cannot be used as the sole method of protection, if: 1) you receive deliveries via a remote fill pipe, 2) you have a coaxial Stage I vapor recovery system installed, 3) you have suction piping with an air eliminator inside the dispenser, or 4) you receive pressurized deliveries on your tank system. Some states are even considering banning the use of ball floats as a means of overfill protection. Alternate methods of overfill protection that may be used are electronic high level alarms and overfill drop tubes installed in the tank fills (a.k.a. flapper valves).

Myth #5

I had a testing company conduct all of my required tests in the past year, so I have nothing to worry about when an inspector shows up. My testing company has it all under control.

You may have had the required testing performed by your testing company, but do you have the documentation to prove it? Accurate record keeping is essential to avoid being penalized by an inspector. The inspector will need to see documentation as proof that the testing was completed, including all backup data. A cover sheet simply stating "pass/fail" will not suffice.

Myth #6

I had my testing company here within the past year; I have accurate test results ready for an inspector, and I have all my documentation in order. Nothing else could possibly go wrong.

There should be no issues here, but have you checked to see that your provider is properly certified or licensed to do work at your site? That's right, it's up to you, the owner, to verify that the service provider that you're using is properly trained and certified to perform the required work. Multi-state owner-operators are especially at risk to this problem, as licensing and certification requirements vary from state-to-state and even county-to-county in some areas! An inspector will reject test results received from a company or individual that is not properly licensed or certified, and you will be sent a notice of violation. You are now non-compliant and will have to pay another company to do the work again, causing additional down time and expense for your site.

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