



EGens Must Have Release Detection!

For many years, USTs in emergency generator systems were not required to be protected by release detection equipment. That changed in Oregon on October 1, 2020. All regulated USTs are now required to maintain release detection.

In our database, we have 142 active facilities with 177 tanks total that are associated with emergency generator systems. Of these 177 tanks, there are 77 in our database with no release detection method. That's 43%, which is a very sobering statistic.

If you have an emergency generator UST that is not currently protected with release detection equipment, you **must** either upgrade your system to include release detection or decommission the tanks. If you are in this situation, please reach out to a UST inspector to discuss your path forward.

UST Testing Documentation and Procedures

As a permittee, you must test your UST system according to a nationally-recognized code of practice or manufacturer specifications. Owners and operators must hire a DEQ-licensed UST service provider to do the compliance testing; however, you must understand yourself what tests are required and the appropriate methodology for each test. If the testing is not completed according to a nationally-recognized code of practice or manufacturer specifications, then that testing is not in compliance with the UST rules. This may result in enforcement action and require retesting of the equipment.

You should ensure that you're getting the specific tests required for your facility (e. g., integrity test of spill buckets) and that the test is being conducted according to an approved method using the proper testing procedures (e. g. hydrostatic test, vacuum test, Dri Sump test, the Franklin Sump Test System, or manufacturer specifications). Upon completion of the testing, you must ensure you receive the appropriate test result forms that document that the appropriate testing method was completed. DEQ requires that testing is completed correctly and that proper documentation is provided. If the service provider does not perform the correct test or provide you with the appropriate documentation, you as the permittee may be subject to enforcement. The corrective action may require re-testing that only can be completed by DEQ-licensed UST service provider.

When a UST service provider performs tests at your facility, make sure they're performing all of the necessary steps. When you receive the test results, read through them to make sure each test is fully documented. A checkbox next to a test that says "Passed" is not sufficient if there is nothing written down about the test procedure itself.

The Petroleum Equipment Institute (<https://www.pei.org>) publishes recommended practice guides for many aspects of UST systems. The PEI RP1200 is a nationally-recognized code of practice for overfill, leak detection and release prevention equipment testing. While the RP1200 itself must be purchased from PEI, the testing report forms are available for free download from PEI's website. (cont.)

UST Testing Documentation and Procedures (cont.)

As an example, let's look at spill bucket testing. Spill buckets are supposed to catch fuel dripping from delivery hoses. The new UST rules that came into effect in Oregon on October 1, 2020 require testing single-walled spill buckets every three years. The simplest test is called a hydrostatic test. Appendix C-3 is the form for recording spill bucket testing; it is reproduced on page 4.

The steps are:

1. Clean and inspect the spill bucket to remove water and debris and make sure there are no obvious cracks or holes.



2. Make sure that the fill cap is sealed on the riser and that any drain valve is leak-tight.
3. Fill the spill bucket with water to within 1½ inches of the top. Let the water settle for 5 minutes. The water should cover the fill cap.



4. Put a measuring stick into the spill bucket touching the lowest part and make sure it stays put. You must leave it undis-



turbed for an hour. Note the time you begin the measurement, and the level of the water to within 1/16 of an inch.

5. After an hour, note the level of the water again to within 1/16 of an inch, and the time of the second measurement.
6. Pump out the water, **dispose of it properly**, and dry the inside of the spill bucket.

The test passes if the water does not drop more than 1/8 of an inch in the hour.

It is a simple test, but the key points to document are the two measurements of the water level and the times the measurements were taken. Without those measurements, the testing documentation is incomplete, and the **test result is not valid**.

When reviewing your testing documentation during an inspection, DEQ will look for these measurements and times. If the test results do not include them, you will receive a **field citation and penalty** for failure to perform the test, and a required corrective action to perform the test correctly.

Make sure that the testing documentation that you receive from your service provider includes the code of practice followed and all required measurements. Do not accept results that only specify "Passed."

(cont.)

UST Testing Documentation and Procedures (cont.)

Each test has its own requirements according to its code of practice or manufacturer requirements. When testing automatic tank gauges, for example, the tester must remove probes from the tank and ensure that the floats move freely and trigger alarms at the appropriate places. Both these measurements and the alarm history are required documentation for this test.

Although UST service providers must be licensed by DEQ to perform these tests, as the permittee, you are ultimately responsible for ensuring that your UST system is tested properly, and failure to perform testing properly will result in enforcement and penalty to you.

DEQ inspectors are here to answer your questions. If you would like more information about your test results, please don't wait until your next inspection.

Proof of Financial Responsibility

You must notify DEQ within 30 days of the expiration of your financial responsibility (FR). Operating a UST system without current proof of financial responsibility is a violation subject to enforcement and penalty.

DEQ will send you a reminder in the month before your FR expires. If you use pollution liability insurance as your FR method, make sure that your insurance agent sends us a Certificate of Insurance, **not an ACORD form**.

We Need Your Email!

We're still collecting email addresses for every active facility. This lets us send you direct reminders to update your financial responsibility (see above) as well as other important program information. When the UST program goes live in Your DEQ Online, your email address will be how you access your facility's account to submit paperwork and pay fees.

If you've already provided your email, thank you! If not, please visit <https://forms.office.com/g/WKrybAzFgk> or scan this QR code with your smartphone.



APPENDIX C-3

**SPILL BUCKET INTEGRITY TESTING HYDROSTATIC TEST METHOD
SINGLE- AND DOUBLE-WALLED VACUUM TEST METHOD**

Facility Name:		Owner:				
Address:		Address:				
City, State, Zip Code:		City, State, Zip Code:				
Facility I.D. #:		Phone #:				
Testing Company:		Phone #:			Date:	
This procedure is to test the leak integrity of single- and double-walled spill buckets. See PEI/RP1200 Section 6.2 for hydrostatic test method, Section 6.3 for single-walled vacuum test method and Section 6.4 for double-walled vacuum test method.						
Tank Number						
Product Stored						
Spill Bucket Capacity						
Manufacturer						
Construction	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled
Test Type	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled	<input type="checkbox"/> Hydrostatic <input type="checkbox"/> Vacuum <input type="checkbox"/> Single-walled <input type="checkbox"/> Double-walled
Spill Bucket Type	<input type="checkbox"/> Product <input type="checkbox"/> Vapor	<input type="checkbox"/> Product <input type="checkbox"/> Vapor	<input type="checkbox"/> Product <input type="checkbox"/> Vapor	<input type="checkbox"/> Product <input type="checkbox"/> Vapor	<input type="checkbox"/> Product <input type="checkbox"/> Vapor	<input type="checkbox"/> Product <input type="checkbox"/> Vapor
Liquid and debris removed from spill bucket?*	<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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Visual Inspection (No cracks, loose parts or separation of the bucket from the fill pipe.)	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail
Tank riser cap included in test?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Drain valve included in test?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Starting Level						
Test Start Time						
Ending Level						
Test End Time						
Test Period						
Level Change						
Pass/fail criteria: Must pass visual inspection. Hydrostatic: Water level drop of less than 1/8 inch; Vacuum single-walled only: Maintain at least 26 inches water column; Vacuum double-walled: maintain at least 12 inches water column.						
Test Results	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail
Comments:						

*All liquids and debris must be disposed of properly.

Tester's Name (print) _____ Tester's Signature _____

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us.

This document is available to view on DEQ's website at <https://www.oregon.gov/deq/tanks/Pages/UST-Forms.aspx>