UST Testing Documentation and Procedures

On Dec. 6, 2022, the UST program presented a webinar on our new Annual Release Detection Operability Testing form. The new form is available on our webpage (https://www.oregon.gov/deq/tanks/Pages/UST-Forms.aspx) along with instructions and reference documents. You can also view a recorded version of the webinar.

The point of UST regulation is to prevent the release of petroleum products into the environment, so release detection operability testing is at the heart of testing requirements for UST systems. If you use interstitial monitoring, you must ensure that your sensors are able to detect liquid product where it collects, and if you use static or continuous .2 gph testing, you must ensure that the probes that measure the level of product in your tank are accurately reporting volumes.

The new rules that came into effect in Oregon on Oct. 1, 2020 require testing these systems every year. The rules that govern UST systems in Oregon apply to permittees, so if your service provider does not perform a test correctly, you as the permittee are subject to the enforcement and penalty resulting from that failure. It is in your own best interest to understand the requirements for both performing and documenting these tests so you can make sure you have the correct documentation available during your inspection.

Both interstitial monitoring and .2 gph testing rely on the automatic tank gauge (ATG) attached to your UST system. **In-tank** setup and alarm history reports must be attached to any form that is used to document release detection operability testing. Only by looking at those reports printed out from your ATG can the DEQ inspector verify that the steps required by the testing procedure were actually performed.

The testing method you use must be either:

- A nationally-recognized code of practice (RP-1200, published by the Petroleum Equipment Institute)
- The ATG manufacturer's specifications (i.e. Veeder-Root, Franklin or other ATG manufacturer)
- A method approved by DEQ

Our approved method is described in the instructions that accompany our form on our website, and are outlined below. This method is based on both the RP-1200 and the tank gauge manufacturer specifications.

Testing Tank Gauge Probes

1) Disconnect the probe from the ATG. This should trigger the alarm.



2) Clear the tank gauge alarm Veeder Roots may take a few minutes for the alarm to sound



UST Testing Documentation and Procedures (cont.)

3) Carefully remove the probe from the tank, and check that the floats move freely. Lay down the probe next to a tape measure, and reattach the cable that connects to the ATG



5) Replace the probe in the tank.



Testing Sump Sensors

1) Fill a small container with either water (for non-discriminating sensors) or test liquid



4) Slowly move the fuel float up until it triggers the high product alarm, and measure where that happens. Do the same with the water float. Check the measurements to make sure they correspond to the values programmed into the ATG.



6) Print out the alarm history and attach it to the testing results form

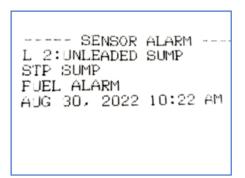


2) Place sensor in liquid-filled container



UST Testing Documentation and Procedures (cont.)

3) Verify that sensor is in alarm at the tank gauge



5) Attach the alarm history report to the testing documentation form



4) Clear the alarm and replace the sensor at the lowest point in the containment sump



6) Repeat for all sensors

Again, operators are responsible for making sure that all testing is conducted correctly and in accordance with UST rules. You're probably paying quite a bit of money for these tests. Make sure you're getting what you paid for!

DEQ UST inspectors are here to help you better understand the testing requirements and offer technical assistance. Inspectors are willing to be on-site with your tester to ensure the proper testing is completed. Our five inspectors cover the entire state of Oregon, so there is a chance that one of us will be in the area when your testing is scheduled. Please give us as much notice as possible. We may not be able to make it to all testing at all facilities, but we want to try.

Send Forms with your Payments

When sending payments to DEQ, please include a copy of the relevant form with your check. Our Business Office handles payments for dozens of environmental programs, and staff need the information on the form to post the payment to the correct account. If paying via ACH transfer, please send an email to DEQAR@deq.oregon.gov (also listed on the ACH instructions) alerting the Business Office to the incoming transfer. Returned ACH transfers incur bank charges, and you won't get all of your money back if we have to return a payment we can't post.

This applies to all UST-related payments: field citation penalties, annual tank fees, 30 day notice to install, owner/permittee modification forms and discovered tanks.

New Faces at DEQ

We have many new people in the UST program, so it's time to update your list!

Inspector home office phone number	Headquarters Staff title phone number
Lauren Dimock	Sharon Al-Najran
Portland 503-229-6030	Hazardous Waste & Tanks Support 503-229-5889
Mark Drouin	Diana Foss
Portland 503-229-5496	Senior Policy Analyst 503-229-5733
Dylan Eckert Eugene 541-686-7517	Steve Paiko Permitting & Licensing Coordinator 503-229-6652
Ingrid Gaffney	Dave Pardue
Portland 503-229-5048	Tanks Program Coordinator 503-229-6085
Andrea Garcia	Jenna Throckmorton
Medford 541-776-6003	Operations & Data Analyst 503-568-6716
Christina Morris (UST Duty Officer)	David Livengood
Portland 503-229-5034	Hazardous Waste & Tanks Manager 503-229-5769
Mike Kortenhof (Fuel Tank Inspection Section Manager) Portland 503-229-5474	

Our inspectors now cover the whole state, rather than the old county assignments you may remember. The same Tanks toll-free number is still available: 800-742-7878 Oregon only

We Still 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.



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.