

Preparing for a smooth inspection

Our UST inspectors conduct each site visit in hopes of not finding a violation! Lack of violations indicate all testing has been completed and all equipment is operating correctly. When an inspector can pass a facility with no citations, they are thrilled with these conditions.

Leathers Fuels is an Oregon-based company with 25 UST facilities all over the state. They are family-run, with about 130 employees, and they operate gas stations with convenience stores, truck stops and cardlock facilities: the whole gamut of commercial UST fueling sites. There are 86 active tanks among these facilities, and their average age is 28.8 years. Owner Brent Leathers says:

Leathers Oil Company started in 1958 with a single station in Sandy, Oregon. Through the years, it grew to 31 locations throughout Oregon, aided primarily by the exodus of many oil companies during the "Oil Embargo" period of the 1970's. Station locations included some of the far reaches of the state, like Lakeview, Umatilla, John Day, Hines, and Medford.

The late 1980's brought about many challenges with the new environmental and UST regulations. Lila Leathers bought 100% ownership in 1989, just in time to embrace these new challenges. Many of the existing sites had historical petroleum releases that proved costly to mitigate, along with the "educated guesses" about which new UST system components provided the best protection going forward. Leathers' staff chose a variety of methods to upgrade tank systems, with an emphasis on the tank gauge and line leak detection methods. Monitoring and maintaining those protective systems has been an emphasis of Leathers' operations, in recognition of the importance of mitigating any possible release.

Over the years, Leathers has developed a strategy to help their UST inspections go efficiently and thoroughly. Upon arrival, a representative of Leathers greets us at the tank nest and the inspection begins.



Tank top sumps are accessible, clean and dry, sensors are installed correctly, and interstitial boots are open.

This tank was installed in 1998!

The strategy starts with having tank top lids and dispenser cabinets open and ready as the inspector arrives on site.





Preparing for a smooth inspection (cont.)





Again, UDC sumps are clean and dry and sensors are installed correctly, able to detect liquid at the lowest part of the sump.

Dispensers are blocked off from traffic.



Tank gauges are easily accessible, and Leathers ensures that someone is present at the facility who knows how to print any required paperwork and sound the overfill alarm.

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And lastly, Leathers ensures that compliance testing paperwork is emailed to inspector a couple of weeks before the inspection. This allows the inspector to evaluate the testing before going to the site.

Leathers' strategy for conducting inspections limits the disruption to their customers by decreasing the inspectors' time on-site. DEQ appreciates Leathers' effort to maintain their equipment and welcome us to their facilities in this manner, and letting us show their operations in this article.

Inspectors are not looking for violations but are looking to ensure that testing is being conducted in a timely manner and equipment is being properly maintained. One way to get an inspector off your facility as fast as possible is to ensure the equipment is easily accessible and in working order, and that records are available for quick inspection. On the following pages, you'll find a few things inspectors will look at during an inspection.

Preparing for a smooth inspection (cont.)

Spill buckets must be visually inspected at least once a month. Spill buckets full of debris or water may limit the effectiveness of catching overages from fuel drops and may require extensive cleanups over time.



Poorly maintained spill bucket: filled with dirty liquid



Containment sumps such as tank top sumps and dispenser sumps need to be inspected yearly. The inspection is to ensure the sumps are clean and properly maintained, which may help limit a catastrophic release from equipment.



Preparing for a smooth inspection (cont.)



Poorly maintained dispenser containment: full of liquid



Well maintained dispenser containment: clean and dry

As if that is not enough, operators are also required to maintain testing records, for years sometimes. A few minutes of preparation from the operator can determine how long an inspector stays at the facility



Alternative fuel compatibility

A 90-10 blend of gasoline and ethanol is now the standard across the US. If you sell clear premium, with no added ethanol, you can't help but notice the difference in corrosion on your equipment when you open the turbine sumps. Ethanol is alcohol, and, just like a bottle of wine that's been left open for a while, the mixture of gasoline and ethanol sitting in your tank grows bacteria, the bacteria that make vinegar. Vinegar is an acid, and acid corrodes metal. Similar processes happen in UST systems storing diesel blended with biodiesel, although ethanol problems tend to appear in sumps while biodiesel seems to affect tanks more.

These effects increase with the concentration of ethanol or biodiesel blended with the fuel, and so Oregon requires you to prove the compatibility of your UST equipment if you want to store gasoline blended with more than 10% ethanol, or diesel blended with more than 20% biodiesel. We call these higher blends "alternative fuels."

We will be reaching out to those facilities where our database has a record that you are storing alternative fuels. If our information is correct, then we will require proof of system compatibility with the substance you're storing. If our information is outdated, then we'll appreciate the correction!

At the right are some examples of ethanol corrosion due to vapor leaks in containment sumps.

Corrosion will reduce the life expectancy of the equipment and may also interfere with release detection. A few minutes of maintenance may prevent a large release!

For more information, scan below to check out DEQ's "Demonstrating UST System Compatibility with Alternate Fuels"





Installed March 2019. New piping, union, and coupling



May 2023 inspection. Corrosion due to gasoline vapors containing ethanol escaping from loose equipment





Blue residue on copper piping is a result of corrosion due to gasoline vapors

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