



# Fuel Services Group

*You Count On Us – Because They Count On You!*  
Contact us at 1-800-340-1759 or email mark.worden@fuelservicesgrp.com



## New Requirements for ALL Facilities beginning 13 October 2021 in Tennessee

*Due to this affecting all UST facilities, do not wait until the last minute to try to schedule services as most providers are scheduling months out.*

- 1) Release Detection is now required for Emergency Generators
- 2) Spill and Overfill Prevention Equipment Testing
- 3) Release Detection Equipment Testing
- 4) Sump Integrity Testing – IM
- 5) Monthly and Annual Walkthrough Inspections
- 6) Compatibility

### 1) Release Detection is now required for Emergency Generators.

All emergency generators will be required to begin performing tank and piping release detection by October 13, 2021. If you have safe suction, this does not require release detection as it will be returned back to the tank in the event of a loss of pressure/suction.

### 2) Spill and Overfill Prevention Equipment Testing

The first one must be conducted prior to October 13, 2021.

- a) Conduct a spill bucket integrity test every 3 years or use a double-walled spill bucket with interstitial monitoring (continuously monitored). Maintain records for 3 years.
- b) Conduct an overfill functionality testing, includes all forms of overfill protection that you have with your system, every 3 years. Maintain records for 3 years.
  - i) Overfill Prevention Flapper Valve - it is inspected to verify functionality, measured to ensure it activates at 95% and length verified to ensure it extends to proper distance from bottom of tank to prevent static buildup during deliveries.
  - ii) High Volume Alarm – the probe is removed and it is inspected for operability, functionality, and measured to ensure that it activates at 90% to alert delivery driver that tank is almost full. The fuel float is moved to the 90% mark to ensure that the alarm activates, the light flashes, and that it is in the appropriate location to be seen and heard by the delivery driver.
  - iii) Ball Float Valve – It must be removed to be inspected for operability and that it is set to activate at the 90% mark. These typically have issues with rust, corrosion, and failure. If it cannot be removed intact and operable – it must be removed and replaced with another

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form of overfill protection if this was your only form. They are no longer authorized to be repaired or installed.

- c) Test/Inspect components within 30 days after a repair to spill or overfill prevention equipment. Maintain all records of repair for the life of system and keep test records for 3 years.

### 3) Release Detection Equipment Testing

Annual testing of electronic and mechanical release detection components are now required. Maintain annual testing records for 3 years (must have three previous annual tests on file).

**The first one must be conducted prior to October 13, 2021.**

- a) Automatic Tank Gauge (ATG): This will check the configuration file, setup, run diagnostics, test battery backup, test alarm, and ensure it is working properly.
- b) Test all probes and sensors: inspection for operability and to ensure they are communicating with the ATG (controller).
- c) Automatic line leak detector function tests
- d) Vacuum pumps and pressure gauges (if installed)
- e) Test all IM tank and sump sensors to ensure operability and they are placed properly.

### 4) Sump Integrity Testing – IM

**The first one must be conducted prior to October 13, 2021.**

- a) Systems using Interstitial Monitoring (IM) for piping release detection must conduct a sump integrity test every 3 years. Maintain records for 3 years.
- b) All tanks, piping or sump repairs must be integrity tested within 30 days of completion of repair (if used for IM). Maintain records of repair for life of UST system and maintain integrity test for 3 years.

This includes sumps, transition sumps, dispenser sumps, and spill buckets. The test must follow TN DEC Division guidance or nationally recognized testing protocol.

Double wall spill buckets with interstitial monitoring sensor is exempt from the 3 year hydrostatic testing if sensor is installed in the annular (interstitial) space.

If ever in question, refer to TN DEC Underground Storage Tank division, Contact information at bottom of sheet.

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## 5) Monthly and Annual Walkthrough Inspections

Periodic operation and maintenance walkthrough inspections must begin **NO LATER than October 13, 2021.**

**A) Monthly walkthrough inspections** performed and recorded every 30 days on an approved TN DEC Division Form (or pre-approved alternate form). Walkthrough shall include the following:

- a) Inspect spill prevention (sumps and buckets) for:
  - i) Liquid, debris, or damage – Remove all liquid / debris (if liquid – ensure proper disposal methods).
  - b) Visually inspect the tank fill riser drop tube and flapper valve (if present) for damage.
    - i) Fill Cap – Check for proper fitting, gasket condition (free from cracks or deterioration)
    - ii) Obstructions – Remove all obstructions and annotate of form.
  - c) Operability of release detection equipment.
    - i) If using Automatic Tang Gauge (ATG)
      - No alarms or unusual operating conditions
      - Review monthly release detection
      - Report all suspected releases
      - Interstitial monitoring checks
        - Check sensor reports – all sensors should be normal, no alarms. Any previous alarms should be listed in the ATG Log with response actions to the alarms and outcomes.
        - Conduct static test if no monthly result is available.
        - Report all suspected releases
      - Must be conducted in accordance with one of the following procedures:
        - Device manufacturer’s instructions
        - A nationally recognized practice (such as Petroleum Equipment Institute (PEI)).
        - A Format established by the TN DEC UST Division
        -
    - ii) If using Statistical Inventory Reconciliation (SIR)
      - Review data and accuracy of daily fuel level readings
      - Check tank monthly for water (water finding paste)
      - SIR reports received every 30 days from vendor
      - Review results and report suspected releases
  - d) Presence of alarms or other unusual operating conditions.
  - e) Review of current release detection records.

Monthly walk-through records must be maintained for a minimum of 12 months.

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- B) Annual walkthrough inspections** performed and recorded annually (once every 12 months) on an approved TN DEC Division Form (or pre-approved alternate form). Walkthrough shall include the following:
- a) Inspect all operating equipment, contained and uncontained for damage leaks to the containment area, or releases to the environment; remove liquid (in contained sumps) or debris.
  - b) Inspect handheld release detection equipment (gauging sticks) for operability and serviceability.
  - c) Inspect spill prevention (sumps and buckets) for:
    - i) Liquid, debris, or damage – Remove all liquid / debris (if liquid – ensure proper disposal methods).
  - d) Interstitial Monitoring (IM)
    - i) Inspect containment sumps visually for damage
    - ii) Remove liquid and debris from sumps
    - iii) For double wall containment sumps, check for leaks in the interstitial area
    - iv) Annual testing of sensors for tank, STP, and dispenser sumps is now part of annual leak detection equipment testing.
  - e) Sump (dispenser, STP, and transition) walkthrough inspections for partially contained or uncontained operating equipment include checking for:
    - i) Visually inspect equipment for damage or corrosion.
    - ii) Leaks to the containment area
    - iii) Releases into the environment
    - iv) Remove liquid and debris for inspection of ancillary equipment/fittings

Annual walk-through records must be maintained for a minimum of 12 months.

For monthly and annual walkthrough inspections:

- (1) Keep a list of each area checked.
- (2) If each area was acceptable or needed action taken
- (3) Description of actions taken to correct the issue
- (4) Delivery invoices if spill buckets are checked less than every 30 days due to infrequent deliveries

## 6) Compatibility

This usually does not apply to Emergency Backup Generators due to a requirement by the generator manufacturer regarding biofuels, however, you should be aware of it.

Any UST system used to store regulated substances blended with greater than 10% ethanol or greater than 20% biodiesel must comply with requirements for fuel compatibility.

The Owner/Operator will need to

- (1) notify the TN DEC UST Division 30 days prior to storing biofuels greater than 10% ethanol or greater than 20% biodiesel.

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(2) Provide documentation showing compatibility of ALL UST system components including:

- a) Tank
- b) Piping
- c) Containment sumps
- d) Pumping equipment
- e) Release detection equipment
- f) Spill equipment
- g) Overfill equipment

All testing must be conducted by a “Qualified person” as defined by the U.S. EPA:

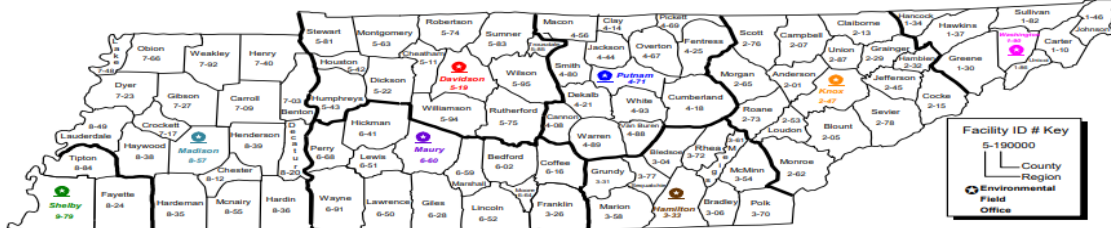
- (1) Licensed contractor certified by device manufacturer.
- (2) Approved by authority having jurisdiction (Division of UST)
- (3) Conducted in accordance with Divisions guidance and can demonstrate adequate experience
- (4) Obtain certification from nationally recognized organization (petroleum equipment institute (PEI)).

List of UST Division forms can be found at: <https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/ust/ust-forms-guidance>

June 1, 2020

## TENNESSEE DIVISION OF UNDERGROUND STORAGE TANKS ENVIRONMENTAL FIELD OFFICES

CENTRAL OFFICE ADDRESS 12<sup>th</sup> Floor, TN Tower (615) 532-0945  
312 Rosa L. Parks Ave. (615) 532-0199 (Fax)  
Nashville, TN 37243 Website: <https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks.html>



**JOHNSON CITY FIELD OFFICE**  
Region 1 – Washington County- 90  
2305 Silverdale Rd.  
Johnson City, TN 37601-2162  
(423) 854-5400  
(423) 854-5401 (Fax)

Kevin Rice.....	(854-5441)
*Don Taylor.....	(854-5391)
*Mark Braswell.....	(854-5459)
Mitzie Berry.....	(854-5444)
Margaret Greene.....	(854-5443)
Heather Mott.....	(854-5486)
Dustin Turner.....	(434-6625)

\*Central Office Positions

**KNOXVILLE FIELD OFFICE**  
Region 2 – Knox County- 47  
3711 Middlebrook Pike  
Knoxville, TN 37921-5602  
(865) 594-6035  
(865) 594-6105 (Fax)

Holly Marlowe.....	(594-5448)
Chris Lewis.....	(594-5449)
Todd Bixler.....	(594-5455)
Kyle Beverly.....	(594-5453)
Jessica De Hope.....	(594-5454)
Rick Huchison.....	(594-5456)
David Stone.....	(594-5508)
Killen Middleton.....	(594-5558)
*Doug Cantrell.....	(594-2145)

**CHATTANOOGA FIELD OFFICE**  
Region 3 – Hamilton County- 33  
1301 Riverfront Parkway, Suite #206  
Chattanooga, TN 37402  
(423) 634-6745  
(423) 634-6389 (Fax)

Randy Slater.....	(634-5737)
Donene Beckett.....	(634-5722)
Nigel Luther.....	(634-5760)
Bruce Rohrbach.....	(634-5850)
Tonya Spence Casson.....	(634-5723)
*Ricky Cathey.....	(634-6024)

**COOKEVILLE FIELD OFFICE**  
Region 4 – Putnam County- 71  
1221 South Willow Ave.  
Cookeville, TN 38506  
(931) 520-6688  
(931) 432-6952 (Fax)

Frank Pointer.....	(520-6669)
Stacey Clark.....	(520-6671)
Sara Kenney.....	(520-6662)
Justin Evans.....	(520-6670)

**NASHVILLE FIELD OFFICE**  
Region 5 – Davidson County- 19  
711 R. S. Gass Blvd  
Nashville, TN 37216  
(615) 687-7000  
(615) 687-7078 (Fax)

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Carrie Ansell.....	(532-0987)
Robert Wilson.....	(687-7093)
Mark Brinton.....	(687-7096)
Paige Ottenfeld.....	(253-3994)
Ethan Ralph.....	(687-7094)
Jo McCrary.....	(532-0123)
Kim Kirk.....	(532-0141)

\*\*Nashville Field Office Continued

**COLUMBIA FIELD OFFICE**  
Region 6 – Maury County- 60  
1421 Hampshire Pike  
Columbia, TN 38401  
(931) 380-3371  
(931) 380-3397 (Fax)

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*John Wright.....	(687-7089)
Drew Storm.....	(687-7095)
Katrina Hunter.....	(687-7086)
Hannah Nodell.....	(253-3236)

**JACKSON FIELD OFFICE**  
Region 7 & 8 – Madison County- 57  
1625 Hollywood Drive  
Jackson, TN 38305  
(731) 512-1300  
(731) 661-6283 (Fax)

Ronda Johnson.....	(512-1342)
Ben Rowsey.....	(512-1344)
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**MEMPHIS FIELD OFFICE**  
Region 9 – Shelby County- 79  
8383 Wolf Lake Drive  
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(901) 371-3000  
(901) 371-3170 (Fax)

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Casey Norris.....	(371-3034)
Jonathan Wilson.....	(371-3030)
Kyle Moore.....	(578-4059)

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