Inspecting High Throughput Facilities

An Inspector’s Challenge
• Schedule appropriately (Sundays seem best) and allow for a full day
• Avoid pre- and post- holiday work days
• Site security is usually good: open, well-lit, lots of foot and vehicle traffic
• Introduce yourself upon arrival and obtain keys for fill ports and diesel dispensers
• Check the ATG while in the store
• Many have a maintenance/manager that is expected to accompany an inspector
• Wear an orange vest and use safety cones and inspection vehicle for traffic control
• Take an additional person to help
  – Significantly reduces field time and its another pair of eyes to watch traffic
  – Often 20 plus dispensers, and 6 or more USTs
Security on diesel dispensers, multiple padlocks and bars or a single pin all through the dispenser cabinet with padlock
Release Detection- What to look for?

- Piping release detection
  - Is it running 3.0 g/h checks? 0.2 g/h monthly tests? 0.1 g/h annual tests?
  - Is the pump running constantly?
  - Is ALL piping being monitored? From the master to the satellite dispenser?
Fig. 1

MASTER

Solenoid Valve (normally closed)

INLET

Solenoid Valve (normally open)

HOSE 1

SATELLITE

Solenoid Valve (normally closed)

HOSE 2
• Can the ELLD monitor the product line through and beyond the meter?
• Recommend operability tests be performed at the satellite dispenser to verify
• When using Red Jacket BIG-FLO Submersible Pump Models P100H1, P200H1, P200H3, P300H3, P500H3, the PLLD only performs 3.0 gph testing and not precision (0.2 and 0.1 gph) testing.
High-throughput facilities

- Over 800,000 gallons per system per month
- System is an independent tank OR a system of manifolded tanks
- 1 month in - 12 months out
- CITLDS (Continuous in tank leak detection system)
- Interstitial monitoring- electronic/continuous
- Chemical/Vapor monitoring every 15 days
Spill prevention

- Many have drains/ oil water separator in lieu of spill basins
Check concrete for cracks that will allow product into the environment
Where does the oil go for storage?
Check for runoff or discharge from OWS
Overfill Prevention

- Check to see if appropriate for system type
- Evaluate effectiveness for operation
- Ensure it is in working order
Overfill Prevention Inoperable - Confirm tank overfill alarm is properly programmed and operational for all tanks.
Other things to look for:

- Unusual or atypical configurations
- Some facilities may have piping that may or may not be a part of the UST system depending on your state interpretation
- This piping can be the source of a large unnoticed release due to lack of monitoring
Bulk supply systems