Did a Release Occur?
Investigation 101

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What might trigger an investigation?

- Discovery of physical damage or degradation
  - Split or cracked penetration boot
  - Split or cracked containment device
  - Severely corroded penetration boot hardware
  - Apparent deformation of containment device
What might trigger an investigation?

- Positive response of a release detection system or device (non-fuel/product)
  - Loss of brine
  - Loss of pressure or vacuum
  - Sensor alarm
  - Visual observation of liquid in interstitial space
What might trigger an investigation?

- Positive response of a release detection system or device (fuel/product)
  - Loss of brine
  - Loss of pressure or vacuum
  - Sensor alarm
  - Visual observation of product in interstitial space or containment device
Now what?

• Find the source/cause of the product and stop.
• Remove product from interstice and/or containment device.
  – Especially for tank interstices this may take several events.
• Complete inspection of the visual portions of the containment.
• Determine type of testing required
  – Tank interstice
    – Manufacturer test protocol
    – NFPA 30: 2-8
  – Piping interstice
    – Manufacturer test protocol
    » Ability to isolate
  – Spill Containment Unit
    • Double wall
      – Manufacturer test protocol
    • Single wall
      – Manufacturer test protocol
      – Hydrostatic
      – Vacuum or Pressure
  – Containment sump
    – Manufacturer test protocol
    – Hydrostatic
    – Vacuum or Pressure
• Test Results
  – Passing: no environmental testing warranted
  – Failing
    • Determine type, scope, and timing of environmental testing
    • Determine location of testing

• Implement Restoration Process per applicable regulations