WHAT LEAK DETECTION DOCUMENTATION MUST I PROVIDE WHEN ENROLLING AN UNDERGROUND STORAGE TANK IN THE NEVADA PETROLEUM FUND?

When enrolling an underground storage tank (UST) for the first time in the Petroleum Fund, or when re-enrolling a UST after November 30th of any year, you must provide documentation that shows neither the tank nor the associated underground distribution piping is leaking. Below, you will find two options that identify acceptable UST testing methods. You may choose whichever option is more convenient or economical for you.

OPTION #1: TANK AND LINE TIGHTNESS TEST REPORT

To be valid for enrolling a UST in the Petroleum Fund, testing results must indicate a tightness test was performed in accordance with 40 CFR 280.43(c) for tanks and 280.44(b) for piping. Each tank and its associated underground distribution piping must pass the tightness test, and the test must have been conducted within the past 6 months by a Nevada Division of Environmental Protection (NDEP) Certified Tank Tester. To obtain a list of NDEP Certified Testers, please visit http://nevadaenvironmentalactivities.ndep.nv.gov and click the *View Certification List* link at the bottom of the page. Underground Tank Testers are located near the bottom of the list. You may also contact Petroleum Fund staff at (775) 687-9368.

OPTION #2: DOCUMENTATION OF MONTHLY LEAK DETECTION MONITORING

Owners and operators of most USTs are required by federal and/or state regulations to document that they are using an approved method of leak detection each month. If you have such documentation you may use it instead of a tightness test to enroll in the Petroleum Fund. To see what documentation you need to send review both sections A and B below to find the methods of leak detection you are using for your tank(s) and for the associated underground product piping. Submit the requested documentation as outlined in sections A and B to NDEP – Attention Petroleum Fund.

Option #2--Section A: Acceptable Leak Detection Documentation for Your Underground Tank(s)

Look at the list below for the method of leak detection that you are using for each tank at your facility, and provide the indicated documentation to demonstrate the tank is not leaking.

Automatic Tank Gauging (ATG) or Continuous In-Tank Leak Detection (CSLD):

If you are using this method, your ATG or CSLD should be set up to perform at least one leak test per month on each tank (this is different from the daily inventory readings). Submit copies of your CSLD reports or other leak tests for the last six months (or the life of the tank, whichever is less).

Double-walled Tank(s) with Interstitial Sensor:

If you are using this method, at least once per month you must document that power is on to the sensor and whether or not the alarm is sounding. This is usually done either by printing out a "sensor status" or "liquid status" report once per month, or by manually keeping a sensor status log that shows the date, the power status, and the sensor status each time the sensor is checked. Submit copies of your sensor status reports or log for the last six months (or the life of the tank, whichever is less).

Statistical Inventory Reconciliation (SIR):

If you are using this method, you must keep on file the monthly SIR compliance reports for each tank for the last 12 months. Submit copies of the SIR compliance reports for the last six months (or the life of the tank, whichever is less).

Inventory Control combined with Tank Tightness Testing:

You may use this method of leak detection for only ten years after the tank was installed with corrosion protection or had corrosion protection added to it. If you are using this method, you must keep monthly inventory records for each tank, which **must be reconciled each month** to determine if any leaks have occurred. You must also have a Tank Tightness Test performed on each tank every five years by a Nevada Certified Tank Tester. Submit for each tank a copy of your most recent tank tightness test report, if it is less than 6 months old. Otherwise submit your reconciled monthly inventory records for the last six months (or the life of the tank, whichever is less).

Other Approved Methods of Leak Detection for Tanks:

Other methods of leak detection that you may be using for your tank(s) include manual tank gauging, groundwater monitoring, and soil vapor monitoring. Copies of these monthly records may also be submitted for the last six months (or the life of the tank, whichever is less).

Option #2--Section B: Acceptable Leak Detection Documentation for Your Underground Piping

Look at the list below for the method of leak detection that you are using for your piping at your facility, and send the indicated documentation to demonstrate your piping is not leaking.

Double-walled Piping with Sump Sensor and Automatic Line Leak Detector (ALLD):

If you are using this method, at least once per month you must document that power is on to the sensor and whether or not the alarm is sounding. This is usually done either by printing out a "sensor status" or "liquid status" report once per month, or by manually keeping a sensor status log that shows the date, the power status, and the sensor status each time the sensor is checked. In addition your ALLD(s) must be tested annually to ensure that they are working properly. Submit copies of your sensor status reports or log for the last six months (or the life of the tank, whichever is less) **and** a copy of the most recent ALLD test results.

Statistical Inventory Reconciliation (SIR) combined with Automatic Line Leak Detector (ALLD):

If you are using this method for your piping, you must keep on file the monthly SIR compliance reports for the last 12 months, plus your ALLD(s) must be tested annually to ensure that they are working properly. Submit copies of the SIR compliance reports for the last six months (or the life of the tank, whichever is less) **and** a copy of the most recent ALLD test results.

Annual Line Tightness Testing combined with Automatic Line Leak Detector (ALLD):

If you are using this method, you must have a line tightness test performed on your product lines (piping) by a Nevada Certified Tank Tester at least every 12 months. You must also have the ALLD(s) tested annually to ensure that they are working properly. Submit a copy of your last annual line tightness test. If the test is older than 6 months, the piping must be retested prior to Fund enrollment.

Line Tightness Testing Every Three Years (only for suction piping with Check Valve at Tank):

If you have suction piping that has a check valve within or near the tank, you must have a line tightness test performed on your distribution piping once every three years. A Nevada Certified Tank Tester must perform the test. Submit a copy of your last Line Tightness Test. If the test is older than 6 months, the piping must be retested prior to Fund enrollment.

Suction Piping with No Check Valve at Tank:

If you have suction piping that has only one check valve, and it is located just below the dispenser, and the piping slopes downward to the tank, then you are not required to perform or document any leak detection on your piping. Submit only the documentation required in Section A for your tank(s). If a tank tightness test is provided, it should indicate the suction piping was tested with the tank.

Other Approved Leak Detection Methods for Piping:

Other methods of leak detection that you may be using for your piping include electronic line leak detectors, groundwater monitoring, and soil vapor monitoring. Copies of these monthly records may also be submitted for the last six months (or the life of the tank, whichever is less). Additionally, you must provide a copy of the most recent ALLD test results

For clarification regarding any of the leak detection testing methods listed above, contact Petroleum Fund staff at (775) 687-9368.

Be advised that UST systems must be fully constructed and functional at the time of enrollment. The Nevada Petroleum Fund only enrolls UST systems containing petroleum products as defined in Nevada Revised Statue (NRS) 445C.270.