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**MEMORANDUM**

**TO:** UST Inspectors

**FROM:** Thomas Walter, Compliance Division Chief *TW*

**DATE:** May 15, 2014

**SUBJ:** UST System Compliance Inspection Report Updates

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The Maryland Department of the Environment's Oil Control Program (OCP) has made important updates to the Maryland Underground Storage Tank System Compliance Inspection Report. The OCP made changes to Section 4.b. *Dispenser Inspection*, Section 7.b. *Stage II Vapor Recovery*, Section 7.c. *Air and Radiation Management Administration Inspection Report*, Section 9 *Tightness Testing*, Section 10.b. *Site wells for Facilities located in HRGUA* and Section 14 *Operator Training* as detailed below.

- **Section 4.b. *Dispenser Inspection*** – Added question 2b.

- Question 2b. – Product pipe manifold installed above the shear valves.

If a product pipe manifold is present in the dispenser and above the shear valves, indicate Yes for question 2b. and Section 4.b. (F)ails the inspection. Product pipe manifold above shear valves is considered a safety and fire hazard. In the event of a break in one shear valve, the product flow may not shut-off on the other pipe, thus allowing product to continue to discharge resulting in a safety and fire hazard. In addition line leak detectors and leak detection equipment may not operate in accordance Code of Maryland Regulations to maintain release detection. Additional information on product pipe manifold is available at:

<http://www.mde.state.md.us/programs/Land/OilControl/FactSheetsPublications/Documents/Product%20Pipe%20Manifold%20Fact%20Sheet%204.28.14%202%20pgs.pdf>

- **Section 7.b. *Stage II Vapor Recovery*** – Three questions were added to Section 7.b.

- Question 4 - Stage II vapor recovery system decommissioned on all gasoline USTs?

On March 21, 2014, the Department implemented the *Stage II Vapor Recovery Systems-Enforcement Discretion Policy*. Under this policy, UST owners may submit a form for the Department's review and approval to decommission an existing Stage II Vapor Recovery System

if the facility undergoes a major system modification or is installing a new UST system, as defined by the Air and Radiation Management Administration regulations.

The Stage II Vapor Recovery Systems - Enforcement Discretion Policy and Form are available on the MDE web site at:

[http://www.mde.state.md.us/programs/Land/OilControl/FactSheetsPublications/Pages/Programs/LandPrograms/Oil\\_Control/factsheetspublications/index.aspx](http://www.mde.state.md.us/programs/Land/OilControl/FactSheetsPublications/Pages/Programs/LandPrograms/Oil_Control/factsheetspublications/index.aspx)

If question 4 is yes, complete questions 4a. and 4b.

- Question 4a. - MDE Notification of Intent to Decommission or Not Install Stage II System form is available?

The inspector must request from, the UST owner or operator to review the completed *Notification of Intent to Decommission or to Not Install Stage II Vapor Recovery System on Certain New or Modified Gasoline Dispensing Facilities (GDF)*. If the completed form is available, indicate Yes.

- Question 4b. - Date of Stage II Decommission (mm/dd/yy).

Enter the date the Stage II Vapor Recovery System was decommissioned.

- **Section 7.c. Air and Radiation Management Administration Inspection Report**

Section added - Stage II Decommissioning

- Has the site decommissioned the Stage II Vapor Recovery System?  Yes  No
- If "yes", please list date of decommissioning (mm/dd/yy): \_\_\_\_\_
- If "yes", enter the last date of the following tests (tests required upon decommissioning and annually after decommissioning):
  - Pressure Decay Test (mm/dd/yy): \_\_\_\_\_
  - Vapor Tie-In Test (mm/dd/yy): \_\_\_\_\_
  - P/V Vent Valve Test (mm/dd/yy): \_\_\_\_\_

- **Section 9. Tightness Testing**

- Question 4 - Changed "vapor test performed within the past year" to "vapor test performed within the past two years".

- **Section 10.b. Tank Field Monitoring Pipes**

- Questions 9 and 10 – Changed "sampled within 180 days" to "sampled within past year".

- **Section 14. Operator Training** – Section 14 was added to the third party inspection report as an addendum on August 8, 2012. Section 14 is included with the updated inspection report.

- Inspector must complete Section 14 and list the inspection result in the "Inspection Summary" on page 1.

If you have any questions, please contact the Oil Control Program at 410-537-3442.