## SP001 Annual Tank Inspections

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# SP001 Annual Tank Inspections

### **Objectives**

- Provide background and context about SP001 Annual Inspection
- Briefly review Checklist Guidance Key Items
- Review the questions on the Annual Inspections, and provide guidance on how to complete the inspection

# SPO01 Annual Tank Inspections Disclaimer This presentation provides general information about conducting annual inspections under the SP001 industry standard. This information is presented as guidance, and is not a statute or regulation. The universe of ASTs and tank systems is exceptionally diverse, as is the equipment installed on these systems. Some specific equipment on certain tanks may not be covered by the Standard—these are to be inspected following the manufacturer recommended inspection/testing schedules and procedures

STI SP	001 Annual Inspec	tion Checklist	
General Inspection Information:			
Inspection Date: Prior	nspection Date:	Retain until date:	
Inspector Name (print):		Title:	
			Copies of the SP001
Inspector's Signature:			Standard (complete),
Tank(s) inspected ID			including the monthly and
Regulatory facility name and ID number (if applicable)			annual inspection
For equipment not included in this Standard, follow the m			
<ul> <li>The periodic AST Inspection is intended for monitoring th Inspector. It shall be performed by an owner's inspector environment, inspect the liquid for regulated products or operation (40 CFR 112.4 (e)(8)(0)).</li> <li>Non-conforming items important to tank or containment in manufacturer who will determine the contexturer who will determine the competive action. No Retain the completed checklists for at least 38 months.</li> <li>Complete this checkling has occurred to the tank system or requirement by a Professional Engineer knowledgeal</li> </ul>	ere paragraph 4.1.2 of the standard. he primary tank, secondary contain ther contaminants and disposed of title and Countermeasure? jules, a f <u>ittearity</u> require evaluation by an eng te the non-conformance and corres the the owner monthly-performed in containment that may affect the pale in SPCC development and imp	nent area, interstice, or spill container. Before discharge to the it properly. Solity should regularly test liquid level sensing devices to ensure proper ineer experienced in AST design, a Certified Inspector, or a tank ponding corrective action in the comment section. specific notektists. IPCC plan, the condition should be evaluated against the current pl lementation.	
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## SP001 Annual Tank Inspections-**Background Information**

#### Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section. Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

It's NOT acceptable to remove questions from the checklist if you just don't want to inspect the item—this would require an environmental equivalence determination by a PE in your SPCC Plan. However, you can reformat the content in the checklist to make it more user friendly, like changing the layout from landscape to portrait, adding columns for more tanks for your facility, or similar changes.

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Not all equipment is covered by this Standard- in this case, follow the manufacturer's recommendations. Manufacturer's recommended inspection/testing schedules and procedures take precedence over the content of the Standard; this is particularly important for mechanical equipment, such as valves, leak detection devices, and other similar equipment. Some equipment may require more frequent testing or checking based on the manufacturer. Some manufacturers require such testing/inspection in order to maintain the warranty of the equipment.

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This note is important, as this is a pretty general inspection checklist that can't cover every possible tank system configuration. Testing liquid level sensing devices is an important SPCC requirement that gets overlooked in a lot of SPCC Plans.

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The annual inspection checklist is to be conducted in addition (NOT in lieu of) to the monthly inspection. These inspection checklists have different queries and checks.

## SP001 Annual Inspection Questions Tank Foundation/Supports

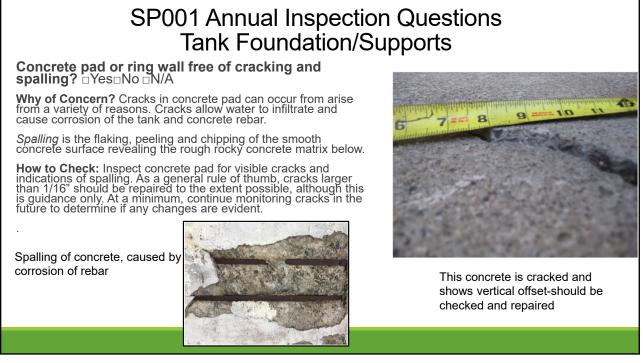
Free of tank settlement or foundation washout? □Yes□No

Why of Concern? Settlement and/or washout causes distortion in tank, piping, and equipment; can lead to increased stress on portions of tank, could lead to catastrophic failure. Distortions can lead to localized low points where water can collect and accelerate corrosion

**How to Check:** Inspect entire tank foundation and surrounding area, looking for uneven or unusual foundation conditions, including erosion, cracking, distortions or loss of underlying support. Other evidence of settlement: leaning tanks, distortion on connected piping or equipment, water collecting in low points around tank/foundation not previously identified



This photo shows some washout of the secondary containment berm of this tank system, but not the tank itself



 SP001 Annual Inspection Questions Tank Foundation/Supports
 Tank supports in satisfactory condition? Yes No N/A
 Why of Concern? Tank supports are typically fabricated of steel or concrete; CFC (5704.2.9.2.3) requires supports or pilings for ASTs storing Class I, II, and IIIA flammable and combustible liquids require 2hour fire resistance rating, with certain exceptions.
 How to Check: Inspect tank supports for proper anchorage, corrosion, and overall integrity. Corrosion common at the tank shell/foundation junction, especially for horizontal tanks secured on saddle style foundations. Anchor bolts are also locations where corrosion is commonly found, particularly in certain environments, like coastal areas and in vaults.
 Key Notes: Tanks with unusual or unconventional supports should be checked carefully; in some cases, this may be potentially a clue that a UST is being used aboveground.

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## SP001 Annual Inspection Questions Tank Foundation/Supports



Aggressive corrosion at tank support; black material is wear pad placed between concrete support and tank



Unconventional or field engineered foundations are clues that UST might be being used as AST

## SP001 Annual Inspection Questions Tank Foundation/Supports

Is water able to drain away from tank if tank is resting on a foundation or on the ground?

Why of Concern? Tanks should be designed to avoid having rainwater collect at the base of the tank to limit corrosion and pooling of liquids in event of tank failure. Substantial corrosion that can severely damage the tank foundation and supports occurs if tanks are installed without a means to direct water away from the tank.

**How to Check:** Inspect area around tank to check for evidence of corrosion, standing water, or water staining. If water is found, have these areas promptly drained to limit the extent of corrosion

The poor design of this AST foundation allowed rainwater to collect underneath the tank, resulting in extensive corrosion of the steel supports



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## SP001 Annual Inspection Questions Tank Foundation/Supports

Is the grounding strap between the tank and foundation/supports in good condition?

Why of Concern? Grounding provides a conductive path to earth to allow static charges that occur during fuel transfer to dissipate. A ground rod is connected to the tank via a strap or wire that is connected to the tank shell.

How to Check: Check the grounding strap to make sure remains securely connected to the tank and is not frayed or damaged.

**Key Notes:** Not all tanks are equipped with grounding straps. Fuel tanks, including those containing gasoline, diesel, jet fuel, and other similar liquids need proper bonding and grounding.

More sophisticated systems for grounding and bonding are used at facilities like airports, military installations and bulk plants where high fuel rate transfers occur



Ground rod and bonding cable installed for a fuel AST

## SP001 Annual Inspection Questions Tank Shell Heads and Roof

Free of visible coating failure? DYesDNo

Why of Concern? Coating failure in SP001 is defined as "significant peeling, cracking, spalling, blistering, pitting and chipping etc. of the coating on an AST resulting in the exposure of the metal surface and corrosion of the tank shell."

**How to Check:** Check the tank surface and note any areas where coating failure is observed. While most of CA has relatively low corrosion rates, some locations are much more aggressive, including coastal areas. Vaulted tanks can also have accelerated corrosion due to the humidity inside the vault.



Substantial corrosion found on a tank located in a coastal area



Corrosion on flat surfaces inside emergency generators can occur from rainwater intrusion into the enclosure. The only way to quantify how bad is corrosion is through ultrasonic thickness (UT) testing to determine the remaining steel thickness

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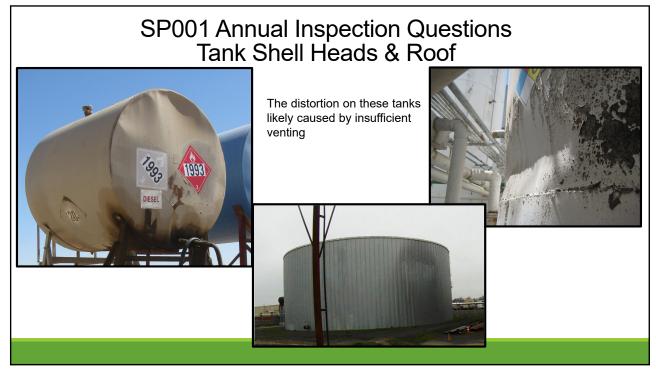
## SP001 Annual Inspection Questions Tank Shell Heads and Roof

# Free of noticeable distortions, buckling, denting, or bulging?? \_Yes\_No

Why of Concern? Tanks should not show distortions—these are most commonly evidence of under-pressure or over-pressure events. An exception might be the case where impact damage has occurred, or damage done as a result of natural causes, such as earthquakes—but these are rare.

**How to Check:** Visually inspect the tank shell to check for distortions, including buckling, denting, or bulging. Check the connections between the shell and tank heads, (on horizontal tanks) or roof of vertical tanks--these areas are often locations where distortion is first observed

**Key Notes:** Ensure that proper venting is maintained on the tank, and that all vents (primary and emergency) are in good working condition. If the distortion is substantial, the tank should be evaluated by a qualified individual.



## SP001 Annual Inspection Questions Tank Shell Heads and Roof

# Free of standing water on roof? \_Yes\_No \_NA

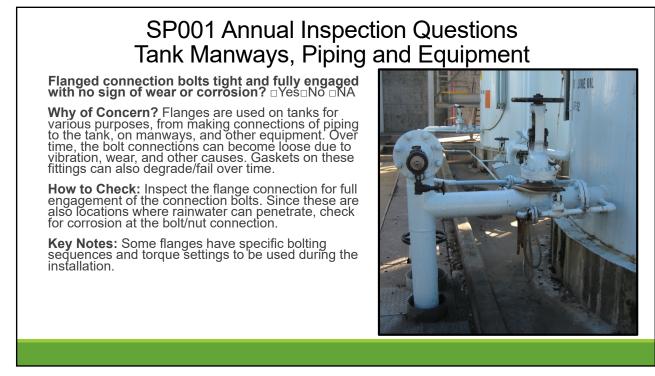
Why of Concern? Depending upon the design and condition of the tank, rectangular and vertical cylindrical tanks may have low spots where standing water can collect causing corrosion.

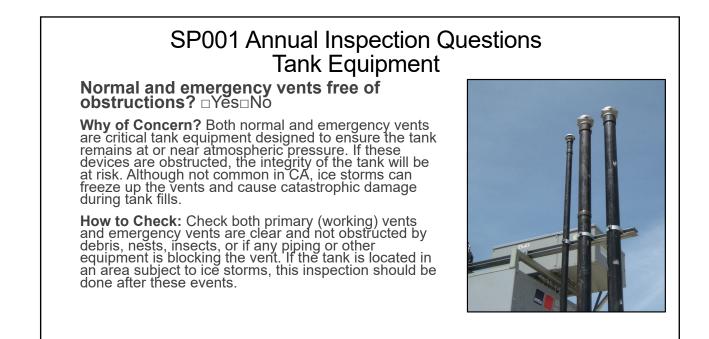
**How to Check:** Check the tank for the presence of standing water on the tank roof. In dry conditions, evidence of standing water formerly collecting on the tank roof often appears as round staining.

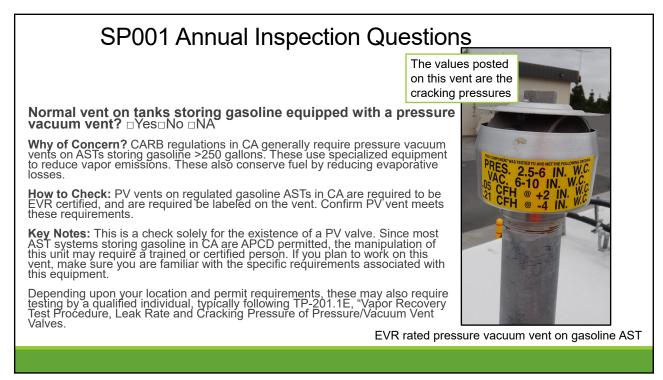
If water is found, remove promptly. Evaluate ways to prevent water ponding in future.



# SP001 Annual Inspection Questions Tank Shell Heads and Roof Are all labels and tags intact and legible? \_\_Yes\_No\_NA Why of Concern? Labels, placards, and tags all contain valuable information that informs operators, delivery drivers, and response personnel. How to Check: Inspect the tank labels, placards, and tags to ensure these are not faded, damaged, or illegible. As a best practice, all tank penetrations should be labeled—this should reduce the chances of fill errors. Filling of the wrong tank port is actually common on double walled tanks, unfortunately. Labeling each port on the tank is a cheap way to potentially reduce operating errors.







## SP001 Annual Inspection Questions Tank Equipment

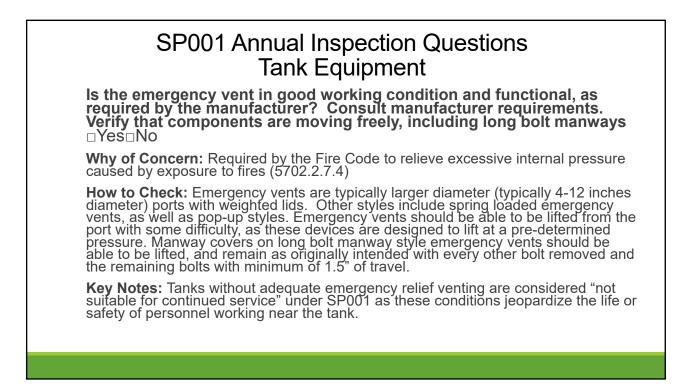
Are flame arrestors free of corrosion and are air passages free of blockage? 
□Yes□No □NA

Why of Concern? Flame arrestors are used on certain tanks to reduce the chance of flames igniting the vapor space inside the tank; blocked passages will affect tank venting.

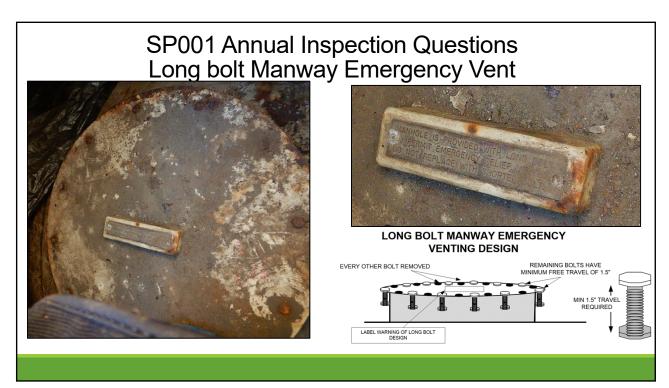
How to Check: Follow the manufacturer's instructions for inspection of the flame arrestor. In certain cases, nuts on the hood of the arrestor body can be removed to inspect the fins or plates inside. Take actions if equipment is not operable or damaged.

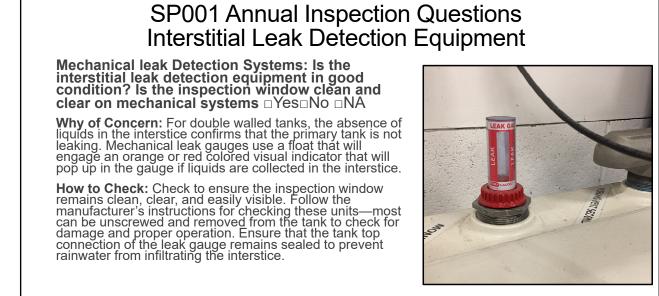
Not common in CA, but found occasionally. Flame arrestors come in a variety of styles and designs



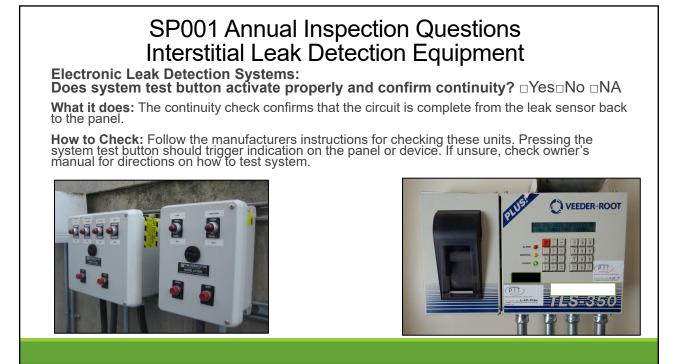


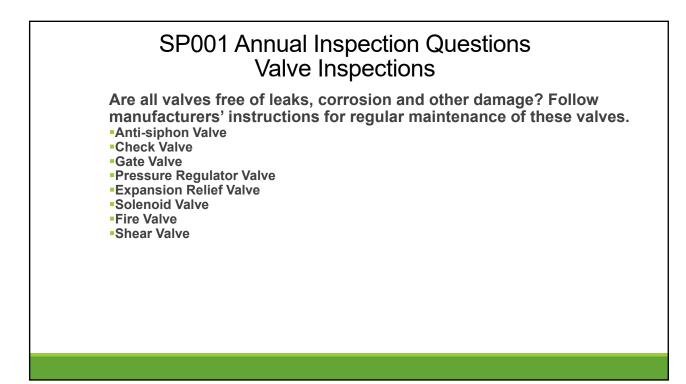












## SP001 Annual Inspection Questions Mechanical Anti-siphon Valves

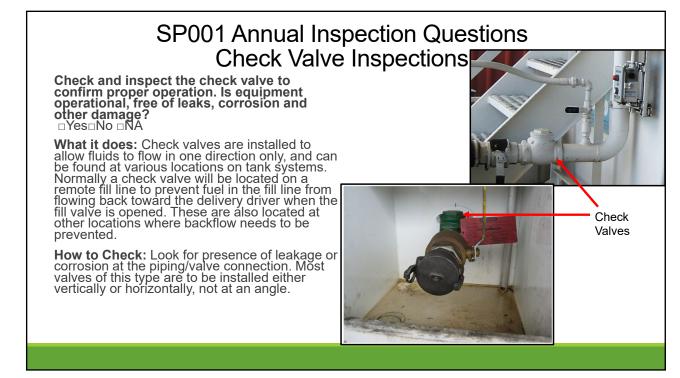
Check and inspect the anti-siphon valve to confirm proper operation. Is equipment operational, free of leaks, corrosion and other damage? □Yes□No □NA

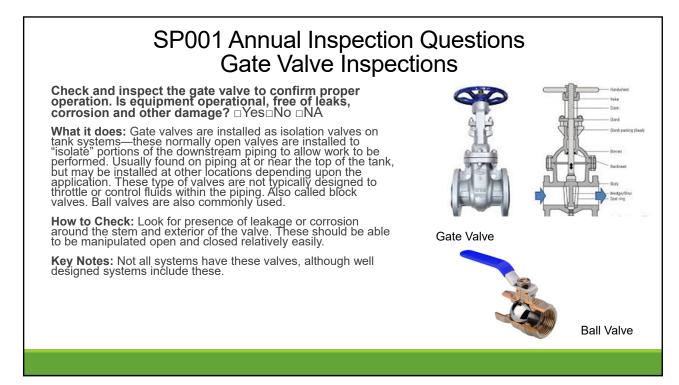
What it does: Mechanical anti-siphon valves typically use internal springs to keep the valve poppet closed until pumps are activated. Once the pump engages, enough force exists that compress the spring into an open position, allowing product to flow. These devices prevent inadvertent siphoning that could occur if a small leak occurs on the piping that extends below the liquid level in the tank.

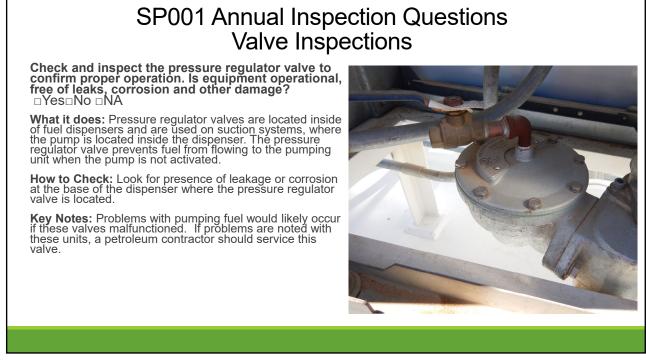
**How to Check:** Look for presence of leakage or corrosion around the exterior of the valve, and at the piping/valve connection.

**Key Notes:** There's usually little that can be adjusted on these valves, although some have adjustable spring tension normally set at the installation. These devices come in a variety of designs.

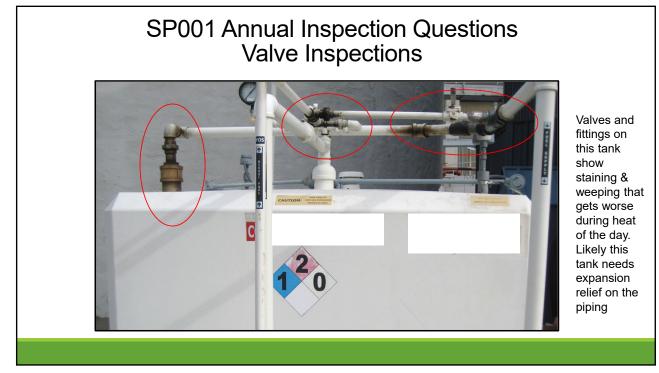


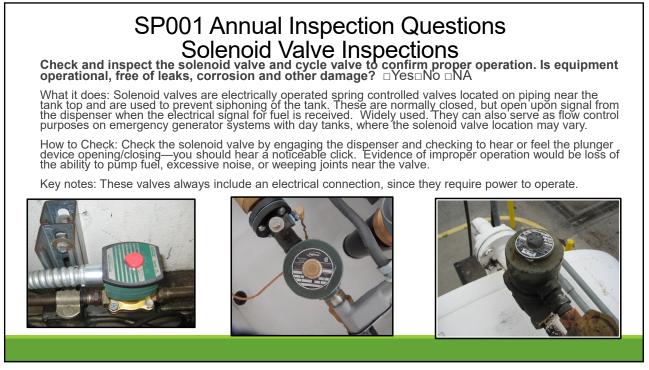












## SP001 Annual Inspection Questions Fire Valve Inspections

Check and inspect the fire valve to confirm proper operation. Is equipment operational, free of leaks, corrosion and other damage? □Yes□No □NA

What it does: Fire valves are typically installed downstream of the submersible pump on the tank top or may be installed at the base of tanks. The include a fusible link connector that is designed to intentionally fail in a fire, and snap the valve closed. Designed to limit the release of fuel downstream in a fire event by closing off the piping.

**How to Check:** These can be manually cycled to release the hook that permits the valve to snap closed. Ensure that the valve lever can move freely and has the proper clearance to close completely. Confirm that the valve is not wired or improperly secured in the open position. Check the fusible link element, making sure it is in place and properly positioned. Check to ensure that no weeping or leakage of the valve is occurring. Return the spring-loaded hasp to the original position when the check is complete.

Key Notes: Not all systems have these types of valves installed



## SP001 Annual Inspection Questions Shear Valve Inspections

Check and inspect the shear valve to confirm proper operation. Is equipment operational, free of leaks, corrosion and other damage? □Yes□No □NA

What it does: Shear valves are installed inside fuel dispensers on systems using submersible pumps. These spring-loaded valves are designed to snap closed in event of a vehicle impact; most also include a fusible link assembly that is designed to intentionally fail in a fire. These block fuel flow in the piping by closing the spring-loaded valve.

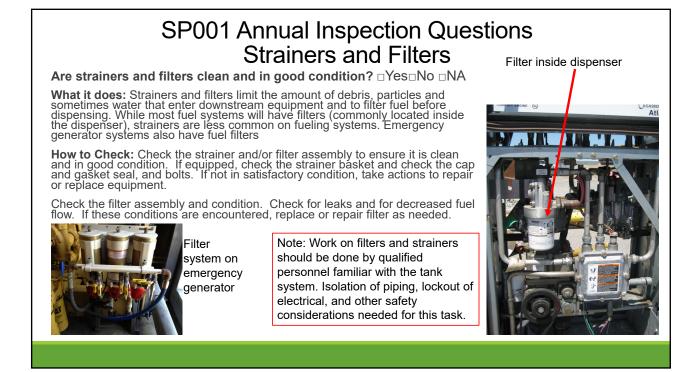
**How to Check:** Refer to manufacturers' instructions for further information about how to check this equipment. Check to ensure that no weeping or leakage of the valve is occurring. Check the fusible link element, making sure it is properly positioned and not wired open.

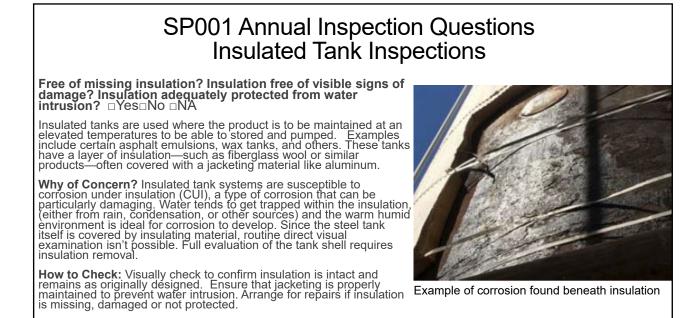
Manually cycle (trip) the valve to ensure that components are moving freely and the valve handle or lever has the proper clearance to close completely. The pump nozzle should not dispense fuel when the valve is tripped. Restore the equipment when finished testing to the original position.



Some shear valves require the use of a wrench to reset the shear valve arm. Refer to the manufacturer's instructions to confirm procedure prior to tripping the shear valve.

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## SP001 Annual Inspection Questions **Insulated Tank Inspections**

Insulation free of noticeable areas of moisture? 
\_Yes\_No 
\_NA

How to Check: Check the insulation for the presence of moisture, such as dark stained areas, wet areas, or similar indications. If moisture is observed, investigate the source of the moisture and make necessary repairs.



The staining at the base of this tank suggests water has infiltrated the insulation beneath the jacketing at some point. Removal of insulation needed to check for extent of damage.

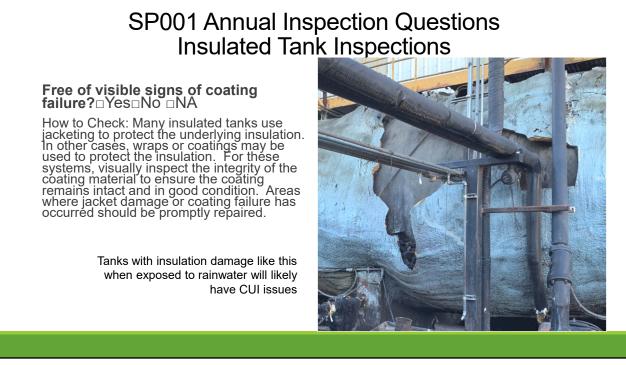
## SP001 Annual Inspection Questions Insulated Tank Inspections

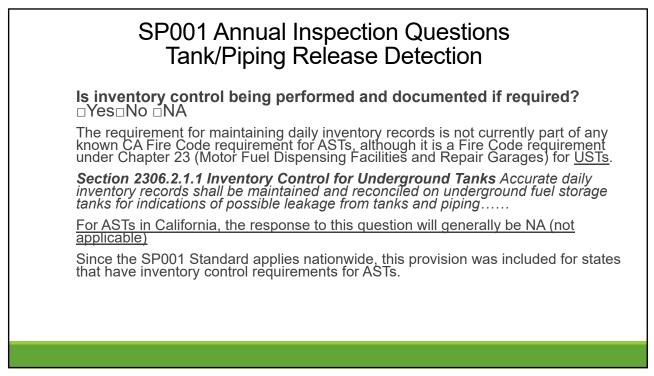
# Insulation free of mold? Yes No NA

**How to Check:** Check the insulation for the presence of mold, mildew, or other growth. These conditions indicate that the insulation may be chronically wet and can lead to corrosion underneath the insulation. If found, take action to address the source of the moisture and mold.



Green colored mold/mildew found on this tank





## SP001 Annual Inspection Questions Tank/Piping Release Detection

Is leak detection being performed and documented if required? DYesDNO DNA

This requirement applies to remote pumping systems (pressurized systems) for motor fuel dispensing facilities (Chapter 23) where submersible pumps transfer liquids to dispensers.

Section 2306.7.7.1 of the CA Fire Code (Motor Fuel Dispensing Facilities and Repair Garages) does contain a requirement for leak detection for Remote Pumping Systems:

2306.7.7.1 Leak Detection. Where remote pumps are used to supply fuel dispensers, each pump shall have installed on the discharge side a listed leak detection device that will detect a leak in the piping and provide an indication. A leak detection device is not required if the piping from the pump discharge to under the dispenser is above ground and visible.

LLDs normally don't work very well on AST systems, due to temperature changes that occur in above grade systems that result in thermal contraction of fuel.

How to check: Determine if facility operators are performing testing of leak detection systems. Not needed if all piping is visible as described above.

## SP001 Annual Inspection Questions

Are electrical wiring and boxes in good condition?  $\Box Yes \Box No$   $\Box NA$ 

Why of concern: Many locations near petroleum tank systems are electrically classified areas and often require special protections for wiring, junction boxes, and electrical connections.

**How to check:** Check the electrical wiring associated with the system for the presence of loose fittings, unprotected or exposed wiring, electrical boxes with improper seals, or other non-conforming conditions. This includes lighting, pumps, motors, conduit runs, and other related electrical system components.

**Key Notes:** Exposed or improperly installed electrical components on a tank system can pose serious safety concerns.

In a formal external inspection, the presence of damaged or noncompliant electrical systems within the hazardous area which may create an imminent ignition source requires the SP001 inspector to determine the tank is not suitable for continued service.



Exposed wiring next to tank storing flammable liquids

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## SP001 Annual Inspection Questions Other Equipment

Has the cathodic protection system on the tank been tested as required by the designing engineer?  $\Box Yes \Box No \ \Box NA$ 

What it does: Cathodic protection (CP) is a method used to prevent corrosion by connecting the steel (cathode) to a sacrificial metal (anode) that preferentially corrodes. Galvanic CP uses simply a sacrificial anode with a less negative electrochemical potential compared with the metal to be protected (cathode). Impressed current CP uses a DC source (rectifier) to provide the electrons and drive the oxidation onto the anode, thereby protecting the cathode (metal). For CP systems to work, they require the four components of an electrochemical cell: a cathode, an anode, a metallic connection, and an electrolyte, like water or soil. Without these four components, CP doesn't work.

CP systems are used on ASTs that are underlain by and in direct contact with sand or soil. ASTs installed on concrete pads that extend beneath the tank do not have a complete pathway for electron transfer--and as a result CP won't work and is not used. Shop fabricated ASTs very rarely use CP in California, although some buried steel piping may have CP installed.

**How to check:** CP systems require periodic testing, more frequently for impressed current systems than for galvanic systems. If the site has a cathodic protection system, confirm that the system is being properly monitored and tested



Impressed current system rectifier this requires periodic readings to determine if system is providing sufficient cathodic protection

## Questions



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