

## INTEGRITY TESTING REQUIREMENTS

Environmental Protection Agency (EPA) has made many revisions of the Spill Prevention Control and Countermeasures (SPCC) Plans and has specifically addresses the long requirement of Tank inspections.

The requirement for tank inspections is as old as the law that has been around as the Spill Prevention Requirements in 1973. In 1993 the Oil Pollution Act strengthened the requirement because of the Valdez Oil spill and catastrophic tank failure in Pennsylvania. In 2002 the EPA specifically addressed requirement of non destructive testing of tanks using national standards and adding specific references including (American Petroleum Institute) API 653 for field erected tanks and (Steel Tank Institute) SP-001 for shop fabricated tanks.

We have completed nearly 300 SPCC Plans in 6 years and had recently tried to find certified tank inspectors to complete these tank inspections. This proved to be very difficult and so we decided to go to the Steel Tank Institute's inspector course and assist companies in inspections and tank testing.

Visual inspections of tanks is one aspect of the testing requirement and much of the time ultra sound testing can be used in conjunction with the visual. The integrity testing program includes verifying compliance with EPA regulations, Steel Tank construction methods, national and state fire code regulations, as well as, OSHA, National Electric Code (NEC) and other National Standards.

Currently the EPA requires steel tanks (Single or Double Walled) to be on a 10 year inspection program from date of service. If you do not know how long the tanks have been in service you should start with the UL 142 or manufacturer's label. If you cannot find either label or you are sure that they have been in service longer than 5 years, you should have them inspected to the national standards and document this process.

Since the EPA has granted nearly a decade of extensions to allow companies to complete this requirement there will be no more grandfathering of the compliance of this requirement for tank inspections. The final compliance date is November 2011.

Please call us a 913-432-4022 to discuss your specific facility and questions you have about this program.

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