



## On-Site INSPECTION TIPS

The Loss Control Program has proven to be very beneficial to the Tank Owner customers. This program has been created to encourage you as the owner or operator to learn more about your facility and what is required by the TNRCC compliance regulations. The Tank Owner's staff review all reports, follow up with suggestions for non-compliant or problem areas. Our goal as a team is to work together to identify any non-compliant areas, get them corrected and to avoid a problem if a release were to occur.

### Who is required to maintain Monthly Inventory Reconciliation Records?

*All retail service stations shall conduct effective manual or automatic inventory control procedures in addition to the required monthly leak detection method. Reconciliation of detailed inventory control records shall be conducted at least once each month, and shall be sufficiently accurate to detect a release as small as the sum of 1.0% of the total substance flow-through for the month plus 130 gallons.*

The operator shall assure that the following additional procedures and requirements are followed:

- Record each operative day the volume measurement for regulated substance inputs, withdrawals, and the amount still remaining in the tank.
- The equipment used shall be capable of measuring the level of stored substance over the full range of the tank's height to the nearest one-eighth of an inch.
- Substance dispensing shall be metered and recorded within the local standards for meter calibration or within an accuracy of six cubic inches for every 5 gallons of product withdrawn.
- At least once per month, measure the water level in the bottom of the tank to the nearest one-eighth of an inch and adjust the inventory records accordingly.

### Do you still have to maintain monthly inventory control records if you have an automatic tank gauge (ATG) system?

**Yes.** Unless your ATG system performs reconciliation at the end of each month, you have to manually reconcile your records. **Inventory Control Reconciliation is part of the TNRCC monthly leak detection requirement for all facilities using SIR and ATG. Please contact the TNRCC UST Division at (512) 239-2182 for further questions.**

Our loss control representatives will review the last 12 months of monthly inventory control records during the site audit to assist you in maintaining the required TNRCC records.

## Corrosion Protection

All buried underground storage system metal components, which store or convey regulated substances (including underground tanks, underground piping and underground ancillary equipment) must be properly protected from corrosion, regardless of age or date of UST system installation. All steel tanks and lines are required to have and maintain adequate corrosion protection.

- The system has to be re-certified a minimum of every three years by a corrosion specialist or qualified person.**
- System design and post installation certification must be performed by a N.A.C.E. specialist.**
- If the system is an impressed current system, a rectifier maintenance log must be maintained every 60 days.**

*Was your cathodic system installed or certified in 1998? Certification is due in 2001! For more information, see TNRCC Rules 30 TAC 334.49.*

## No Certificate – No Gas!

The TNRCC is inspecting facilities who did not apply or qualify for a delivery certificate and are imposing substantial fines to the distributor and owner/operator for those who are still receiving fuel. **TNRCC has stated, "all violators will be found"**! Marketers can verify the status of a particular location by accessing the TNRCC website, [www.tnrcc.state.tx.us](http://www.tnrcc.state.tx.us). Pull up their home page - "More Topics" - PST Registration Database.

## **WHY** does Tank Owners request copies of tank and line testing?

There are **three main reasons** members are asked to provide tank and line testing information.

1. Helps assure that all members are complying with TNRCC and EPA technical regulations.

And why is this important?

Members are sharing substantial renewal credits. The weakest link is a policyholder not being attentive to tank management. The procedure also allows us to help members stay in compliance before a loss occurs. Pollution Liability coverage anticipates policyholders are complying with the regulations. Failure to do so can limit their insurance coverage after a loss occurs or result in a denial of a claim.

2. The test documents verify the tanks and lines are working properly. If not, it enables us to react early to a possible release.
3. The test documents also provide base line documentation that tanks and lines are tight. In the event of a release, the Claims Department has a historical file documenting your compliance, and a place to begin an investigation.

We recognize gathering this information is time consuming. It is costly from a TOMIC administrative standpoint too. Making sure the tank systems are being properly managed assures our members access to responsive protection should a release occur. It also helps keep your net insurance premium costs to an absolute minimum.

## **INCIDENT REPORTING** – *Who should be notified?*

1. Local authorities (i.e., fire department, police department, etc.)
2. Environmental Company
3. TNRCC Responsible Party Remediation Division at (512) 239-2200
4. Tank Owners Mutual Insurance Co. at 800-336-1338 or 817-336-1336

If you have a release or a suspected release, contact all the above immediately. Your quick response may cut claim expenses and help prevent any further hazard to our environment.

## **TNRCC Self Certification Annual Renewals**

Just a reminder, the TNRCC annual self-certification renewals will be coming up at the beginning of 2002. The forms have to be received a minimum of 30 days prior to the renewal date for the TNRCC to process. More to come from the TNRCC.

## **FINANCIAL ASSURANCE**

The Financial Assurance Department of the TNRCC is randomly requesting proof of financial assurance in accordance with the requirements of 30 TAC Chapter 37, Subchapter I. Our new certificate wording complies with their regulations. We will issue your new certificate with your next renewal policy or upon your request.

## **JOBBER QUESTIONNAIRE**

Tank Owners mailed a questionnaire to all insureds that have sites operated by someone other than the insured. We have had pollution incidents reported where there may be some confusion as to the responsible parties in maintaining compliance records, reporting fuel releases, fuel losses or claims. Are the responsibilities pertaining to insurance, compliance etc. of the owner and/or the operator included in your lease agreement? Please return the forms ASAP so we can document your file. Contact the TOMIC staff at 800-336-1338 for any questions.

## **CONTACTS**

**TOMIC Member Service Team**  
(800) 336-1338 or (817) 336-1336

**TOMIC Web Site**  
[www.tankowners.com](http://www.tankowners.com)

**TOMIC Email**  
[service@tankowners.com](mailto:service@tankowners.com)

**TNRCC PST Registration Team**  
(512) 239-2160

**TNRCC UST & Stage II Technical Specialists Team**  
(512) 239-2182

**TNRCC Financial Assurance Team**  
(512) 239-0300

**TNRCC Web Site**  
<http://www.tnrcc.state.tx.us>

**EPA AST Hotline** (202) 260-2342

**EPA Web Site** [www.epa.gov](http://www.epa.gov)

# **TANK OWNERS**

MUTUAL INSURANCE COMPANY

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