

# Install and Closure Guidelines

Effective Date: January 17, 2018

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## Background

What are the Department's expectations regarding planning, notification, and reporting of a Petroleum System Installation or Closure?

In order to provide clarification and consistency the department has created these guidelines to address Petroleum System Installations and Closures. These Guidelines are intended to apply to all DATCP Inspectors, Local Program Operators (LPOs) and Service Companies.

## Procedure

### **Pre-Inspection:**

- All inspectors and LPOs will document their inspections on Form [TR-WM-138](#) Checklist for Underground Storage Installation, [TR-WM-120](#) Checklist for Aboveground Storage Installation or [TR-WM-140](#) Checklist and Report for Tank Closure (TSSA). Always be sure to use the most current form. Any supporting or supplemental forms shall be included depending on the specific application; e.g. [TR-WM-130](#) Point-of-Sale Fueling Installation Notification, etc.

The most current copy of each form can be downloaded from:

[https://datcp.wi.gov/Pages/Programs\\_Services/PetroleumHazStorageTanksForms.aspx](https://datcp.wi.gov/Pages/Programs_Services/PetroleumHazStorageTanksForms.aspx)

- If an Owner/Operator intends to begin operation immediately after the Final Inspection, they should prepare and submit the required documentation at least 15 days prior to the final inspection. This includes:
  - a) [TR-WM-137](#) Underground Flammable/Combustible Liquid Storage Tank Registration
  - b) Wisconsin Operator Training Designation Form per ATCP 93.820
  - c) Affidavit of Financial Responsibility OR Certificate of Insurance with Schedule

### **Scheduling, Notification and Inspection:**

- Per ATCP 93.115(2)(b)(3) The certified installer shall notify the authorized agent or the department, on the ATCP 93 Notification form (ERS-9198 / [TR-WM-121](#)), at least 5 business days before starting an installation, to arrange for inspections. When you receive the required 5-day installation notification, respond back to the contractor and owner via email that you received it and confirm the date/time you will arrive on site for the UST pre-construction meeting or AST final inspection. Include in the email to the owner a statement that if the owner wishes to begin operation of a tank system requiring a permit to operate immediately following the final inspection they will have to send in to the department the financial responsibility documentation required in ATCP 93.145 prior to the final inspection. Copy Karine Aslakson and Tom Knudsvig on your email; when they receive the

 [DATCP Storage Tank Forms page](#)  
 [ATCP 93](#)

financial responsibility information they will let you know the requirement has been met. (We will be revising the notification form to reflect this requirement).

- If you have received proper notification under ATCP 93.115(2) and you cannot make an inspection due to schedule conflicts do not hold up the installation, find an alternative method to verify the inspection requirement such as date/time stamped photos.
- If you have not received proper notification under ATCP 93.115(2) document the violation and contact your supervisor or LPO Coordinator. It is at the Inspector's discretion whether they can accommodate an installer who has not provided the proper notification.

**Pre-construction meeting (only for UST tanks and/or UST piping):**

- When the installer provides the written 5 day notification the pre-construction meeting should be scheduled (expect to spend an average of 2-3 hours at the site):
  - a. The pre-construction meeting is typically held at the installation site, the excavation for the tanks or piping has been started but not have been completed. The tank bedding material can begin to be placed after you have confirmed the material type and size are correct.
  - b. The inspector should ask the contractor how they are verifying the backfill depth (12" minimum) and type is correct. Acceptable methods of verification include; inspector visual observation of a gauge stick; photos of a gauge stick, etc. If the verification method is incomplete or incorrect, the inspector shall have the contractor provide verifiable documentation. This may include field checking depths of the fill in the bed and also a review of the sieve analysis of the backfill material.
  - c. Verify vacuum as shipped from the factory is on the tank(s) interstitial space and for fiberglass tanks meets both of the following criteria:
    - i. Installation of the tank has begun at least 7 days after the factory applied vacuum on the label. The date that the vacuum was applied is on a label near the monitoring gauge or on the shipping documentation delivered with the tank.
    - ii. The vacuum gauge shipped with the tank reads 12 inches of mercury for a Xerxes tank [40 kPa]/ 10 inches of mercury for a Total Containment tank [34 kPa] or more. Modern Welding tanks only need to maintain the same vacuum level as received at the site; the contractor should have that information. Always refer to the specific manufacturer's installation specifications.

If either of the above is not met, the tank shall be tested per the manufacturer's installation instructions; e.g. the specific manufacturer prescribed air/soap test. This test must be completed to the manufacturer's written standards which includes the duration, soap/water mixture for the season, applied psi, etc.
  - d. As tanks are being placed the Pre-construction form can be completed.
  - e. The inspector should remain on site for at least the placement of the first couple of tanks so they can verify spacing, correct backfill placement, and deadman placement if used. It is a good practice to take 2-3 photos.

### **Underground Pipe Test:**

Piping can be placed in the trench but shall be uncovered for the test (expect to spend an average of 1 hour at the site):

- a. Air can be on lines (1.5X operating pressure on primary/maximum 5 psi on secondary).
- b. Sump hydrostatic water test may be performed either at same time or as part of the final inspection.
- c. Verify pipe type (fiberglass/flex) and layout (length, placement- pitch/separation between pipes and conduit/tank bed walls (may not be possible with flex pipe), flex connectors with rigid pipe). All should appear as detailed on the installation plan review documents.

### **UST or AST Final Inspection:**

A UST inspection should take an average of 2 hours; AST inspection 1 hour:

- a. The contractor should have all work completed and entire system ready for inspection
- b. If the facility wants to begin fueling when the final inspection has been completed, you should have already received acknowledgement from permitting that the proof of financial responsibility was submitted and verified. (UST systems only)
- c. Registration paperwork signed by owner should be given to inspector and sent in to permitting with the install inspection checklist

### **Closure Inspections:**

UST closure should take an average of an hour; AST closures should take less than an hour. An LPO is NOT required to be on site for an AST Closure:

- a. For UST removal the tank should already be out of the ground, cleaned and purged but the excavation should be open to allow for signs of visual contamination and olfactory test. (Make sure the olfactory test result is from the excavation and not the tank.) For federally regulated tanks if contamination is found the site assessor shall notify the owner; for non-federally regulated tanks the inspector shall notify the owner.
- b. If the tanks are not cut up or crushed on site, USTs and ASTs should be marked with date of closure, inerting or purging method, former product stored, present vapor state, and a warning against using for other liquid storage before being removed from the site. The marking letters should be at least 2 inches high. Examples from API 1604:

**Note: the exact wording of the label is not as important as the information contained on the label.**

TANK HAS CONTAINED LEADED GASOLINE\*  
NOT VAPOR-FREE  
NOT SUITABLE FOR STORAGE OF FOOD OR  
LIQUIDS INTENDED FOR HUMAN OR ANIMAL CONSUMPTION  
DATE OF REMOVAL: MONTH/DAY/YEAR

**\*Or other flammable or combustible liquid. Use the applicable designation (For example, DIESEL).**

For tanks that may have contained leaded products, an additional warning is recommended by API 1604:

TANK HAS CONTAINED LEADED GASOLINE  
LEAD VAPORS MAY BE RELEASED IF HEAT IS  
APPLIED TO THE TANK SHELL

### **Post Inspection Reporting:**

- After completing the final inspection all DATCP Petroleum Inspectors and LPOs will collect the following documents :
  - Registration form for each tank (compartment tanks require a registration form for each compartment)
  - Installation checklist for each tank (compartment tanks require a checklist for each compartment)
  - Startup/pre-operational test for each tank
  - Tank gauge and line leak detection setup
  - Line tests
  - Line ELLD/MLLD induced functional leak test

If you did not witness an item on the checklist do not check it off as verified. To ensure prompt payment for any Install/Closure inspections, complete and correct paperwork should be submitted to the Department by the 5th of the following month.

### **Post Inspection Reporting for DATCP Petroleum Inspectors:**

- State Inspectors will document each inspection in WinWam. State Inspectors will collect their documents, enter them into WinWam and Email a notification to Karine when you have signed off on the final inspection. She can then access the WinWam report the next day and register the tank(s). A printed WinWam inspection report does not have to be left on site.
- State Inspectors, if you are performing an installation inspection in a territory you are not assigned to perform the annual inspections and you find there are violations on existing tank systems, notify the responsible inspector for follow up.

**Post Inspection Reporting for LPOs:**

- LPOs will collect their documents and submit them to the permitting department no more than 2 weeks following the completion of the final inspection.

**Required Reporting for Owner/Operators:**

- Owner/Operators are required to submit their tank registration within 15 days per ATCP 93.140(2)(a) and closure documentation within 21 days per ATCP 93.460 and ATCP 93.560.
- If the Owner/Operator wishes to begin operation of a tank system requiring a Permit to Operate (PTO) immediately following the final inspection they will have to submit to the department the financial responsibility documentation required in ATCP 93.145, all tank registrations and AB Operator Certification (if applicable) prior to the final inspection if they haven't already done so.

**NOTE: Sites that require a Permit to Operate (PTO) will not be allowed to begin operation until all of the following documents are received, verified and processed by the department:**

- a) TR-WM-137 Underground Flammable/Combustible Liquid Storage Tank Registration**
- b) Wisconsin Operator Training Designation Form**
- c) Affidavit of Financial Responsibility – Pollution Insurance**

**The installation inspector shall not sign off on the inspection checklist without verifying completion of the checklist items for the above.**