



DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

Draft

DATE: April 30, 2017

TO: Tank Owners/ Operators

FROM: Heather Peters
Tanks Compliance and Technology Unit
Hazardous Waste Program

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Environmental Services Program

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SUBJECT: Statistical Inventory Reconciliation (SIR) Information for Underground Storage Tank (UST) Owners/Operators

10 CSR 26-2.040 requires all tank and piping that routinely contain regulated substance be monitored for leaks in accordance with the National Work Group on Leak Detection Evaluations (NWGLDE) listing, federal thresholds, and the equipment/method's manufacturer's requirements. 10 CSR 26-2.041 requires this monitoring to be conducted at least every 30 days.

10 CSR 26-2.043(B) outlines the requirements for conducting statistical inventory reconciliation (SIR). To properly conduct SIR, owners/operators must obtain daily inventory measurements to at least the nearest one-eighth inch (1/8") accuracy and maintain accurate delivery records. This data must be submitted to a NWGLDE-listed vendor. The results must pass and be valid in accordance with the manufacturer's requirements and the NWGLDE listing or be investigated in accordance with 10 CSR 26-2.050 as applicable.

10 CSR 26-2.043(B) does not provide clear and specific guidance on how quickly the report must be provided after the data/sampling set is gathered. As such, the Missouri Department of Natural Resources is allowing owner/operators **10 days** from the end of the month to obtain and review the final SIR data analysis report.

- If the tank SIR result indicates an **Inconclusive**, you must immediately investigate the suspected release. If within seven days you cannot discover the cause of the inconclusive result and verify that a release has not occurred, then you must respond to the incident as a suspected release (see page two).



- If the tank SIR result indicates a **Fail**, you must first check your monitoring device. If the monitoring device is found to be defective and is immediately repaired, recalibrated, or replaced, and additional monitoring does not confirm a failing result, then no additional response is necessary. However, if additional monitoring does confirm the fail, within 24 hours you must follow the steps below.

Responding to the suspected release:

1. If you have **no** indications of a release to the environment, you may contact Ms. Heather Peters or the UST Suspected Release Inspection Coordinator, Tanks Compliance and Enforcement Unit to discuss equipment issues and testing options at (573) 522-5665. **However, if you find evidence of a release* or for after-hours reporting of a suspected release, please contact the Department's Spill Line at (573) 634-2436.**
2. If you did not have evidence of a release to the environment, additional steps are still required to investigate the suspected release. This includes either:
 - a. A system test. A system test requires a tank tightness test and a line tightness test. The results of the system test may be submitted to Heather Peters/ UST Suspected Release Inspection Coordinator via e-mail at tanks-compliance@dnr.mo.gov; or
 - b. A site check. A site check requires sampling of the soil and nearby monitoring/observation wells for the presence of a release where contamination is most likely to be present at the UST site. The results of the sampling investigation should be forwarded to the New Release Project Manager, Tanks Section, P.O. Box 176, Jefferson City, Missouri 65102-0176.

***Any time you find evidence of a release of regulated substance to the environment (product in soils, nearby waters, tank pit), these events are suspected releases under 10 CSR 26-2.050 and must be reported to the Department's Spill Line at (573) 634-2436.**

If you have questions concerning sampling procedures, locations and methods, please contact the Tanks Section at (573) 751-6822.

If you have any questions concerning UST equipment issues, system testing, testing methods and procedures, please contact the Tanks Compliance and Technology Unit at (573) 522-5665.

HP:cah

- c: Brian Allen, Director, Environmental Services Program
Steve Sturgess, Director, Hazardous Waste Program