



North Carolina Department of Environment and Natural Resources
Division of Waste Management

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November 21, 2013

TO: Owners and Operators of Regulated Underground Storage Tanks

RE: Deadline for Using Inventory Control or Manual Tank Gauging with Periodic Tank Tightness Testing

A few tank owners and operators are currently using inventory control or manual tank gauging in conjunction with tank tightness testing every five years (IC or MTG) as their methods of leak detection. **The use of these methods is TEMPORARY and only valid for UST systems installed prior to October 31, 2007.** The above methods may only be used for a limited time period (i.e. until ten (10) years after the *tank* is installed). After that time, owners and operators must use an approved permanent monthly monitoring method of leak detection. All UST systems installed prior to the date of this letter, November 21, 2003, should have already switched to an approved permanent method of leak detection. Neither of the above methods may be used on UST systems installed on or after November 01, 2007. **Secondary containment with interstitial monitoring in accordance with 15A NCAC 2N .0900 must be the primary leak detection method on all regulated tanks of any size for underground storage tanks installed on or after November 01, 2007.** An example is provided below to help determine how long either of the above methods may be used before switching to a permanent monthly monitoring method is required:

1. A fiberglass tank and fiberglass piping were installed on October 1, 2003. Spill and overfill equipment were also installed on October 1, 2003. Overfill equipment was replaced in 2006. IC could be used until September 30, 2013 because it was originally upgraded at installation in 2003.

Manual tank gauging (MTG) cannot be used for any tanks installed after November 1, 2007. The following guidelines only apply to tanks installed prior to November 01, 2007. Manual tank gauging can be used only on tanks 2,000 gallons or smaller. Tanks 550 gallons or smaller can use this method alone. Tanks from 551 to 2,000 gallons can use manual tank gauging only when it is combined with periodic tank tightness testing. The combined method of manual tank gauging and tank tightness testing is a TEMPORARY leak detection method. You can use the combined method for only 10 years after installing a new tank that has corrosion protection and spill/overfill devices or for 10 years after upgrading an old tank with corrosion protection and spill/overfill devices. (However, tanks that are filled by transfers of no more than 25 gallons at one time are not required to have spill/overfill devices.) During this 10 year period, tanks need tightness testing every 5 years. After the 10 year period, you must use a monthly monitoring method, such as automatic tank gauging, SIR or interstitial monitoring. Manual tank gauging does not meet your tank system's leak detection requirements for piping. Pressurized and some suction piping must use other methods of leak detection, such as interstitial monitoring. (See " Leak Detection Methods for Petroleum Underground Storage Tanks and Piping").

Tank Size	Minimum Duration of Test	Weekly Standard (1 Test)	Monthly Standard (4-Test Average)
up to 550 gallons	36 hours	10 gallons	5 gallons
551-1,000 gallons (also require periodic tank tightness testing)	36 hours	13 gallons	7 gallons
1,001-2,000 gallons (also require periodic tank tightness testing)	36 hours	26 gallons	13 gallons

If you have any questions, please do not hesitate to contact the UST Section at (919) 707-8171.