Record-keeping requirements for underground storage tanks

Owners and operators of regulated underground storage tanks (USTs) must keep certain records related to their tank system(s). These records should be kept at the UST site or a location that is easily accessible to Minnesota Pollution Control Agency (MPCA) inspectors. Electronic records are acceptable as long as they are accessible to MPCA inspectors.

Although some UST records must be kept for a limited time, the MPCA recommends keeping these records indefinitely. The records may be useful during the sale of the property or to show if an UST system has been leaking.

Corrosion protection

Records that must be kept for the life of steel USTs or steel piping include:

- Documentation from the MPCA that allows alternative corrosion protection equipment to be used at a site.
- Documentation from a corrosion expert that says corrosion protection equipment is not necessary at the site.

Records that must be kept for systems using an impressed current cathodic protection system include:

- Results from the last three cathodic protection tests conducted by a cathodic protection (CP) tester. The tests must be conducted within six months of installation or repair, and annually thereafter.
- 60-day rectifier readings must be kept for three years. The rectifier readings can be done by the owner or operator to assure the equipment is operating properly.

Records that must be kept for systems using sacrificial anode cathodic protection system include:

- Results from the last three cathodic protection tests conducted by a CP tester. The tests must be conducted within six months of installation or repair, and at least every three years thereafter.

Operation and maintenance testing

Records that must be kept for five years include inspection and testing results of the following:

- Monthly walk-through inspection of the UST system.
- Annual leak detection equipment operability inspections and testing (e.g. Automatic tank gauge, probes sensors etc.).
- Annual visual inspections of spill bucket and secondary containment sumps if used for interstitial monitoring.
- Overfill equipment functionality testing (required every three years).
- Spill bucket integrity testing (required every three years).
- Secondary containment sump integrity testing if used for interstitial monitoring (required every three years).

Documentation of proper disposal of waste generated from spill bucket and secondary containment integrity testing must be kept for five years.

Release detection

Records that must be kept as long as the release detection method is used:
Documentation of the manufacturer’s written performance claims.
- Documentation of the manufacturer’s written maintenance and calibration schedules.
- Documentation from the MPCA that an alternative release detection method may be used.

Records that must be kept for five years:
- Documentation of any maintenance, calibrations or repairs of the release detection equipment.
- Results of any testing, or monitoring of release detection methods including:
  - Monthly statistical inventory reconciliation.
  - Monthly automatic tank gauging with a 0.2 gallons per hour (gph) test result.
  - Monthly interstitial monitoring results (required for tanks or piping installed after December 22, 2007).
  - Annual functionality tests of interstitial sensors or leak sensing devices as applicable.
  - Monthly manual tank gauging records demonstrating that tank liquid level readings were taken at the beginning and end of the manual tank gauging period, and weekly and monthly averaging of the shortages and overages.
  - Tank tightness testing as applicable.
  - Annual line tightness testing at 0.1 gph or monthly line tightness testing at 0.2 gph.
  - Annual functionality testing of any automatic line leak detectors (mechanical or electronic).

Class A, B, and C operator
Records that the facilities class A and B operators have passed the operator examination must be kept until the facility closes or the class A or B operator is no longer employed at the facility. Records that the facilities class C operators have received training must be kept until the facility closes or the class C operator is no longer employed at the facility.

Repairs to UST systems
Records that must be kept for the life of the UST system include:
- Documentation of UST system repairs including the nature of each repair.
- Results of required integrity testing on repaired tank system components according to 7150.0250 subpart 2.

Equipment compatibility
Documentation that the UST system components are compatible with the substance that is stored and dispensed must be kept for the life of the tank system.

Permanent closure records
The results of any site assessment conducted according to 7150.0345 during permanent closure, or change in status to a nonregulated substance, and other records demonstrating compliance with closure requirements according to Minn. R. ch. 7150.0400 – 7150.0430 must be kept for three years.

Closure records may be submitted to the MPCA if they cannot be kept at the site or at an alternative site where they would be readily accessible. It is a good idea to keep the site investigation records indefinitely if the property will ever be sold.

For more information
You can access the MPCA’s website for more information about USTs or to link to the UST rules. The UST Program website is at https://www.pca.state.mn.us/waste/underground-storage-tank-systems. You can also call the MPCA at 651-296-6300 or 1-800-657-3864.