



**Release Reporting
for
Underground Storage Tank
Owners & Operators**

**Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division of Waste Management**

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This document is not a substitute for reading and understanding Kentucky’s statutes and regulations governing the operation and maintenance of underground storage tanks per 401 KAR Chapter 42. This document will assist tank owners and operators understand the steps to take in the event of a confirmed, threatened, or suspected release at a UST facility. It does not include all possible instances in which a release report is required nor is it comprehensive in detailing all possible investigative actions required by the owners and operators. This document is not intended to detail the full response actions of the Cabinet’s Emergency Response Team and Field Operations Branch, but is to provide an overview of the Cabinet’s possible response when evaluating notifications and investigating a confirmed, threatened, or suspected release. In addition, be aware that there may be additional federal, state, and or local reporting requirements. Notification to one entity does not relieve the tank owner or operator from notification requirements to other agencies.

Releases from underground storage tank (UST) systems are costly to clean up and negatively impact the business operations of UST owners. While cleanup costs may be reimbursable through the Petroleum Storage Tank Environmental Assurance Fund (PSTEAF), the costs of lost product and reduced revenues from a release may not be recoverable. The Kentucky Department for Environmental Protection (KDEP) has the mission of protecting human health and the environment and the UST owner is in business for economic gain – both parties benefit from early detection and reporting of releases and repair of USTs, if necessary.

State law and regulations require immediate reporting of suspected, threatened or confirmed releases from UST systems to the cabinet's 24-hour Emergency Response Team Hotline at 1-800-928-2380. This document provides information on what may be considered a suspected, threatened, or confirmed release and the steps to investigate and report a release into the environment. Refer to [401 KAR Chapter 42](#) for definitions and regulations pertaining to underground storage tanks, and specifically [401 KAR 42:060 Section 1](#) for reporting releases, spills, and overfills.

This document is arranged in three (3) sections for ease of use and to quickly find the appropriate response to a suspected, threatened, or confirmed release. Field Operations Branch (FOB) and the Emergency Response Team (ERT) possible responses are included with each notification.



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1.0 Tier I Notifications

Tier I conditions require immediate investigation from the owner or operator, and potential reporting to cabinet's Emergency Response Team Hotline.

1.1 Confirmed presence of product outside of primary UST system

- Product in the environment
- Fuel alarm from discriminating liquid sensors
- Failure of overfill device that results in a release to the environment

Action: Immediate owner or operator response

Product in the environment

A UST system release is any free product observed outside of the primary tank and/or piping system (including free product in secondary containment), in the environment, or posing an immediate threat to the environment. The UST owner and operator shall report a release to the cabinet's 24-hour Emergency Response Team Hotline and investigated immediately. Owners and operators are required by law to investigate the source of the leak using appropriate testing methods, make required repairs, and retest using a third-party-approved test method. If the source of the product is not determined then the owner or operator should carefully observe for a recurrence of the release. The free product shall be cleaned up and properly disposed. Maintain records of all actions taken to resolve the event.

Fuel alarm from a discriminating liquid sensor

A liquid sensor alarm indicates a release of free product, and the owner or operator shall immediately investigate the alarm. If the source of a release cannot be immediately identified and repaired, then the UST owner or operator shall report a release to the cabinet's 24-hour Emergency Response Team hotline. If the cause of the alarm was determined to be a failed or faulty sensor, the sensor shall be repaired or replaced followed by a passing operational test. Repairs to product piping below the shear valve require testing using a third-party-approved test method. Maintain all records of actions taken to resolve the sensor alarm.

Overfill Event that results in a release to the environment

In the event of a UST overfill where fuel is released from a tank riser or a tank vent line, the owner or operator shall immediately investigate and determine the reason for the overfill event. Overfill device failures that result in product being released to the environment shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Owners and operators shall ensure all releases are cleaned up, any defective overfill prevention devices are replaced, and no free product or vapor problems persist. Maintain records of all actions taken to resolve the event. Releases that are a result of an improperly attached transport hose or other transporter operator error are not considered UST releases but are still reportable under KRS 224.1-400(11).

- ❖ **ERT/FOB response:** ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If a UST system failure is confirmed, ERT will red tag and disable the failed system until the equipment is repaired or replaced, and retested using a third-party-approved method with documentation of passing test results provided to ERT. Free product recovery actions may also be initiated by ERT when applicable.



1.2 Presence of vapors

Action: Immediate owner or operator response

Immediately report the presence of indoor petroleum vapors to the cabinet's 24-hour Emergency Response Team hotline. Coordinate with ERT to investigate the entire UST system to determine the cause of petroleum vapors. A review of all release detection and inventory records shall be conducted to investigate possible undetected inventory losses. All sumps, manways, dispensers, tank pit observation wells, and other system components shall be checked for the presence of free product. All subsurface features such as stormwater, sanitary collection systems, or utility conduits shall also be checked for free product or vapors. Identifying the source of the vapors may require some, or all, of the UST system components to be tested in an effort to locate the leak source. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** ERT will immediately respond to a notification of petroleum vapors inside of a commercial or residential structure or other feature (stormwater/sanitary collection systems, utility conduits, etc.). If the investigation determines a probable source for the vapors, ERT will red tag and disable the failed UST system. At times, there may not be a readily known vapor source or there may be multiple UST facilities nearby. In those situations, ERT may conduct system tightness testing of suspect UST systems in an effort to identify the vapor source. ERT may also require the sealing of all electrical and plumbing conduit entries as well as floor drains and other penetrations made through the floor of the building. Additional actions may be taken by ERT in an attempt to mitigate vapor intrusion within the subject UST facility.

1.3 Presence of water in tanks

Action: Immediate owner or operator response

Immediately report water level within a tank that is greater than one (1) inch to the cabinet's 24-hour Emergency Response Team hotline. Confirm automatic tank gauge (ATG) reading by manually gauging tank with the appropriate water finding paste. Begin investigation of tank components to determine if water intrusion was caused by failed riser caps in flooded sumps or manways; failed pump head gasket in flooded sumps or manways; failed spill bucket with water entering through riser or faulty plunger; failed vapor recovery adaptor; or other tank component that might allow water into the tank. Depending on the findings and specific repairs, a third-party-approved tank tightness test may be required. If no water entry source is identified, a tank tightness test shall be conducted to confirm the tank is tight. Maintain all records of actions taken to resolve the water intrusion event.

- ❖ **ERT/FOB response:** ERT will immediately respond to reports of water intrusion into tanks greater than two (2) inches. If confirmed water intrusion or failed test is observed, ERT will red tag and disable the failed system until the system components are repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT. Severe water intrusion events that pose a threat of release due to the flooding of the tank may require the performance of immediate removal of fuel from the suspect tank. If the owner or operator cannot facilitate removal of the fuel from the tank, ERT may take the necessary action to render the tank empty of fuel.



1.4 Failure of third-party-approved tank or piping tightness tests

Action: Immediate owner or operator response

Owners and operators will be required to cease operation of the failed system, identify the leak source, perform required repairs, and conduct third-party-approved tightness testing to confirm the repair. If the source of the leak cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Maintain all records of actions taken to resolve the test failure event.

- ❖ **ERT/FOB response:** ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and retested using a third-party-approved method with documentation of passing test results provided to ERT.

1.5 Potential damage to UST system or components

- Fires, lightning strikes, natural disasters, transport accidents
- Struck dispensers

Action: Immediate owner or operator response

Fires, lightning strikes, natural disasters, transport accidents

Immediately investigate the operating conditions of the UST system after an unusual occurrence described in this section. Assess the UST system for damage or presence of any free product noted outside of the primary UST system in the environment, or damage to the UST system that poses a threat to the environment. If a resulting leak cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Owners and operators shall investigate the source of the release, make required repairs, and test the repair using a third-party-approved method. Any free product discovered shall be cleaned up and properly disposed. Maintain records of all actions taken to resolve the event.

Struck dispensers

Product piping equipped with ELLDs shall have a 0.1 gph test conducted as soon as possible after being struck. Piping equipped with MLLDs shall have a third-party-approved line tightness test conducted within seven (7) days. Broken shear valves that cannot be immediately replaced or repaired will be capped before returning the system to operation. Piping repairs below the shear valve require third-party-approved line tightness testing before returned to service. Struck bollards or bumpers are considered to be potentially damaging and may result in damage to underground piping. An investigation into the potential damage should be completed. Maintain records of all actions taken to resolve the event.

- ❖ **ERT/FOB response:** ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If system damage, a release or failed test is confirmed ERT will red tag and disable the failed system. Documentation of system repair and precision testing may be required prior to system restart with specific requirements to be determined based on severity of the damage and specific type of UST components impacted. Documentation of repair and system precision testing results are to be provide to ERT.



1.6 Malfunctioning or missing automatic line leak detectors

- Pump relay alarm or continuously running submersible turbine pump (STP)
- Failure to replace a failing line leak detector
- Missing or disabled line leak detector

Action: Immediate owner or operator response

Pump relay alarm or continuously running (STP)

This condition does not allow gross line leak detection to occur. Owners and operators shall immediately disable the piping system and repair the equipment. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the system and a passing third-party-approved operational test shall be conducted. Maintain records of all actions taken to resolve the event.

Failure to replace a failing line leak detector

This condition does not allow gross line leak detection to occur. Owners and operators shall immediately disable the piping system and repair the equipment. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the system and a passing third-party-approved operational test shall be conducted. Maintain records of all actions taken to resolve the event.

Missing or disabled automatic line leak detector

This is a presumed willful violation of release detection and prevention requirements. If FOB observes a pressurized product line that lacks an automatic line leak detector (ALD) or observes an intentionally disabled ALD, the inspector will notify the State Fire Marshall and the cabinet's 24-hour Emergency Response Team hotline. ERT will immediately respond, red tag, and disable the deficient system until the equipment is properly installed and tested using a third-party-approved method.

- ❖ **ERT/FOB response:** ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed piping system until the equipment is repaired or replaced, and retested using a third-party-approved method with documentation of passing test results provided to ERT.



2.0 Tier II Notifications

Tier II conditions require immediate investigation from the owner or operator, and potential reporting to the cabinet's Emergency Response Team Hotline.

2.1 Erratic dispenser behavior from a suction system

Action: Owner or operator immediately investigate and resolve within 7 days

Erratic or intermittent flow from a suction dispenser may indicate a leak in product piping. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Repairs to product piping below the dispenser check valve require a third-party-approved line tightness test. Maintain all records of actions taken to resolve erratic flow event.

- ❖ **ERT/FOB response:** ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.

2.2 Failing results from a tank or piping release detection method

- Annual and periodic line test failures from electronic line leak detectors
- Annual and periodic tank test failures from automatic tank gauge
- Liquid alarm from discriminating liquid sensor
- Tank interstice alarm
- Failing results from SIR or MTG
- SIR inconclusive results
- Unexplained inventory discrepancies

Action: Owner or operator immediately investigate and resolve within 7 days

Annual and periodic line test failures from electronic line leak detectors

As a first step to investigate this type of suspected release, force an equivalent line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. Otherwise, investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and, if piping is repaired below the shear valve, tested using a third-party-approved method. If no releases or leaking components are observed, no internal electronic or mechanical components are defective, and piping will not pass an annual (0.1 gph) ELLD test, the owner or operator shall conduct a third-party-approved line tightness test. Maintain all records of actions taken to resolve this situation.

Annual and periodic tank test failures from automatic tank gauge

As a first step to investigate this type of suspected release, force an equivalent tank test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the tank. Otherwise, investigate the specific tank by checking all tank sumps, riser manways, tank interstice, or any pit observation wells for the presence of free product. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the tank system and tested using a third-party-approved test method. If no failed components or programming errors are identified and the tank does not pass an annual (0.1 gph) ELLD test, the owner or operator shall conduct a third-party-approved tank tightness test. Maintain all records of actions taken to resolve tank test failure alarms and annual tests.



Liquid alarm from discriminating sensor

If interstitial monitoring is the primary release detection method, the owner or operator shall investigate the alarm and take appropriate actions to evaluate the containment sump or sensor. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the containment system and tested using a third-party-approved test method. Maintain all records of actions taken to resolve the sensor alarm.

Tank interstice alarm

If interstitial monitoring is the primary release detection method, the owner or operator shall investigate the alarm and take appropriate actions to test the sensor or the tank interstice. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the tank system and tested using a third-party-approved test method. Maintain all records of actions taken to resolve the tank interstice alarm.

Failing result from SIR release detection method

Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for failing results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to a tank or product piping, a third-party-approved test shall be conducted. If a cause for the monthly failure is not identified, a third-party-approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the release detection method failure.

SIR inconclusive results

Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for inconclusive results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to a tank or product piping, a third-party-approved test shall be conducted. If a cause for the consecutive inconclusive results is not identified, a third-party-approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the inconclusive results.

Unexplained inventory discrepancies

Release detection methods are not foolproof. For example, automatic tank gauging and line leak detectors cannot detect leaks from the pump head and SIR only provides results on a monthly basis. Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for inconclusive results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to the tank or product piping, a third-party-approved test shall be conducted. If a cause for the inventory discrepancy is not identified, a third party approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the release detection method failure.

- ❖ **ERT/FOB response:** ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.



2.3 Liquid alarm from non-discriminating liquid sensor

Action: Owner or operator immediately investigate and resolve within 7 days

If interstitial monitoring is the primary release detection method, the owner or operator shall investigate the alarm and determine the cause. If water is found to be causing the alarm, the owner or operator shall take appropriate actions to empty, repair, and test the containment sump. If initial investigation confirms a release of fuel, immediately investigate and repair the source of the release. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Repairs to product piping below the shear valve shall be tested using a third-party-approved method. Repairs or replacement of sump parts or sensor requires appropriate testing. Maintain all records of actions taken to resolve the sensor alarm.

- ❖ **ERT/FOB response:** ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.

2.4 Potential catastrophic product piping failure (>3.0 gph leak)

- Gross line failure with Automatic Line leak detector pump shutdown
- Slow dispenser flow for pressurized piping with mechanical line leak detector
- Automatic line leak detector failure that is not immediately remedied

Action: Owner or operator immediately investigate and resolve within 7 days

Gross line failure/ Automatic Line leak detector pump shutdown alarm

As a first step to investigate this type of suspected release, the owner and operator shall ensure a qualified person forces the release detection system to conduct an equivalent line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. If the ELLD continues to fail the 3.0 gph test, force a periodic (0.2 gph) or annual (0.1 gph) line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. Otherwise, investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and, if piping is repaired below the shear valve, tested using a third-party-approved method. Replacement of a defective ELLD requires an operational test with passing results. Maintain all records of actions taken to resolve this situation.

Slow dispenser flow for pressurized piping with mechanical line leak detector

Slow flow indicates a mechanical line leak detector may have detected a leak in product piping greater than 3.0 gph. Immediately investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and tested using a third-party-approved method. Replacement of a defective MLLD requires an operational test with passing results. If no releases or leaking components are observed, no internal electronic or mechanical components are defective, and the MLLD continues to go into slow flow, the owner or operator shall conduct a third-party-approved line tightness test. Maintain all records of actions taken to resolve this situation.

Automatic line leak detector failure that is not immediately remedied

If a mechanical or electronic line leak detector fails to pass an operational test, the failed test result shall be submitted to the Underground Storage Tank Branch (USTB) within seven (7) days of the test date. The failed line leak detector shall be immediately replaced with a leak detector that is functioning properly and that has passed an operational test after replacement. The passing test result shall be submitted to USTB within thirty



(30) days. If immediate replacement and re-testing is conducted, no release reporting is required, but testing is still required to be submitted to USTB. If an improperly functioning leak detector cannot be immediately replaced, the owner or operator shall immediately report to the cabinet's 24-hour Emergency Response Team hotline of the test failure. The failed system shall be immediately taken out of service until a properly functioning leak detector is installed with a passing operational test result conducted. Maintain records of all actions taken to resolve the event.

- ❖ **ERT/FOB response:** ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.

2.5 Potential catastrophic tank failure (>3.0 gph leak)

- A sudden loss or leak alarm
- Gross tank leak or failure alarm

Action: Owner or operator immediately investigate and resolve within 7 days

Sudden loss or leak alarm or gross tank leak or failure alarm

As a first step to investigate this type of suspected release, the owner and operator shall ensure a qualified person forces the release detection system to conduct an annual (0.1 gph) ATG test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the tank. Subsequent passing static or continuous tests can also be used to confirm tank integrity. Otherwise, investigate the specific tank by checking all tank sumps, riser manways, tank interstice, or any pit observation wells for the presence of free product. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the tank system, and tested using a third-party-approved test method. If no failed components or programming errors are identified and the tank will not pass an annual (0.1 gph) ATG test, the owner or operator shall conduct a third-party-approved tank tightness test. Maintain all records of actions taken to resolve tank test failure alarm.

- ❖ **ERT/FOB response:** ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.



3.0 Tier III Notifications

Tier III conditions that require prompt investigation from the owner or operator.

3.1 Failed spill buckets or catch basins that are not contributing to water intrusion

Action: Owner or operator response within 7 days

Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to replace the defective spill bucket and submit passing test results. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** FOB will follow up to ensure the spill bucket has been replaced and passing test results have been submitted to the USTB.

3.2 Failed under dispenser containment (UDC) and sump testing

Action: Owner or operator response within 7 days

Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair or replace the defective containment sump and submit passing test results. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** FOB will follow up to ensure that UDC and sumps are repaired or replaced and passing test results have been submitted to the USTB.

3.3 Failed cathodic protection testing

Action: Owner or operator response within 7 days

Owners and operators are required to report failing test results to USTB within seven (7) days of completing the test. Owners and operators have ninety (90) days from the test date to retest the system if the failing results are thought to be due to adverse weather condition. Owners and operators have ninety (90) days to repair the cathodic protection system, retest, and submit the passing results. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** FOB will follow up to ensure the cathodic protection system has been retested and/or repaired, and passing test results have been submitted to the USTB.

3.4 Failed overfill device testing

Action: Owner or operator response within 7 days

Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair/replace the defective overfill device and submit passing test results. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** FOB will follow up to ensure that overfill devices are repaired or replaced and passing test results have been submitted to the USTB.



3.5 Failed electronic release detection equipment testing

Action: Owner or operator response within 7 days

Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair/replace the defective equipment and submit passing test results. Maintain records of all actions taken to resolve the incident.

- ❖ **ERT/FOB response:** FOB will follow up to ensure the defective electronic release detection equipment is repaired or replaced and passing test results have been submitted to the USTB.

3.6 Suspected release reports that do not result in confirmed releases

Action: Owner or operator response within 7 days

Owners and operators shall maintain records of all repairs to UST systems and system components for the life of the system. Types of records could be service tickets, passing system test records, etc.

- ❖ **ERT/FOB response:** FOB will follow up to ensure that suspected releases have been resolved.



4.0 UST Release Report Reference Chart



Tier I Notifications

Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
1.1	Confirmed presence of product outside of primary UST system	Product in the environment	Immediate owner and operator response	A UST system release is any free product observed outside of the primary tank and/or piping system (including free product in secondary containment), in the environment, or posing an immediate threat to the environment. The UST owner and operator shall report a release to the cabinet's 24-hour Emergency Response Team Hotline and investigate immediately. Owners and operators are required by law to investigate the source of the leak using appropriate testing methods, make required repairs, and retest using a third-party-approved test method. If the source of the product is not determined then the owner or operator should carefully observe for a recurrence of the release. The free product shall be cleaned up and properly disposed. Maintain records of all actions taken to resolve the event.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If a UST system failure is confirmed, ERT will red tag and disable the failed system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT. Free product recovery actions may also be initiated by ERT when applicable.
1.1	Confirmed presence of product outside of primary UST system	Fuel Alarm from a discriminating sensor	Immediate owner and operator response	A liquid sensor alarm indicates a release of free product, and the owner or operator shall immediately investigate the alarm. If the source of a release cannot be immediately identified and repaired, then the UST owner or operator shall report a release to the cabinet's 24-hour Emergency Response Team hotline. If the cause of the alarm was determined to be a failed or faulty sensor, the sensor shall be repaired or replaced followed by a passing operational test. Repairs to product piping below the shear valve require testing using a third-party-approved test method. Maintain all records of actions taken to resolve the sensor alarm.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If a UST system failure is confirmed, ERT will red tag and disable the failed system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT. Free product recovery actions may also be initiated by ERT when applicable.
1.1	Confirmed presence of product outside of primary UST system	Overfill Event that results in a release to the environment	Immediate owner and operator response	In the event of a UST overfill where fuel is released from a tank riser or a tank vent line, the owner or operator shall immediately investigate and determine the reason for the overfill event. Overfill device failures that result in product being released to the environment shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Owners and operators shall ensure all releases are cleaned up, any defective overfill prevention devices are replaced, and no free product or vapor problems persist. Maintain records of all actions taken to resolve the event. Releases that are a result of an improperly attached transport hose or other transporter operator error are not considered UST releases but are still reportable under KRS 224.1-400(11).	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If a UST system failure is confirmed, ERT will red tag and disable the failed system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT. Free product recovery actions may also be initiated by ERT when applicable.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
1.2	Presence of vapors	Petroleum Vapors noted in indoor areas	Immediate owner and operator response	Immediately report the presence of indoor petroleum vapors to the cabinet's 24-hour Emergency Response Team hotline. Coordinate with ERT to investigate the entire UST system to determine the cause of petroleum vapors. A review of all release detection and inventory records shall be conducted to investigate possible undetected inventory losses. All sumps, manways, dispensers, tank pit observation wells, and other system components shall be checked for the presence of free product. All subsurface features such as stormwater, sanitary collection systems, or utility conduits shall also be checked for free product or vapors. Identifying the source of the vapors may require some, or all, of the UST system components to be tested in an effort to locate the leak source. Maintain records of all actions taken to resolve the incident.	ERT will immediately respond to a notification of petroleum vapors inside of a commercial or residential structure or other feature (stormwater/sanitary collection systems, utility conduits, etc.). If the investigation determines a probable source for the vapors, ERT will red tag and disable the failed UST system. At times, there may not be a readily known vapor source or there may be multiple UST facilities nearby. In those situations, ERT may conduct system tightness testing of suspect UST systems in an effort to identify the vapor source. ERT may also require the sealing of all electrical and plumbing conduit entries as well as floor drains and other penetrations made through the floor of the building. Additional actions may be taken by ERT in an attempt to mitigate vapor intrusion within the subject UST facility.
1.3	Presence of water in tanks	Water greater than 1" within a tank	Immediate owner and operator response	Immediately report water level within a tank that is greater than one (1) inch to the cabinet's 24-hour Emergency Response Team hotline. Confirm automatic tank gauge (ATG) reading by manually gauging tank with the appropriate water finding paste. Begin investigation of tank components to determine if water intrusion was caused by failed riser caps in flooded sumps or manways; failed pump head gasket in flooded sumps or manways; failed spill bucket with water entering through riser or faulty plunger; failed vapor recovery adaptor; or other tank component that might allow water into the tank. Depending on the findings and specific repairs, a third-party-approved tank tightness test may be required. If no water entry source is identified, a tank tightness test shall be conducted to confirm the tank is tight. Maintain all records of actions taken to resolve the water intrusion event.	ERT will immediately respond to reports of water intrusion into tanks greater than two (2) inches. If confirmed water intrusion or failed test is observed, ERT will red tag and disable the failed system until the system components are repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT. Severe water intrusion events that pose a threat of release due to the flooding of the tank may require the performance of immediate removal of fuel from the suspect tank. If the Owner/Operator cannot facilitate removal of the fuel from the tank then ERT may take the necessary action to render the tank empty of fuel.
1.4	Failure of third-party-approved tank or piping tightness tests	Confirmed third party approved failed tank and piping tests	Immediate owner and operator response	Owners and operators will be required to cease operation of the failed system, identify the leak source, perform required repairs, and conduct third-party-approved tightness testing to confirm the repair. If the source of the leak cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Maintain all records of actions taken to resolve the test failure event.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
1.5	Potential damage to UST system or components	Fires, lightning strikes, natural disasters, transport accidents	Immediate owner and operator response	Immediately investigate the operating conditions of the UST system after an unusual occurrence described in this section. Assess the UST system for damage or presence of any free product noted outside of the primary UST system in the environment, or damage to the UST system that poses a threat to the environment. If a resulting leak cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Owners and operators shall investigate the source of the release, make required repairs, and test the repair using a third-party-approved method. Any free product discovered shall be cleaned up and properly disposed. Maintain records of all actions taken to resolve the event.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If system damage, a release, or a failed test is confirmed then ERT will red tag and disable the failed system. Documentation of system repair and precision testing may be required prior to system restart with specific requirements to be determined based on severity of the damage and specific type of UST components impacted. Documentation of repair and system precision testing results are to be provide to ERT.
1.5	Potential damage to UST system or components	Struck dispensers	Immediate owner and operator response	Product piping equipped with ELLDs shall have a 0.1 gph test conducted as soon as possible after being struck. Piping equipped with MLLDs shall have a third-party-approved line tightness test conducted within seven days. Broken shear valves that cannot be immediately replaced or repaired will be capped before returning the system to operation. Piping repairs below the shear valve require third-party-approved line tightness testing before returned to service. Struck bollards or bumpers are considered to be potentially damaging and may result in damage to underground piping. An investigation into the potential damage should be completed. Maintain records of all actions taken to resolve the event.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. If system damage, a release, or a failed test is confirmed then ERT will red tag and disable the failed system. Documentation of system repair and precision testing may be required prior to system restart with specific requirements to be determined based on severity of the damage and specific type of UST components impacted. Documentation of repair and system precision testing results are to be provide to ERT.
1.6	Malfunctioning or missing automatic line leak detectors	Pump relay alarm or continuously running (STP)	Immediate owner and operator response	This condition does not allow gross line leak detection to occur. Owners and operators shall immediately disable the piping system and repair the equipment. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the system and	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed piping system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT.
1.6	Malfunctioning or missing automatic line leak detectors	Failure to replace a failing line leak detector	Immediate owner and operator response	This condition does not allow gross line leak detection to occur. Owners and operators shall immediately disable the piping system and repair the equipment. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the system and a passing third-party-approved operational test shall be conducted. Maintain records of all actions taken to resolve the event.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed piping system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
1.6	Malfunctioning or missing automatic line leak detectors	Missing or disabled automatic line leak detector	Immediate owner and operator response	This is a presumed willful violation of release detection and prevention requirements. If FOB observes a pressurized product line that lacks an automatic line leak detector (ALD) or observes an intentionally disabled ALD, the inspector will notify the State Fire Marshall and the cabinet's 24-hour Emergency Response Team hotline. ERT will immediately respond, red tag, and disable the deficient system until the equipment is properly installed and tested using a third-party-approved method.	ERT will immediately respond to the hotline report or a report from another regulating agency of a nonresponsive owner. ERT will red tag and disable the failed piping system until the equipment is repaired or replaced and retested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier II Notifications

Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
2.1	Erratic dispenser behavior from a suction system	Intermittent or no flow from a suction dispenser	Owner or operator resolve within 7 days	Erratic or intermittent flow from a suction dispenser may indicate a leak in product piping. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Repairs to product piping below the dispenser check valve require a third-party-approved line tightness test. Maintain all records of actions taken to resolve erratic flow event.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.2	Failing results from a tank or piping release detection method	Annual and periodic line test failures from electronic line leak detectors	Owner or operator resolve within 7 days	As a first step to investigate this type of suspected release, force an equivalent line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. Otherwise, investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and, if piping is repaired below the shear valve, tested using a third-party-approved method. If no releases or leaking components are observed, no internal electronic or mechanical components are defective, and piping will not pass an annual (0.1 gph) ELLD test, the owner or operator shall conduct a third-party-approved line tightness test. Maintain all records of actions taken to resolve this situation.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.2	Failing results from a tank or piping release detection method	Liquid alarm from discriminating sensor	Owner or operator immediately investigate and resolve within 7 days	If interstitial monitoring is the primary release detection method, the owner or operator shall investigate the alarm and take appropriate actions to evaluate the containment sump or sensor. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the containment system and tested using a third-party-approved test method. Maintain all records of actions taken to resolve the sensor alarm.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.2	Failing results from a tank or piping release detection method	Tank Interstice Alarm	Owner or operator immediately investigate and resolve within 7 days	If interstitial monitoring is the primary release detection method, the owner or operator shall investigate the alarm and take appropriate actions to test the sensor or the tank interstice. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the tank system and tested using a third-party-approved test method. Maintain all records of actions taken to resolve the tank interstice alarm.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
2.2	Failing results from a tank or piping release detection method	Failing result from SIR release detection method	Owner or operator immediately investigate and resolve within 7 days	Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for failing results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to a tank or product piping, a third-party-approved test shall be conducted. If a cause for the monthly failure is not identified, a third-party-approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the release detection method failure.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.2	Failing results from a tank or piping release detection method	SIR Inconclusive Results	Owner or operator immediately investigate and resolve within 7 days	Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for inconclusive results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to a tank or product piping, a third-party-approved test shall be conducted. If a cause for the consecutive inconclusive results is not identified, a third-party-approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the inconclusive results.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.2	Failing results from a tank or piping release detection method	Unexplained inventory discrepancies	Owner or operator immediately investigate and resolve within 7 days	Release detection methods are not foolproof. For example, automatic tank gauging and line leak detectors cannot detect leaks from the pump head and SIR only provides results on a monthly basis. Immediately investigate the suspect UST system by checking all tank and dispenser sumps, riser manways, tank interstice, dispensers, or any pit observation wells for the presence of free product. Other potential sources for inconclusive results may be data collection errors or meter miscalibration. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the failed component and, if repairs are made to the tank or product piping, a third-party-approved test shall be conducted. If a cause for the inventory discrepancy is not identified, a third party approved system tightness test shall be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the release detection method failure.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
2.3	Liquid alarm from non-discriminating liquid sensor	Interstitial Monitoring Alarm as primary release detection	Owner or operator immediately investigate and resolve within 7 days	Immediately review the data collection process to rule out data errors or stick reading problems. If no obvious errors are noted, investigate the product grade by opening the specific tank sump and checking each dispenser for the presence of free product. If the investigation confirms a system release, immediately update the confirmed failure/release to the hotline. Appropriate repairs must be made to the failed component and a third party approved test must be conducted. If a cause for the MTG monthly failure is not identified, a third party approved system tightness test must be conducted to check both tank and associated piping for leaks. Maintain records of all actions taken to resolve the event.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.4	Potential catastrophic product piping failure (>3.0 gph leak)	Gross line failure/ Automatic Line leak detector pump shutdown alarm	Owner or operator immediately investigate and resolve within 7 days	As a first step to investigate this type of suspected release, the owner and operator shall ensure a qualified person forces the release detection system to conduct an equivalent line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. If the ELLD continues to fail the 3.0 gph test, force a periodic (0.2 gph) or annual (0.1 gph) line test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the product piping. Otherwise, investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and, if piping is repaired below the shear valve, tested using a third-party-approved method. Replacement of a defective ELLD requires an operational test with passing results. Maintain all records of actions taken to resolve this situation.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.4	Potential catastrophic product piping failure (>3.0 gph leak)	Slow dispenser flow for pressurized piping with mechanical line leak detector	Owner or operator immediately investigate and resolve within 7 days	Slow flow indicates a mechanical line leak detector may have detected a leak in product piping greater than 3.0 gph. Immediately investigate specific product piping by checking STP sumps and under all dispensers for the presence of free product. If a source of the condition cannot be immediately identified, and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Failed product piping shall be repaired and tested using a third-party-approved method. Replacement of a defective MLLD requires an operational test with passing results. If no releases or leaking components are observed, no internal electronic or mechanical components are defective, and the MLLD continues to go into slow flow, the owner or operator shall conduct a third-party-approved line tightness test. Maintain all records of actions taken to resolve this situation.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
2.4	Potential catastrophic product piping failure (>3.0 gph leak)	Automatic line leak detector failure that is not immediately remedied	Owner or operator immediately investigate and resolve within 7 days	If a mechanical or electronic line leak detector fails to pass an operational test, the failed test result shall be submitted to the Underground Storage Tank Branch within seven (7) days of the test date. The failed line leak detector shall be immediately replaced with a leak detector that is functioning properly and that has passed an operational test after replacement. The passing test result shall be submitted to USTB within thirty (30) days. If immediate replacement and re-testing is conducted, no release reporting is required, but testing is still required to be submitted to USTB. If an improperly functioning leak detector cannot be immediately replaced, the owner or operator shall immediately report to the cabinet's 24-hour Emergency Response Team hotline of the test failure. The failed system shall be immediately taken out of service until a properly functioning leak detector is installed with a passing operational test result conducted. Maintain records of all actions taken to resolve the event.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced and tested using a third-party-approved method with documentation of passing test results provided to ERT.
2.5	Potential catastrophic tank failure (>3.0 gph leak)	Sudden loss or leak alarm or gross tank leak or failure alarm	Owner or operator immediately investigate and resolve within 7 days	As a first step to investigate this type of suspected release, the owner and operator shall ensure a qualified person forces the release detection system to conduct an annual (0.1 gph) ATG test to confirm or refute the original alarm. A passing test is sufficient to confirm the integrity of the tank. Subsequent passing static or continuous tests can also be used to confirm tank integrity. Otherwise, investigate the specific tank by checking all tank sumps, riser manways, tank interstice, or any pit observation wells for the presence of free product. If a source of the condition cannot be immediately identified and repaired, a release shall be reported to the cabinet's 24-hour Emergency Response Team hotline. Appropriate repairs shall be made to the tank system, and tested using a third-party-approved test method. If no failed components or programing errors are identified and the tank will not pass an annual (0.1 gph) ATG test, the owner or operator shall conduct a third-party-approved tank tightness test. Maintain all records of actions taken to resolve tank test failure alarm.	ERT or FOB will dispatch a responder when the owner or operator reports to the hotline if a system release or failed test is confirmed. ERT will red tag and disable the failed system until the equipment is repaired or replaced, and tested using a third-party-approved method with documentation of passing test results provided to ERT.



Tier III Notifications

Tier Notification	Suspected UST System Release	Alarm or Event	Owner/Operator Response Timeframe	Owner/Operator Response Actions	KDEP Response Actions
3.1	Failed spill buckets or catch basins that are not contributing to water intrusion	Failed spill buckets or catch basins that are not contributing to water intrusion	Owner or operator response within 7 days	Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to replace the defective spill bucket and submit passing test results. Maintain records of all actions taken to resolve the incident.	FOB will follow up to ensure the spill bucket has been replaced and passing test results have been submitted to the USTB.
3.2	Failed under dispenser containment (UDC) and sump testing	Failed under dispenser containment (UDC) and sump testing	Owner or operator response within 7 days	Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair or replace the defective containment sump and submit passing test results. Maintain records of all actions taken to resolve the incident.	FOB will follow up to ensure that UDC and sumps are repaired or replaced and passing test results have been submitted to the USTB.
3.3	Failed cathodic protection testing	Failed cathodic protection testing	Owner or operator response within 7 days	Owners and operators are required to report failing test results to USTB within seven (7) days of completing the test. Owners and operators have ninety (90) days from the test date to retest the system if the failing results are thought to be due to adverse weather condition. Owners and operators have ninety (90) days to repair the cathodic protection system, retest, and submit the passing results. Maintain records of all actions taken to resolve the incident.	FOB will follow up to ensure the cathodic protection system has been retested and/or repaired, and passing test results have been submitted to the USTB.
3.4	Failed overfill device testing	Failed overfill device testing	Owner or operator response within 7 days	Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair/replace the defective overfill device and submit passing test results. Maintain records of all actions taken to resolve the incident.	FOB will follow up to ensure that overfill devices are repaired or replaced and passing test results have been submitted to the USTB.
3.5	Failed electronic release detection equipment testing	Failed electronic release detection equipment testing	Owner or operator response within 7 days	Owners and operators are required to report failing test results to the USTB within seven (7) days of completing the test. Owners and operators have thirty (30) days from the test date to repair/replace the defective equipment and submit passing test results. Maintain records of all actions taken to resolve the incident.	FOB will follow up to ensure that electronic release detection equipment is repaired or replaced and passing test results have been submitted to the USTB.
3.6	Suspected release reports that do not result in confirmed releases	Suspected release reports that do not result in confirmed releases	Owner or operator response within 7 days	Owners and operators shall maintain records of all repairs to UST systems and system components for the life of the system. Types of records could be service tickets, passing system test records, etc.	FOB will follow up to ensure that suspected releases have been resolved.