



MassDEP UST Program

Fact Sheet: Updates to Third Party Inspection Report Form

MassDEP has updated the Third- Party Inspection Report (TPIR) form to: (1) reflect October 2021 amendments to the UST regulations, 310 CMR 80.00; (2) increase compliance rates; and (3) improve registration information. This fact sheet has been developed for Third Party Inspectors and presents an overview of the updates.

No changes have been made to how the form is organized or displayed. For example, the form starts with registration information and moves on to inspection requirements, leak detection, etc. There is also no loss of functionality – for example, inspectors can still insert notes and comments and the form can be printed out as a PDF.

What has changed?

Fewer Required Questions. The form has been streamlined to reduce the number of required questions, based on facility-specific information.

Incorporation of Reg Amendments. The form reflects amendments made to the UST regulations in October of 2021, such as triennial integrity testing for spill buckets and sumps.

Increased Efficiency. Some questions now include an embedded description of the specific regulatory requirement, instead of referring the reader back to the reg citation. This makes the info more readily available and makes the inspection process more efficient.

Corrected Omissions/Clarifications. A number of sections address omissions or needed clarifications, such as those regarding sumps and piping leak detection.

Improved Recording and Tracking of Inspection Results. The form has been designed to more clearly identify and track inspection results by using icons.

Workflow. The form's workflow will remain the same, except for one change: nSPECT now includes icons to more clearly identify and track the status of any deficiencies.

- (1) **Initial Inspection.** TPI records *all* observations from initial inspection on TPIR form.
 - The UST regulations require all observations (compliance and deficiencies) to be recorded on the TPIR form and submitted to MassDEP. [Record results, per 310 CMR 49(7)c.; include deficiencies, per 310 CMR 49(7)c.2.]
 - If any deficiencies are recorded, an icon will appear next to the item.
- (2) **No deficiencies?** TPI signs and dates form and provides form to owner/operator.
- (3) **Deficiencies?**
 - Owner/operator corrects deficiencies, *if possible*, by facility compliance date.
 - **TPI re-inspects** and documents findings on TPIR form.
 - **Resolved.** TPI documents any corrected deficiencies using the ***“resolved” icon.***
 - **Unresolved.** Any unresolved deficiencies will automatically generate an RTC Plan
 - **Submit TPIR Form.** O/O submits TPIR form (and, if applicable, an RTC Plan) by facility compliance date.
- (4) **RTC Completion Report**

- Due within 30 days. RTC Completion Report is due 30 days from TPIR form submittal date.
- TPI conducts re-inspection and records any corrected deficiencies on TPIR form.
- RTC plan may include proposed alternative completion due date for review by MassDEP for corrections requiring additional time beyond RTC completion date.

New/expanded sections. The updated form contains some new and expanded sections. Here is an overview along with examples of new questions.

(1). Expanded Section... **Section A - Registration, Notification and Submittals**

- Includes new notification & submittal requirements per 10/1/2021 reg amendments
- Examples: installation certifications, as-built plans or scaled drawings for tank installs

(2). New Section.... **Section C - Tank and Piping Installation and Design Requirements**

- This section focuses on equipment design/installation requirements.
- Goal: more easily identify and address any discrepancies between field observations and DMS registration.

(3). Expanded Section.... **Section D - Inspections, Response to Alarms, Current Conditions**

- This section focuses on day- to- day operations and alarm status.
- It also asks for other observations. Example: see question D7, “Are there any observations, including visual or olfactory observations, that may indicate the presence of a leakage or release?”

(4). New Section.... **Section F - Sumps**

- This section focuses on sumps, related equipment and testing requirements.
- It also addresses current operating conditions. Example: see question F13, “Are sumps in good operating condition? For example, do they appear to be liquid tight, free from cracks, holes or other damage; free from corrosion, breakage and wear; are piping boots (that seal the piping to the containment sump) in-tact and functioning? 310 CMR 80.27 and 310 CMR 80.35.

(5). New Section.... **Section T - Piping Leak Detection**

- This section lists allowed piping leak detection options for easy reference
- Goal: more easily identify and resolve any discrepancies between field observations and registration info.

(6). Date Fields

- Some questions ask for the date of the most recent periodic or annual test
- This reinforces the testing deadlines, ensures certified documentation of test results and helps tailor education and outreach efforts.
- Example: see question F6: “What is the date of the most recent over-fill device annual test?”