



Division of  
Underground  
Storage Tanks



October 2020

## Tennessee Tank Talk



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### Welcome!

Welcome to the third edition of Tennessee Tank Talk. Our continuing purpose is to bring you information about the implementation of Tennessee Division of Underground Storage Tanks (UST) Rules that became effective October 13, 2018. In addition, we have some exciting news to share. The UST-Solid Waste Disposal Control Board voted unanimously on October 07, 2020 to continue with the rule making procedures. This rule making process will include the public comment period and a public hearing, primarily dealing with UST Fund Coverage and Fee Suspension Rules. Please find more information about these proposed Rule changes and how you can participate in the Rule-making process. As always, we encourage your feedback and input so that we can have the most meaningful Rules for all Tennesseans. Let us know what you think of this newsletter by emailing us at [Tanks.UST@tn.gov](mailto:Tanks.UST@tn.gov). Send us your ideas and suggestions to help us continually improve.

A handwritten signature in black ink, appearing to read "Stan Boyd".

Stan Boyd  
Director

### Current Proposed Rules Changes

UST Fund Coverage and Fee Suspension Rules provide two major changes. First, the current rules make fund coverage for a fund eligible release dependent upon an owner or operator's compliance history. With these revisions, all fund eligible releases will be entitled to reimbursement from the fund; however, an owner or operator's compliance history will now determine the amount of the fund deductible. Second, the

revisions will suspend annual tank fees from July 1, 2021 through June 30, 2026. The rules also provide general cleanup revisions to Rules 0400-18-01-.09 and 0400-18-01-.10.

An initial set of draft rules has been prepared for public review and comment and may be accessed [here](#). A public hearing will be held on December 1, 2020 10:30 AM CDT at the William R. Snodgrass Tennessee Tower 2nd Floor conference rooms A, B & C (additional information provided in the link above).

Oral or written comments are welcomed at the hearing. In addition, written comments may be submitted prior to or after the public hearing to:

Tennessee Department of Environment and Conservation, Division of Underground Storage Tanks; Attention: Rhonda Key, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 12th Floor; Nashville, Tennessee 37243; telephone 615-532-0989 or fax 615-532-9759.

Written comments must be received by 4:30 PM CDT, December 8, 2020 in order to assure consideration. For further information, please contact Rhonda Key at the above address or telephone number or by e-mail at [Rhonda.Key@tn.gov](mailto:Rhonda.Key@tn.gov).

## Ball Float Valve Rule Change

**Action:** Ball float valves may not be used for overflow prevention for new UST systems installed after October 13, 2018.

**Tank Owner Responsibility:** Tank owners may install automatic shutoff devices (flapper valves) or an audible/visual overflow alarm as the primary method of overflow prevention.

*This requirement applies to all new UST systems installed on or after October 13, 2018 and to all existing facilities beginning October 13, 2021.*



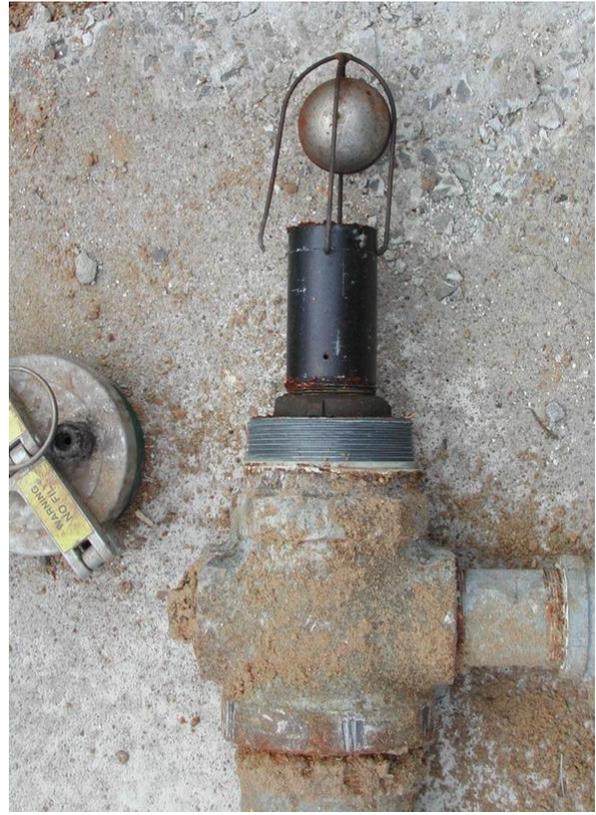
## What is a Ball Float Valve?

A ball float valve (also called a flow vent valve) is located inside the tank where the vent line exits the tank. The ball float valve restricts vapor flow from the UST as the tank gets close to full. As the tank fills, the ball in the valve rises, restricting the flow of vapors out of the UST during delivery. The flow rate of the delivery will decrease noticeably and should alert the person responsible for monitoring the delivery to stop the delivery. It may be difficult to determine whether or not this device is present because of where it is located.

## Damaged Ball Float Valve Equipment



Wire restraining cage is broken and ball is missing.



Wire restraining cage is not properly attached.

Q&A



1. **Where is a ball float valve located?**

A ball float valve is located in the vent piping.

2. **When does a ball float valve engage?**

A ball float valve engages when the tank is 90% full.

3. **What do manufacturers not recommend when using a ball float valve?**

They do not recommend using a ball float valve with suction piping, pressurized delivery, or coaxial Stage I vapor recovery.

4. **What could happen if a UST with a ball float valve as their overfill prevention has loose fittings?**

If the UST has loose fittings, back pressure may not develop and could result in an overfill.

5. **When are overfill prevention devices effective?**

Overfill prevention devices are only effective when combined with careful filling practices

*\*Ball float valves may not be used for overfill prevention for new UST systems installed after October 13, 2018.*

## Helpful Resources

**UST- New Rules Web Page**

Contact Your Local Field Office

2018 Federal Rule Change Quick Reference Guide

Current Tennessee UST Rules

EPA -Must For USTs

TDEC Underground Storage Tanks Home Page

EPA- Underground Storage Tanks Home Page



12th Floor, TN Tower  
312 Rosa L. Parks Ave  
Nashville, TN 37243

(615)-532-0945  
(615) 532-0199 (fax)