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**WATER QUALITY CONTROL DIVISION**  
**SAFE DRINKING WATER PROGRAM POLICY**

<b>POLICY TITLE:</b> Storage Tank Rule Alternative Inspection Schedule Policy	
SDWP policy number:	DW-012
Adoption date:	
Effective date:	To be determined
Scheduled review date:	
Version:	1
Approved by:  Ron Falco, P.E. Safe Drinking Water Program Manager	

8 **1.0 Purpose and Background**

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The Water Quality Control Commission’s March 10, 2015 addition of the Storage Tank Rule to the Colorado Primary Drinking Water Regulations, 5 CCR 1002-11 (Regulation 11) was intended to ensure that suppliers of water operate and maintain finished water storage tanks so that they are free of sanitary defects. In order to achieve this, section 11.28 (Storage Tank Rule) of Regulation 11 requires suppliers of water to conduct periodic inspections at least quarterly and comprehensive inspections at least every five years of each of their finished water storage tanks. Under certain circumstances, a supplier of water may include an alternate finished water storage tank inspection schedule and written justification for the alternate schedule in their written finished water storage tank inspection plan. The supplier’s written finished water storage tank inspection plan is subject to department review and revision.

The purpose of this policy is to present the department’s interpretation of what constitutes adequate justification for an alternative tank inspection

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Justification**

1 schedule and the criteria for accepting such schedules. Specifically, this policy  
2 identifies some of the circumstances that can be identified in the supplier's  
3 written justification for their alternative tank inspection schedule.  
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5 The department reserves the right to deviate from this policy as specified in  
6 WQCD Policy 1: Implementation Policy Framework.

7 **2.0 Applicability**  
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9 This policy applies to all suppliers of water that use finished water storage  
10 tanks as part of the public water system which are subject to section 11.28 of  
11 Regulation 11.

12 **3.0 Definitions**  
13

14 Definitions from Regulation 11 that are most relevant in this policy include:

15 3.1 *Public Water System* or *PWS* as defined in Regulation 11, section  
16 11.3(60) means a system for the provision to the public of water for  
17 human consumption through pipes or other constructed conveyances, if  
18 such system has at least fifteen service connections or regularly serves  
19 an average of at least 25 individuals daily at least 60 days per year.

20 3.2 *Finished Water* as defined in Regulation 11, section 11.3(32) means  
21 water that is supplied to the distribution system of a public water  
22 system and intended for distribution and human consumption without  
23 further treatment, including disinfection contact time, except treatment  
24 as necessary to maintain water quality in the distribution system (e.g.,  
25 booster disinfection, addition of corrosion control chemicals).

26 3.3 *Finished Water Storage Tank* as defined in Regulation 11, section  
27 11.28(1)(c) means a tank or vessel owned by the supplier that is located  
28 downstream of the entry point and is not pressurized at the air water  
29 interface. Pressurized storage tanks are not included in the definition of  
30 finished water storage tanks.

31 3.4 *Entry Point* as defined in Regulation 11, section 11.3(30) means a  
32 location before or at the first customer which is representative of  
33 finished water. The entry point may represent finished water from  
34 multiple treatment plants and/or multiple sources.

35 3.5 *Periodic Inspection* as defined in Regulation 11, section 11.28(1)(d)  
36 means a visual external storage tank inspection that is typically  
37 performed by the supplier to identify evident sanitary defects (e.g., lack  
38 of screens on vents).

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1           3.6    *Comprehensive Inspection* as defined in Regulation 11, section  
2                   11.28(1)(b) means an internal and external storage tank inspection to  
3                   identify sanitary defects that covers all aspects of the condition of the  
4                   storage tank including but not limited to sanitary, structural, and  
5                   coating systems conditions, as well as security and safety concerns.

6    **4.0    Policy Statements**

7           4.1    Although not required in Regulation 11, suppliers of water are  
8                   encouraged to conduct routine storage tank inspection activities on a  
9                   greater frequency than periodic inspections. Because they are not  
10                  required by regulation, these routine inspection activities do not have to  
11                  be documented, but documentation of routine inspections can be useful  
12                  to suppliers of water.

13          4.2    Unless a supplier of water includes a written justification for an  
14                  alternative inspection schedule in their written storage tank inspection  
15                  plan, periodic storage tank inspections must be done at least quarterly  
16                  and comprehensive storage tank inspections must be done at least every  
17                  five years.

18                   (i)    The intent behind the alternative schedule is to provide suppliers  
19                   of water a means to stay in compliance with the Storage Tank  
20                   Rule requirements by offering inspection schedule flexibility when  
21                   warranted.

22                   (ii)   The intent behind the written justification requirement is to  
23                   provide the department with the opportunity to review the  
24                   alternative schedule justification to confirm that the justification  
25                   is adequate and can be accepted by the department.

26          4.3    An alternative inspection schedule does not need to be developed in  
27                  response to one-time, episodic, short-term, or temporary circumstances  
28                  which postpone completion of an inspection, inspections, or specific  
29                  inspection activities required by the Storage Tank Rule. Such temporary  
30                  or short-term circumstances must be documented by the supplier of  
31                  water and may require the supplier of water to notify the department if  
32                  required in section 11.28(5) of Regulation 11. An inspection, inspections,  
33                  or specific inspection activities which cannot be conducted on time  
34                  should be resumed, completed, and documented as soon as possible.

35                   (i)    A periodic inspection should not be postponed for an entire  
36                   quarter because the supplier of water could not conduct the  
37                   periodic inspection on a specific day within the quarter. This  
38                   means that if a Supplier schedules an inspection on May 1<sup>st</sup> and  
39                   circumstances prevent the Supplier from completing the

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1 inspection on that day, then the Supplier must make reasonable  
2 efforts to complete the inspection prior to the end of that same  
3 calendar quarter. If an inspection is not completed, the Supplier  
4 is required to notify the department and a violation may have  
5 occurred which would require Tier 2 public notice. It is therefore  
6 not recommended to schedule inspections toward the end of the  
7 quarter.

8 (ii) Likewise, elements of a comprehensive inspection should not be  
9 postponed for five years simply because they could not be  
10 completed on the day that the inspection was scheduled and/or  
11 conducted.

12 4.4 Alternative inspection schedules should reflect ongoing operational  
13 conditions at a public water system which make quarterly periodic  
14 inspections or 5-year comprehensive inspections unsafe, impractical,  
15 unnecessary, or some combination of prohibitively expensive and  
16 another condition such as personnel safety and/or a well-documented  
17 history of tank inspections with no sanitary defects.

18 (i) Typically, at least two the following factors will be required to  
19 justify an alternative tank inspection schedule. However, this  
20 two-factor standard does not apply to safety when an alternative  
21 inspection schedule is the only reasonable means of mitigating  
22 risks to personnel safety.

23 1. Personnel safety: Employee safety must always be  
24 assured. For example: climbing standpipes or onion  
25 shaped tanks on the eastern plains may pose a danger to  
26 operating personnel and may be considered for an  
27 alternate schedule depending on other factors.

28 2. Cost avoidance: Cost avoidance by itself is not a  
29 satisfactory justification for an alternate schedule. If a  
30 supplier must hire specialty help to climb elevated  
31 tanks, that additional cost could impose a burden on an  
32 annual budget and the quarterly periodic inspection  
33 schedule might need to be modified. Cost avoidance for  
34 comprehensive inspections is not a factor that is  
35 acceptable. Public water systems are expected to  
36 budget for these inspections especially since they are on  
37 a 5-year schedule.

38 3. Plant security: The amount of security at and around a  
39 storage tank could be used to justify a less frequent

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1 periodic inspection schedule. This means that the risk of  
2 vandalism or terrorism is very low due to security  
3 measures at the tank such as a properly secured ladder  
4 or stairway, hatch alarms, video cameras, security  
5 fencing and no sign of tampering at ground level as  
6 observed during routine site visits/inspections.

7 4. Historical basis: If a storage tank has a good history  
8 from previous inspections which are well documented,  
9 then extending the schedule may be justified,  
10 especially if cost or safety factors are of concern at the  
11 tank.

12 4.4.i.4.1 Proper documentation from previous inspections  
13 is essential to the acceptance of an alternate  
14 schedule justified on an historical basis.  
15 Conversely, if previous inspection documentation  
16 only includes vague descriptions of conditions, no  
17 photo or video evidence of conditions, no  
18 signatures, and no specific or inadequate  
19 qualifications of the inspector or inspectors, then  
20 an alternate tank inspection schedule may not be  
21 justified.

22 4.4.i.4.2 If the tank has shown historically to be subject to  
23 vector populations (e.g., copious amounts of  
24 animal feces), graffiti, frequent vent screen  
25 damage, etc. then the historical basis suggests  
26 that this tank should be inspected on a normal  
27 schedule (i.e., quarterly periodic inspections and  
28 5-year comprehensive inspections).

29 5. Impractical: Suppliers of water may justify an  
30 alternative tank inspection schedule due to weather  
31 conditions, such as heavy snow where tanks are either  
32 completely buried or cannot be accessed due to an  
33 abundance of surrounding snow during the winter  
34 months. The supplier's justification could couple either  
35 cost avoidance (snow removal with heavy equipment) or  
36 safety with impracticability due to weather conditions.

37  
38 In addition, opening a storage tank hatch every quarter  
39 can be a periodic inspection activity that is justified for  
40 an alternative schedule based on impracticability and

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1 safety or cost avoidance. However, the supplier should  
2 open the hatch at least once per year.

3 4.4.i.5.1 A supplier might not normally be able to inspect  
4 their tank from November through March due to  
5 heavy snow. Such a supplier is required to write  
6 their justification to not perform periodic  
7 inspections for this time period and include it in  
8 their inspection plan. Per the regular inspection  
9 schedule, the supplier is expected to inspect  
10 their tanks during the preceding quarter as well  
11 as the following quarter, April through June,  
12 provided it is safe to do so.

13 4.4.i.5.1.1 Despite the alternative schedule,  
14 suppliers should complete inspections  
15 and inspection activities when  
16 conditions change to a degree that  
17 allows such inspections or activities to  
18 be completed safely.

19 4.4.i.5.1.2 The supplier should consider short-term  
20 and long-term solutions so that the  
21 tank can be inspected without allowing  
22 snow to enter the storage tank. Short-  
23 term solutions could be as simple as  
24 adding a tarp over the tank hatch to  
25 aid in snow and ice removal. Long-term  
26 solutions might include building a  
27 structure over the tank or tank hatch to  
28 protect it from the elements. In  
29 addition, any inspection activity that  
30 can be completed despite the snow,  
31 should be completed and documented.

32 (ii) If adequately justified in writing by the supplier of water,  
33 alternative inspection schedules can be established for periodic  
34 inspections, comprehensive inspections, or both. Likewise, a  
35 supplier of water can justify in writing, an alternative schedule  
36 for specific periodic and/or comprehensive inspection activities.  
37 Therefore, the supplier of water must ensure that the written  
38 justification they include in their written inspection plan is  
39 adequately detailed to explain what type of inspection and/or  
40 which inspection activities are to be completed on an alternative  
41 inspection schedule.

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- 1 (iii) Justifications based on costs and convenience alone will not be  
2 acceptable to the department and are likely to result in violations  
3 which require notifying the department, as well as completing  
4 public notice requirements.
- 5 (iv) Vague justifications, schedules and ambiguous timelines will not  
6 be acceptable to the department. In any case where the supplier  
7 is justifying an alternative schedule, the supplier must:
- 8 1. Document in the finished water storage tank inspection  
9 plan the justifying factors, listed in 4.4(i) 1 through 5  
10 above, for each inspection type and/or activity to be  
11 conducted on an alternative inspection schedule.
- 12 2. Provide adequate detail to allow the department to  
13 evaluate the Supplier's compliance with their  
14 alternative schedule.
- 15 (v) The department recommends that the supplier assess their  
16 alternative inspection schedules and document those assessments,  
17 including:
- 18 1. Ways the burden associated with conducting each  
19 inspection type and/or activity can be reduced other  
20 than conducting them on an alternative inspection  
21 schedule.
- 22 2. Reasons why the burden associated with conducting  
23 each inspection type and activity cannot be reasonably  
24 reduced without an alternative inspection schedule.

25 4.5 Periodic Inspections

- 26 (i) Suppliers of water should complete, within 3 months of the prior  
27 inspection, the next periodic inspection. The department  
28 discourages a supplier of water from conducting a periodic  
29 inspection at the beginning of one calendar quarter and then  
30 conducting the next periodic inspection at the end of the  
31 following calendar quarter (effectively increasing the frequency  
32 to six months versus three). If such a schedule is necessary, the  
33 department recommends that the supplier of water be prepared  
34 to justify this schedule and include a written justification for this  
35 schedule in their written storage tank inspection plan.
- 36 (ii) For suppliers of water that are new or were not previously  
37 registered as a public water system, the supplier should conduct a

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1 periodic tank inspection of each non-pressurized finished water  
2 storage tank within the first quarter and quarterly thereafter.

3 (iii) Opening a storage tank hatch is a periodic inspection activity  
4 conducted every quarter to evaluate the sanitary seal and check if  
5 any contaminants are visible on the surface water.

6 (iv) Suppliers of water are not required to inspect tanks that are not  
7 in service. Suppliers should develop an alternative inspection  
8 schedule based on the normal operating period for each tank (or  
9 group of tanks with the same operating schedule) when not  
10 operational year-round. Likewise, suppliers of water that do not  
11 serve water to the public year-round (thus are a seasonal water  
12 system), are not required to inspect their tanks while those tanks  
13 are not serving water to the public. In accordance with the  
14 department's Seasonal Systems Handbook's start-up procedures,  
15 seasonal water systems must check the sanitary integrity of their  
16 tanks by inspecting vents, overflows, and hatches prior to  
17 supplying water to the public each season.

18  
19 To facilitate this process, the department recommends seasonal  
20 suppliers conduct a periodic inspection of their tanks annually at  
21 the same time they complete their required start-up procedures  
22 prior to opening to the public. Seasonal systems are required to  
23 conduct a periodic inspection within the same quarter when they  
24 open (begin serving water to the public), as all suppliers of water  
25 are required to conduct periodic inspections each quarter that the  
26 water system is active and operational. The Seasonal Systems  
27 Handbook can be accessed from the following department web  
28 link: <https://www.colorado.gov/cdphe/gwr>.

29 1. One exception may occur if a supplier has a tank which  
30 is only in use when it is not accessible (e.g., due to  
31 deep snow). In such a case, the supplier should conduct  
32 a full periodic inspection prior to and following each  
33 seasonal tank use, or conduct the periodic inspection  
34 activities which could not be completed while the tank  
35 was not fully accessible.

36 (v) If circumstances prevent safe completion of certain inspection  
37 activities, suppliers of water should document the circumstances  
38 in their inspection plan and conduct as much of the periodic  
39 inspection as possible each quarter. Inspections or specific  
40 inspection activities which cannot be conducted for any reason for  
41 an extended period of time (or seasonally) should be resumed as

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1 soon as possible and should not be delayed for an entire quarter.  
2 If the supplier finds that these circumstances extend into the next  
3 quarter, the supplier should justify an alternative schedule for the  
4 inspection activities in their inspection plan.

5 4.6 Comprehensive Inspections

6 (i) With the Storage Tank Rule becoming effective April 1, 2016,  
7 suppliers are required to perform a comprehensive inspection of  
8 their finished water tanks within 5 years of this date and  
9 subsequently every five years thereafter. Suppliers of water must  
10 complete, within 5 years of the prior comprehensive inspection,  
11 the next comprehensive inspection. The department discourages a  
12 supplier of water from conducting a comprehensive inspection at  
13 the beginning of one 5-year period and then conducting the next  
14 comprehensive inspection at the end of the following 5-year  
15 period (effectively increasing the frequency to 10 years versus 5).  
16 If such a schedule is necessary, the department recommends that  
17 the supplier of water be prepared to justify this schedule and  
18 include a written justification for this schedule in their written  
19 storage tank inspection plan.

20 (ii) The five years referenced in Section 11.28(2)(a)(iii)(B) of  
21 Regulation 11 is measured in terms of calendar years and is not  
22 intended to reflect the supplier's operational time of their system  
23 or of their tank(s).

24 (iii) For suppliers of water that are new or were not previously  
25 registered as a public water system, the supplier of water must  
26 conduct a comprehensive tank inspection of each non-pressurized  
27 finished water storage tank within 5 years of becoming a public  
28 water system and every 5 years thereafter.

29 (iv) If circumstances prevent safe completion of certain inspection  
30 activities, suppliers of water should still conduct as much of the  
31 comprehensive inspection as possible every five years. Inspections  
32 or inspection activities which could not be completed should not  
33 be delayed for a full five years, but should be conducted as soon  
34 as conditions allow.

35 (v) A supplier of water has a well-documented history of doing  
36 comprehensive tank inspections every 3 years with few or no  
37 adverse findings. The Storage Tank Rule is not intended to  
38 encourage such a supplier of water to decrease their interval of  
39 comprehensive tank inspections to every 5 years, even though

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1 such a supplier could do so and be in compliance with the Storage  
2 Tank Rule requirements.

3 4.7 Examples of Adequate Alternative Schedule Justification

4 (i) A supplier has one 500,000 gallon elevated finished water storage  
5 tank that has been in service for five years. The supplier's  
6 certified operator and own staff are not qualified to inspect  
7 elevated tanks as they are neither trained nor hold the applicable  
8 certifications needed for elevated tank inspections. With no  
9 qualified in-house inspection personnel, the supplier has to  
10 contract a firm to conduct periodic and comprehensive  
11 inspections of the tank.

12  
13 Due to safety and cost avoidance factors, the supplier justifies an  
14 alternative schedule for periodic inspections of the tank where an  
15 initial inspection will be completed by the end of 2016 and yearly  
16 thereafter. However, the supplier's justification states that if any  
17 sanitary defects or unforeseen issues are identified during the  
18 initial periodic inspection or any subsequent inspection, the  
19 schedule will be adjusted to a more frequent one depending on  
20 the nature of the findings.  
21

22 (ii) A supplier is unable to inspect their tanks from November through  
23 March due to heavy snow. The supplier includes in their tank  
24 inspection plan a justification to not perform periodic inspections  
25 for the fourth and first quarters based on impracticability,  
26 personnel safety and cost of removing the snow. In addition, the  
27 supplier includes the nature of the risks if their tanks were  
28 inspected when heavy snow is present. The supplier also states  
29 that they expect to inspect their tanks during October as well as  
30 the following quarter, April through June, per the required  
31 quarterly inspection schedule provided that it is safe to do so.

32 1. If the above supplier has access to the tank and can safely  
33 inspect the tank during the first quarter (January through  
34 March), then the supplier should complete a periodic  
35 inspection, or at least those periodic inspection activities  
36 which can be safely completed, during the first quarter.  
37 This would apply if there were little snow the whole year  
38 or if there is a warm spring which allows access to the tank  
39 earlier than normal.

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1                                   2. Conversely if the supplier experiences early snow,  
2                                   preventing access to the tank during the third quarter (July  
3                                   through September) and this is not representative of  
4                                   normal conditions, the supplier must document the  
5                                   conditions which prevented access to the tank for the  
6                                   periodic inspection, but this would not provide justification  
7                                   for a new alternative schedule to eliminate conducting  
8                                   periodic inspections in the third quarter in future years.

9                                   (iii) A supplier is located in a cold climate area from November  
10                                   through mid-March and is experiencing weather conditions  
11                                   resulting in a temporary safety risk with an icy ladder in January.  
12                                   The supplier delays the inspection until the ice melts. However,  
13                                   the conditions persist throughout the first quarter inspection  
14                                   period so the supplier documents the conditions in their storage  
15                                   tank inspection plan as justification for an alternative inspection  
16                                   schedule for those activities that can only be done by climbing  
17                                   the ladder. The supplier includes in their justification that the  
18                                   ladder related activities will be done when it is safe to do so.

19  
20                                   The supplier completes and documents other inspection activities  
21                                   which can be done without use of the ladder on schedule.  
22                                   An alternative inspection schedule would not be necessary, if all  
23                                   of the inspection activities were completed on time (within the  
24                                   quarter for periodic inspections and within five years for  
25                                   comprehensive inspections).

26                                   (iv) Deep snow piles up on or around a storage tank access hatch and  
27                                   the snow is not likely to melt until after the supplier closes the  
28                                   water system for the season. This condition might be considered  
29                                   permanent or at least seasonal and justification for an alternative  
30                                   schedule can be included in the inspection plan for this tank.

31  
32                                   Because weather conditions vary, such conditions may or may not  
33                                   justify an alternative tank inspection schedule. The supplier  
34                                   should, therefore, be specific enough in documenting the  
35                                   justification for the alternative tank inspection schedule so that  
36                                   the department can evaluate and determine whether it is  
37                                   adequate or subject to revision.

38                                   (v) The road that a supplier drives to access their tanks is impassable  
39                                   and unsafe to navigate due to heavy snow. The supplier does not  
40                                   have the reasonable means of mitigating the risk to their tank  
41                                   inspector who needs to travel the road in order to complete a  
42                                   tank inspection. The road conditions persist and the end of the

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1 quarter is approaching so the supplier documents the road  
2 conditions as justification for an alternative inspection schedule.

3 1. However, if the road can be plowed or accessed by  
4 snow cat or snowmobile due to heavy snow, and the  
5 Supplier has such equipment available, then the  
6 inspection could be completed without an alternative  
7 inspection schedule. The department does not,  
8 however, intend for suppliers of water to make  
9 unreasonably large expenditures to obtain equipment if  
10 none was previously available.

11 (vi) A supplier of water was conducting comprehensive tank  
12 inspections every seven years prior to inception of the Storage  
13 Tank Rule. The inspections are well documented with reports that  
14 include photographs and videos taken during the inspection. The  
15 inspection reports include few adverse findings and few or no  
16 sanitary defects. The supplier includes in their written tank  
17 inspection plan this historical basis with all supporting  
18 documentation, safety personnel and cost avoidance as their  
19 justification for an alternative seven-year inspection schedule  
20 versus five.

21 (vii) A supplier's storage tank's access hatch is located in a confined  
22 space vault that is 12 feet below ground and the lid is secured  
23 with 20 bolts. The supplier provides in their storage tank  
24 inspection plan, written justification for opening the access hatch  
25 once per year based on impracticability and safety. In this  
26 example, the supplier will perform all remaining periodic  
27 inspection activities (provided that they can be safely completed)  
28 during that inspection quarter. The supplier states that they will  
29 not go more than a year without opening the tank hatch without  
30 other extenuating circumstances. The supplier must not eliminate  
31 opening the hatch all together.

32 4.8 Examples of Inadequate Alternative Schedule Justification

33 (i) During a sanitary survey, the department inspector finds that the  
34 supplier hasn't been conducting periodic tank inspections on a  
35 quarterly basis. The inspector notes that the storage tank  
36 inspection plan includes an alternative periodic inspection  
37 schedule to inspect their three 20,000-gallon ground-level  
38 finished water storage tanks once a year versus quarterly based  
39 on the fact that they are limited on available inspection personnel  
40 and do not want to hire a company because of the expense.

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1  
2 The department determines this justification inadequate and the  
3 supplier is in violation of the Storage Tank Rule for failing to  
4 perform periodic inspections which is a treatment technique  
5 violation that requires Tier 2 public notice. The supplier must  
6 start conducting periodic inspections on a quarterly basis and  
7 comprehensive inspections every 5 years.

8 (ii) A supplier's tank inspection plan includes a written justification  
9 for an alternative periodic inspection schedule based on the  
10 tank's inspection history. However, the supplier's past periodic  
11 inspection reports are not on regular intervals, do not include the  
12 inspector(s) credentials, do not include adequately detailed  
13 findings when warranted, and include no photographs. Therefore,  
14 the department inspector does not have a clear picture of this  
15 tank's historical conditions. Under these circumstances, the  
16 Storage Tank Rule requires such a supplier to conduct quarterly  
17 periodic inspections and comprehensive inspections every five  
18 years.

19 (iii) A supplier includes a justification in their tank inspection plan for  
20 an alternative comprehensive inspection schedule since they have  
21 too many tanks, are rurally located, and can't afford to hire a  
22 company to conduct the inspections.

23  
24 The department determines this justification inadequate and the  
25 supplier will be in violation of the Storage Tank Rule for failing to  
26 perform comprehensive inspections, effective April 1, 2021, which  
27 is a treatment technique violation that requires Tier 2 public  
28 notice. The supplier must conduct a comprehensive inspection on  
29 or by April 1, 2021 and every 5 years thereafter.

30 4.9 Suppliers of water should contact the department by calling 303-692-  
31 3596 when unsure whether or not an issue is an appropriate justification  
32 for an alternate storage tank inspection schedule.

33