

Effective regulatory compliance or tank degassing

Maintaining regulatory compliance is a complex and diverse challenge when degassing tanks across the nation. Various forms of documentation are required in order to show compliance with applicable federal, state and local requirements. These documents are legally binding, serving as permanent records of duties performed within allowable constraints. Proper regulatory documentation is imperative, and

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it's for this reason any deficiencies or oversights should be identified and addressed in a prompt and uniform manner. Proper monitoring and documentation is the proof the tank owner did all that was required to make sure nothing was done out of compliance. Once the project is complete, the information can't be replicated.

One way to ensure regulatory compliance best practices for your degassing contractor is to verify it has a log review system in place, whereby documentation is evaluated as it comes back from the field. Proper review is essential to compliance and is key to identifying and flagging any noncompliant operations staff for purposes of retraining. In addition, a grading system can be helpful to the degassing contractor to evaluate compliance proficiency among the operational staff within select categories, as well as overall facility and service line ratings.

There are several ways of making sure the goals are met by the technologies used to clean the vapor space of tanks. One way may be site auditing all the compliance processes periodically to ensure proper procedures are being followed. Audits are performed by supervisory staff and ensure proper knowledge and understanding are in place within operations staff to properly perform job functions. Audits can be performed on a periodic basis and will evaluate topics such as the following:

- Proper valuation of log sheet
- Proper monitoring and calibration
- Customer report complete and accurate
 - Correct issuance of permit documentation

Certain processes and procedures relating to compliance cannot be evaluated using returning documentation alone. It is therefore necessary to assess certain competencies and procedures during the course of operations. The information gained from routine field audits serves as a window into on-site, compliance-related activities.

Another important topic to consider is monitoring and meter maintenance. Information gathered to document compliance is only as useful as the instrument gathering it. A good meter maintenance practice provides calibration, service and repair needs for all monitoring equipment utilized within the company. During tank degassing, compliance personnel are responsible for ensuring appropriate monitors are utilized for detection of specific

compounds within a desired range. In order to ensure proper care and function of monitoring equipment are utilized, all devices should be inventoried and checked for proper use and function before issuance. Equipment check-in and checkout systems should be employed, and broken or malfunctioning meters should be designated as such and not returned to service until after they are properly repaired or replaced.

A company's regulatory compliance program's chief goal is essential to providing meaningfully and reliable mechanisms by which to evaluate compliance status. Through the use of these valuations, a company can continue to address any emerging gaps in compliance relating to aptitude or abilities.

These are some of the elements necessary for providing assurance to tank owners that degassing is being performed in a regulatory compliant manner.

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