

From the Compliance Corner:

by Bill Morris

Tips For Using SIR

SIR (Statistical Inventory Reconciliation)

If the customer has a pressurized or suction system and is using SIR (and is a 3rd party certified method) for monthly release detection for the tanks, this also includes the lines as well. With a pressurized system, the line leak detector will still need to have an annual performance test done.

Note: Sometimes, customers think that SIR is just doing inventory control. It's not. SIR uses the data from inventory control and with a special software program determines if the system (tanks & lines) are tight. To meet TCEQ requirements for this method of monthly release detection (tanks & lines), it includes inventory control records and the SIR reports from the vendor.

Here's the secret:

Stick readings need to be taken to 1/8 inch (TCEQ rules). Be sure the correct tank chart to 1/8 inch is used. The SIR report is only as accurate as the information submitted.

Be sure to take all readings such as gallons dispensed, and accurate stick readings (or in some cases the ATG readings) at the same time each day.

For fuel deliveries, be sure to use GROSS gallons. A common mistake is to use NET gallons.

If the SIR monthly report says "inconclusive", and the cause is not resolved within 72 hours with a pass test from the SIR vendor, this would have to be reported to the TCEQ as a suspected release. If the SIR report says fail, it must be reported also as a suspected release.