### Examples of Suspected Releases and Required Owner/Operator Response
(Revised in accordance with March 17, 2019 regulations)

<table>
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<th>Suspected Release Types</th>
<th>Scenario</th>
<th>Action</th>
<th>Result</th>
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| **SIR inconclusive or failure** | The SIR (statistical inventory reconciliation) vendor reports inconclusive or failed SIR results that cannot be overturned within 24 hours of receipt of the vendor report. | Owner/operator reports suspected release to OPS within 24 hours and performs a system test that includes checking meter calibration, checking blend ratios, and conducting pressurized tightness tests on tanks and lines. | 1) Notify OPS of the results of the system test within 10 days.  
2) If the tank and/or line tests fail, the owner/operator reports a confirmed release within 24 hours, repairs, replaces, upgrades, or closes the tank system, and conducts a site check within 30 calendar days. |
| **Presence of LNAPL, stained soil, petroleum odors, or elevated PID readings in soil** | While excavating, drilling, or performing repairs to a tank system, LNAPL, stained soil or petroleum odors are observed, or elevated PID readings (>50 ppm) indicate volatile organic compounds in soil. | Owner/operator reports suspected release to OPS within 24 hours and performs a system test that includes pressurized tightness tests on tanks and lines. | 1) Notify OPS of the results of the system test within 10 days.  
2) If the tank and/or line tests fail, the owner/operator reports a confirmed release within 24 hours, and repairs, replaces, upgrades, or closes the tank system.  
3) Even if the system test passes, a site check must be conducted within 30 calendar days to determine if the apparent environmental contamination is confirmed by laboratory detection of chemicals of concern. |
| **Fuel is discovered in the interstitial space of secondary containment but is not immediately removed** | Regulated substance is found in interstitial monitoring space of secondary containment such as a submersible turbine pump sump, spill bucket, dispenser, tanks or piping and the fuel is not immediately removed. | Owner/operator reports suspected release to OPS within 24 hours and performs a system test that includes a hydrostatic test of secondary containment or pressurized tightness tests on tanks and lines. | 1) Notify OPS of the results of the system test within 10 days.  
2) If the system test fails, the owner/operator reports a confirmed release within 24 hours, repairs, replaces, upgrades, or closes the tank system, and conducts a site check within 30 calendar days. |
| **ATG alarm or failure** | The alarm for the ATG (automatic tank gauge) system indicates a loss of fuel from the primary containment or a problem with the release detection system and the defective device was not immediately repaired, recalibrated, or replaced. | Owner/operator reports suspected release to OPS within 24 hours and performs a system test. | 1) Notify OPS of the results of the system test within 10 days.  
2) If the system test fails, the owner/operator reports a confirmed release within 24 hours, repairs, replaces, upgrades, or closes the tank system, and conducts a site check within 30 calendar days. |
| **Vapors detected in a structure** | Petroleum vapors are impacting an adjacent structure. | Owner/operator contacts the fire department, reports a suspected release to OPS within 24 hours, and performs a system test. | 1) Notify OPS of the results of the system test within 10 days.  
2) If the system test fails, the owner/operator reports a confirmed release within 24 hours, repairs, replaces, upgrades, or closes the tank system, and conducts a site check within 30 calendar days. |

[Examples of Confirmed Releases will remain the same in guidance]