

## **Upgrade Notification to DNR & PMMIC**

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Fuel system maintenance and upgrades are necessary at all underground storage tank facilities. This is done to keep these systems operating as effectively and efficiently as possible. In your quest to optimize your fuel system, it is your duty to make sure the appropriate people are being notified prior to the upgrade and installation activities.

An upgrade is the addition or retrofit to some part up your existing UST system, such as replacing old piping, adding new leak detection equipment, cathodic protection, or spill and overfill controls to improve the ability to prevent the release of product. Installation activity includes the addition of a new tank and piping system.

Notification of such installations or modifications must be provided to the Department of Natural Resources (DNR) at least 30 days prior to the installation using the “Notification of Intent to Install” form. It is also suggested that you report these system changes to your insurance provider, such as PMMIC, so there is no loss of, or lapse in coverage. Although the Iowa Licensed Installer generally completes this notification form, it is your responsibility to make sure it gets to the appropriate entities.

In this past inspection year (2011), PMMIC reported twenty-seven (27) facilities that had upgraded part of their fueling systems without proper notification to the authorities. Keep in mind that this is a violation of the Iowa laws and you may be subject to penalties and not allowed to operate your facility until all the appropriate paperwork is recorded with DNR and PMMIC. Communication as well as coordination is very important in this process.

Depending on the scope of your fuel system installation or modification, you may need to provide the following documentation to the DNR.

1. **Notification of Intent to Install** (30 days prior to installation/modification)
2. **Registration Form #148** (w/in 30 days after the installation/modification)
  - Installer's certification of completion of the installation.
  - Identifies the owner/operator/authorized agent.
  - Provides a description and construction details of the UST system.
  - Tank management fees are submitted with registration form.
  - NESHAP (Air Quality) requirements.
3. **Installer/Installation Inspector Checklist for Installation, Replacement, Upgrade, Retrofit, Repair** (accompanies Form #148)
  - Inspector's certification of the installation process.
  - Submitted by the installation inspector within 14 days after the final inspection.
4. **UST System Tightness Test Results** (accompanies Form #148)
  - Confirms UST system is tight with no damage incurred during shipping or installation.

- Includes tank/line tightness testing, equipment functionality testing, and cathodic protection.
5. **Certification of Financial Responsibility** (accompanies Form #148)
- Demonstration of financial resources to clean up a site if a release occurs, correct environmental damage, and compensate third parties for injury to their property or themselves.
  - Certificate of Insurance, i.e. PMMIC

Also keep in mind that it is a good idea to keep your insurance provider informed of all changes well in advance to prevent any loss of coverage. The underwriting process may take up to 30 days to complete, so it is important to keep them informed to keep the process moving along smoothly.