

PMMIC Performing Compliance Inspections for DNR? **By Brian Pottebaum, Loss Control Inspector Supervisor, PMMIC**

You are very aware that PMMIC conducts annual site inspections at all of their insured locations, and have been since 2002, but did you know that the future inspections can qualify for DNR compliance inspections?

New rules adopted by the DNR require a compliance inspection every two years. Every site must complete the first inspection in calendar year 2007. PMMIC policyholders are ahead of the game, and can benefit by a **FREE** inspection as long as they maintain their policy with PMMIC. All non-PMMIC sites will have to hire someone to conduct the inspection, and that could cost up to \$500 per inspection.

In order for the PMMIC policyholder's inspection to qualify for a compliance inspection, the named insured must sign and return a release and authorization form to PMMIC. The release form was mailed to every insured in early October. If you have not received the form, or have other questions about the form, contact PMMIC at (800) 942-1000.

Without a signed release on file prior to an inspection, PMMIC cannot release the results to DNR, therefore the inspection will not count as a regulatory inspection.

Because the inspection will now be considered a "compliance" inspection, PMMIC will need to document that the facility was in compliance with all DNR regulations at the time of the inspection. This means that PMMIC will now require that you have 12 months of passing leak detection records for the entire UST system. In addition, PMMIC will be verifying that registration tags are current and attached to each fill port.

PMMIC policyholders should have little trouble with the transition to meeting the new inspection and underwriting criteria. Federal regulations require 12 months of leak detection be maintained by each facility at all times. For example, if you have an automatic tank gauge that you are using for monthly tank leak detection, you should have 12 months of adequate leak test printouts in your file. Each one of these tests must meet the monitor certification requirements, i.e. they must be above the minimum fuel level when the tank is tested. For example, the Veeder Root TLS 250 tank monitor is only certified to test above 50% tank volume, so any test conducted below 50% is not considered a valid test. You will need to obtain a passing test with the tank over half full for each month with this monitor.

Other certification limitations for tank monitors include maximum tank size, whether the tank can be manifolded, and whether continuous testing software is available. If you have any questions about the certification limitations of your tank monitor, you should contact your service contractor and have them provide you with the third party evaluation certification. This certification should be part of the documentation you received when the monitor was installed.

As part of the process to document all facilities are in compliance at the time of the inspection, PMMIC will ask you to submit the most recent 12 months of tank and line leak detection. PMMIC will send this request to you along with the notice to be inspected within 60 days. All records must be mailed, faxed or emailed to the PMMIC office. The inspectors will not be allowed to retrieve the records from any site during the

inspection. First, the inspectors are on the road all week long and are seldom in the office, so the paperwork could be delayed. Second, we want to keep the site inspection as time-efficient as it is right now. Because you are providing the leak detection records at inspection time, you will no longer have to provide them at the time of the renewal.

A helpful hint when sending in these printouts is to make photo copies of them and keep the originals. The reason for this is that some printouts will fade over time, and it will reduce the amount of mail you have to send. Fit as many printouts as you can on one sheet of paper. Remember that each tank needs one “certified” passing test for each of the 12 months. If that printout does not indicate the fuel level at the time of the test, you will need to include the inventory printout from that same day.

On a rare occasion, PMMIC may ask that you provide a current cathodic protection certification or internal tank lining inspection. If you have recently re-certified your cathodic system or internal tank lining, or will be soon, you should remember to provide the certification to PMMIC as soon as it is available.

The benefit of having a **FREE** compliance inspection far outweighs the hassle of submitting 12 months of leak detection to PMMIC. Please contact our office if you have any questions about this transition.