

When to Submit Appropriate Notification

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It's not news to anyone that the petroleum business has changed a lot over the last decade. Industry is finding new ways to move fuel safer, faster and more effectively. And in an effort to keep up with those changes and public demand, facilities are upgrading their equipment. However, it is critical that the proper notifications are made to the right people at the right time before these upgrades occur. This article will give you several basic guidelines that you must follow if you are considering any underground storage tank (UST) system changes in the future.

New UST Installation

When installing an UST system, whether it is at an existing or new location, the Department of Natural Resources (DNR) must be notified **at least 30 days prior to installation**. This applies to all USTs containing petroleum or hazardous chemical products. To properly notify DNR, you must complete and submit the *Notification of Intent to Install* form. At the same time, you should also notify PMMIC, your petroleum storage tank insurance provider. This notification helps you coordinate the installation process with the regulatory departments and PMMIC. Once the appropriate people are notified of the installation, you will be advised of additional documentation that will be required prior to bringing your new system on-line. Please note that other insurance carriers may also require this information. If you are not insured by PMMIC, you should contact your insurance carrier to confirm what notification requirements they have for installations and changes to your UST system.

After the installation is complete, you must register the new tanks with the DNR **within 30 days**. This process is done with the *Underground Storage Tank Registration Form #148*. This form is 7 pages long and every page must be complete prior to submittal to the DNR. Be aware, there are multiple older versions of this form circulating, so make sure that you complete the most recent form created September 2008. Older versions of this document are missing critical installation information and will not be accepted if submitted. You should rely on your installer to help complete this form accurately, but **DO NOT** assume they will file this form and supporting documentation with DNR and PMMIC. This is the facility owner's responsibility. It is also very important to remember that tanks can not be put in service until they are properly registered with DNR.

UST Changes or Upgrades

Upgrades are handled similar to "New Installations" only you need to complete the *Notification of Tank Closure or Change-in-Service* form rather than the intent to install form. You will see this form is also used for "Removal of Tank", "Closing Tank in Place" and "Change-in-Service to Unregulated Use". This form must be completed appropriately and submitted to DNR **at least 30 days prior to commencing work**. This form should also be submitted to PMMIC at the same time. This notification helps you coordinate the upgrade process with the regulatory departments and PMMIC. Once the appropriate people are notified of the upgrades, you will be advised of any additional documentation that will be required prior to bringing the upgraded system on-line.

Ownership Change

Whenever a facility changes ownership, the DNR and PMMIC **must be notified immediately**. The DNR uses the *Underground Storage Tank Registration Form #148* form to process all ownership changes. PMMIC should also get a copy of that form in addition to any other policy

application forms that are required. **REMINDER:** PMMIC no longer allows policy assignments (transfers) from one owner to another. This was effective June 1, 2009 for all PMMIC policies. For more information, please refer to the article “Revised PMMIC Policy Assignment (Transfer) Process” by Thomas Norris in the last edition of Iowa Oil Spout; otherwise it can be viewed on-line at http://www.pmmicinsurance.com/en/inspector_notebook.cfm.

Temporary UST Closure

Whenever regulated tanks at a facility are out of operation for **more than three (3) consecutive months**, the *Notification of Temporary Closure* form must be submitted to the DNR and PMMIC. Financial responsibility and leak detection must be maintained during temporary closure if the tank is not emptied. Also, cathodic protection is required to be maintained as if the facility was still in operation if it is present. There may be additional documentation required as proof the tank(s) are temporarily closed according to DNR protocol. This form should also be used if some of the tanks are going to be temporarily closed while some are to remain in service at one facility.

Returning UST to Service [NEW]

Recently, the DNR added a notification process for returning UST systems to service after being in temporary closure. This process is explained in the two page guidance “Returning an UST System to Service” available on the DNR’s web site. After completing all the items listed in that guidance and **prior to returning the tank to service**, you must complete and submit the *Notification of Returning an UST to Service* form to the DNR and PMMIC. In addition to the notification form, you will be required to submit all applicable leak detection records, precision tightness testing, cathodic protection testing, certificate of insurance, and current ownership information.

Permanent UST Closure

As stated earlier in UST Changes or Upgrades, you need to complete and submit the *Notification of Tank Closure or Change-in-Service* form **at least 30 days prior to removing or permanently closing an UST**. The DNR will provide the tank owner with guidance documents that explain the soil and groundwater sampling requirements upon receipt of the notification form. The owner must indicate an anticipated date of closure and give a **24 hour notice** (phone call) to the local DNR field office. The *Underground Storage Tank Closure Report* (removed or filled-in-place) must be submitted to the DNR **within 45 days after the tank or piping removal**. PMMIC should also be notified by the owner with the two closure notification forms in the same timeframe.

Please be aware that there are some local areas, specifically Polk & Linn Counties that may require construction and operation notifications/permits aside from the DNR notifications mentioned above. Contact your local officials for those details. It is imperative that all interested parties are kept informed to make all processes work smoothly. If you need more information of these notifications and requirements, or want copies of the forms please refer to <http://www.iowadnr.gov/land/ust/techindex.html> or contact the DNR Underground Storage Tank Section at 515/281-8779 or 515/281-8879.