

## **How to Prepare for a UST Compliance Inspection**

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Some site owners may have already experienced an underground storage tank (UST) compliance inspection, but others have not and are wondering what has to be done to make sure that the inspection process goes smoothly and without violation.

The United States Environmental Protection Agency (EPA) has recently mandated UST compliance inspections every two years at all regulated sites, with the first inspection completed in calendar year 2007. In order to meet this demand, the Iowa DNR has authorized 3<sup>rd</sup> party inspections. All compliance inspections must be conducted by an Iowa certified compliance inspector. A list of these individuals is available on the DNR website. The PMMIC inspection satisfies this requirement.

The PMMIC site inspection process will be very similar to past years with only a few minor adjustments. The process starts with a mailed notice to the owner that the site inspection will be conducted within 60 days. Once the inspection process is complete, including any applicable follow-up response to deficiencies, a copy of the report is supplied to the DNR. The 3<sup>rd</sup> party inspections are randomly audited by the DNR, so there is a chance that the DNR will inspect your site in addition to the 3<sup>rd</sup> party inspection.

**All PMMIC insured sites will be inspected annually, however the compliance inspection report will only be submitted to DNR once every two years, as required by state and federal regulation.**

One minor change to the PMMIC site inspection process includes reporting on the DNR registration tag being attached to the tank fill pipe (or the riser pipe used for emptying the used oil tanks). All regulated tanks with capacity greater than 110 gallons must be registered and have a permanent metal tag attached in this manner. A silver (permanent) metal tag must identify all tanks between 111 and 1100 gallons, and all tanks greater than 1100 gallons must be identified by a purple (permanent) metal tag. These larger tanks are registered annually with the DNR, and there will be annual metal tags issued like in years past that must be attached in the same manner as the permanent tag. In other words, next year and years that follow you must have two tags (purple tag & annual registration tag) attached at the fill pipe of each regulated UST greater than 1100 gallons. If you are unable to locate your permanent tank tags, contact DNR immediately to have new tags issued.

Another change to the PMMIC process includes more leak detection records at policy renewal time. In years past, PMMIC has only required that you submit the most recent month of tank and line leak detection records. Because the new state and federal regulations require 3<sup>rd</sup> party inspections to document that the site is in compliance with all applicable leak detection requirements, PMMIC is now requiring the policy renewals to include the most recent 12 months of leak detection records. You have been required to maintain adequate leak detection records for years, so the only change is that you must now provide them to PMMIC on an annual basis. To minimize the amount of paperwork that you mail, make sure that you only send applicable documents. For more guidance on how to address these requirements, refer to the document "New Leak Detection Requirement for Renewals" at the PMMIC web page ([www.pmmicinsurance.com](http://www.pmmicinsurance.com)).

Here are some key items to help ensure that you have a good experience when the compliance inspection is conducted. These items may not all apply to your site, but it is a good idea to conduct those that do apply on a regular basis.

Inspect monitor status – Make sure all leak detection and cathodic protection monitors are operating properly. This includes:

- Tank monitor (recent passing leak tests on all tanks & all alarms must be cleared/addressed)
- Line monitor (recent passing leak tests on all lines & all alarms must be cleared/addressed)
- Interstice/sump sensor monitor (all alarms must be cleared/addressed)
- Impressed current rectifier (all amp, volt & hour gauges must be operational and numbers should be consistent with previous months)

Inspect dispenser area – Make sure all dispensing units, including loading racks and hose reels, are installed properly, in good condition, leak free and any fuel, water, or debris is cleaned from the dispenser sumps. This includes:

- Dispenser hoses are not cracked or leaking
- Dispenser filters are changed routinely and not leaking
- Dispenser mechanicals are not leaking (this requires the bottom covers to be removed and all meters, pumps, piping, valves, solenoids, etc. to be inspected)
- Dispenser sump should be intact (all entries into sump and containment itself should be sealed)
- Sensors should be set to the lowest point in the dispenser sump
- Piping should be inspected for general condition (any defects should be documented and monitored)
- Any metal portion of the piping, including fittings and flex connectors, must be isolated from the backfill or cathodically protected

Inspect tank area – Make sure all tank manways, including fill pipes, submersible pumps, tank probes and interstice sensors, are installed properly, in good condition, leak free and any fuel, water or debris is cleaned from the piping sumps. This includes:

- DNR tank registration tag is properly displayed out at the tank (\*make sure that it does not get covered and is easily located by the inspector)
- Manway drive lids must be accessible, should seat properly when closed and not rest on any part of the tank (lid must not rest on tank probe cap, fill pipe, sub pumps, sumps, etc.)
- Tank must be sealed properly at surface (i.e. tank probes, interstice caps, fill caps, vapor recovery adaptors, etc.)
- Overfill prevention device must not be impaired (i.e. no tank stick in the fill pipe, overfill alarm disabled, etc.)
- Sumps and spill basins must be free of all fuel, water, debris, so the entire contents of containment can be inspected
- Submersible pump and piping are not leaking (this also includes leak detectors, valves, solenoids)
- Piping sump and spill basin should be intact (all entries into sump and containment itself should be sealed)
- Sensors should be set to the lowest point in the piping sump
- Piping should be inspected for general condition (any defects should be documented and monitored)
- Any metal portion of the piping, including submersible pumps, fittings and flex connectors, must be isolated from the backfill or cathodically protected

Inadequate leak detection records are the number one violation that we are finding. Please maintain adequate records and be able to document the last 12 months of leak detection at all times.

If you have any questions about the inspection process, don't hesitate to contact our office.