

PMMIC 2013

Inspection Findings

Brian Pottebaum

Rounds & Associates/PMMIC

2013 “Top Ten” Deficiencies Cited

1. Liquid/Debris in Spill Containment
2. Insufficient Secondary Containment (Piping Sump)
3. Insufficient Secondary Containment (Dispenser Sump)
4. Failure to Properly Post Emergency Contact Information
5. IDNR Permanent Tank Registration Tag(s)
6. Trained UST Operator Not Present at Staffed Facility During Inspection
7. Leak in Fuel System (with Secondary Containment)
8. Automatic Tank Gauge (ATG) Operation
9. Inadequate Documentation of Operator Training
10. Inadequate Spill Containment

1. Liquid/Debris in Spill Containment

- Approximately 68% of sites cited for deficiency

IAC 135

- Spill equipment that will prevent release when transfer hose is detached from fill pipe
- or...simply need to be maintained as designed by manufacturer
- Sumps (containments) must be maintained and kept free of debris, liquid and ice at all times. (post 11/28/2007)
- Regulated substances spilled into any spill catchment basin, turbine sump, transition/intermediate sump or under-dispenser containment shall be immediately removed. (post 11/28/2007)

Liquid/Debris in Spill Containment



Liquid/Debris in Spill Containment



2. Insufficient Secondary Containment (Piping Sump)

- e.g. Liquid/Debris in piping sump
- Approximately 34% of sites cited for deficiency

IAC 135

- Sumps (containments) should be maintained and kept free of debris, liquid and ice at all times.
- Regulated substances spilled into any spill catchment basin, turbine sump, transition/intermediate sump or under-dispenser containment shall be immediately removed. (post 11/28/2007)

Insufficient Secondary Containment (Piping Sump)



Insufficient Secondary Containment (Piping Sump)



Insufficient Secondary Containment (Piping Sump)



3. Insufficient Secondary Containment (Dispenser Sump)

- e.g. Liquid/Debris
- Approximately 30% of sites cited for deficiency

IAC 135

- Sumps (containments) should be maintained and kept free of debris, liquid and ice at all times.
- Regulated substances spilled into any spill catchment basin, turbine sump, transition/intermediate sump or under-dispenser containment shall be immediately removed. (post 11/28/2007)

Insufficient Secondary Containment (Dispenser Sump)

Dry



Liquid



Insufficient Secondary Containment (Dispenser Sump)



Insufficient Secondary Containment (Dispenser Sump)



Insufficient Secondary Containment (Dispenser Sump)



4. Failure to Properly Post Emergency Contact Information

- Emergency contact information posting at attended or unattended fueling facilities
- Approximately 22% of sites cited for deficiency

IAC 135

- Emergency contact information and emergency procedures must be prominently displayed at the site. An unstaffed facility shall have an emergency shutoff device as provided in [135.5\(1\)](#) and a sign posted in a conspicuous place that includes the name and telephone number of the facility owner, an emergency response telephone number to contact the Class B operator, and information on local emergency responders.

Attended Facilities

DNR Emergency Contacts & Phone Numbers

| | |
|----------------------------|------------|
| Emergency* | 911 |
| Fire Department | |
| Police | |
| Class A Operator | |
| Class B Operator | |
| Manager | |
| Assistant Manager | |
| Petroleum Service Provider | |

***WHEN TO CALL 9-1-1**

- Call 9-1-1 when life and/or property are in immediate danger
- When you see smoke or a fire
- When rescue or emergency medical assistance is needed

| Iowa DNR Contacts | |
|--|----------------------------------|
| DNR Emergency Response: (24 hour phone) | 515.281.8694 or fax 515.725.0218 |
| UST Central Office: (work hours phone) | 515.281.3634 or fax 515.281.8895 |
| <i>Use the Release Report Form to fax within 24 hours or 6 hours if an emergency condition exists: http://www.iowadnr.gov/land/ust/ustrelease.html</i> | |

| Iowa DNR Field Office Contacts | | | | | |
|--------------------------------|--------------|--------------|--------------|--------------|--------------|
| Field Office | Phone | Fax | Field Office | Phone | Fax |
| 1-Manchester | 563.927.2640 | 563.927.2075 | 4-Atlantic | 712.243.1934 | 712.243.6251 |
| 2-Mason City | 641.424.4073 | 641.424.9342 | 5-Des Moines | 515.725.0268 | 515.725.0218 |
| 3-Spencer | 712.262.4177 | 712.262.2901 | 6-Washington | 319.653.2135 | 319.653.2856 |

DNR Field Office Locations



Posted in clearly visible location at front of store (easily accessible to Class C Operators)



Unattended Facilities

Tank or Building Area

Dispensing Area



5. IDNR Permanent Tank Registration Tag(s)

- Approximately 14% of sites cited for deficiency

Permanent Tank Tag

- Each regulated UST issued tag
- Attached to fill port for the life of the tank
- Identify fill ports
- Confirm compliance
- Deliveries are prohibited to a tank w/o permanent and current annual tags

Tank Tags (Permanent/Annual)



1100 gallons or less

Annual Renewal Tag

Permanent ID Tag

Greater than 1100 gallons



6. Trained UST Operator Not Present at Staffed Facility During Inspection

- Approximately 12% of sites cited for deficiency

IAC 135

- Trained operators must be readily available to respond to suspected or confirmed releases, equipment shut-offs or failures, and other unusual operating conditions.
- A Class A or Class B operator should be immediately available for telephone consultation with the Class C operator when a facility is in operation. Class A or Class B operators should be able to be on site at the storage tank facility within four hours.
- For staffed facilities, a Class C operator must be on site whenever the UST facility is in operation.



Trained UST Operator Not Present at Staffed Facility During Inspection



Trained UST Operator Not Present at Staffed Facility During Inspection

IOWA UST CLASS C OPERATOR

Certificate of Completion

This is to certify that _____ completed the **IA UST Class C Operator Instructional Program** that satisfies the state training requirements of IAC 567- 135.4(6), Iowa Administrative Code. The signatures on this document certify that this individual has been trained as a Class C Operator at the following location: _____

Class C Operator Signature

Class A or B Operator Name (Print)

Completion Date of Training

Class A or B Operator Signature

Unstaffed Facilities

IAC 135

- For unstaffed facilities, a Class B operator must be geographically located such that the person can be on site within **two** hours of being contacted by the public, the owner or operator of the facility, or the department. Emergency contact information and emergency procedures must be prominently displayed at the site. An unstaffed facility shall have an emergency shutoff device as provided in [135.5\(1\)](#) and a sign posted in a conspicuous place that includes the name and telephone number of the facility owner, an emergency response telephone number to contact the Class B operator, and information on local emergency responders.

7. Leak in Fuel System (with Secondary Containment)

- Approximately 12% of sites cited for deficiency
- Leaks at dispenser (w/UDC) or tank connection (w/piping sump)
- 93% of all contained leaks were at DISPENSER
- When considering all possible leaks; 25% sites had a leak of some degree and 95% of those again at the DISPENSER
- Inspect and re-inspect dispensers after service work...

Leak in Fuel System (with Secondary Containment)

Activate Pump



Wipe Down



Why do we activate Pump?



Damp meter before pump is activated



Obvious leaking meter after pump is activated

8. Automatic Tank Gauge (ATG) Operation

- Approximately 11% of sites cited for deficiency
- Alarms – High Product, High Water, Sudden Loss, etc.
- Properly testing UST system
- Correct time and date

Automatic Tank Gauge (ATG) Operation

- Properly Testing Tank (Inspected 7/16/13)

| TANK | GAL/HR | TEST |
|------|--------|--------|
| 1 | 0.00 | PASSED |

TEST ENDING TIME:
MAY 15, 2013
11:47 AM

Automatic Tank Gauge (ATG) Operation

- "Sudden Loss" Alarm

by, State, ZIP
one Number
SHAP Catego
ifier Hours
ifier Volts
ifier Amperes
le
ide
rosion
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ressed A
Deliv
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Pressu

JUL 2, 2013 5:05 PM kett

SYSTEM STATUS REPORT

T 1:LEAK ALARM
T 1:SUDDEN LOSS ALARM

INVENTORY REPORT

T 1:DIESEL
VOLUME = 4918 GALS
ULLAGE = 6989 GALS
90% ULLAGE= 5798 GALS
TC VOLUME = 4893 GALS
HEIGHT = 41.42 INCHES
WATER VOL = 15 GALS
WATER = 0.79 INCHES

Automatic Tank Gauge (ATG) Operation

- “High Product” Alarm



Automatic Tank Gauge (ATG) Operation

- Test Fail



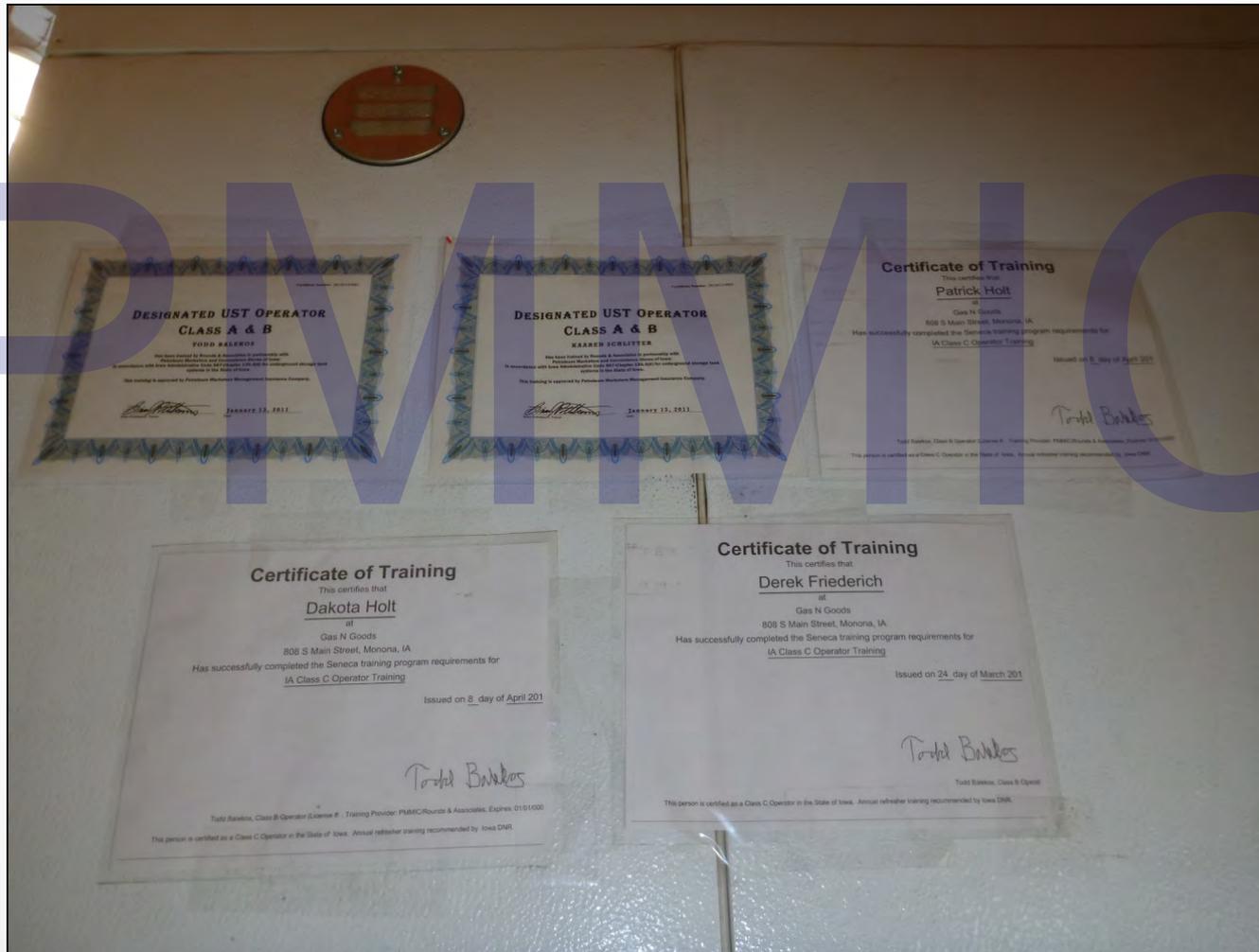
9. Inadequate Documentation of Operator Training

- Approximately 9% of sites cited for deficiency

IAC 135

- A copy of the certificates of training for Class A and Class B operators shall be on file and readily available for inspection in accordance with subrule [135.4\(5\)](#).
- A copy of the certificates of training for Class B and Class C operators shall be available at each facility for which the operator is responsible.

Inadequate Documentation of Operator Training



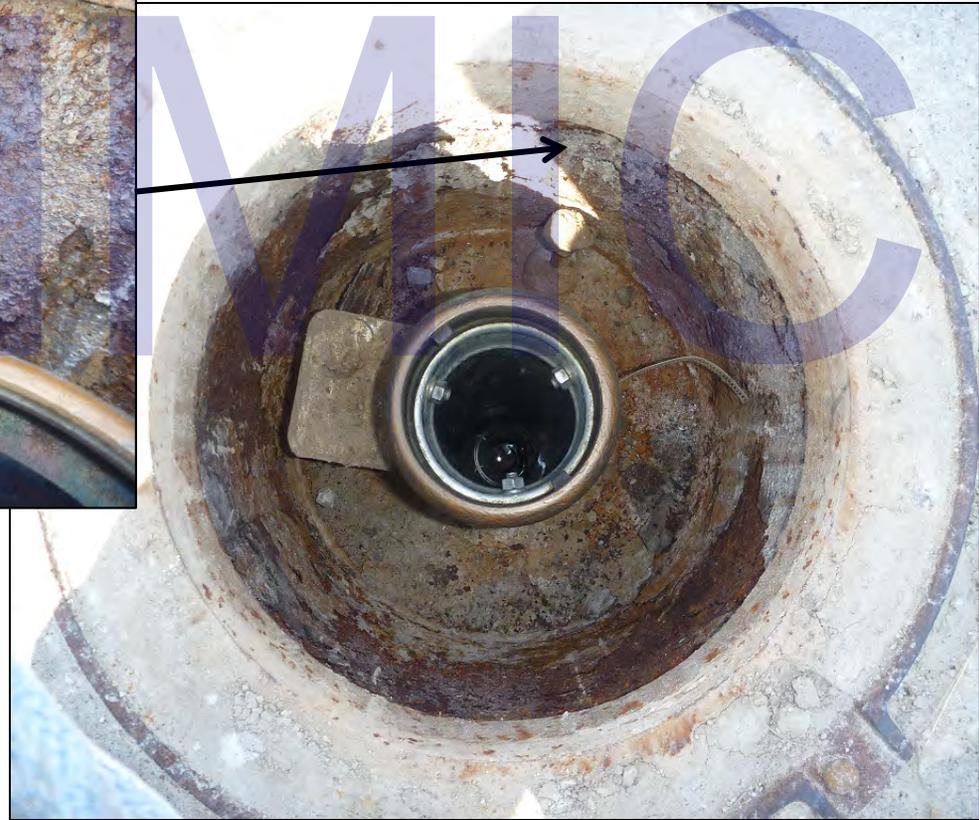
10. Inadequate Spill Containment

- Approximately 8% of sites cited for deficiency

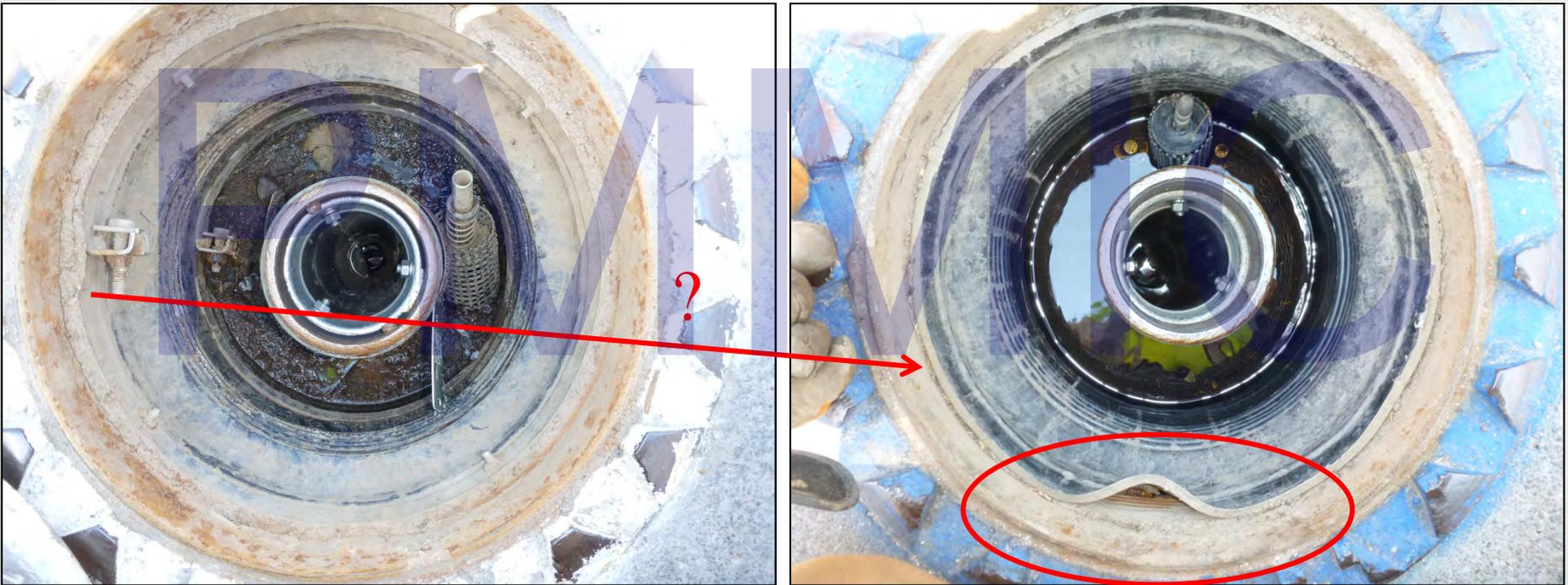
IAC 135

- Spill prevention equipment that will prevent release of product to the environment when the transfer hose is detached from the fill pipe (for example, a spill catchment basin).

Inadequate Spill Containment

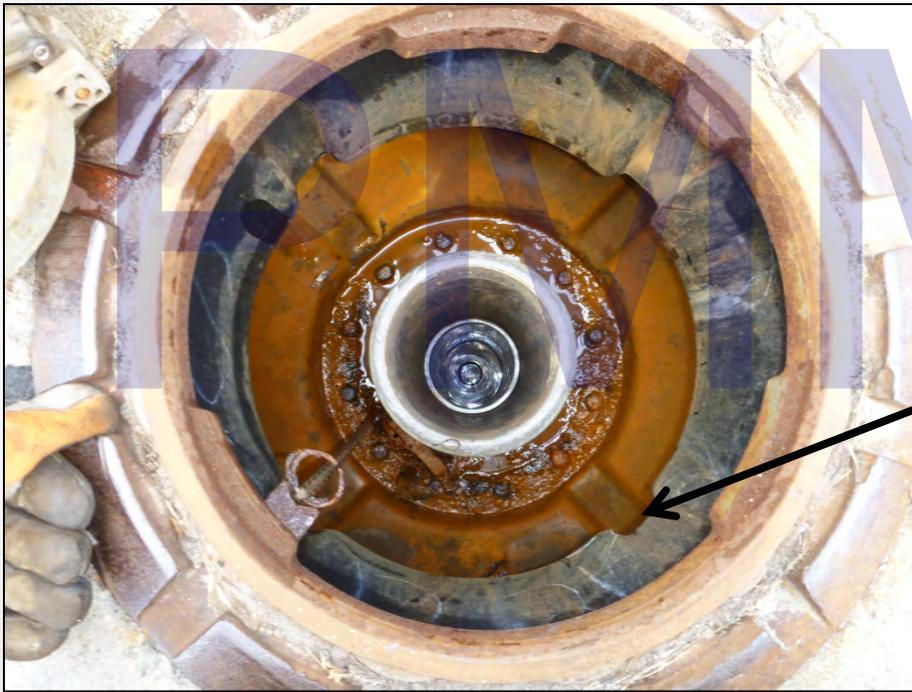


Inadequate Spill Containment



Note: Sometimes expansion clamp is missing or loose at bottom as well.

Inadequate Spill Containment



Inadequate Spill Containment







Top View



Side View



Repairs don't work...



Inadequate Spill Containment



Again...repairs DO NOT work



Inspection Deficiency Summary

- Liquid/Debris – 3
 - Liquid/Debris in Spill Containment – 68%
 - Insufficient Secondary Containment (piping) – 34%
 - Insufficient Secondary Containment (dispenser) – 30%
- Operator Training – 3
 - Failure to Properly Post Emergency Contact Info – 22%
 - Trained UST Operator Not Present at Staffed – 12%
 - Inadequate Documentation of Operator Training – 9%
- IDNR Permanent Tag
- Leak in Fuel System (with Secondary Cont.)
- ATG Operation

UST Installer Training

- February 25-26th, 2014
 - **Save the Date** - Details still forthcoming
 - Meets IAC 134.19(6)
 - Intended for those needing *installer* license in State of IA
 - Adventureland Inn, Altoona, IA



UST Compliance Inspector Training

- February 27-28th, 2014??
 - Hosted by R&A/DNR
 - Intended for those needing *Compliance* Inspector license in State of IA
 - Must take Installer Course first
 - Adventureland Inn
 - Contact us





Questions?

