



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
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DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

15 April 2014

Subject: Fuel Transfers to Underground Storage Tanks

Dear Fuel Transport Companies:

During March 2014 there were two significant spills resulting from transport drivers overfilling underground storage tanks. Fortunately, neither the public nor transport drivers were injured at either event. What both spills had in common was this: neither driver bothered to stick the tank to determine its available capacity.

One situation involved a hospital where diesel product flowed out of the tank, across a very busy parking lot and a busy street into a storm sewer inlet. The other site is still undergoing investigation to determine the environmental impact. Both incidents may cost thousands of dollars in repair, cleanup and further environmental assessment. Both incidents involved a combustible liquid.

There are two purposes to this letter. The first one is to urge you to do whatever it takes to get drivers to stick tanks and look at automatic tank gauging (ATG) system information to confirm that the contents of the tanker can fit into the tank. The second purpose of this letter is to remind you that lives are at stake here. The company that overfills a tank with flammable liquids (gasoline blends) instead of combustible liquids may have a lot more than just an expensive cleanup on their hands.

Overfills have got to stop. When one looks at the entire fuel path from the tight fill to the nozzle at the dispenser there are two points in that path which are not monitored, and continue to be sources of spills: the transport driver transferring fuel into the UST and the customer on the other end pulling product out of the tank and transferring it to a container or vehicle. Yes, there are still leaks in the points between, but a lot fewer than in the past. Our UST systems have improved remarkably in technology and safety. What remain vulnerable are the procedures at the fill port and at the nozzle.

In the future, please heed the following:

1. The State Fire Marshal Office, US DOT, International Fire Code, NFPA 385 all require that the driver attend to the transfer process and at no time leave the transfer process. The reasons are clear: the prompt visual detection of an overfill and leaks, guarding public safety, and immediate reaction to flow valves and levers at the tanker should a problem develop.

2. Speak with the owner/operator upon arriving to verify the amount of fuel ordered and that it will be transferred to the intended tanks.
3. Owner/operators and tanker drivers must both determine the available capacity of the tank or ullage before transferring fuel. Use the ATG system, stick the tank and consult the conversion chart.
4. Liquid tight connections must be used when delivering to tanks of 1000 gallons or more.
5. Do not attempt to bypass overfill equipment in order to expedite deliveries. This is an egregious and unlawful practice that endangers the public and can easily lead to a spill.
6. Since January 10, 2011, all large gasoline dispensing facilities (monthly throughput of more than 100,000 gallons of gasoline) are required to install Stage 1 Vapor Recovery Systems (VRS) to capture harmful hydrocarbon vapors during fuel transfer and return them to the tanker. If a VRS system is installed, you must connect to it. Do not attempt to force open the dry break of the vapor recovery port to avoid connecting the vapor recovery hose and coupler. This is another egregious practice that defeats the purpose of vapor recovery by releasing harmful and flammable vapors at ground level, and endangers the public.

Thank you for your attention to these matters. If you have questions about these safe handling practices, please contact Tom Collins at 515.281.8879 or Paul Nelson at 515.281.8779.

You perform countless safe fuel deliveries and transfers across the state of Iowa, and the public is grateful. The UST Section is always interested in hearing from you about ways we can work together to continue to make the transfer of product to USTs safer for drivers, the public and the environment.

Sincerely,



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