Underground Storage Tank Section

UST CHAPTER 135 RULE REVISIONS

Stakeholder Meeting IV

February 16, 2016

MEETING AGENDA

- Written Comments Received/Your Response to Comments
- Where the Department currently stands
- Previously discussed items
- Items that are up for discussion

Additional items if time allows:

- Closure Sampling
- Chapter 134 UST Professionals
- Chapter 136 Financial Responsibility

RESCINDED ITEMS SINCE LAST STAKEHOLDER MEETING

- Meet testing and inspection requirements by October 13, 2018
- Lined tanks and permanent closure
- Not tracking Class C operators
- No need to submit Annual walkthrough
- No 3-6 month inspection for new builds
- New owners paying late fees
- Moved proposed Feb. deadline back to March 1
- Annual C operator training

NEW COMMENTS AS OF 2/16/2016

- Steel tanks w/o CP
- Three year training is sufficient
- Concern about who does annual walkthrough is time
- Draft rules: are #1 and 5 the same
- Conflict with state and fed testing on page 25. We will change our requirement to 3 yr.
- Annual training for Class C is good idea but is too difficult, time consuming and costly
- IDNR preparing Class A/B exam is acceptable
- Class A/B operators do not have to be retrained. They work at this daily
- Will owners/operators be required to do anything more for compatibility—need more detail
- Need reciprocity for Class B

- Date of testing and inspections should be 3 years after adoption
- 3 year retraining for Class A/B fits with other states
- March 1 is a reasonable date to apply late fee
- Submitting install docs 30 days after last installation inspection works
- Do those who do monthly and annual walkthroughs have to be Class A/B
- Adopt EPA's revised regulation. Postpone IDNR's proposed changes
- Some owners/operators are overfill devices that can be checked without removal
- Oppose DNR having discretion to require vertical plume definition at Tier 2

IDNR's Position

- Make state and federal changes concurrently. IDNR requirements must reflect federal revisions
- IDNR believes what we have reached is reasonable
- IDNR will work for consensus with all stakeholders
- IDNR does not want to duplicate efforts, resources, time

ITEMS THAT NEED FURTHER DISCUSSION

DEFINITIONS

- Added a definition for UST Professional

"*"UST Professional"* is an individual licensed by the Iowa Department of Natural Resources under IAC--Chapter 134. The licensing program includes underground storage tank system installation, installation inspection, UST system testing, tank lining, cathodic protection installation/inspection and inspecting for UST system operational compliance. The license issued will list the type of work the individual is licensed to perform.

REGISTRATION TAGS AND ANNUAL MANAGEMENT FEE 135.3(5) PG.20

- Changed the deadline date to March 1 after which the late fee will be enforced.

SPILL AND OVERFILL CONTROL 135.4(1) PG.27-29

- CP
  - Problem: addressing tanks without continuous CP
  - Up to 0-90 days: restore power, repair, CP test
  - 90-365 days: restore power, repair, CP test, precision test and retested (CP) within 6 months
  - >365 days (active site): internal inspection, inspect metallic components, repair/replace corroded components, precision test on components, restore power if all passing, retest CP within 6 months
  - >365 days (inactive): permanently close

TRAINING REQUIRED FOR UST OPERATORS 135.4(6) PG.32

- Class A/B retraining every 3 years

Surrounding states that do have a retraining requirement have adopted the following:

- Illinois- 2yrs
- Kansas- 4yrs
- Nebraska- 5yrs

How important do you believe operator training to be?

TRAINING REQUIRED FOR UST OPERATORS 135.4(6) PG.32

Why Class A/B operator training is so important to the DNR

- Technology, procedures, policies change
- Class A/B operators are in charge of compliance

TEMPORARY CLOSURE 135.15(1) PG.85-87

- Problem: addressing indefinite temporary closure
- IDNR wants to be consistent with DPS requirement
- 45 temp closed with no FR
- 27 temp closed with FR
- 25 “abandoned” sites
- 10 temp closed farm/residential

The International Fire Code states:

3404.2.13.1.3 Out of service for one year. Underground tanks that have been out of service for a period of one year shall be removed from the ground in accordance with Section 3404.2.14 or abandoned in place in accordance with Section 3404.2.13.1.4.

PERIODIC OPERATION AND MAINTENANCE WALKTHROUGH INSPECTIONS 135.4(12) PG.36-37

- Monthly walkthroughs: spill prevention and release detection equipment, review LD records
- Annual walkthroughs can be done by a trained professional, technician, etc.
- IDNR has prepared monthly/annual walkthrough inspection forms.
- Delivery Prohibition will be enforced on sites where monthly/annual walkthroughs are not being conducted.

MONTHLY WALKTHROUGH

Page 1

Date:

IOWA MONTHLY UNDERGROUND STORAGE TANK INSPECTION CHECKLIST

Facility Registration #	Facility Name	Facility Location	Inspector
		Address: City:	Name: Position:

ITEM	Mark "Y" for Yes and "N" for No or "N/A" if not applicable	N/A	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5
Spill Containment at Fill Port							
1	Containment not damaged – no longer capable of holding liquid, holes or cracks present						
2	No Water in Containment						
3	No Fuel in Containment						
4	No Debris in Containment						
5	No Liquid in interstitial space (if containment is double walled)						
Overfill Prevention in Fill Pipe (Auto Shutoff)							
6	No obstructions in fill pipe preventing overfill equipment from functioning						
7	No damage to fill pipe or cap (fill cap attaches securely to fill pipe)						
8	Fill cap gasket not damaged preventing tight seal						
Tank Release Detection	Type (circle): **Interstitial** ATG **SIR** Groundwater **Vapor** Manual Tank Gauging						
9	Tank leak detection operating						
10	No leak detection alarms present						
11	Leak detection records reviewed and current						
12	Equipment in operating conditon						
13	Groundwater/Vapor wells capped and locked						

IOWA MONTHLY UNDERGROUND STORAGE TANK INSPECTION CHECKLIST

		N/A	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5
Piping Release Detection	Type (circle): **Electronic** Mechanical **Interstital**						
14	Pipe leak detection operating						
15	No leak detection alarms present						
16	No unusual operating conditions						
17	Leak detection records reviewed and current						

DESCRIBE DEFICIENCIES HERE – provide item number, tank description (volume, product stored)

Attach corrections to deficiencies to inspection form, keep in records

ANNUAL WALKTHROUGH

Page 1

Date:

IOWA ANNUAL UNDERGROUND STORAGE TANK INSPECTION CHECKLIST			
Facility Registration #	Facility Name	Facility Location	Inspector
		Address: City:	Name: Position:

ITEM	Mark "Y" for Yes and "N" for No or "N/A" if not applicable	N/A	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5
Monthly Inspections							
1	Completed monthly inspection and checklist						
2	12 months of monthly inspections reviewed and adequate						
3	Deficiencies in monthly inspections over past year corrected						
Submersible Turbine Pump (STP) Sump							
4	No fuel leaks present (piping, STP, or other)						
5	Junction boxes sealed; seal-offs present						
6	Flexible connector is not twisted, kinked or bent beyond manufacturers specifications						
7	Submersible pump, piping and fittings show no signs of leaking						
8	Sump is free of cracks, holes, bulges or other defects						
9	Penetration fittings intact and secured; boots in good condition						
10	Sump sensor properly mounted at the bottom of the sump						
11	No water in containment						
12	No fuel in containment						
13	Containment lid, gaskets and seals are in good condition						
14	Interstitial monitor not in alarm/ No leak into interstital space						

IOWA ANNUAL UNDERGROUND STORAGE TANK INSPECTION CHECKLIST

ITEM	Mark "Y" for Yes and "N" for No or "N/A" if not applicable	N/A	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5
Other Sumps	Mark N/A if no other sumps						
15	No fuel leaks present						
16	Piping not in contact with soil without cathodic protection						
17	Penetration fittings intact and secured; boots in good condition						
18	Sump is free of cracks, holes, bulges or other defects						
19	No water in containment						
20	No fuel in containment						
21	No leaks to containment area						
22	Containment lid, gaskets and seals are in good condition						
23	Sump sensor properly mounted at the bottom of the sump						
24	Interstitial monitor not in alarm/ No leak into interstital space						
Dispensers	Provide name of dispenser(i.e. 1/2, 3/4)						
25	No fuel leaks present (dispenser or piping)						
26	Piping not in contact with soil without cathodic protection						
27	Flexible connectors not twisted, kinked or bent beyond manufacturers specifications						
28	Penetration fittings intact and secured; boots in good condition						
29	Sump is free of cracks, holes, bulges or other defects						
30	No water in containment						
31	No fuel in containment						
32	Sump sensor properly mounted at the bottom of the sump						
33	Interstitial monitor not in alarm/ No leak into interstital space						
Hand Held Release Detection Equipment							
34	Tank gauge stick is operable and serviceable						
35	Groundwater bailer is operable and serviceable						
36	Vapor monitoring device is operable and serviceable						

Page 3	IOWA ANNUAL UNDERGROUND STORAGE TANK INSPECTION CHECKLIST
DESCRIBE DEFICIENCIES HERE – provide item number, tank/dispenser description (volume, product stored)	
Attach corrections to deficiencies to inspection form, keep in records	

LUST REVISIONS

LUST Staff has received comments and will be responding soon.

UST PROFESSIONALS AND FINANCIAL RESPONSIBILITY

- Chapter 134
  - Remove outdate requirements such as pixel size and temporary certification for Cis
  - Include Sec. Cont. testing documents with items to submit at install
- Chapter 136
  - All federal revisions (edits)

IMPLEMENTATION DATES

Federal Regulation to be Implemented	Proposed Date of Implementation
Flow restrictors in vent lines	Immediate upon adoption
Testing following a repair	Immediate upon adoption
Closure of internally lined tanks that fail periodic inspection	Immediate upon adoption
Demonstrating compatibility	Implemented
Airport hydrant fuel systems and field constructed tanks	Owners and operators must begin meeting these requirements by October 13, 2020
Secondary containment and interstitial monitoring	Implemented
UDCs for new dispensers—implemented	Immediate
Operator training	Immediate
Site assessment records for groundwater and vapor monitoring	Immediate
Previously deferred UST systems (emergency generators, airport hydrant fuel systems and field constructed tanks)	Immediate for emergency generators October 13, 2020 for airport hydrant fuel systems and field constructed tanks
Spill prevention equipment testing	Owners and operators must conduct the first test or inspection by October 13, 2020
Overfill prevention equipment inspections	
Containment sump testing for sumps used for piping interstitial monitoring	
Release detection equipment testing	
Walkthrough inspections	Immediate upon adoption