

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP. DIRECTOR

March 6, 2013

Hi everyone,

Just a reminder that inspection database training is coming up on March 25-28, Monday-Thursday, 1:00-3:00 in the third floor conference room of the Wallace Bldg located at 502 E 9th St in Des Moines (corner of E. 9th and Grand Ave). In addition to compliance inspectors, anyone who will be entering an inspection for a company or on behalf of an individual inspector should attend the training event.

If you have not already done so, contact Bonnie (515.281.6010) to register for **one** of the four days. Anyone currently unable to access the inspection database will need to establish an Enterprise Authentication & Authorization (A&A) account. See attached instructions if needed. If you encounter problems, contact Bonnie at Bonnie.Garrison@dnr.iowa.gov.

You may still enter inspections on the old database; we will do a final data migration when we go to production with the new database sometime shortly after training.

Some issues have come to my attention that I would like to address.

- 1. Contact the owner or Class B operator and have them shadow you during the compliance inspection. It is imperative that they see what you see. These inspections come up only every two years, it should not be burdensome for an owner or Class B operator to be present during the inspection. This is especially important when a reportable release and other problems are observed. We instruct attendees of our inspector course to arrange an inspection when the owner or Class B operator can be present. I have recently received phone calls from owners or Class A or B operators concerned that the inspector conducted the inspection without them. If you arrive on site, and the owner or Class B cannot be present for some reason, find out if they can have someone stand in for them, or consider rescheduling for a time when they can be there.
- 2. When you observe leaking, dripping, weeping, damp components (meters, solenoids, piping, submersible pumps, leak detectors, flex connectors, etc.) in uncontained sumps, try to determine how serious it is. What is the source/component causing the leak? How long has it been leaking? Is it a continuous leak or intermittent, (i.e., when the pump is activated)? Is there a strong petroleum odor present in the backfill? Is there staining in the backfill material? Dig around in the backfill to see if the leak has saturated the soil or if it is a superficial leak. Make a determination about how serious this leak is. If you cannot tell the rate of the leak, for example from a dispenser, place something beneath the leak on the backfill (shallow pan, plastic, paper towel, absorbent pad) and see what it looks like after you complete your inspection. We need you

- to investigate and make observations it is part of the inspection. The whole point of third party inspections is better prevention and compliance with UST requirements. Cursory observations are not helpful, and if you do not offer instruction/guidance to the owner or Class B operator, nothing will be done.
- 3. Remember, persistent, steady leaks/drips may require the component be taken out of service if it cannot be repaired immediately.
- 4. A leak in an uncontained sump that appears to have saturated the soil and accumulated over time requires the compliance inspector to inform the owner operator to report the suspected leak to the department. A site check may be necessary depending on the extent of the leak. Carry the forms with you and provide the owner or Class B operator a copy, help them complete it and submit it. They can email us or use USPS or they can just phone it in to us. The compliance inspector then has 7 days to submit a suspected release form to the department.
- 5. When you are conducting an inspection, keep in mind that you are licensed by the department, and you perform UST work on behalf of the department. You help carry out our mission of preventing releases, protecting groundwater and keeping the public safe. Please bear that in mind. Our expectation is that UST professionals are courteous and professional while conducting compliance inspections, and in their interactions with the public.
- 6. If an owner fails to pay you within the time period stipulated in the contract, that is between you and the owner. You may not withhold the inspection report from the owner as a means of effecting payment. Rules state the inspection report shall be sent to the owner within 10 business days [134.14(1)], not when payment is fulfilled.

Please let me know if there are any questions. I look forward to seeing you the last week of March. We can discuss this further at that time.

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