



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
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DEPARTMENT OF NATURAL RESOURCES
PATRICIA L. BODDY, INTERIM DIRECTOR

To: Iowa Licensed UST Compliance Inspectors
From: Tom Collins/Paul Nelson
Date: 2 Februar0079 2011
Re: 2011 Inspection Cycle

By the end of January, UST owners and operators will receive a memo from the UST Section reminding them of their UST facility inspection requirement. Iowa is on a two-year inspection cycle with inspections required within two years of the last inspection. Some facilities are already in violation of the inspection requirement. We will tell owners and operators to check the date of their facility's last inspection. You may also want to check your records and contact the owners/operators to remind them about the date. The first inspection deadline was December 31, 2007.

As in the past, owner/operators have also been instructed to send you copies of their inspection records (leak detection, repairs, cathodic protection, etc.) in advance of the inspection. This is preferable to trying to review the records during the inspection or waiting for records to be submitted to you after the inspection.

Database Development

We will be overhauling our UST inspection database this year for improvements as well as to accommodate new requirements and categories such as NESHAP 6C, operator training, dispensers and UDCs. You will be able to use the current version while these upgrades are taking place. We aim to make the new inspection database easier to use by including updated fields, NESHAP 6C information, and uploading multiple photos. Please let me know what other improvements we should be making for the new database.

If you issue a violation to a site, make sure you go back into the database after they resolve the violation to update it. If you do not update the database, it will not get done. It is your responsibility to see these inspections all the way through to the site's return to compliance and to accurately reflect their status on the database. We still have a problem of compliance inspectors not following up on violations and deficiencies. Attached is a UST Compliance Inspection Response Form. Provide this form to the owner/operator to document return to compliance requirements. When the violations/deficiencies have been resolved within the 60 day timeframe (or another time determined by you and the severity of the violation) have the owner/operator return the form to you within the time frame. If they don't provide the information in the deadline, contact me and I will notify the field office.

After the owner/operator returns the Inspection Response Form you must update the database. The steps below will take you through the process of updating the database:

1. Enter the registration # in the database
2. Click on **View** for the inspection you want. This will take you to the *Compliance Inspection Report* page
3. Scroll down to the bottom of the page and click on **Deficiencies/Corrective Action Items**
4. Click on **Select** for the violation you want to update or resolve. Notice the gray corrective action table that appears below the corrective action items
5. Click on **Edit**, scroll down until the entire table is in view

6. Begin with **Work completed?** and proceed with the remaining fields. If the work is completed, click on the box. Remember, the default is “**No**,” so if the work is not completed, do not click the box.

Due Date:	<input type="text"/> 
Work completed?	<input type="checkbox"/>
Date work completed:	<input type="text"/> 
Action taken:	<input type="text"/>
Work completed by:	<input type="text"/>
Work satisfactory?	<input type="checkbox"/>
Follow-up visit required?	<input type="checkbox"/>
Date of follow-up visit:	<input type="text"/> 
Inspector's first name:	<input type="text"/>
Inspector's last name:	<input type="text"/>

7. Click on **Save** and repeat the same procedure for all items that need to be resolved. Eventually, you will be able select multiple identical violations (e.g., spill buckets with liquid and debris), and resolve them at the same time without going back to select each item. I’m afraid for now you will have to select each item to resolve it.
8. After you have resolved all the items, click on **UST Inspection Summary Report**; you will see the changes made in the report or click **Exit**, and you will return to the first page of the *Compliance Inspection Report* and can select a new facility.

Standard Responses for Violations

Don’t forget to use the standard responses to describe deficiencies/violations in place of notes as much as you can. We can query and track standard responses, but cannot query your notes. Standard language is provided whenever you mark a Section as having failed the inspection. For example, you are entering data under Automatic Tank Gauging so you click on **Enter Data**, which takes you to the Automatic Tank Gauging screen with 10 items to review and mark (remember default is **Yes**). If you mark **No** to one or more of the items 4-9, Automatic Tank Gauging fails the inspection. The standard responses will not appear unless the section fails the inspection (i.e., if you answer **No** to one or more of the items 4-9).

1. Click on the **OK** button when you have marked all the items, this will fail the site in the automatic tank gauging section. You will be taken to the screen that records the violations. The screen will show you a **Select** feature next to each tank that failed the ATG Section.
2. Click on **Select**. A table pops up below with an **Edit** button.
3. Click on **Edit**. The standard language responses are located here. Select the response that suits the violation by clicking on the box. In case there are no standard responses, type in your comments in the field next to **Custom Response**.
4. Click on **Save** after you have selected your response(s) and then click on **Select** to go to the next tank; repeat the steps above.

5. To help find the standard language you are looking for in a particular section, you can search for keywords by pressing “ctrl” + “f” (while you’re in the standard responses) to bring up the search box (it may appear at the bottom of the page). Type in a word/phrase you are looking for (e.g., ATG or drive plate lid), and the word/phrase will be highlighted on the page. Click on **Next** and all the ATG responses will be highlighted.
6. When you have completed the standard responses for that section, click on **Proceed to Next Section**.

Printing Reports

After you have finished entering all the data you will end up on the *Compliance Inspection Report* Page. If there are violations they will appear below each Section’s heading. If everything looks okay, click on **Save as New Version**. You are taken to a screen with all the violations. Click on **UST Inspection Summary Report**.

To print a copy, go to the top left of the screen and select Acrobat (PDF) file from the *Export* drop down menu. Click on **Export**. A PDF version will appear that can be printed, saved, or emailed.

Notification of Inspections

As soon as you arrange the inspection with the owner/operator be sure to enter it in the database. This notifies the field office in the region where you are conducting the inspection and the central office and allows us to track the progress of the inspections and schedule audits.

After you enter the information for one page and click the **Next** button, the data on that screen is saved. If you “time out” while you are entering information only the information entered before the last time you clicked the **Next** button will be saved.

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

All Gasoline Dispensing Facilities must be in compliance with 40 CFR Part 63, Subpart 6C by **January 10, 2011**, including testing, record keeping and reporting. The purpose of these regulations is to reduce the emissions of hazardous air pollutants (HAP) to the environment and to protect public health. NESHAP 6C requirements bring significant environmental benefits, and will also help owners and operators keep the gasoline vapors and their investment inside the tanks instead of going into the atmosphere. The DNR’s Air Quality Bureau enforces NESHAP, but since the UST Section oversees biennial inspections, we collect and exchange information with Air Quality. Guidance is attached on what to look for during compliance inspections for Stage 1 Vapor Recovery Systems.

NESHAP 6C requirements are not yet incorporated into the inspection database. This next upgrade to the databases will incorporate NESHAP 6C information. For the present, please collect the information at the time you conduct the inspection, or have the owner/operators send it to you if it is not available at the time of the inspection. Use the form attached and e-mail, fax or use USPS to send it to Paul or me in the UST Section. If you use USPS, save some postage and mail a bunch at one time. We will enter it in the database as soon as it is upgraded. Owners/operators of large GDFs must send notification to Air Quality by March 11, 2011, once they comply with the 6C NESHAP requirements. Notification forms are available on the Air Quality website: <http://www.iowadnr.gov/air/prof/NESHAP/>. Owners/operators can send the **signed** form to: Iowa Department of Natural Resources, NESHAP Coordinator, 7900 Hickman, Suite 1; Windsor Heights, IA, 50324 or Fax to 515-242-5094, or email to diane.brockshus@dnr.iowa.gov.

For questions, contact Christine Paulson at christine.paulson@dnr.iowa.gov (phone: 515-242-5154) or Diane Brockshus at diane.brockshus@dnr.iowa.gov (phone: 515-281-4801). You should have already received a memo from Air Quality about the NESHAP 6C requirements.

Operator Training

We are well underway with operator training and have a year to go before the deadline (December 31, 2011). By the deadline, all regulated facilities must have trained Class A and B operators, and Class C operators if they are a marketer or sell retail gasoline. What does this mean for the current inspection cycle? Remind the owner/operators of the requirement and encourage them to get training early. Approved operator training vendors are posted on our website: <http://www.iowadnr.gov/land/ust/ustowners.html>.

As of April 14th, 2010, Class C operators must have written basic operating instructions and procedures specific to the facility, and emergency contact names and telephone numbers readily available on site. We supplied most of this information (what they are required to know and why) to marketers in a memo in March of 2010. Make sure this information is readily available. Attached is a copy of what was sent. If this information is not readily available to a Class C operator, it is a violation. Information and procedures on how to deal with spills, location of emergency shutoff, emergency contacts and phone numbers, among other things, are a must for each marketing facility (i.e., those that sell retail gasoline and are required to have Class C operators). There is no place to enter this on the database as yet, so make it known on the Inspection Response Form (see sample response form).

Photos

Make sure you document any deficiencies and violations with photos and upload those to the inspection database. Future upgrades include multiple downloads of photos.

Releases: Confirmed and Suspected

As UST professionals, you are required to report suspected and confirmed releases to the owner/operator immediately, who in turn must report the release to the department within 24 hours or 6 hours if a hazardous condition exists (public or environment is at risk). Within 7 days of the discovery of a suspected or confirmed release, the UST professional must submit a copy of the Notification of Release form to the UST Section. The form can be found on our website: <http://www.iowadnr.gov/land/ust/ustforms.html>. A copy of this form is attached.

As always, contact Paul (515-281-8779) or me (515-281-8879) with any or questions or concerns. Work safely, and thank you for your cooperation and efforts.