

Underwater Storage Tank Inspection & Cleaning Guidance¹ Iowa Department of Natural Resources

Numerous companies offer the services of inspecting finished water storage tanks using underwater methods such as divers or remote operated vehicles (ROV). The DNR does not have specific rules governing the methods for cleaning or inspecting water storage tanks but does have rules for disinfection and sampling following cleaning, inspection, and maintenance of storage tanks (AWWA Standard C652-19 and Recommended Standards for Water Works 2022 Edition adopted by reference in 567 IAC 43.3 (2) "a" in 2025). It is the responsibility of the public water supply to ensure that that the water being served to its customers is safe and meets the requirements of the rules contained in 567 IAC Chapters 40-43. This document serves as guidance for maintaining drinking water standards during an underwater tank inspection or cleaning event as outlined in section 4.4 of AWWA Standard C652-19. These guidelines do not apply to newly constructed tanks, or tanks which are removed from service and drained for cleaning or inspection. AWWA Standard C652-19 should be referenced for these situations.

Only experienced qualified contractors should be used. Contractors must follow all applicable federal, state, and local regulations and be willing to explain their diver safety and disinfection procedures. Improperly disinfected divers, inspectors, and equipment can contaminate the water and pose a risk to public health and safety. Additionally, tank sediment may contain microorganisms which, if re-suspended during the inspection or cleaning, has the potential to cause contamination of the water. Observing and measuring water quality and taking the appropriate actions if drinking water standards are not maintained, including the notification of customers, is the responsibility of the water utility.

I. Notifications

- A. Notice to customers: as a courtesy, the utility is encouraged but not required to provide advance notification of the proposed tank entry to customers served by the affected tank in a manner appropriate for the area and the utility.
- B. Notice to the DNR: notice to DNR is not required unless a Precautionary Boil Advisory is issued per section III.A or IV of this guidance document. To report a boil advisory or for general questions contact the appropriate DNR Field Office:

FO1 (Manchester): 563-927-2640 FO4 (Atlantic): 712-243-1934 FO2 (Mason City): 641-424-4073 FO5 (Des Moines): 515-725-0268 FO3 (Spencer): 712-262-4177 FO6 (Washington): 319-653-2135

After Hours Emergency Response Hotline: 515-725-8694

II. Tank Isolation

It is strongly recommended that the storage tank be isolated (removed from service) during underwater inspection or cleaning for safety reasons and to reduce the potential for contamination and to allow for decontamination if necessary. If the tank cannot be isolated, the work should be performed during periods of positive flow into the tank or when flow rates are minimal. If a tank is not isolated, the utility should ensure it

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¹ The Iowa Department of Natural Resources (DNR) has prepared this guidance to assist facilities in complying with public water supply regulations. This document is intended solely as guidance, cannot be used to bind the DNR and is not a substitute for reading applicable statutes and regulations. This guidance was based on AWWA C652-19 Disinfection of Water Storage Facilities and Recommended Standards for Water Works 2022 Edition. This guidance is only meant to address the sanitary quality of the water before and after tank entry and is not meant to provide guidance on safety issues for confined space entry and diving operations. Because of the hazardous nature of this work, contractors must comply with all federal, state, and local regulations and safety requirements.

can be isolated in an emergency. This requires that all necessary equipment, such as valves, be in proper working order through routine exercise and that operators are familiar with the isolation procedure. This requires that the equipment be exercised routinely and system operators be familiar with the isolation procedure.

III. Monitoring

A. Before Entry – the chlorine residual of the tank contents shall be measured and recorded by the contractor or water utility. Samples should be taken from several depths, if possible. If the chlorine residual is less than 0.5 mg/L free chlorine or 2.0 mg/L total chlorine if chloraminating, sufficient NSF/ANSI 61 certified chlorine solution or granules should be added to raise the residual in the tank to the levels described above. Residuals should not exceed 4 mg/L. The system should also measure and record turbidity if they have the equipment to do so.

If the system does not normally disinfect and/or cannot meet the above disinfection requirements prior to entry <u>and</u> the tank cannot remain isolated from the system until negative bacteriological analysis from a State of lowa certified drinking water laboratory is obtained, the system must consult with the DNR to determine if a precautionary boil advisory is warranted. (Note: it is the general policy of the DNR under this situation to require a precautionary boil advisory for the distribution area served by the tank according to the *Iowa Main Break and Depressurization Guidance* (IDNR Form 542-0535). When issued, the precautionary boil advisory is to remain in effect until the work is completed and acceptable water quality can be verified through bacterial sampling).

- B. After Entry it is necessary to ensure that water quality has not degraded and that sufficient chlorine residuals are maintained at or above the levels established in section III.A. The following steps shall be taken:
 - i. Tanks that have been isolated:
 - Following completion of the work, residual chlorine and turbidity in the tank (if applicable) shall be measured and recorded.
 - If residuals have dropped during the work, they should be restored to a minimum 0.5 mg/L free chlorine or 2.0 mg/L total chlorine if chloraminating prior to collecting bacteria samples.
 - Water from the full storage facility must be sampled and tested for coliform bacteria by a State of Iowa certified laboratory and be absent prior to placing the tank back into service.
 - ii. Tanks that are not isolated during work or cannot remain isolated until bacteriological sampling can be completed:
 - Residual chlorine and turbidity of the tank (if applicable) shall be measured and recorded every four hours or more frequently while work is being done inside the tank and following completion of work to ensure residuals remain above 0.5 mg/L free chlorine of 2.0 mg/L total chlorine if chloraminating.
 - Sufficient NSF/ANSI 61 certified chlorine solution or granules should be added at the end of each interval to raise the residuals to the levels described above.
 - Following completion of work, water from the full storage facility must sampled and tested for coliform bacteria by a State of lowa certified laboratory and be absent.

IV. Acceptable Quality

- A. As long as the conditions in section III are met, a boil advisory is not required unless pressures have dropped to zero in the distribution system during the inspection process <u>or</u> positive bacteria sample results are obtained after the completion of work after the tank has been returned to service. If testing shows the presence of coliform bacteria the following steps shall be taken:
 - i. Tanks that have been isolated:
 - Qualified personnel should evaluate the situation and take corrective action.
 - Following corrective action, two or more successive sets of samples, taken at 24-hour intervals, shall be analyzed by a State of lowa certified laboratory and be absent of coliform bacteria prior to returning the tank to service.

- ii. Tanks that were not isolated or were returned to service:
- A Precautionary Boil Advisory for the distribution area served by the tank must be instituted according
 to the *lowa Main Break and Depressurization Guidance*. This guidance is available at
 www.iowadnr.gov/ws-publicnotice.
- Qualified personnel should evaluate the situation and take corrective action.
- Following corrective action, distribution samples must be analyzed by a State of Iowa certified laboratory and show no presence of coliform bacteria, as required by the Iowa Main Break and Depressurization Guidance. The tank must also be resampled for coliform bacteria. The precautionary boil advisory can be lifted only after all distribution system samples and two or more successive sets of samples collected from the tank at 24-hour intervals are free of coliform bacteria.
- B. When surface water plant clearwells or ground storage tanks are inspected and cleaned, turbidity must be measured in addition to measuring disinfectant residual. Water exceeding 1.0 NTU must not be released to the system. Please note that inspection of tanks that are used to meet contact time requirements (CT), may require additional measurement and surveillance to ensure the system meets CT requirements. Systems are encouraged to consult with their respective DNR Field Office prior to inspection of a CT tank.

V. Equipment and Personnel Requirements

- A. All equipment to be used shall be available for inspection.
- B. All equipment exposed to water shall be dedicated for potable water storage facilities only and shall be stored in a manner that prevents both chemical and bacteriological contamination.
- C. All equipment shall be constructed and maintained so that water quality is not affected.
- D. Divers shall be completely encapsulated with no bare skin exposed. There shall be no contact of the mouth or head with the water.
- E. Diving clothing shall be of the dry-suit type, in good condition, and free from tears or other imperfections that may impair the integrity of the suit.
- F. Float down inspectors must wear a dry suit that can be properly disinfected.
- G. Unless explicitly approved by the utility to do so, divers or ROV's shall not disturb tank sediment.
- H. All personnel entering a storage tank shall be free of communicable disease and shall not have been under a physician's care within the previous 7 day period. No person who knowingly has an abnormal temperature or symptoms of illness shall work in a storage tank.

VI. Disinfection of Equipment

- A. All equipment exposed to water shall be suitable for disinfection.
- B. Before opening, the access hatch and its immediate area shall be cleaned of all loose dirt and debris.
- C. A diver and clothing shall be disinfected after the diver is suited up and on top of the tank.
- D. A solution of 200 mg/L available chlorine shall be applied to all surfaces and immediately prior to entry to the water. Application can be by submersion, spray, sponge, or brush and shall remain in contact with the solution for at least 30 minutes. Any excess, runoff, or spillage is to be controlled so that it does not enter the storage tank.
- E. Any equipment that contacts the exterior roof shall be re-disinfected prior to entering the tank.

VII. Certifications

- A. The contractor shall have a comprehensive safety manual on site which addresses all potential hazards for the particular storage tank. The manual shall include certifications for onsite employees for diving, OSHA confined space entry, first aid, and CPR.
- B. The contractor shall have a method and equipment readily available for extraction and lowering of an injured diver.

VIII. Logistics

A pre-job meeting involving the contractor and water utility representatives shall be held to ensure that the personnel understand the inspection or cleaning procedures, the configuration of the reservoir, disinfection procedures, maintenance of water quality, and the consequences if such quality is not maintained.