



DNR Underground Storage Tank Topics for Informal Stakeholder Meetings

April 9 & 14, 2026

Discussion Topics for 4/9/26

- DNR's Response to stakeholder comments regarding regulations of Risk Based Corrective Action (RBCA)
 - **135.2 – Definitions**
 - *“Light, nonaqueous-phase liquid” or “LNAPL” ~~refers to an organic compound that is immiscible with, and lighter than water~~ means a light non-aqueous phase liquid (e.g., ~~crude petroleum~~, oil, gasoline, diesel fuel, ~~heating oil~~.) that has a density less than water and is immiscible with water.*
 - *“Migrate” or “migrating” means a LNAPL body that is expanding laterally into areas previously not impacted by LNAPL.*
 - *“Mobile LNAPL” means LNAPL that exists above residual saturation levels such that it can accumulate in monitoring wells constructed within its footprint or smear vertically with a rising or falling water table but will not migrate or spread from its current footprint (i.e., move into monitoring wells beyond its current footprint).*
 - *“Residual LNAPL” means LNAPL that is bound in the soil and will not move into monitoring wells or smear with a rising or falling water table.*
 - **135.7(5)b - Free product assessment and removal**
 - *Use abatement of free product migration as a minimum objective for the design of the free product removal system. Free product recovery systems must be designed to remove free product ~~to the maximum extent practicable in accordance with 135.7(4)a~~;*
 - **135.7(5)d(11) - Free product assessment and removal**
 - *Identification of all water lines, regardless of construction material, within the area of free product. ~~A water line~~ Water lines and gaskets which are susceptible to petroleum contamination shall be considered within the area of free product if it is located within the boundary of the free product plume as defined by wells unless it can be demonstrated that no LNAPL exists within 10 feet (horizontally or vertically) of the water line and the LNAPL is not migrating nor is likely to migrate. Water lines and gaskets which are susceptible to petroleum contamination within the area of free product must be relocated unless ~~there is no other option and~~ the department has approved an alternate plan of construction- or it can be demonstrated that residual and mobile LNAPL is not in contact with water lines or gaskets. See ~~paragraph~~ 135.12(3)“c.”*
 - **135.10(9)a(1) - Soil to water line pathway assessment, pathway completeness and receptor evaluation**
 - *~~Actual receptors include all water lines within ten feet of the soil plume defined to the Tier 1 level.~~ All water lines must be evaluated for this pathway regardless of distance from the source if the lines are in areas where Tier 1 levels are exceeded. Actual receptors include all water lines within ten feet of the soil plume defined to the Tier 1 level, unless it can be demonstrated that the water line inside the soil plume is not in contact with the soil contamination.*
 - **135.12(6)c - No action required classification, plume status**
 - *A groundwater pathway shall be reclassified from high risk to no action required if:*
 - 1) *all contaminant concentrations are below the site-specific target level and if exit monitoring criteria have been met. Exit monitoring criteria means that the three most recent consecutive groundwater samples from all monitoring wells must show a steady or declining trend and the most recent samples are below the site-specific target level. ~~Other criteria include~~ A steady and declining trend includes the following: the first of the three samples for the source well and transition well must be more than detection limits;*

concentrations cannot increase more than 20 percent from the first of the three samples to the third sample; concentrations cannot increase more than 20 percent of the previous sample; and samples must be separated by at least six months—; or
2) *there are no actual receptors within the groundwater plume and plume stability has been documented to show that the plume is not migrating to actual receptors.*



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April 9 & 14, 2026

Discussion Topics for 4/14/26

- DNR's Response to stakeholder comments regarding the definition of replace and replacement
 - **135.2 – Definitions**
 - *"Replace" or "replacement" means the installation of a new underground tank system or component, ~~including dispensers,~~ in substantially the same location as an existing tank system or component, ~~and to include but not be limited to the change in any part of a UST system above grade by exchanging one unit for a like or similar unit.~~*
- DNR's Response to stakeholder comments regarding regulations regarding Unstaffed Facilities
 - **135.4(6)f - Unstaffed facilities requirements**
 - *For unstaffed facilities, a Class B operator must be geographically located such that the person can be on site within two hours of being contacted by the public, the owner or operator of the facility, or the department. Emergency contact information and emergency procedures must be prominently displayed at the site. An unstaffed facility shall have an emergency shutoff device as provided in 135.5(1) and a sign posted in a conspicuous place that includes the ~~name and telephone number~~ contact information of the facility owner, ~~an emergency response telephone number to contact~~ or the Class B operator, and information on local emergency responders.*
- DNR's Response to stakeholder comments regarding Site Temporary Closure
 - **135.4(2)e - temp closed systems with cathodic protection**
 - **135.4(2)e(1)1:** *Power must be restored to an inoperative corrosion protection system. A damaged or failed corrosion protection system must be repaired by a ~~cathodic protection tester~~ qualified service technician. A corrosion expert must approve any modifications to the system that are outside of the original design.*
 - **135.4(1)e(2)4:** *A precision tightness test must be conducted ~~on the entire UST system in accordance with 135.5(4)c or 135.5(5)b.~~*
 - **135.4(2)e(3)4:** *All metal piping and buried metal components (e.g., flex connectors, couplings) that routinely contain product must be inspected by a UST professional or cathodic protection tester. If the metallic components have no visible corrosion and have passed a line tightness test (unless the piping is exempt from leak detection, e.g., Safe or European Suction), then the cathodic protection system may be repaired or replaced under the supervision of a corrosion expert. Metallic components that show visible corrosion must be replaced. ~~If the piping and metallic components do not pass a line tightness test or a cathodic protection test and cannot be repaired in accordance with this chapter, the UST owner must permanently close the line.~~*
 - **135.4(2)e(3)5:** *A precision test must be conducted ~~on the entire UST system following repair or replacement of the cathodic protection system in accordance with 135.5(4)c or 135.5(5)b.~~*
 - **135.4(2)e(3)8:** *~~A copy of the new design standards must be kept as part of the cathodic protection records.~~*
 - **135.4(2)e(4):** *If the impressed current cathodic protection system has been inoperable for more than 365 days and cannot ~~or will not~~ be brought back into immediate use, the tank system must be permanently closed in accordance with ~~rule 567-~~ 135.15(2).*
- DNR's Response to stakeholder comments regarding Return to Service Requirements
 - **135.15 - return to service requirements**
 - **135.15(1)b(4):** *Maintain financial responsibility ~~(e.g., insurance)~~ in accordance with 567—Chapter 136. ~~If at any time financial responsibility coverage is or will be terminated, a site check for~~*

~~contamination must be completed before coverage is terminated. A site check must use the closure in place sampling procedures in paragraphs 135.15(3)“b” and “d” or the Tier 1 site assessment in rule 567—135.9(455B). If the tanks are located in a contaminated area with active monitoring and remediation, the tank owner may request the department waive the site check providing justification.~~

- ~~135.15(1)c(4): The corrosion protection system is being maintained in accordance with subrule 135.4(2). Include documentation that electricity is being maintained to operate the impressed current cathodic protection system if present.~~
- ~~135.15(1)c(5): For lined tanks, provide a copy of the last internal inspection.~~
- ~~135.15(1)c(56): Provide proof of Maintain financial responsibility (e.g., insurance) according to 567—Chapter 136.~~
- ~~135.15(1)f: Prior to returning a temporarily closed tank back into service, the owner or operator must complete and submit the department’s return-to-service form signed by a licensed certified installer and provide the following documentation unless otherwise approved by the department. The tank system cannot be operated or receive fuel until current tank tags have been issued.~~
- ~~135.15(1)f(1): Documentation that the tanks were temporarily closed in accordance with subrule 135.15(1).~~
- ~~135.15(1)f(21): Where applicable, documentation that corrosion protection has been maintained continuously in accordance with subrule 135.4(2). The owner or operator must provide an inspection log of the cathodic protection system and the inspection report of the cathodic protection system completed by an Iowa-licensed corrosion certified cathodic protection tester.~~
- ~~135.15(1)f(54): Results of precision tightness tests (0.1 gph) conducted on lines in accordance with 567—135.5(455B). This includes piping used for remote fill.~~
- ~~135.15(1)f(65): NOTE: Function tests are not required on confirmed “safe suction” dispensing lines.~~
- ~~135.15(1)f(8): Secondary containment is installed where necessary in accordance with subrule 135.3(9).~~
- ~~135.15(1)f(9): Spill containment, overfill prevention and all containment sumps are in good condition and operating in accordance with subrule 135.4(1). Tightness tests conducted within the last 12 months must be provided for secondary containment of tanks, piping, sumps, under dispenser containment and spill containment.~~
- ~~135.15(1)f(107): Provide test results of the periodic testing of spill and overfill prevention equipment and containment sumps used for interstitial monitoring in accordance with 135.4(12) in the last 12 months.~~
- ~~135.15(1)f(119): Certification from an Iowa-licensed certified installer that the UST system and equipment are installed correctly, are in good operable condition and meet all regulatory requirements for startup and operation.~~
- ~~135.15(1)f(1311): Change of ownership form (if the UST facility system was sold).~~