



# STATE OF IOWA

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DEPARTMENT OF NATURAL RESOURCES  
RICHARD A. LEOPOLD, DIRECTOR

To: Iowa Licensed UST Compliance Inspectors  
From: Tom Collins/Paul Nelson  
Date: January 29, 2009  
Re: 2009 Inspections

UST owners and operators recently received a memo from the UST Section reminding them of their UST facility inspection requirement by December 31, 2009. Iowa is on a two-year inspection cycle. The first inspection deadline was December 31, 2007.

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.


### New Inspection Database Version

Version 1.3.0 of the UST inspection database has been moved to production. The only item that affects inspectors is that the new version resolves the issue of not being able to update or add new corrective action items after the first version of the inspection has been created. The previous version would allow us to make corrections or resolve deficiencies, but when you went to the Summary Report page, the changes disappeared—it wasn't saving them. Apparently it was caused by some bug in the program.

Make sure you update the database after the UST facility resolves its violations/deficiencies. 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. Over half of the 2007 inspections that were entered in the database were incomplete, the violations unresolved. When field offices followed up on them they found the problem wasn't that the violations weren't resolved, but that the database wasn't updated. Entering all of the information in the database is part of the inspection process.

If you have violations/deficiencies to resolve, it is done through the *Corrective Action/Deficiency* button. This is how you do it:

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"/>	

- 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.
- 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.

We will meet with the database contractors one last time to close out all the issues under the current contract, and will then develop another contract for improvements to the database. Let me know your thoughts and suggestions for improving it.

#### 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).

- After failing the automatic tank gauging section, Click on the *OK* button when you have marked all the items. 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.
- Click on Select. A table pops up below with an *Edit* button.
- Click on *Edit*. This is the standard language or responses you can use relating to ATGs. 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*.
- 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. Also, even though it may say in red *There are no pre-defined messages available for this item*, pay no attention to this unless there really are no pre-defined messages. This feature is being fixed.
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*. The PDF version shows up which you can print or save to a file and e-mail.

#### Notification of Inspections

Another feature that has been improved is the notification process. The field offices and the central office are notified each time an inspection is scheduled and saved. This allows us to track the progress of the inspections and schedule audits. Be sure to enter the date of the inspection on the inspection database as soon as you schedule it with the owner/operator.

We know it hasn't been easy using the database. It should be easier to use now, so please make sure you follow through with all your inspections from the field to the database.

Another feature of the new version is the saving of data. Each time the *Next* button is clicked, the data on that screen is saved. If you "time out" while you're entering information, the information on the last screen you were using will be saved as long as you clicked on the *Next* button. Don't hesitate to contact Teresa Barrie ([Teresa.Barrie@dnr.iowa.gov](mailto:Teresa.Barrie@dnr.iowa.gov)) or Charity Miller ([Charity.Miller@dnr.iowa.gov](mailto:Charity.Miller@dnr.iowa.gov)) if you have questions or problems about the database.

#### National Emissions Standards for Hazardous Air Pollutants (NESHAP)

We discussed NESHAP requirements at our inspector training in August. The UST Section is not responsible for enforcement of the NESHAP requirements; Air Quality is the enforcement agency. The UST Section already enforces some of the requirements, and has the means (third party inspection program) to collect and exchange information with Air Quality. UST professionals are also affected by these requirements as they must work with the owner/operators to install the proper equipment and meet the new standards. NESHAP requirements bring significant environmental benefits, and will also help owners and operators keep the benzene vapors and their investment inside the tanks instead of going into the atmosphere.

NESHAP standards have been incorporated into the Notification of Installation, Installation Inspection Checklist and the registration form, but are not yet incorporated into the inspection database. The UST Section is working with Air Quality to incorporate the NESHAP information on its UST/LUST and inspection databases, but for the present, there is no place to enter this information. It will likely take up a section of its own in the inspection database and will look something like this:

## Stage 1 Vapor Recovery Survey Form

Facility Registration: Insert Facility Name    Insert Address and City

Compliance Inspector Name: Select an Inspector Name

The facility's estimated monthly throughput for gasoline is:

1.  Less than 10,000 gallons.

Is tank top access vapor tight?    Yes  No

2.  10,000 gallons or more, but less than 100,000 gallons.

Is tank top access vapor tight?    Yes  No

Are drop tubes installed in all tanks?    Yes  No

3.  100,000 gallons or more

Is tank top access vapor tight?    Yes  No

Has Stage 1 Vapor Recovery System been installed?    Yes  No

Is it dual point  or single point ?

When was it installed? insert date

Has vapor balance system been tested?    Yes  No

When was it tested? insert date

Are the results passing?    Yes  No

We don't want to miss this inspection year opportunity to gather NESHAP information, therefore, while the database is being prepared, this form will be available on the UST Section website. Here is what we propose to do while the database is being prepared. The above form will be available on the website under *Compliance Inspections* when you receive this e-mail. It will be a MS Word document, which you can save, and then attach it to an e-mail addressed to me ([Tom.Collins@dnr.iowa.gov](mailto:Tom.Collins@dnr.iowa.gov)).

Please start collecting the information now and send it in as you complete the inspection. I apologize for the extra steps. You should be able to gather the information by asking the owner/operator. There are least a couple hundred large GDFs that will require Stage 1 Vapor Recovery in Iowa; Des Moines and Cedar Rapids have a hundred GDFs between them.