



# STATE OF IOWA

CHESTER J. CULVER, GOVERNOR  
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DEPARTMENT OF NATURAL RESOURCES  
RICHARD A. LEOPOLD, DIRECTOR

## MEMO

**Date:** August 29, 2008  
**To:** UST owner/operators  
**From:** Iowa DNR Underground Storage Tank Section  
**Re:** UST Compliance Inspection Requirements

The DNR requires a compliance inspection of your UST system at least every two years. The inspection includes both a physical inspection of your UST system and a review of your UST records, such as leak detection, repairs and maintenance. Compliance inspections give us a snapshot of the condition of your UST system regarding UST regulations. Compliance inspections are the best way for us to protect groundwater and public safety, and identify more serious problems before they develop. We appreciate your cooperation as owner/operator with the third party inspector and inspections.

In order to better prepare for the next inspection of your UST system, please submit the appropriate records below to your compliance inspector. Do not send the original records--copies only, please. These records are required by the DNR for regulatory compliance:

1. Leak detection requirements for each tank:
  - a. If you have an **automatic tank gauging system (ATG)**, submit one passing test printout for each month. Make sure the test you save for the month is shortly after a delivery or when the product level is at its highest for the month. The product level will show up on either your leak test or inventory report. Use the test with the highest level of product.
  - b. If you use **SIR**, submit the last 12 months of individual monthly tests. You may also submit the annual report; but unless you submit each month's report along with it, the SIR is invalid.
  - c. If you use **interstitial monitoring or secondary containment**, you are monitoring the space between the primary and secondary walls of your tanks and/or piping. Submit the last 12 months of recorded visual inspections (log of monthly entries) or the last 12 months of reports from your automated system.
  - d. If you use **vapor or groundwater monitoring**, submit results of the last 12 months of monitoring. Make sure you identify the monitoring device used: automatic or manual.
  - e. If you use the combination method of **daily inventory control and tank tightness testing**, you are recording inventory daily and reconciling monthly plus you have a precision test completed on your tank every 5 years. In order to use this method, your tanks cannot be older than 10 years. After 10 years, you cannot continue with this combination method of leak detection monitoring and must switch to one of the other approved methods; however, you are encouraged to continue to use daily inventory control and monthly reconciliation as a secondary method of leak detection. It is an effective way of keeping track of product throughput. If you are using this method, submit your records for each month for the last 12 months and results of the last precision (0.1 gph) tank test (unless your tank is not yet 5 years old).
  - f. The correct third party certification for your ATG system should be available on site, and should have been provided by your ATG system installer. If not, go to the National Work Group on Leak Detection Evaluations (NWGLDE) to print a copy of your equipment's evaluation (<http://nwglde.org/>).
2. Leak detection requirements for **pressurized piping**.

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- a. If you are using an electronic line leak detector (ELLD), submit one passing line leak detection printout for each of the last 12 months showing either a 0.2 or 0.1 gph leak rate. Also, submit the last annual function test of your electronic line leak detector (if required by the manufacturer). You do not need to conduct an annual line tightness test if you are using a monthly monitoring method such as this. You must also submit a function test of your ELLD if required by the ELLD's manufacturer.
  - b. If you are using a **mechanical line leak detector (MLLD)**, which must be capable of detecting a leak of 3 gph at 10 pounds per square inch line pressure within one hour, submit the last **annual function test** of the line leak detector (a test that assures the MLLD can detect such a leak) and your most recent **line tightness test** (0.1 gph).
  - c. If you are using **interstitial monitoring**: submit log of visual inspections for each month or monthly reports from your automated system.
  - d. If you are using **vapor or groundwater monitoring**: same as "c." above.
3. Leak detection requirements for **suction piping**.
    - a. **Suction piping** requires a tightness test (0.1 gph) of the product line every three years. Submit the most recent line tightness test (within the last three years).
  4. **Cathodic protection records** for steel tanks and piping. (Fiberglass or composite tanks do not need cathodic protection.)
    - a. If you have steel tanks, submit the last two cathodic protection test results. The same goes for steel piping. Cathodic protection testing is required every three years.
    - b. If you have an impressed current system (rectifier), submit the 60-day log of your inspection of the rectifier. The DNR recommends you inspect your rectifier every 30 days for proper operation.
    - c. If your tank was lined, submit the most recent internal inspection results. Lining inspections are required 10 years after tanks were lined and every 5 years thereafter. Internal periodic inspections are waived if cathodic protection was added within a year of the lining or if an internal integrity assessment of the tank was completed before adding cathodic protection to your tank.
  5. Submit records of any repairs to your UST system since the last inspection, e.g., repairs to your cathodic protection system, tanks or lines. Also, submit a copy of the 148 form if new equipment or installations have taken place.
  6. Make sure your insurance certificate is current. The certificate is renewed annually. Include a copy of the certificate along with the other records above
  7. If your UST site is temporarily closed, submit a copy of the temporary closure form.
  8. Make sure your annual tags and permanent tags (purple) are attached to the fill ports of your tanks. **Permanent tags (purple) must remain on the fill ports for the life of the tanks.**

**Please do not submit originals of the above records--copies only.** Keep the original records on site, and send the compliance inspector copies of the originals. Also keep in mind DNR field personnel occasionally may be conducting follow-up inspections and will need access to your records as well; this is another reason for not sending your original copies. Please arrange the records (leak detection) in chronological order. No more than one test per month is required. Any results of "Fail" for leak tests should have been reported to the DNR, but include those with the copies of the records submitted to the compliance inspector.

Thank you for your cooperation.