

Underground Storage Tank System Checklist for Equipment Compatibility with E-blend Fuels (greater than 10% ethanol by volume)

This checklist is to be completed by the owner/operator and an Iowa Licensed Installer. In place of an Iowa Licensed Installer, an owner/operator may use a professional engineer's judgment who has knowledge, experience and training in materials science (API, RP 1626, p. 1.4) to determine the suitability and compatibility of materials/ equipment/ components with E-blend fuels. In such a case, the Professional Engineer would complete the checklist and sign it. The owner must complete those items identified as the owner's responsibility in the checklist.

FACILITY INFORMATION		
Facility Name:		Registration No.:
Site Address:		No. of Tanks:
City, County:	Zip Code:	Date of Inspection:
Owner Name:		
E-blend stored: E15 E-85 Other		
Iowa Licensed Inspector or Professional Engineer:		
Company:		IA License No.:
Company Address:	Phone Number:	
City:	Sta	ate: ZIP Code:

The UST system components below must be compatible with the E-blend fuel stored and dispensed (see asterisks for thread sealant and adhesive). Review this checklist thoroughly for its requirements before converting to E-blend fuel. Enter *Model/Brand*, *Manufacturer* and check either Yes or No in one or both columns under *UL Listed* or *Manufacturer Approved*.

Table 1: Tanks and Product Piping

Component	Model/Brand	Manufacturer	UL Listed	Manufacturer Approved
Tank [*] (capacity:)			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Auto Shutoff			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Sub Pump, O-rings, Gaskets			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Tank Sump			Yes 🗌 No 🗌	Yes 🗌 No 🗌
ATG Probe, float/sensor			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Ball Float			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Sump Sensor			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Ріре			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Thread Sealant**			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Adhesive**			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Flex Connectors			Yes 🗌 No 🗌	Yes 🗌 No 🗌
LLD			Yes 🗌 No 🗌	Yes 🗌 No 🗌

*Internally lined tanks are not suitable for conversion to storage of E-blend fuels. ** If compatibility is undetermined, analysis may be used to determine compatibility. Deadline for determining compatibility is 1 July 2007. Third party precision line testing required annually.

Dispensers and Dispenser Sumps

The DNR and Fire Marshal Division require dispensers to bear the UL Mark or listed by another independent testing laboratory. Currently there are no E-blend compatible dispensers with a UL Mark. In the fall of 2005, the DNR, the Fire Marshal Division and the ethanol industry worked out an agreement wherein dispensers that comply with NFPA 30A for dispensing E10 may be used to dispense E85. The agreement was intended to facilitate the dispensing of E85 in Iowa while providing for the safety of customers and facilities. The agreement allowed for a two-year phase in of dispensing equipment, until July 1st, 2007 when it was believed UL Marked dispensers would be available. During the 2006 session of the Iowa General Assembly, the enactment of 2006 Iowa Acts, House File 2754 extended the date by which listed equipment will be required for dispensing E-85 to July 1, 2009. All UST systems that store and dispense E-blend fuel after July 1, 2009 must be fully compatible.

Owners and operators must check E-blend dispensers daily for leaks and equipment failure. Any component of the dispenser that leaks or does not operate as designed due to exposure to E-blend must be removed and replaced with compatible components. Notify the DNR immediately (515-725-8322 or 515-725-8324) of the failed component. Each daily check of the dispenser is to be recorded on the DNR's UST form website: (http://www.iowadnr.gov/InsideDNR/RegulatoryLand/UndergroundStorageTanks/USTForms.aspx

The inspection record must be completed by the owner/operator or someone authorized by the owner/operator and knowledgeable about the inspection requirements. The inspection record should be kept on site where possible or available for submittal to the DNR within two working days.

If an owner/operator discontinues storing and dispensing E-blend fuel and switches back to gasoline before buying Eblend compatible dispensers, daily visual inspections of the dispenser must continue for six months after converting. Owner/operators must also continue to keep a record of the inspections on the DNR's daily inspection form.

Component	Model/Brand	Manufacturer	UL Listed	Manufacturer Approved
Dispenser			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Pipe sealant*			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Seals/Gaskets			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Suction Pump			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Hoses			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Nozzle/Swivel			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Break-away			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Filter			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Meter			Yes 🗌 No 🗌	Yes 🗌 No 🗌
Dispenser/Sump				
Pipe		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Pipe Sealant*		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Flex Connector		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Sump		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Emergency Valve**		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Sensor		,	Yes 🗌 No 🗌	Yes 🗌 No 🗌
Check valve		,	Yes 🗌 No 🗍	

Table 2: Dispensers and Dispenser Sump

* If compatibility is undetermined, analysis may be used to determine compatibility. Deadline for determining compatibility is 1 July 2009. Third party precision line testing required annually. **Emergency/Shear Valve must be compatible with E-blend fuels.

Before E-blend is Transferred to the Tank

Once equipment compatibility has been established, the items below must be completed before E-blend fuel can be transferred to the tank. <u>Items that are the responsibility of the UST owner are indicated</u>. The remaining items are the responsibility of the Iowa Licensed Installer or Professional Engineer.

- Inform the facility's UST insurance carrier of plans to convert to an E-blend fuel. The UST insurance carrier may have additional requirements other than what the DNR requires. (Responsibility of Owner).
- **Obtain an amended certificate of insurance indicating UST coverage for the E-blend stored and dispensed.** (Responsibility of Owner).
- Check for water in the tank. No level of water is acceptable for E-blend fuels due to the phase separation problems. (Responsibility of Installer initially and the owner thereafter.)
- All visible fittings and connections at the top of the tank are tight (no vapors escape and no water enters).
- Sump and spill containment covers prevent water from entering. (Installer)
- Water infiltration problems fixed if necessary.
- The tank has been cleaned of all water and sediment.
- Clean tank certificate obtained or comparable documentation (e.g., see API Publication 2015, Cleaning Petroleum Storage Tanks and NFPA 326, Standard for the Safeguarding of Tanks and Containers for Entry, Cleaning, or Repair, 199 Edition). (Responsibility of Owner)
- Labeling: identify the fill port and paint access covers according to API RP 1637. Make sure transport driver cannot make the mistake of delivering E-blend fuel to the wrong fill pipe. Label dispenser.

First Delivery

- Tank filled to 80 percent capacity (recommended by the Renewable Fuels Association or RFA) and kept as full as possible for 7 to 10 days. (Responsibility of Owner)
- Conduct a precision test of the tank system (0.1 gph leak rate) with ATG system within seven days after tank is filled to make sure system is tight and leak detection equipment is operating properly. Report any "Fail" results. (Responsibility of Owner)
- Test for water (use alcohol compatible paste if you stick your tanks) at the beginning of each shift for the first 48 hours after delivery (RFA). If there is water in the tank, remove it, find out how it got there and fix it so it doesn't occur again. (Responsibility of Owner)
- Check for water daily with your stick or ATG system if product seems to pump slow, check and replace filters. (Responsibility of Owner)
- Informed and demonstrated to owner/operator on how to visually inspect the E-blend dispenser for leaks and problems and on how to complete daily inspection record.
- Ethanol Compatibility Checklist signed by the Iowa licensed installer or Professional Engineer (e.g., with knowledge and training in materials science) and tank owner and submitted to the DNR by the UST owner. Include a copy of the revised certificate of insurance and the *Clean Tank Certificate* or comparable document with the checklist. (Responsibility of Owner)

Ongoing Maintenance

- **Check regularly for water.** No level is acceptable. (Responsibility of Owner)
- Calibrate the dispenser liquid meter at the time of conversion and at two weeks after conversion to verify meter accuracy. Particulate materials in the product may cause excessive wear of the meter, which would require more frequent calibration (API RP 1626).
- Conduct daily, visual inspections of the dispenser and dispenser sump (secondary containment) beneath the dispenser (if one is installed) and all the other items in the inspection record. The record should be kept on site where possible and available for submittal to the DNR within two working days. (Responsibility of Owner)

Installer Certification

I have inspected the visible UST system components, and review referenced on pages 1 and 2 of this checklist. I have found the ir equipment/components of this UST site to be true and accurate.	nformation listed on the above checklist regarding the
Signed	_ 🗌 Iowa Licensed Installer 🗌 Professional Engineer.
Date:	
Owner's Signature	Date:
Licensed Installers/Professional Engineers: Please comment on w compatible with the E-blend used or why the site is not compati	• • • •