

## 30/30/30

The records or notices that UST facilities are required to submit to PMMIC and the regulatory authority generally fall into an annual or 30-day interval, with a few exceptions such as biennial sensor tests or triennial cathodic protection recertifications. 30/30/30 is designed to assist owner/operators in remembering regulations that are part of a 30-day cycle or require a 30-day notice.

### 30-Day Notice for New Installations, Tank Closure, or Change in Service

When installing a new UST system and/or removing or upgrading an existing system, you must notify the regulatory agency and PMMIC at least 30 days prior to commencing work. These forms can be found on your regulatory agency's website or at:

[www.pmmic.com/operations/state-fed-forms](http://www.pmmic.com/operations/state-fed-forms).

### 30-Day Walkthrough Inspections

Owners and operators are required to conduct walkthrough inspections of the UST system every 30 days, focusing on specific components of the system related to monthly leak detection and spill or overfill prevention. At a minimum, you must follow the guidelines as designed by State and Federal regulations. This is most easily accomplished by incorporating a walkthrough checklist or something similar. Please be advised that a copy of this information must now be provided to PMMIC as part of your annual compliance review. PMMIC is currently asking for these records at renewal and as part of the annual PMMIC inspection.



### 30-Day Leak Detection

All newly installed double-walled UST systems, including tanks and piping systems, must perform Secondary Containment Interstitial Monitoring (SCIM) to satisfy regulatory leak detection requirements. This includes the tank interstice (annular space), tank top piping sumps, transition sumps, and dispenser sumps. This can be done manually by keeping a 30-day log of the containment conditions, or it can be done electronically through liquid sensors programmed to your Automatic Tank Gauge (ATG) and printed every 30 days. Please be aware if utilizing the ATG, you must manually print these reports to meet your 30-day leak detection requirement. You must keep these reports and provide copies to PMMIC at renewal of your policy.

Remember that when it comes to walkthrough inspections and leak detection, the regulations specify that these tasks must be completed **every 30 days**, not "monthly." Visit the PMMIC blog for more information about 30/30/30 requirements.

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## CHAIRMAN'S CORNER

We have been working with small businesses since our inception in 2000.

While we insure some of the largest retailers in the US, many of the facilities we insure are owned by small businesses. We insure more than 500 retail petroleum facilities in Iowa that sell less than 300,000 gallons of fuel annually. These small businesses are critical components of Iowa's rural distribution network. These businesses provide not only fuel, but snacks, groceries, prepared food, hot and cold drinks, lottery tickets, restrooms and other services to thousands of Iowans. As we have expanded to other states including Arizona, Kansas, New Mexico, Oregon, Texas and Wisconsin, we have become especially valuable for small businesses.

Small businesses are the life blood of our communities. Small business owners usually live near their businesses and are often active supporters of civic organizations, local schools and local charities. Their involvement in their communities improve the quality of life for their customers and their employees. While the largest businesses make headlines and get the most attention from vendors or service companies, for most people small businesses are the foundation of the American Dream.

The impact of COVID shut-downs, supply chain disruptions and government mandates have had a disproportionately adverse impact on small petroleum retailers. Whether through a sale or permanent closure, our small business population is declining. While we are sad to see any customer exit the industry, we also realize that the sale or closure of a UST facility is when the value of our insurance coverage is fully recognized by our customers.

We focus on both risk management and risk financing. Our coverage is designed to protect you when you sell your business or when you close your business so you can move on and enjoy life, rather than paying for corrective action that may not be covered by a less expensive or "less paperwork" insurance policy. We protect your retirement.

The US recognized Small Business Week the first week of May. We celebrate our small businesses every week. We appreciate your business and we look forward to celebrating your success against the daily frustrations you face. We also look forward to being there when you need us most.

As Always,

Ron Burmeister

## SPOT THE PROBLEM

This picture was taken of the secondary containment sump under a fuel dispenser during a compliance inspection. Under Dispenser Containment (UDC) is now a requirement for all new installations and is designed to catch any leaked product from inside the dispenser cabinet.

Can you spot the problem in this picture?

*(Answer on the next page)*



## REMEMBERING JOHN FINE

John A. Fine, long-time industry professional and retired R&A Risk Professionals inspector, passed away at the age of 72 on March 14, 2022.

John started his career in the petroleum industry as a fuel tank wagon operator, before eventually buying the operation and starting his own business. Fine Oil Company delivered bulk petroleum products to customers in Iowa and Missouri. Later, John acquired a station in Centerville and eventually added UST and AST installations and multiple delivery trucks to the enterprise. Prior to joining R&A in 2002, John sold his business and worked as a project manager for one of Iowa's preeminent convenience store chains.



John was Senior Loss Control Inspector at R&A from 2002 until his retirement in 2018. During his time with us, John completed over 20,500 inspections. There wasn't a single facility in the state of Iowa or Missouri that he didn't know by location, if not name! John was an expert in the petroleum installation and equipment industry and was instrumental as PMMIC and R&A established inspection protocols, set standards, and trained new hires. In September 2021, John became the first inductee into the R&A Hall of Fame as his "jersey" was officially retired.

John was well-known for his "old school" work ethic and will be greatly missed. He is survived by his brother, Dale (Linda), daughters Jessica, Kayla (Grant), Lydia (Nathan), and Monica (Sean), ex-wife Diane (Nick), six grandchildren, two nephews, and a multitude of cousins, extended family, and many, many friends. Memorial contributions can be directed to the ALS Association of Iowa or the It Gets Better Project.

## RENEWABLE FUELS COMPATIBILITY *(Continued from Page 4)*

PMMIC also requires liquid tight under dispenser containment (UDC) if a dispenser is not confirmed compatible with the biofuel. The dispenser and the UDC must be monitored monthly. To meet the regulatory compatibility requirements, one of the following is required:

- A certification or listing of the UST system equipment or components by a nationally recognized, independent testing laboratory for use with the regulated substance stored; or
- Written approval from the equipment or component manufacturer that indicates compatibility and specifies the range of biofuel blends the component is compatible with; or
- An alternative method of documenting compatibility, approved by implementing agency.

In addition, the owner/operator is required to keep the above records on file for as long as the regulated substance is stored and should always notify the implementing agency of any change in product.

Visit [www.epa.gov/ust/ust-system-compatibility-biofuels](http://www.epa.gov/ust/ust-system-compatibility-biofuels) for more information.

## SPOT THE PROBLEM ANSWER *(From Page 2)*

The problem in this picture is the liquid collected in the UDC. This containment should be visually inspected every 30 days or continuously monitored (with liquid sensor) and cleaned immediately if any liquid is observed, regardless of whether it is water or fuel. Extended exposure to product will void any warranties and can compromise the containment as well as components within the containment.

## RENEWABLE FUELS COMPATIBILITY

The EPA first passed UST regulations in 1988, which included compatibility requirements for the UST systems and the product they store. Since then, the nation's fuel supply has changed significantly as more renewable fuels have been introduced. Ethanol and biodiesel products are commonly known as renewable fuels or biofuels. In 2015 the USEPA implemented new UST regulations that require additional actions of owners and operators pertaining to compatibility with biofuels. In *UST System Compatibility With Biofuels*, published by EPA in 2020, the term biofuels is used to describe:

- Gasoline blends containing greater than 10 percent ethanol;
- Diesel blends containing greater than 20 percent biodiesel;
- Any other substance identified by the implementing agency now or in the future.

As an owner or operator, you must provide at least 30 days advance notice to the implementing agency before storing any of the above products in a UST system.



UST Systems installed before 2015 may have components that are not compatible with higher blend biofuels. The entire UST system, including tank, piping, connectors, pumps, sensor, glues, adhesives, sealants and gaskets, must be compatible with the fuel stored and dispensed. Any compromised component in the UST system presents a serious risk to the environment as the damaged or deteriorated parts can fail and result in a release. Compared to other fuels, gasoline containing more than 10% ethanol and diesel containing greater than 20% biodiesel have a higher likelihood of incompatibility with many existing UST systems.

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