



May 29, 2020

LAND O LAKES INC
RANDY HANSON
PO BOX 538
ELDORA IA 50627

Subject: Letter of Non-Compliance: Release Detection Requirements for Satellite Dispenser Line
Site: LAND O LAKES (Former United Suppliers), 30473 260th St, Eldora
Registration No. : 198603017

Dear Owner:

During the biennial compliance inspection conducted on January 31, 2020 the Iowa certified compliance inspector found that the satellite dispenser at the above referenced facility does not have line leak detection for the pressurized line.

The Iowa Administrative Code (IAC) 567-135.5(2)"b", requires underground piping that routinely contains regulated substances be monitored for releases by equipping the pressurized piping with an automatic line leak detector conducted in accordance with 135.5(5)"a" and have an annual line tightness test conducted in accordance with 135.5(5)"b" or have monthly monitoring conducted in accordance with 135.5(5)"c".

The Department discussed the specific system design with Midwest Liquid Systems who installed the dispenser system.

The understanding is the line from the diesel tank to the master dispenser is suction with a check valve located under the dispenser. The line from the master to the satellite dispenser is considered a pressurized line, however the pressure within the line is estimated at about 10psi. According to the licensed installer, installing a line leak detector on this line would be ineffective based on the low pressure of the line. IAC 567-135.5(5)"a" requires an automatic line leak detector (ALLD) be able to detect a leak of 3 gallons per hour at 10psi line pressure within one hour. The low pressure of this line means it operates at the slow flow rate of an ALLD at all times.

The Department is offering the following options to bring the satellite line into compliance:

1. Conduct triannual line tightness testing on the pressurized line between the master dispenser and the satellite line. An annual line test alone, is not frequent enough to meet the requirements of an ALLD. The leak detection requirements for this section of piping would fall under IAC 567-135.5(4)"h"(2). The next line tightness test would be due July 24, 2020.
2. Upgrade the piping to double wall, install under dispenser containment (UDC) under the satellite dispenser, install an ALLD, and conduct interstitial monitoring of the piping and UDC. The containment would then need to be tested every 3 years to meet the secondary containment requirements. Installing a containment under the satellite and conducting interstitial monitoring would not meet the requirements of the IAC Chapter 135 since the existing piping is single wall.

The pressurized piping line is required to have piping leak detection. Please provide a response to the Department by June 22, 2020 on which option you will be choosing.

Sincerely,



Cara Ingle

Environmental Specialist, Underground Storage Tank Section
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CC: DNR Field Office 2

Dan Tiensvold, Midwest Liquid Systems (via email)

Christian Quijano, R & A Risk Professionals (via email)