



# Fact Sheet

## Fuel Drop IMD Questions and Answers

**Q:** Is the fuel drop approval just a one-time approval for startup?

**A:** Yes, a permittee should only need one approval, to finalize testing.

**Q:** If written request must be submitted to regional office, is email ok?

**A:** Yes.

**Q:** Does as-built pertain to only new equipment or also old?

**A:** We do want to see all UST equipment currently in the ground. There may be old as-builts in the file which can be used as a reference.

**Q:** Do you want all of these documents submitted again at the end with the checklist?

**A:** No, there is no need to submit the same documentation. The following documents are required to be submitted as a part of the installation (\*submit for fuel drop approval):

- Proof of financial responsibility\*
- Testing results demonstrating tank tightness\*
- Documentation demonstrating installation of all required release detection equipment\*
- Output from automatic tank gauge showing that all interstitial monitoring sensors including: sump, under dispenser containment, and annular space sensors are active and properly programmed\*
- Documentation demonstrating installation of all required spill and overfill protection equipment\*
- Passing primary and secondary testing results from all installed lines\*
- Passing integrity tests of spill buckets and sumps\*
- As-built drawings of the installation that comply with OAR 340-150-0010(3a-b)\*
- Monitor Certification
- Line Leak Detector Test
- Primary Line Tightness Test
- Piping Installation Check-list (manufacturer or fiberglass)
- Tank registration and installation check-list
- List of equipment and part installed
- Pictures of sub-surface installation
- Fire authority signoff (if applicable) and/or copies of pressure test results
- UST Alternative Fuel Compatibility Form (if applicable)
- DEQ Installation Checklist

When emailing your paperwork, please combine your submittals into a single PDF with the facility number as part of the filename (for example: "Facility 2233 Fuel Drop Request")

**Q:** What is the difference between ORS and OAR?

**A:** ORS stand for Oregon Revised Statutes- these where the authority for the program comes from and gives the basics for which the rules are built. OAR stands for Oregon Administrative Rules –these are what DEQ refers to as the rules and what we cite when doing enforcement.

**Q:** In the as-built do we expect distances off buildings and other structures and depths of equipment?

**A:** Yes, we need to have a clear picture of the underground equipment and its placement at the facility. This is the only opportunity to fully understand what is going on at the site before it is covered. This document can be very useful in future work including modifications, decommissioning, and cleanup actions.

**Q:** What will be the penalty for dispensing fuel before an operating certificate is given?

**A:** \$500 field citation is the starting penalty, with formal enforcement possible for continued operation. We may issue a warning letter or enforcement for contractors who do not submit installation checklists

**Q:** What happens if there is a repeat violation?

**A:** If the same violation occurs within 3 years for facilities or 5 years for repeat violations for service providers, we consider it a repeat violation. Repeat violations go to formal enforcement. Operators or service providers receive a Pre-Enforcement Notice and work with our Office of Compliance and Enforcement.

**Q:** What happens if work needs to be expedited?

**A:** Inspectors are always willing to assist when possible and appreciate enhanced communications if you need faster turnaround times. We request that you keep us up-to-date as to the installations progress

**Q:** Is this IMD in force now?

**A:** Yes, as of Nov. 4, 2021 we expect inspectors to follow the IMD.

## **Program name and contacts**

If there are questions you have that are not answered in this document please reach out to Eric Kelley at [eric.kelley@deq.state.or.us](mailto:eric.kelley@deq.state.or.us) or Diana Foss at [diana.foss@deq.state.or.us](mailto:diana.foss@deq.state.or.us) .

## **Alternate formats**

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).