

UST BEST MANAGEMENT PRACTICES

A New Year's resolution you should consider is implementation of best management practices (BMP) on your underground storage tank system.

BMPs include important operational and maintenance responsibilities of the UST system. BMPs involve routine maintenance and monitoring, They also require inspecting and testing of spill prevention, overfill prevention, corrosion protection, and release detection equipment.

The U.S. EPA collects technical compliance data for active UST facilities across the country and publishes a compliance report twice a year based on specific performance measures. The performance measures are generally based on the aforementioned "best management practices".

In the 2024 fiscal year, EPA indicates that nationally 60% of all operational UST facilities are in compliance with all four categories. That's up 2% from last year.

Based on this EPA report, the category that creates the biggest problem for operators in every state is release detection. It is important to understand that there are monthly and annual operational requirements involved with release detection. The method of release detection that is used at the UST facility determines the specific monthly and annual tasks.



This is a basic list to follow to help stay in compliance with release detection:

1. Monthly – Check release detection, such as the ATG, to make sure it is not indicating a petroleum release from your UST system, such as a leak alarm or failed tightness test. All alarms must be addressed immediately. Make sure to record every system check and alarm responses as part of the required 30 Day walkthrough. Monthly – Retrieve "passing" leak detection records for the tanks and associated piping. This could be as simple as obtaining a leak test printout or liquid sensor status printout from the ATG.
2. Annually – Release detection system and associated components, such as the ATG, ATG probe, line leak detectors, and/or liquid sensors must be inspected and tested to confirm functionality. You must always maintain 12 months of leak detection records.

Your release detection system must be inspected and tested annually, with appropriate documentation filed in your records and made available to regulators when requested.

Regulatory compliance inspections occur randomly and at any time of the year, so you should always be compliant, not just at the end of the year. If you are not certain you are conducting release detection properly, consult a professional or attend an approved UST operator training course.

Best management practices should be a standard for a solid business plan. Corrective action and cleanup related to petroleum releases can cause thousands of dollars in avoidable expenses to you. Don't wait for a release to implement best practices.

Remember, compliance is a business issue.

BOARD OF DIRECTORS

Ronald Burmeister
Chairman of the Board

Randy Meyer
Vice Chairman

Jeffrey Yurgae
Secretary

Randy Woodard
Director

Robert Renkes
Director

Terry Handley
Director

Kathleen Till Stange
Director

OFFICERS

Patrick Rounds
President & CEO

Brian Wiegert
Vice President

Tony Song
Vice President

TABLE OF CONTENTS

UST Best Management Practices...	1
Chairman's Corner.....	2
Value of 3rd Party Inspections.....	2
UST National Update.....	3
Making a Difference.....	3
Leak Points.....	3
UST Operational Best Practices.....	4
Celebrating 25 Years of Success.....	4
Welcome New Employees.....	5
Sump Testing.....	5
Ensure Tank Systems Safe.....	6

CHAIRMAN'S CORNER

Our Commitment to Best Practices

At PMMIC, we pride ourselves on maintaining the highest standards of excellence and integrity in everything we do. One of the ways we ensure this is through our staff's active participation in respected professional organizations. These affiliations help us stay informed, network with industry leaders, develop best practices, and continuously enhance our internal practices to better serve our clients and communities.

Our professionals participate in several critical standards organizations, including PEI Technical Training & Certification Council, API (American Petroleum Industry), UL, ASTM, STI/SPFM, NACE International (now known as AMPP), Actuarial Board for Counseling and Discipline and ICC (International Code Council).

These memberships not only contribute to our staff's professional growth but also ensure we are consistently aligned with the latest industry standards. By engaging with these organizations, we continue to foster our commitment to our expertise, ensuring our work adheres to the best practices in the field.

We have participated in the development of dozens of standards applicable to petroleum storage tank systems and system operation through ASTM, PEI, API and UL. We also utilize these standards in our system inspections, compliance assistance, loss control management services and in our training of installers, testers, inspectors, removers, owners and operators.

Our leadership team includes experts recruited from various professional industries including Certified Public Accountants, Attorneys, Chartered Property Casualty Underwriter, Certified Claims Adjuster, Installers, Inspectors, Testers, AMPP Cathodic Protection Tester, Associate of Casualty Actuarial Society, Licensed Insurance Agents and Brokers, and Environmental Compliance Auditors.

We don't just believe in Best Practices, we help to define them and we operate within them.

We also participate as board members of industry associations including Missouri PSTIF Advisory Committee; Wisconsin Fuel & Retail Association – Board Member; Arizona Petroleum Marketers Association – Legislative committee member; Georgia Association of Convenience Stores; Past Chair of Renewable Fuel Infrastructure Board - State of Iowa (Board member 2006-2024).

As we embark on our 25th year providing the most reliable UST insurance coverage in the industry, we look forward to working with you, utilizing best practices to assist you in your successes.

Best wishes for a Merry Christmas and Happy New Year!

Ron Burmeister, Chairman

THE VALUE OF THIRD-PARTY INSPECTIONS

There is a natural human instinct that causes us to change our behavior when we are being observed. Known as the Hawthorne Effect, it occurs when individuals modify an aspect of their behavior in response to their awareness of being observed. It sometimes skews work efficiency studies because employees return to "normal" behavior when the observation is over.

With UST operations, the Hawthorne Effect is created by using a third-party inspector to verify compliance. When internal staff or a vendor knows that all of their work will eventually be observed or "audited" by a trained professional, the technician will be less likely to cut corners, use poor workmanship, or sell you something you don't need.

That is the purpose of our third-party, independent compliance inspections. PMMIC has been inspecting UST systems since our inception. We evaluate your system and any repairs or changes and identify any deficiencies or concerns. Regardless of fault or causation, we report just the facts and we photo-document all findings. We have documented improved service as a result of our inspections. And because we do not sell fixes or equipment, you know we are only motivated to tell you the facts.

UST NATIONAL UPDATE

- The California State Water Resource Control Board requires closure of single-walled UST systems and single-walled piping at all facilities by December 31, 2025.
- The Hawaii Department of Health requires all tanks and piping be upgraded to secondary containment by July 15, 2028.
- The Minnesota Pollution Control Agency on December 4, 2024 announced that it fined a Freeborn County Company \$33,850 for failing to install and upgrade tanks at seven locations to be compatible with ethanol early in 2024. "When companies do not fully comply with regulatory requirements, the resulting pollution can be harmful to people and the environment," the MPCA wrote.
- The US EPA Office of Underground Storage Tanks issued the following FY 2024 performance measures:
 - o There are 534,740 active USTs at 190,299 facilities;
 - o 4,047 confirmed releases in FY 2024, or 2.1 releases per 100 facilities;
 - o Nationally, only 60.2% of facilities are in compliance with all federal regulations

"When companies do not fully comply with regulatory requirements, the resulting pollution can be harmful to people and the environment."

Minnesota Pollution Control Agency

MAKING A DIFFERENCE FOR CHILDREN & FAMILIES



At R&A Risk Professionals and PMMIC Insurance, we are proud of our employees' commitment to supporting children and families in need. Each Christmas, our team contributes to Children & Families of Iowa (CFI), an organization dedicated to providing vital services such as family support, childcare, career training, and behavioral health.

Our employees' have donated thousands of dollars in gift donations to CFI's Holiday Shop, helping to bring joy and assistance to families in need.

Whether it's organizing holiday drives, or volunteering their time to various causes, our employees continue to make a meaningful difference. Their compassion and dedication reflect the values that drive our company's mission to give back and support those who need it most.

We are grateful for the kindness and care of our team and look forward to continuing these efforts in the future. Together, we are helping to create brighter futures for children and families. For more information on CFI, go to cfiowa.org.

LEAK POINTS

UST system connections and transitions may create "leak points". As one manufacturer notes, "Whether the piping, tank sumps, dispensers, hoses, valves, multiports, spill containers, couplings and test boots are snapped, screwed or welded together, connection points are generally the first places where leak points potentially develop."

These leak points, where fuel can get out or water can get in, need special attention to ensure they have not been compromised. To identify and stop leaks early, inspections should focus on tank top access points such as fill port caps, vapor recovery ports, monitor probes, submersible pumps, ball float and other UST openings. In addition, dispenser piping connections and dispenser components should be inspected regularly.

With the growth of higher ethanol fuel blends, thread sealant or "pipe dope" that is not compatible with higher ethanol blends can create significant risks at critical leak points. If compatibility is not documented, threaded joints should be reinstalled with compatible sealant before storing higher ethanol blends (any blend greater than 10% ethanol). Compatibility should be documented by an appropriate UL Listing or a manufacturer's warranty for ethanol blends greater than E10.

UST OPERATIONAL BEST PRACTICES

As a UST system Operator, how can you implement best practices? The first step is to know which standards to follow.

For UST operations in general:

- ASTM E1990-22 Standard Guide for Performing Evaluations of Underground Storage Tank Systems for Operational Conformance with 40 CFR, Part 280 Regulations
- ASTM E2681-21 Standard Guide for Environmental Management of Underground Storage Tank Systems Storing Regulated Substances

For UST inspections and Maintenance:

- PEI RP900m-21 UST Inspection & Maintenance

For equipment testing:

- PEI RP1200-24 Testing UST Spill, Overfill, Leak Detection and Secondary Containment

If using hydrostatic testing of sumps, or to inspect sumps:

- ASTM E3225-24 Standard Practice for Performing Visual Examination of Containment Sumps
- ASTM E3448-24 Standard Guide for Managing Liquid and Debris from Petroleum Underground Storage Tank Containment Sumps

If you suspect a leak:

- ASTM E2733-23 Standard Guide for Investigation of the Source and Cause of Releases from Underground Storage Tank Systems



CELEBRATING 25 YEARS OF SUCCESS

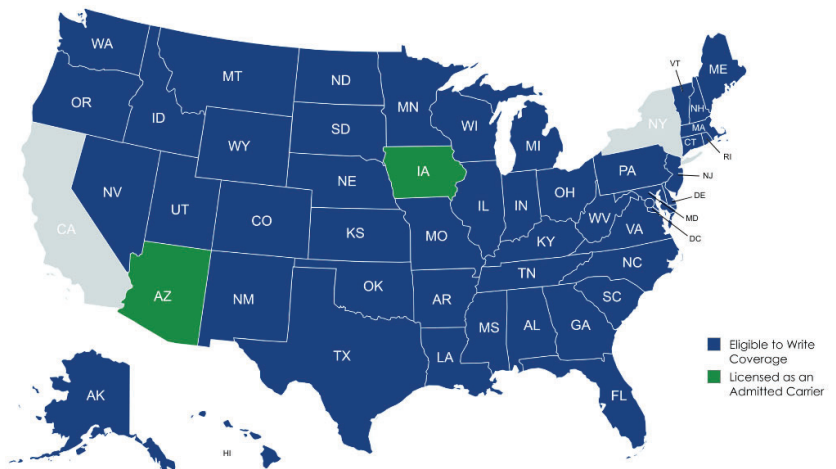


2025 marks a significant milestone for PMMIC as we celebrate 25 years of success. Founded on January 13, 2000, as the Petroleum Marketers Mutual Insurance Company (PMMIC), we initially operated as a non-profit mutual insurance company before transitioning to a stock insurance company in 2005.

On November 8, 2000, PMMIC received its certificate of authority from the Iowa Commissioner of Insurance. On that same day, we successfully assumed the assets and liabilities of the Iowa UST Insurance Fund, making us the first private insurer to transition a government liability fund to private insurance. After more than two decades, we remain the only insurer to achieve this accomplishment.

PMMIC specializes in providing environmental liability insurance for both underground storage tanks (USTs) and aboveground storage tanks (ASTs). Our clients range from convenience stores and trucking companies to cities, counties, hospitals, and various industries that rely on storage tanks for emergency generators.

The team at PMMIC has set the standard for loss control and environmental protection in the petroleum distribution industry. Through our annual on-site loss control inspections, we have significantly reduced losses and helped tank owners maintain regulatory compliance. PMMIC is the only UST insurer that is owned by tank owners. Today, we are authorized to provide coverage in 48 states, continuing to lead the way in providing comprehensive UST and AST insurance.



2894 106th St., Suite 220
P.O. Box 7628
Urbandale, IA 50323

Ensure Your Tank Systems Are Safe and Compliant with R&A



A **PMMIC** Company

As a wholly owned subsidiary of PMMIC Insurance, R&A Risk Professionals stands as a trusted, independent leader in third-party inspections for both under and aboveground storage tanks. Since 1999, our expert team has conducted over 50,000 on-site inspections of petroleum storage tank facilities nationwide.

Our goal is simple: to deliver 100% independent evaluations and help operators fully understand their systems and business needs. We offer personalized inspections tailored to meet the unique demands of each facility, and our flexible reporting makes it easier for you to coordinate repairs or preventative maintenance with your service company. Rest assured, R&A's services are unbiased—we don't sell or install petroleum equipment, ensuring that our inspection results are thorough and impartial.

R&A SERVICES INCLUDE:

- Pre-Purchase Inspections
- 30-Day and Annual Walk-Through Inspections
- Loss Control Inspections
- EPA & State Compliance Inspections
- Audit Installer/Service Company Work
- Audit Current Maintenance Practices
- Owner/Operator Training Services
- Installer Training Courses
- Regulatory Impact Analysis



At R&A Risk Professionals, we're committed to ensuring your tanks are safe, compliant, and performing at their best.

To learn more about R&A's services, or to discuss specific compliance needs at your site, contact Christian Quijano at cquijano@pmmic.com or (515) 334-3010.