

Raising the Standard: Compliance Through Independent Inspections

Angela Oravetz & Brian Pottebaum

How it started

- Funding cut to DNR inspectors in the five regional offices across Missouri
- Department was told by the Governor's office that we would be using the contract inspectors that the Missouri Petroleum Storage Tank Insurance Fund (PSTIF) used
- We joined the contract
- An amazing partnership was born with Missouri's composite inspection program

It wasn't so pretty in the beginning

- DNR had their own way of doing a compliance inspection
- R&A Risk has their procedure of doing an inspection
- Another contractor does the underwriting for sites that participate in the PSTIF. They review the compliance records for those sites.
- DNR reviews the records for sites that do not participate in the PSTIF
- Different ways to write up an inspection
- The contractor does not cite violations

Evolution

- Lots of conversations and compromise
 - Department
 - R&A Risk
 - EPA
- Everyone had their own way of doing things and things they wanted
- Department still had 2 inspectors
 - New installation inspections
 - All other

The contractor – R&A Risk

- Very confident
- We've been doing this forever
- Trust us
- We know what we are doing
- This is what we are doing to do for you

The Department

- In shock we are no longer doing inspections ourselves
- Learning to trust that this new way to meet the inspection requirement will work
- Creating and adapting to a new procedure
 - Adding fields to our database to track when inspections arrive
- Being a liaison to EPA to reassure them we are going to make this work

EPA

- We had to prove to them that our new composite inspection program was going to work
- We did lots of oversight to confirm this new partnership was working
 - Record review audits with the underwriting contractor
 - Tag along inspections with the contractor
 - Audit inspections

Adapting and a New Way of Meeting the Inspection Requirement

- R&A Risk is our data collector
 - Specific procedures outlined in the contract detailing how they will conduct an inspection
 - Take photos of everything
 - Every photo tells a story
 - Inspection cover letter, report, and response form
- The Department reviews each inspection and determines if a violation is present

Announced Inspections



August 19, 2025

CASEYS MARKETING COMPANY
PO BOX 3004
ANKENY, IA 50021-9672

- Sites receive a letter notifying them that an inspection will be performed in the next 60 days
- If they are not insured with the PSTIF, they a Records Request form is included with the announcement letter
- Goal is for the Department to review the records and the inspection at the same time

Dear UST Owner/Operator:

This is to let you know that we plan to have an inspector visit the following location(s) within the next 60 days:

- ST0010507 - CASEYS GENERAL STORE #1054, 206 W COMMERCIAL, PIERCE CITY
- ST0010567 - CASEYS GENERAL STORE #1110, 405 GRAND AVE, CAMERON
- ST0019950 - CASEYS GENERAL STORE #2058, 1601 E CLEVELAND AVE, MONETT
- ST0020356 - CASEYS GENERAL STORE #2078, 599 E PINE BLVD, POPLAR BLUFF
- ST0020835 - CASEYS GENERAL STORE #4321, 700 HWY 53, POPLAR BLUFF

The inspector is employed by R&A Risk Professionals, a contractor working for the State of Missouri. R&A Risk Professionals is conducting this inspection on behalf of the Missouri Department of Natural Resources' (the department) Environmental Remediation Program, pursuant to Section 319.117, Revised Statutes of Missouri.

The purpose of the inspection is to verify information previously provided to the department and to confirm that you are operating your tank system in compliance with applicable laws and regulations. It will be necessary for the inspector to check beneath the fuel dispensers and in fuel manways, so our inspector will request keys to these areas during their visit.



Missouri PSTIF UST Inspection Report

Facility Name	MISSOURI BOTTOM ROAD	Named Insured	RUNESTON
Address	12000 MISSOURI BOTTOM ROAD	Address	231 SOUTH
City, State, Zip	HAZELWOOD, MO 630422314	City, State, Zip	CLAYTON
Phone	3145695000	Phone	314227815
Dispensers	1	Latitude	38.768291
Transition Sumps	0	Longitude	-90.396771

ST Number	ST0019337	Rectifier Hours	
Date	10-11-14	Rectifier Volts	
Inspector	JAF	Rectifier Amps	
Observer			

Tank #	Compartment #	Product	Capacity	Tank Material	Double Wall	Interior Lining	Corrosion Protection	Tank Design
1	1	Diesel	10,000	Fiberglass	No	No	N/A	

Line #	Compartment #	Piping Material	Double Wall	Corrosion Protection	Delivery System
1	1	Flex Pipe	Yes	N/A	Pressure

Monitor/Gauge Inspection	Yes	No	N/A
ATG in normal status			
Interstitial monitor in normal status			

Fill/Spill Inspection
Spill basins clean/functioning
Overfill device present/functioning
Drop tubes present in applicable tanks

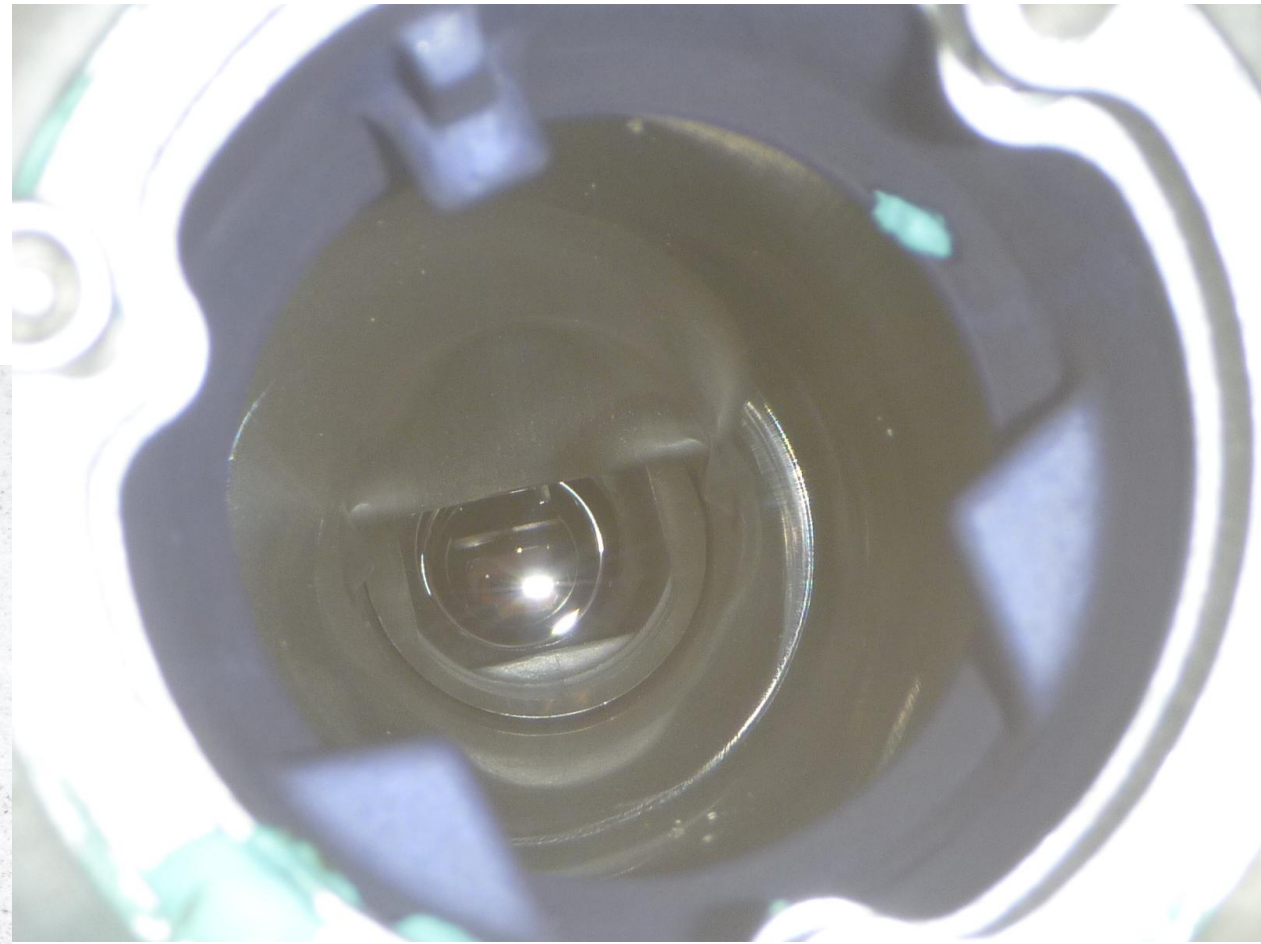


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Piping Sump Contains Liquid/Debris - Liquid in tank top pipe sump.



Metal in Contact with Soil/Liquid (at tank top/transition area) - Metal product pipe in contact with liquid in tank top pipe sump.



Dispenser Sump Contains Liquid/Debris - Liquid in dispenser containment sump.



Missouri UST Inspection Report

Facility Name	MISSOURI BOTTOM ROAD	Named Insured	RUNESTONE INVESTMENTS LLC-ALTUS PRO
Address	12000 MISSOURI BOTTOM ROAD	Address	231 SOUTH BEMISTON AVENUE
City, State, Zip	HAZELWOOD, MO 630422314	City, State, Zip	CLAYTON, MO 63105
Phone	3145695000	Phone	3142278158

ST Number	ST0019337	Rectifier Hours	
Date	10/11/2016	Rectifier Volts	
Inspector	John Fine	Rectifier Amps	
Observer			

Tank #	Compartment #	Product	Capacity	Tank Material	Double Wall	Interior Lining	Corrosion Protection	Tank Leak Detection	Spill Equipment	Overfill Protection
1	1	Diesel	10,000	Fiberglass	No	No	N/A	ATG	SW	Auto Shutoff

Line #	Compartment #	Piping Material	Double Wall	Corrosion Protection	Delivery System	Line Leak Detection	Electronic or Mechanical LLD
1	1	Flex Pipe	No	N/A	Pressure	LTT	Mechanical

Monitor/Gauge Inspection	Yes	No	N/A
ATG in normal status	X		
Interstitial monitor in normal status			X
Rectifier operational			X
Electronic line leak display in normal status			X

Dispenser Inspection	Yes	No	N/A
Containment under dispenser	X		
Dispenser containment clean/functional		X	
Dispenser containment sensor functional			X
Shear valves properly anchored/functional	X		
Corrosion issues at dispenser		X	
Piping appears functional at dispenser	X		
Leaks present at dispenser		X	

Fill/Spill Inspection	Yes	No	N/A
Spill basins clean/functional	X		
Overfill device present/functional	X		
Drop tubes present in applicable tanks	X		
Other Issues with fill pipe		X	

Tank Area Inspection	Yes	No	N/A
Contained piping sump	X		
Piping sump clean/functional		X	
Sump sensor appears functional			X
Submersible pump installed/operating properly	X		
ELLD/MLLD installed/operating properly	X		
Corrosion issues at tank	X		
Piping appears functional at piping sump	X		
Leaks present at piping sump		X	
Monitoring wells marked and secured	X		
Any tanks out of use		X	

Other Issues Noted (These issues must be corrected within 60 days by completing the attached response form):

Metal in Contact with Soil/Liquid (at tank top/transition area)

Submersible pumps (with metal pipe connections or components) above tanks are in direct contact with soil/liquid. These pumps and metal connections/components must be isolated or cathodically protected according to 10 CSR 26-2.031(1)(A). Please **PROVIDE DOCUMENTATION** that all metal system components are protected from corrosion. - **Metal product pipe in contact with liquid in tank top pipe sump.**

Recommendations (No response or correction is required):

Piping Sump Contains Liquid/Debris

We recommend that you remove and properly dispose of liquid and debris in piping secondary containment sump(s). - **Liquid in tank top pipe sump.**

Dispenser Sump Contains Liquid/Debris

We recommend that you remove and properly dispose of liquid and debris in dispenser sump(s). - **Liquid in dispenser containment sump.**

Missouri UST Inspection Response Form

October 20, 2016

Please complete this form and return with requested documentation (e.g. invoice, work order, contractor's statement, photos, etc.) within the required timeframe to:

TO: Rounds & Associates
2894 - 106th Street, PO Box 7628
Urbandale, IA 50323
Phone: (515) 334-3010
Toll-Free: (855) 808-8686
Fax: (515) 334-3013

RE: ST0019337

MISSOURI BOTTOM ROAD
12000 MISSOURI BOTTOM ROAD
HAZELWOOD, MO 630422314

OTHER ISSUES NOTED - Complete by Due Date Indicated

Due Date	Corrected By: ☐ Owner/Operator ☐ Service Co. (Print Company):	Date Completed
12/19/2016	Metal in Contact with Soil/Liquid (at tank top/transition area) - Submersible pumps (with metal pipe connections or components) above tanks are in direct contact with soil/liquid. These pumps and metal connections/components must be isolated or cathodically protected according to 10 CSR 26-2.031(1)(A). Please PROVIDE DOCUMENTATION that all metal system components are protected from corrosion. - Metal product pipe in contact with liquid in tank top pipe sump.	

Owner/Operator Signature: _____ Date: _____

RECOMMENDATIONS NOTED - No Due Date

Due Date	Corrected By: ☐ Owner/Operator ☐ Service Co. (Print Company):	Date Completed
NONE	Piping Sump Contains Liquid/Debris - We recommend that you remove and properly dispose of liquid and debris in piping secondary containment sump(s). - Liquid in tank top pipe sump.	
NONE	Dispenser Sump Contains Liquid/Debris - We recommend that you remove and properly dispose of liquid and debris in dispenser sump(s). - Liquid in dispenser containment sump.	

MoDNR Reviews the Inspection

- Each week we download the inspections, photos, and inspection responses
- They are reviewed
 - SOC determinations are made based upon the photos
- If a site has not submitted a complete response, we reach out and ask for the missing documents

Records Reviews

- Not done at the inspection
- For sites insured with the PSTIF they are done at their renewal
- For sites not insured with the PSTIF they are done at the time the Department reviews the inspection.

Tag Along Inspections: Watching the Contractor Work

- Go at watch R&A Risk do the inspection
- Make sure they are doing it "the DNR way" and exactly like the contract states it would be performed
- Write a memo to the file to document findings



MEMORANDUM

DATE: September 6, 2024
TO: Contract Inspection Audit File
FROM: Angela Oravetz
Environmental Specialist
Tanks Compliance and Technology Unit
SUBJECT: Tag Along Inspection Findings From ST0022150

Contractor: Rounds and Associates
Contract Inspector: Keith Craig
Tag Along Inspection Date: September 4, 2024
Facility: Edison Express (ST0022150)
Facility Address: 158 Long Road, Chesterfield, St. Louis County

Tag Along Findings:

The contract inspector introduced himself to the facility staff as performing an inspection on the underground storage tanks. He provided a business card to the facility staff. He explained the inspection process and asked to see their Veeder Root tank monitor. The facility utilizes an automatic tank gauge (ATG) to perform their tank and piping release detection. No alarms were present on the ATG. The facility had their monthly walkthrough log near the ATG. This was photographed as well. The contractor performed a walk around the site, documenting this with photographs. The contract inspector located the monitoring wells in the tank pit. Small cones were placed over these and photographed. The contractor checked the submersible pump areas and fill ports. Automatic shutoff overfill devices were located and photographed. The integrity of each spill bucket was examined visually as well as by touch. Liquid was observed in the premium and diesel spill buckets. The ATG probe caps were checked to ensure they were secure on the riser and that the grommet was secure as well. The submersible turbine pump tank tops were visually inspected and photographed. Containment sumps are present at the tank tops and under each dispenser. Liquid was present in all three tank tops and under #1/2. Sacrificial cathodic protection is installed at the premium tank top only. There was no metal in contact at

Records Reviews

- Go to the Missouri Petroleum Storage Tank Insurance Fund's office and pull files
- Random sites
- Sites we had questions on based upon reviewing the photos
- Technology changed
- All participants upload their records into a portal
- Now we just send an email and ask for the records we need

Audit Inspections

- DNR inspectors going to the site to inspect it after R&A Risk has been there
 - We do the whole inspection to make sure that we find the same conditions
 - Document that the site did fix any issues that the contractor observed
- Sites selected
 - Randomly if we are in the area doing other new installation or inspections
 - If we had questions on the inspection that was performed
 - If we had a question on the documentation that was submitted as a response

Positives

- Consistent inspection performed at each site
- Small DNR team reviewing inspections which means greater consistency
- Allows us to meet the 3 year inspection requirement with limited funding resources
- Multi-facility tank owners know exactly what to expect at each inspection



Who We Are



- Leader in environmental risk management for petroleum marketing industry
- Environmental Claims Management Services
- Petroleum Storage Tank Training Services
- Third Party Tank Inspection Services
 - Properly trained/certified inspection team

"Inspections are more than compliance - they protect the environment"



Why We Do Inspections



- ✓ Protect the environment & community
- ✓ Reduce owner/operator liability & costs
- ✓ Ensure compliance with regulation
- ✓ Unbiased, certified 3rd party inspections
- ✓ Build trust through regular site reviews

"Inspections are more than compliance - they protect the environment"



What We Do

- 1) Prepare
 - Import site data from state agencies
 - Notify owners in advance; letters + call ahead
- 2) Inspect
 - On-site evaluations
 - Photos & documentation
 - Immediate reporting of critical issues
- 3) Report & Support
 - Clear inspection reports
 - Digital submissions to DNR/PSTIF
 - Guidance for corrective actions



"From preparation to reporting, our process is built for efficiency and accuracy"



Preparation: Efficient Scheduling



• Keep Operation Running

- Little down time or interference for o/o

• Group Facilities

- Improve efficiency

• Map & Schedule

- Optimize travel routes

• Inspectors Determine Daily Route

- Work around traffic, construction, etc.
- Will work weekends

• Prioritize Compliance

- Align with due dates

"Preparation ensures efficiency and minimal impact on facility operation"



Inspection: Efficiency in Action

- Understand EPA TCR items
 - Know what you are looking for before you start
- Streamline Records
 - Records reviewed separately, not on-site
- Comprehensive Documentation
 - Photos of key areas + sketches when needed
- Immediate Reporting
 - Critical issues reported within 24 hours
 - Reportable release, missing overfill or line leak detection



"Efficient inspections mean less disruption, faster reporting, and higher accuracy"



Inspection: Process



- 1) Introduction
 - Notify site staff & explain inspection role
- 2) Walk-Around
 - Quick scan for recent or ongoing petro releases
- 3) Inspections by Zone
 1. In-store Equipment
 2. Dispenser Area
 3. Tank Field (Spill/Fill & Piping Sumps)
- 4) Documentation
 - Record observations & prepare report

"Clear, consistent steps ensure every facility is reviewed thoroughly"



Inspection: In-Store Equipment

- Evaluate Monitoring System
 - ATG, ELLD, IM, Rectifiers
- Confirm Functionality
 - Equipment working; No alarms
 - Passing results within 30 days



"Reliable monitoring equipment is the first line of defense"



Inspection: Dispenser Area

- Full Component Inspection
 - Pumps, meters, solenoids, valves, piping, hoses, nozzles
- Check Installation & Condition
 - Proper setup, not damaged
 - No Leaks



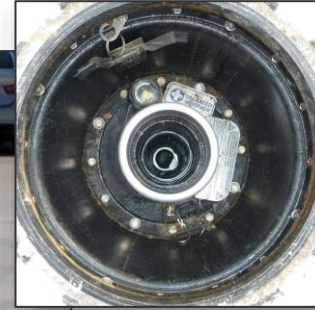
- Containment Inspection
 - Clean and intact
 - Component inspection
 - No indication of release to environment
- Report Findings
 - Note issues on report

"Thorough dispenser checks prevent costly leaks and failures."



Inspection: Tank Field

- Inspect Tank Top Access
 - Installation, condition, and leak detection
- Containment Inspection
 - Clean and intact
 - No indication of release to environment



- Spill & Overfill Systems
 - Clean, not damaged
 - Appears functional
 - Includes Vapor Recovery
- Document Findings
 - Record all observations

"Tank Field inspections prevent releases and ensure regulatory compliance."



Post Inspection: Reporting & Follow-up

- Immediate Alerts
 - Critical issues reported directly to o/o during inspection
- Detailed Report
 - Inspection Report and Response form sent to o/o
 - File sent to PSTIF/DNR after response from o/o
- Secure Data Storage
 - All inspection forms, documents, photos stored in R&A database



"Timely reporting and follow-up ensure compliance, safety, and peace of mind"



Conclusion: What Matters

- ✓ Maintain Efficiencies (record review separate from inspection)
- ✓ Conducted/reviewed by skilled professionals
- ✓ Communication between all parties
- ✓ Training/Workshops for owner/operators, inspectors & AHJ
- ✓ Periodic program review/audits

"We expect owners and operators to be properly trained, we should expect the same of compliance inspectors"

Trust the Process --- Thank you!

Angela Oravetz

Environmental Program Manager

Tanks Section

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Brian Pottebaum

R&A Risk Professionals

VP of Technical Operations

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