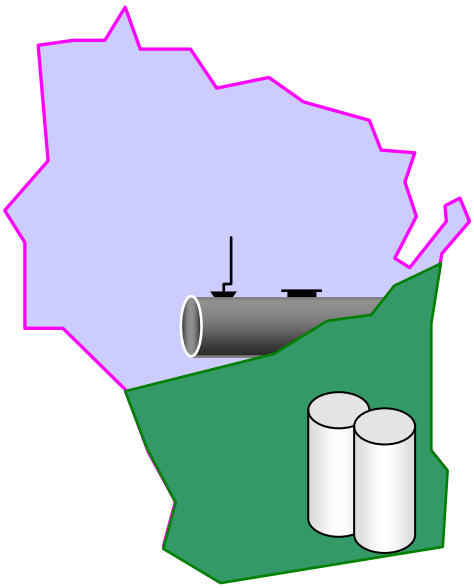
Internet Inspection Reporting Application (IIRA)
HELP Manual
For
SPS 310
Storage Tank Inspectors



Revised February 14, 2013

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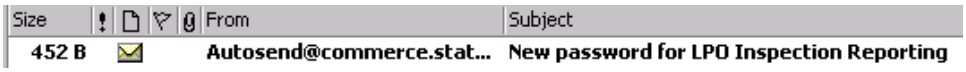
Introduction to the Internet Inspection Reporting Application (IIRA)

There is a two-fold purpose for the on-line tank inspection process. The first part is to gather statistics concerning problems with tanks and or sites for program and EPA reporting and code development purposes. The second purpose is to be able to pay for the inspection of tanks on an "as inspected" basis.

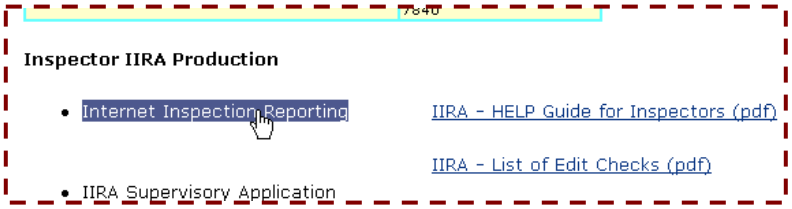
Password

DSPS inspectors and LPO agencies will be sent a customer id and password as assigned by the Storage Tank Regulation Section Chief at the Department of DSPS. The e-mail will be from "Autosend . As soon as you receive your password you should log-in and go into the "Enter by Inspection List" side of the program to assure that you have the ability to access the program. The passwords are character sensitive. If you are unable to access the application try entering your password by performing a cut and paste from the e-mail to the login box. Once you have successfully logged into the application you should change the password to one that you will remember.



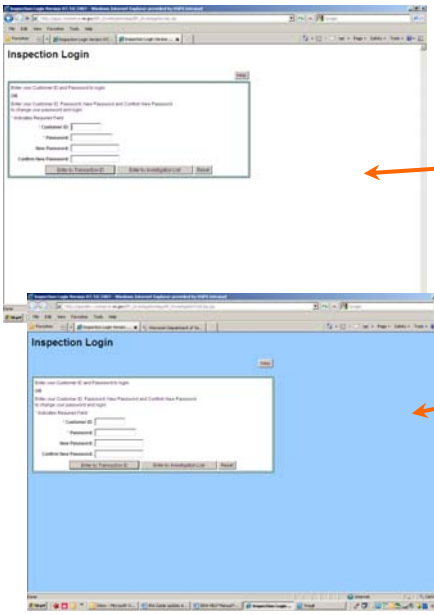
Log-in to the IIRA

Access the Internet Inspection Reporting application (IIRA) via the Storage Tank Home Page. There is a list of IIRA associated web page links on the lower portion of the web page. The Internet Inspection Reporting links will take you to the Inspection Login page.



http://apps.DSPS.wi.gov/ER_InvestigationApp/ER_InvestigationJsp.jsp

The login page provides a level of security by restricting who has access to the site information and it also gives the inspector two options to view site data. The PASSWORD is specific to a DSPS inspector or to a LPO agency.
Contact the Storage Tank Regulation Section Chief (Sheldon Schall) if you have forgotten your logon password or desire a new password.



Note that there are two IIRA web sites.

1. A Production or "live" information reporting and data collection web site, characterized by the *white* background as displayed in the adjacent screen captures.

2. A Training and testing site characterized by the *blue* background as displayed in the screen capture to the lower left. The training site is discussed in the following paragraph.

Note: Most screen captures used in this Help Manual are taken from the IIRA Training application and therefore will have a blue background rather than the production application's white background.

The first two fields are for entering your customer id and then your password. It is on this screen where you can also change your password. If the inspector does not select “Enter by Transaction” or “Enter by Investigation” button before clicking enter, a screen will appear where that decision has to be made. An extra step in the process, but necessary to reduce the download time.

IIRA Training Application

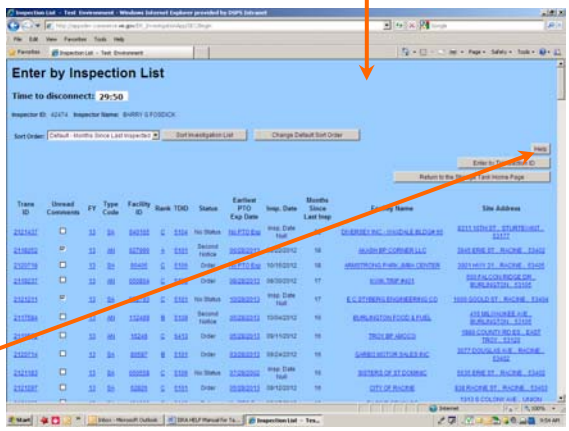
This application is for training inspectors and field testing new enhancements. Inspection data that is entered will not be saved for inspection and regulatory statistics or LPO payment. Close out and find the correct link on the storage tank home page that takes you to the “live” application for permanent data entry.

Because inspectors were accidentally entering inspection data into the training application, the link to the training application was moved off the tank program Internet home page. Access to this application is via the DSPS Intranet server at the following link:
http://appsdev.DSPS.wi.gov/ER_InvestigationApp/ER_InvestigationTestJsp.jsp

***Note**: The password for this Training application must remain “mytest.”*

The Training application “Enter by Inspection List screen also has a blue background to distinguish the training application from the production application.

We unfortunately experience a lot of inspectors having problems by entering data in the training site when they should be in the production site.



Enter by Investigation List

The “Enter by Investigation List” will take the inspector to a page that lists all the sites where the inspector or LPO is responsible for performing annual inspections. This page also gives the inspector the option of sorting by several categories. Also, a default sort order can be established. This page displays the inspections that have not been closed. Designating the status “Inspection Completed” for all tanks on the site closes the inspection process and moves the site off the list.

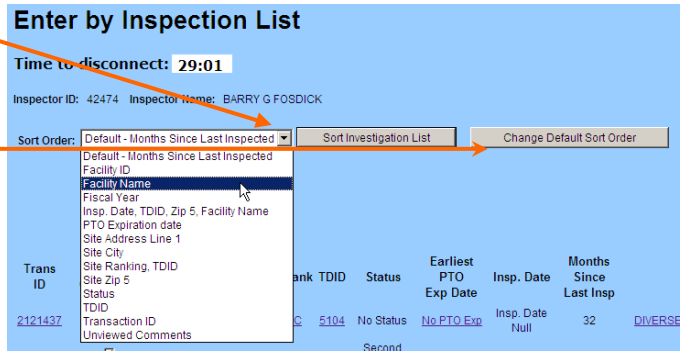
The “HELP” button on each IIRA web page takes you to an on-line version of this IIRA HELP Guide.

Facility Inspection List

Initially, you will be presented with a list of inspections that have yet to be started or are not completed and closed. There is site identifying information on the left half of the screen and to the right are two inspection data fields that come from the "actual investigation date" field that you enter on the next screen. Initially the date field for the fiscal year assignments will be "Null" since no inspection has yet been recorded in the application. An inspection that is closed will not show on this list – this list is only for inspections that have yet to be started or have been started but not closed. The data on this web page originates from data entered by the inspector on another web page, from data entered by DSPS permit staff, or data generated by the DSPS Regulated Objects program.

By clicking on the drop-down box arrow you can change the sort order of the list.

By clicking on the "Change Default Sort Order" button you can arrange the list to come up in the chosen default order each time you login. If you hit the "Sort Investigation List" button the sort will go back to the default sort order.



The "TDID" (Tank District identifier) sort order or the TDID column IS NOT the fire district id that many inspectors may be familiar with although in most cases it is similar.

IIRA Inspection List Headings:

The "Transaction ID" is an IIRA identifier that is specific to a fiscal year inspection period. It relates to data that is entered and tracked during the respective fiscal period. Using the transaction ID provides a means for the inspector to pull up status data for a previous year(s).

The "Facility ID" is the primary identifier for a tank site. The facility ID may be different than the "Site ID." The site ID may relate to a multi-occupancy site such as West Towne Mall, and the facility ID will relate to an occupancy within the mall, such as Firestone Auto Service Center that may own or operate storage tanks.

The "Rank" column is a ranking by violation history. The A facilities are high priority as a result of the type of violation and/or the frequency of violations; the B facilities are medium priority; and the C facilities are low priority as a result of few violations over a period of time. Within each ranking category the order is most severe to least severe. The rankings are based on criteria (example: history of leak detection record-keeping problems-A). It was created to get facilities with the same or repeated violations year after year in compliance by increasing inspections during the year to keep them in compliance.

Trans ID	Unread Comments	FY	Type Code	Facility ID	Rank	TDID	Status	Earliest PTO Exp Date	Insp. Date	Months Since Last Insp	Facility Name	Site Address
1819146	☐	11	AN	50570	C	0103	No Status	10/28/2011	Insp. Date Null	11	ADAMS COUNTY AIRPORT	2075 11TH AVE., ADAMS, 53
1821753	☐	11	AN	648632	C	0103	No Status	05/28/2011	Insp. Date	9	KWIK TRIP #774	237 N MAIN ST., ADAMS, 53

"Status" column is the selection that you have made on the next screen after an inspection; for example Investigate, Order, etc.

"Earliest PTO Expiration Date" is the date the permit expires. This date will also be on the Tank Attributes page.

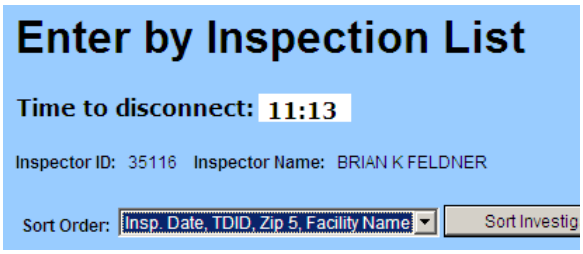
"Months since Last Inspection" column is a field populated when the inspections are created for the FY. The application first looks for the nearest actual investigation date for the previous annual investigation (inspections the inspector create in Reg Obj do not count). If the application does not find an investigation, then it looks at the earliest install date for the tanks that are in use or temporarily out of service and uses that date. If an install date is not found the application defaults to January of 2000. When the IIRA runs it compares the date above to the current date and comes up with the number of months.

You may click on any of the site identifying columns to bring up the form where you will enter the results of the inspection.

Some of the information on this screen is useful only if you need to communicate a problem to the tank program staff. For example, the first column contains a "transaction id" that is used by the computer system to track a specific site investigation, but does not hold any other meaning.

Application "Time-Out"

Most Internet applications have a time-out allowing the application to shut-down and disconnect after a designated period of inactivity. The IIRA is 30 minutes. The facility home page has a "Time to disconnect" notification. Any action, such as a sort or moving to another page will reset the disconnect back to 30 minutes.

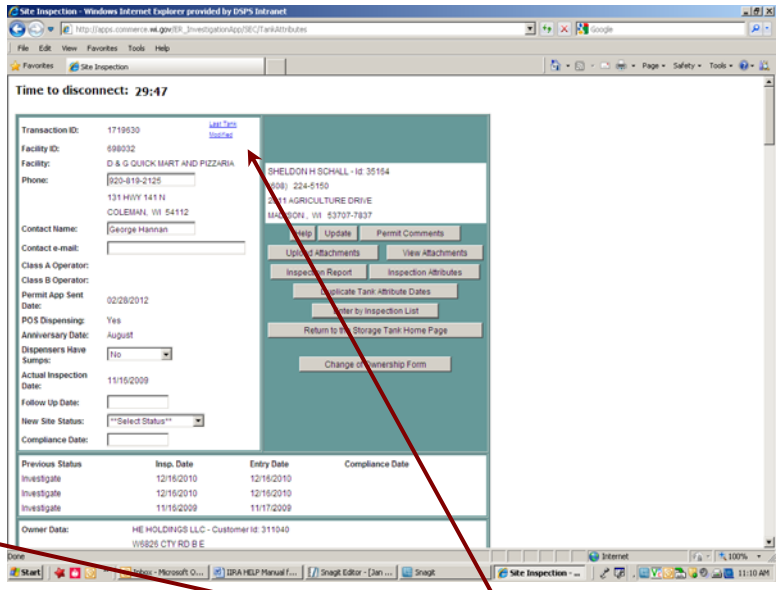


The "Time Out" is on the IIRA Inspection List page and the home page for each facility.

Facility home page

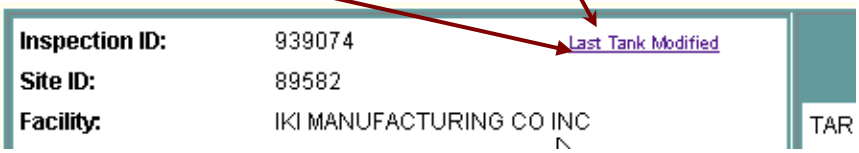
The web page that exhibits the primary facility information is referred to as the "Facility Home Page." It is from this page that any attribute or inspection data is changed or updated.

"*Attributes*" are system specific configurations, equipment or other data (i.e., test dates) that are documented in the storage tank database.



Last Tank Modified

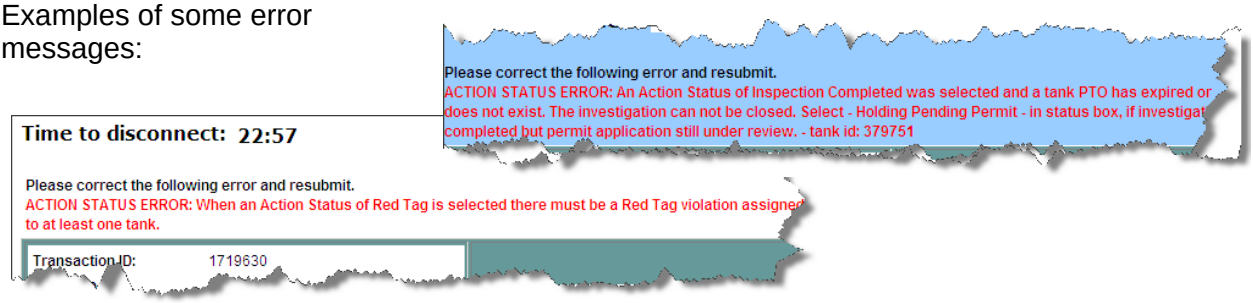
Because some sites have many tanks and large amounts of data entry, interruptions may result in an inspector losing track of where he/she is in the data entry process. The IIRA has a recall mechanism "Last Tank Modified" that will take the inspector to the most recent tank that had inspection or attribute data updated.



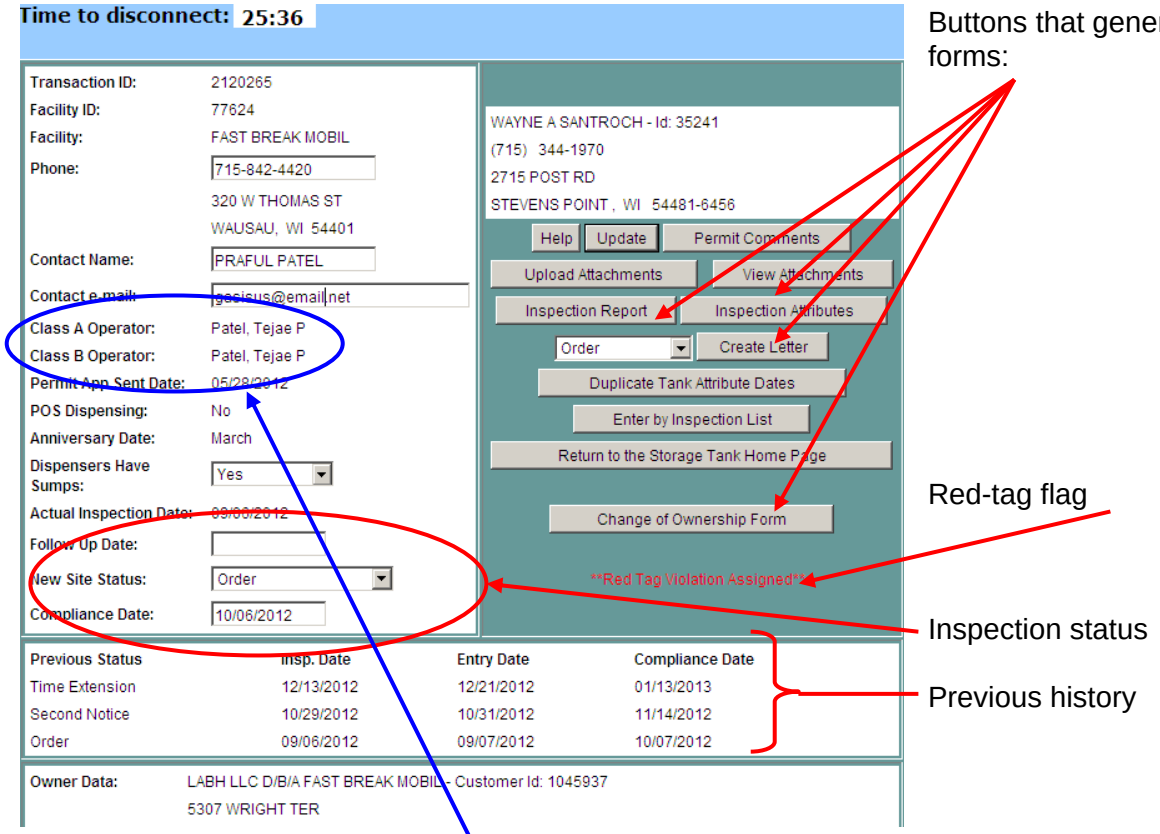
Trails that start on the "Facility Home Page":

Everything starts and ends with the Facility Home Page (FHP). The FHP provides the inspector with the key contact and regulatory data relating to the facility. The quality of much of the data on this page and in the other areas of facility IIRA information is very much dependent upon the oversight and administrative diligence of the inspector.

Error messages will appear at the top of the FHP if you have not entered information correctly. Examples of some error messages:



The following graphics exhibit the status and "trailheads" that will take the inspector to the various administrative tools and data collection web pages for the respective facility and tank system. Details of each tool or data collection page are explained further into this guide.



Buttons that generate forms:

Red-tag flag

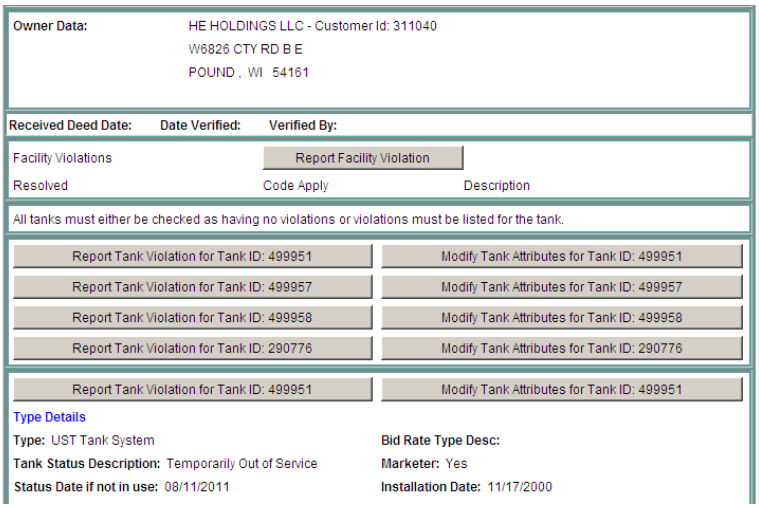
Inspection status

Previous history

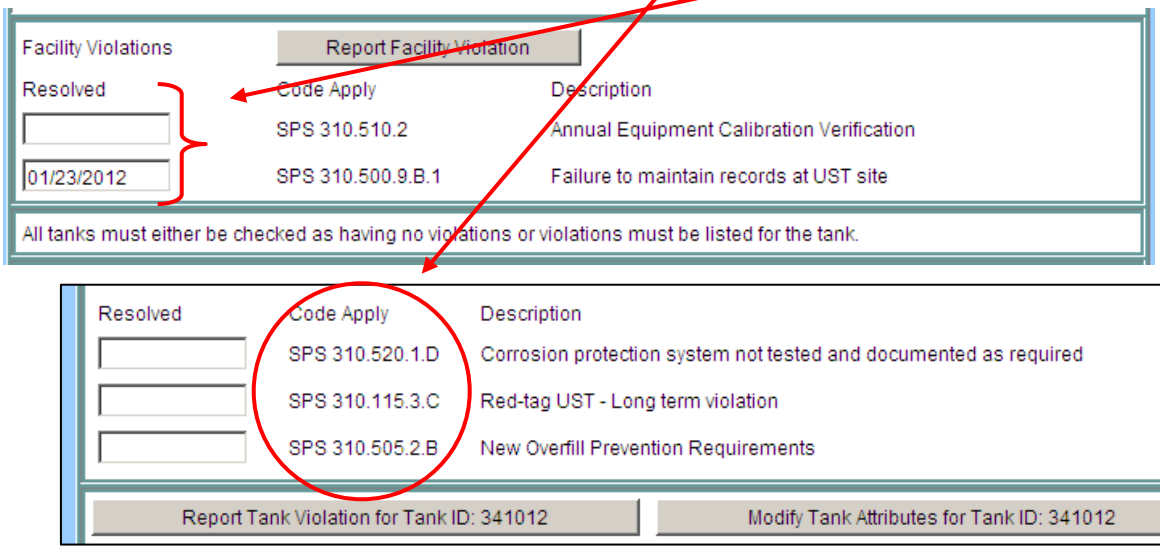
All federally regulated UST facilities are required to have designated A/B Operator. The name of the designated operator along with the individual's qualification certificate is to be provided to the department by the facility RP. If this area of the facility home page is not populated with a name orders are to be issued for compliance.

Further down the web page there are buttons for each tank on the IIRA inspection list.

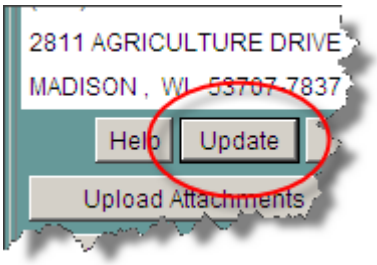
Note that the facility may have tanks that do not meet the criteria for IIRA inspection. The facility may also have tanks that should be on the IIRA and either were not registered or were registered incorrectly. This must be corrected by having the owner complete a new UST or AST registration form



When an inspector marks violations the violations appear under the facility compartment or under the respective tank compartment. The compliance date must be entered when compliance is achieved.



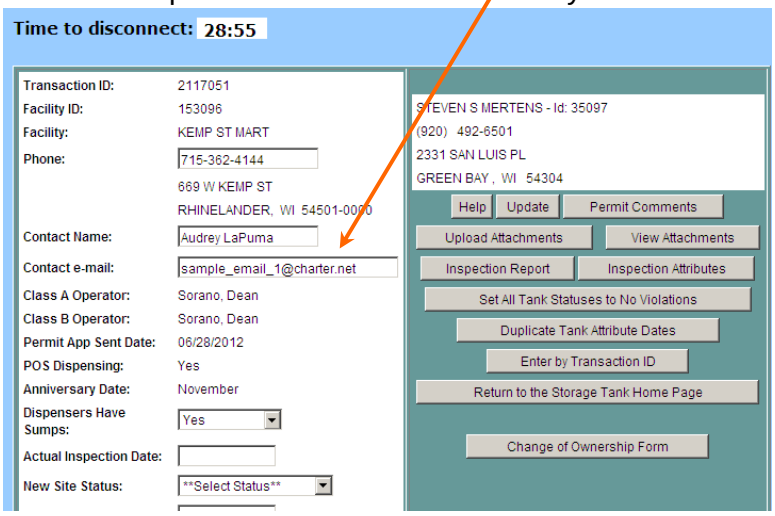
When entering any data on the facility home page you must click the “Update” button before you leave the page.



IIRA Facility Contact E-MAIL Feature

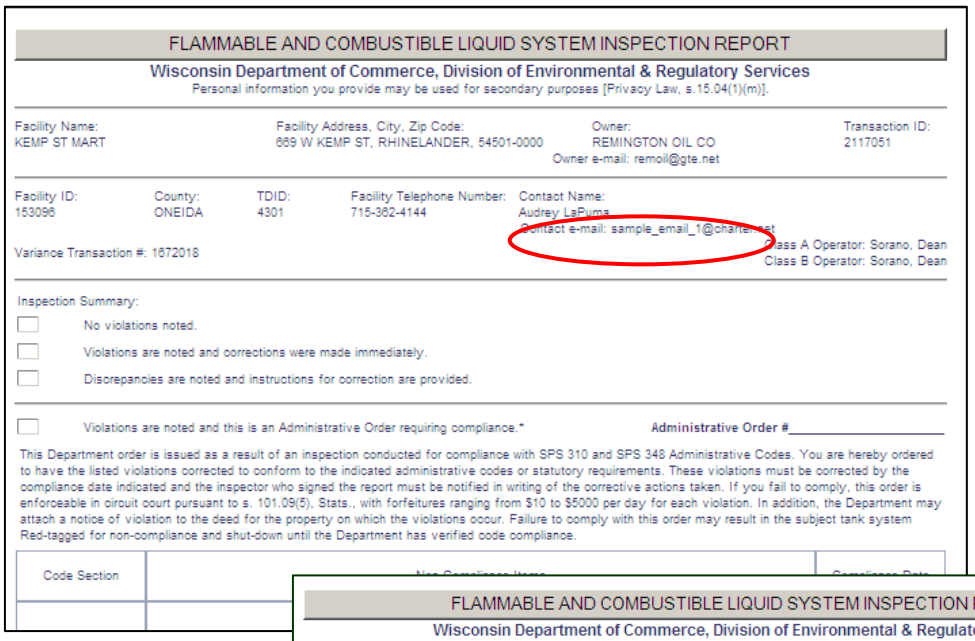
Inspectors have the ability to add a contact e-mail in the contact area of the IIRA main page, in a field directly below contact name entry. This e-mail will then appear on the Inspection Report and Inspection Attributes.

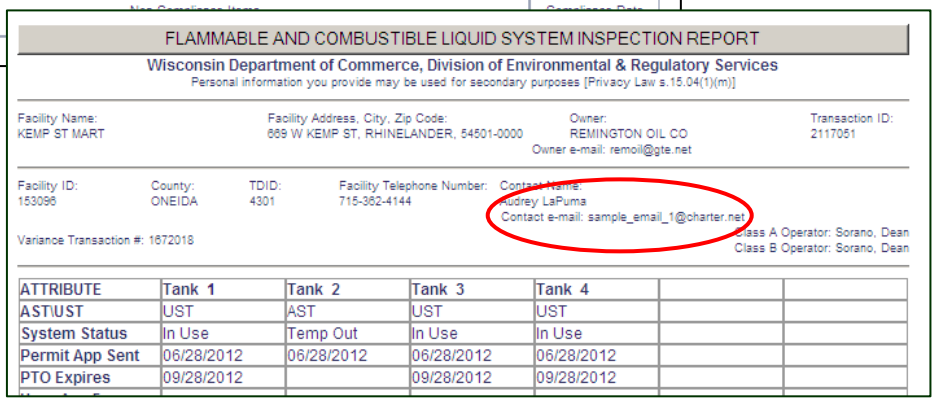
The permit staff has the ability to add an owner e-mail in Regulated Objects; that e-mail is different than the inspector entered e-mail address. The e-mail addresses are independent of each other. The Contact e-mail address in IIRA is associated with the facility and is stored in a table that keeps information about that facility. This e-mail address has nothing to do with the e-mail addresses found on the Regulated Object Customer window that is overseen by the permit staff (the contacts tab page specifically). The Regulated Object (customer) contacts have to do with owners or people at a home office like Kwik Trip; while the e-mail address inspectors enter in IIRA is an e-mail address associated with the facility itself and the respective contact person.



The permit staff will not be able to enter or modify the e-mail addresses that you enter in IIRA.

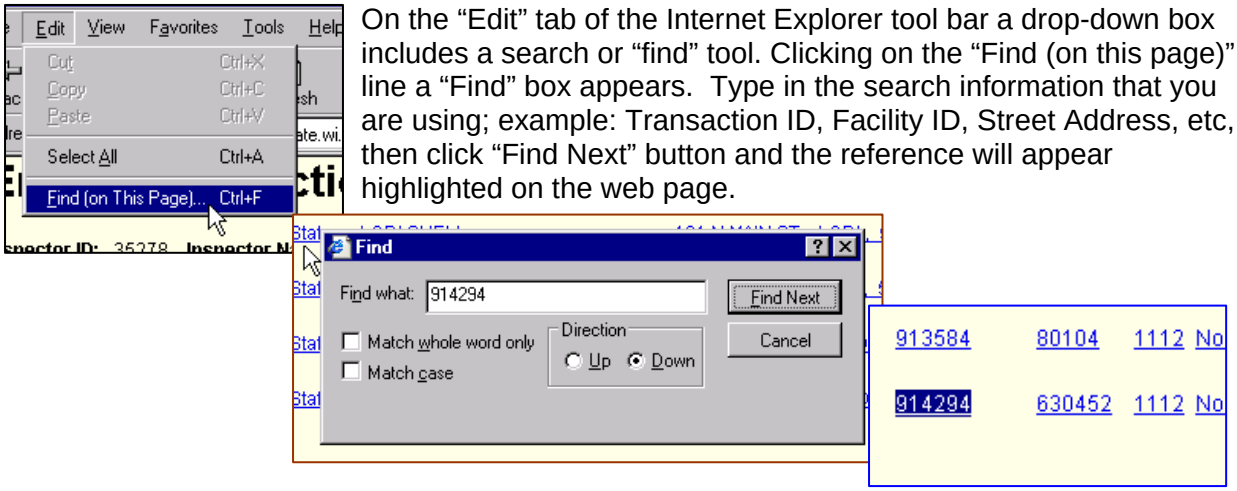
Note: Adding the e-mail feature causes the Inspection Attributes to print on two pages. Set your printer to .50 top and bottom margins to have one page printing.





ATTRIBUTE	Tank 1	Tank 2	Tank 3	Tank 4		
AST\UST	UST	AST	UST	UST		
System Status	In Use	Temp Out	In Use	In Use		
Permit App Sent	06/28/2012	06/28/2012	06/28/2012	06/28/2012		
PTO Expires	09/28/2012		09/28/2012	09/28/2012		

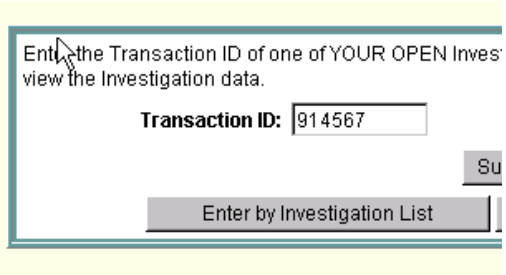
Searching the Inspection List



On the "Edit" tab of the Internet Explorer tool bar a drop-down box includes a search or "find" tool. Clicking on the "Find (on this page)" line a "Find" box appears. Type in the search information that you are using; example: Transaction ID, Facility ID, Street Address, etc, then click "Find Next" button and the reference will appear highlighted on the web page.

Enter by Transaction ID

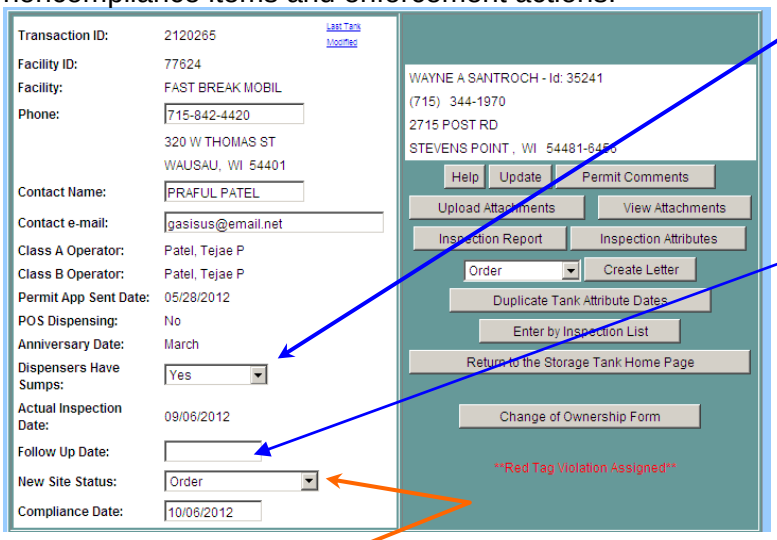
The "Enter by Transaction ID" page takes the inspector to a site inspection specific page. You will only get results from transactions or sites assigned to you.



Trans ID	Unread Comments	FY	Type Code	Facility ID	Rank	TDID	Status	Earliest PTO Exp Date	Insp. Date	Months Since Last Insp	Facility Name	Site Address
1819146	☐	11	AN	50570	C	0103	No Status	10/28/2011	Insp. Date Null	11	ADAMS COUNTY AIRPORT	2075 11TH AVE , ADAMS , 53
1821753	☐	11	AN	648632	C	0103	No Status	05/28/2011	Insp. Date	9	KWIK TRIP #774	237 N MAIN ST , ADAMS , 53

Getting to the Facility and Tank Details

Each site requiring an annual inspection has a web page that provides the inspector with tank system data, a means to update selective data items referred to as “attributes” and record noncompliance items and enforcement actions.



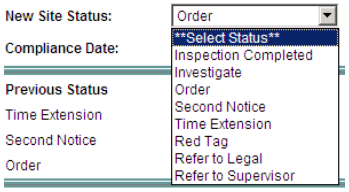
“Actual Inspection Date” is the date that the first inspection was conducted. “Inspection Date Null” indicates that an annual inspection has not been entered for the facility.

"Follow Up Date" is the date of any follow-up visits, telephone calls, receipt of test date or any follow-up correspondence to the "Inspection Date."

Site Status Categories

“Status” category is the status that the site is in after the first annual inspection visit within the fiscal period. “No Status” indicates that the site has not yet received an initial annual inspection visit from the inspector. If you perform an inspection and find no violations (or all the violations are resolved) you may close an inspection “Inspection Completed.” An inspection that is closed will not show on the site list after you click the “update’ button.

The “Site Status” is determined at the completion of the most current regulatory action. A drop-down box provides the respective status categories. The box to the right lists the designated status categories.



Inspection Completed – The status given to a facility that has no violations or has resolved outstanding non-compliance problems to the satisfaction of the inspector. The facility will move off the inspection list.

Investigate – This status is used when the site has not been issued a state order. Example would be test results are going to be faxed to inspector.

Order – The annual inspection has been conducted and enforcement / non-compliance orders have been issued to the RP.

Second Notice – A second notice has been issued to the RP for outstanding non-compliance addressed in the initial enforcement order.

Time Extension - This feature is selected when an inspector extends a State Order compliance date in writing to the owner/operator (example: line test schedule past compliance deadline due to availability of tester).

Red Tag – A red-tag has been administered along with the respective written order for compliance.

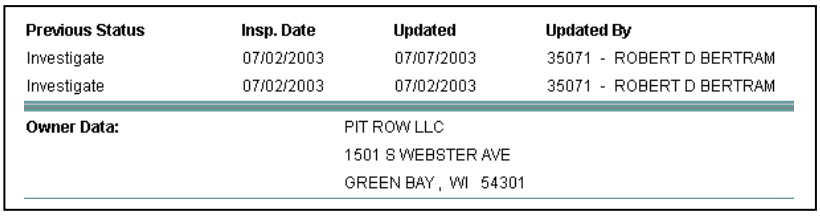
Refer to Supervisor – Non compliance at the field level has moved the enforcement effort up the chain. This indicates that the field inspector has completed the field-oriented process and

moved the enforcement to the next level. DSPS inspectors will forward to their respective supervisor and LPOs will forward to the respective tank specialist. The facility will move off the inspection list.

Refer to Legal – Status selected when site has been turned over to DSPS legal section and then on to Attorney General's Office.

Inspection History

The next two sections contain a history of inspection activity for this site followed by owner information.

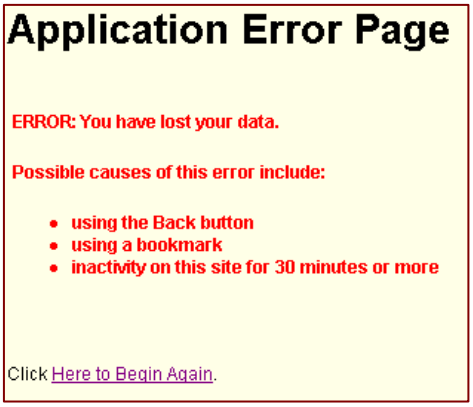


Previous Status	Insp. Date	Updated	Updated By
Investigate	07/02/2003	07/07/2003	35071 - ROBERT D BERTRAM
Investigate	07/02/2003	07/02/2003	35071 - ROBERT D BERTRAM

Owner Data: PIT ROW LLC
1501 S WEBSTER AVE
GREEN BAY , WI 54301

Error Message

The IIRA has several operator actions that may trigger an error. Because the application involves data exchange and data revisions that take place between the DSPS central data base and the inspector's remote PC, the system must provide a means to capture data, as well as glean data that was entered by the inspector, but was determined to be erroneous prior to completing the data exchange. In other words, the process can not allow data to "hang," which would occur if the back button were used. The graphic to the right reflects the actions that will result in an error message and the loss of data.



Application Error Page

ERROR: You have lost your data.

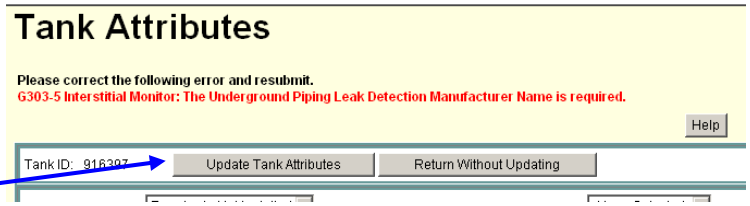
Possible causes of this error include:

- **using the Back button**
- **using a bookmark**
- **inactivity on this site for 30 minutes or more**

Click Here to Begin Again.

Note: *DO NOT USE THE BACK BUTTON*

A second type of error message is referred to as an "Edit Check." The application has controls to prevent a tank record from being updated with incorrect information or updated without the inspector entering specific required information such as a tightness date or manufacturer's name. If you click the "Update Tank Attributes" button without completely completing the data entry, the Edit Check will appear. Each edit check has a number and a description that indicates the problem. The Storage Tank web site has a link to the PDF version of the Edit Check Listing.



Tank Attributes

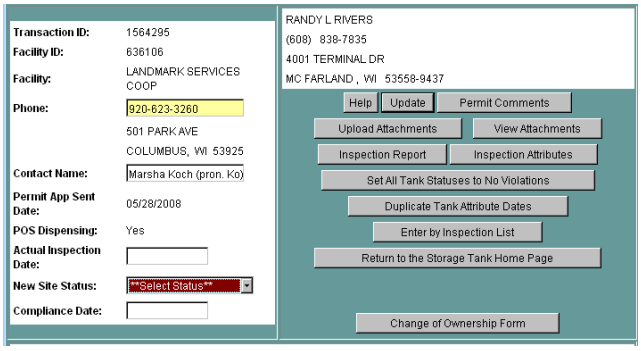
Please correct the following error and resubmit.
G303-5 Interstitial Monitor: The Underground Piping Leak Detection Manufacturer Name is required.

Help

Tank ID: 916397 | Update Tank Attributes | Return Without Updating

Site Detail & Inspection Reporting

Each site designated for an inspection has a page that lists the relative data for the site and the tank(s). The upper right section of the page identifies the assigned DSPS inspector or the LPO agency. The upper left corner of the page contains information about the site. This includes the site name, address, phone number, date the Permit Renewal application was sent.



This page is where the inspector will begin entering annual inspection related data e.g., inspection date, follow up date, and inspection status.

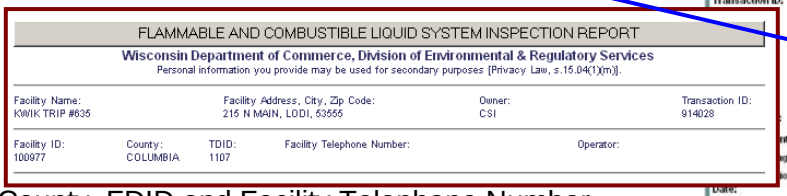
Below the assigned inspector information are several buttons.

- The “Help” button on this page and corresponding pages brings up a “HELP” document intended to assist the inspector in understanding the application.
- The "Update" button updates any changes to the data and returns you to your inspection list. **Note** - to update the data a “STATUS” is required and every tank must either be marked with Violation Found or marked as having No Violations. Error messages should help you with other problems.
- The “Permit Comments” is an area that you can make comments for the Permit Staff to view.
- “Upload Attachments” & “View Attachments” are features that allow inspectors to upload pictures, site specific, to the database.
- The "Inspection Report" will bring up the actual Inspection Report to use at the inspection.
- The "Inspection Attributes" will bring up all tank and line attributes to complete the inspection. This form also can be used as a worksheet to record current test results for later entry into the IIRA system.
- The "Create Letter" Text button will bring up the state order only after "Order" is selected and has been updated. This will create a state order complete with code violations that were entered into the IIRA system that are not resolved.
- The “Duplicate Tank Attribute Date” will bring up the page that tests dates are entered and by selecting each tank will duplicate test dates.
- The “Enter by Inspection List” button will return you to the list of open inspections where you can select another inspection or log out of the application.
- The “Return to the Storage Tank Home Page” will take you back to the web page where the links to the IIRA are located.
- The “Change of Ownership” will bring up a form including all tanks on that site that you can print and use to register a new owner of a site.

NOTE: When changing an attribute entry in the IIRA or when adding contact information, such as telephone number, you must click the "update" button to capture the data. We have heard from a few inspectors that their past FY inspection changes did not appear in this year's IIRA data. The IT people looked into it and their conclusion is that the inspector did not key the update button before backing out of the section and closing the transaction session.

Inspection Report

The “Inspection Report” button is located on the Site Inspection screen. Clicking on the Inspection Report” button will display an Inspection Report that includes the Facility Name, Address, Owner Name, Transaction ID, Facility ID,

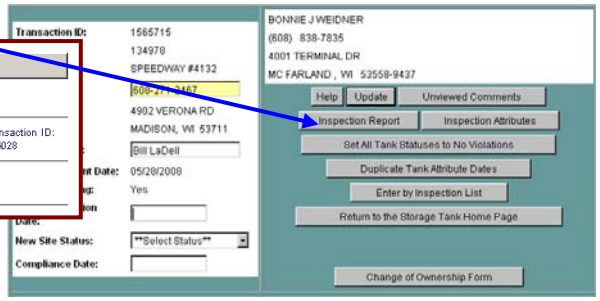

FLAMMABLE AND COMBUSTIBLE LIQUID SYSTEM INSPECTION REPORT

Wisconsin Department of Commerce, Division of Environmental & Regulatory Services

Personal information you provide may be used for secondary purposes [Privacy Law, s.15.04(1)(m)].

Facility Name:	Facility Address, City, Zip Code:	Owner:	Transaction ID:
KWIK TRIP #635	215 N MAIN, LODI, 53555	CSI	914028

Facility ID:	County:	TDID:	Facility Telephone Number:	Operator:
100977	COLUMBIA	1107		



County, FDID and Facility Telephone Number.
Important: **DO NOT USE THE BACK BUTTON** - to return to the previous page; you must click on the large button that also serves as the title to the form or the application will cause an error.

Print Settings

State standard is IE Explorer and the settings should be changed to print the document as it was intended. Change font text size and page setup so that <u>all</u> reports print properly:

Font Size:	View, Text Size/Medium
Page Setup:	Paper/Size/Letter
	Header/&w&bPage &p of &P
	Footer/&u&b&d
	Orientation/Portrait
	Margins/Left/0.5”
	Margins/Right/0.5”
	Margins/Top/0.5”
	Margins/Bottom/0.5”

If using the 2-ply NCR paper:

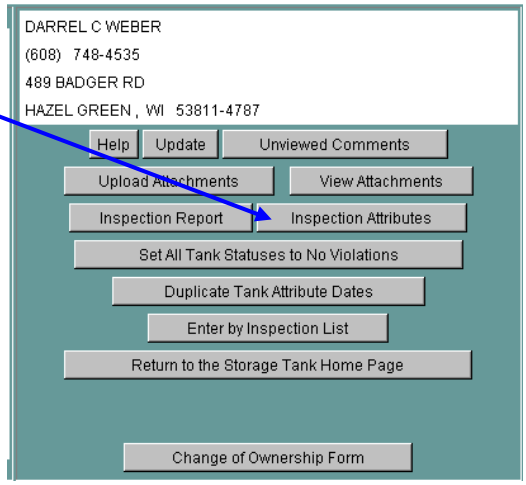
File/Print the Inspection Report to a 2-ply NCR paper feeding one sheet at a time and sending it twice to the printer or set both sheets in paper tray and print 2 copies. Report is ready to take to the field. Violations can be hand written onto the 2-ply form. Inspector can leave the owner/operator the original and the inspector will keep the yellow copy to use for entering inspection, violations, orders, tank attributes and test dates into IIRA system.

If inspector prefers to take the Inspection Report back to the office to complete and mail a copy to the RP, a contact signature should be acquired at the inspection on the worksheet Inspection Report and noted on the completed report that a signature is on file. Important -- when the Inspection Report is used as a State Order a copy of the Inspection Report/State Order must be mailed to the tank owner listed on the database.

The Inspection Report on the IIRA system cannot be saved to a Word Document nor can any information be entered directly onto the document.

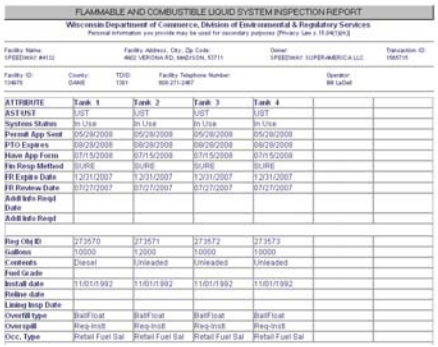
Inspection Attributes

The “Inspection Attributes” button is located on the Site Inspection screen. Clicking on the “Inspection Attributes” button will display a site-specific report summarizing tank and line attributes. This report is a reference document for the inspector. It prints in a format that displays a large number of tanks on a single page.



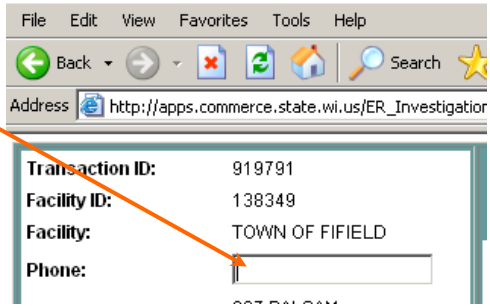
It is also used as a worksheet to record current test dates while at the site, i.e., tank test date, line test date, leak detector test date, etc. Record all current test results in space provided.

The “Inspection Attributes” report will be helpful when entering the current test dates onto the IIRA reporting system “Modify Tank Attributes” or “Duplicate Tank Attributes Dates”.


FLAMMABLE AND COMBUSTIBLE LIQUID SYSTEM INSPECTION REPORT
Wisconsin Department of Commerce, Division of Environmental & Regulatory Services

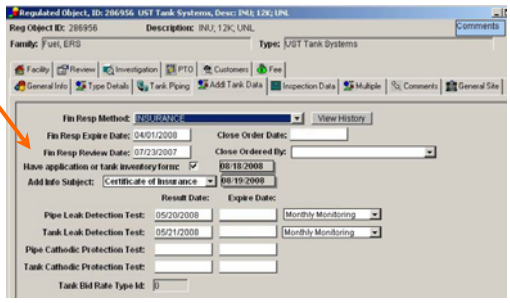
ATTRIBUTE	Tank 1	Tank 2	Tank 3	Tank 4
AST/UST	UST	UST	UST	UST
System Status	In Use	In Use	In Use	In Use
Permit App Sent	05/28/2008	05/28/2008	05/28/2008	05/28/2008
PTO Expires	08/28/2008	08/28/2008	08/28/2008	08/28/2008
Have App Form	07/15/2008	07/15/2008	07/15/2008	07/15/2008
Fin Resp Method	SURE	SURE	SURE	SURE
FR Expire Date	12/31/2007	12/31/2007	12/31/2007	12/31/2007
FR Review Date	07/27/2007	07/27/2007	07/27/2007	07/27/2007
Addl Info Reqd Date				
Addl Info Reqd				
Reg Obj ID	273570	273571	273572	273573
Gallons	10000	12000	10000	10000
Contents	Diesel	Unleaded	Unleaded	Unleaded
Fuel Grade				
Install date	11/01/1992	11/01/1992	11/01/1992	11/01/1992
Reline date				
Lining Insp Date				
Overfill type	Ball Float	Ball Float	Ball Float	Ball Float
Overspill	Reg-Instl	Reg-Instl	Reg-Instl	Reg-Instl
Occ. Type	Retail Fuel Sal	Retail Fuel Sal	Retail Fuel Sal	Retail Fuel Sal

The “Facility Telephone Number” on this report is intended to be the telephone number that the inspector uses in his/her routine relationship with the facility. This number is populated or revised by the inspector; it is not a telephone number that is entered by permit staff via the tank registration process. The inspector will enter the desired telephone number on the IIRA facility page. This telephone number will also be reflected on the inspection report as well as the attribute report.



Additional Information Requested Date & Additional Information Required

The permit staff assigned to the site will enter these dates into Reg Obj. The dates will show up on the Tank Attributes page. The date the permit application form was received and checked-in is reflected on the line “HAVE AP FORM;” however, this date does not mean that the application has been reviewed. “Addl Info Reqd” is the date the permit staff reviewed the documents submitted and either made a phone call or mailed a letter requesting



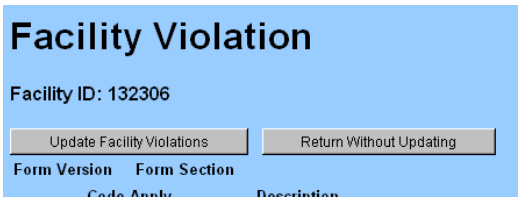
Facility ID: 64794	County: MARATHON	TDID: 3706	Facility Telephone Number:

ATTRIBUTE	Tank 1	Tank 2	Tank 3
AST/UST	UST	UST	UST
System Status	In Use	In Use	In Use
Permit App Sent	05/28/2008	05/28/2008	05/28/2008
PTO Expires	08/28/2008	08/28/2008	08/28/2008
Have App Form	08/18/2008	08/18/2008	08/18/2008
Fin Resp Method	INSU	INSU	INSU
FR Expire Date	04/01/2008	04/01/2008	04/01/2008
FR Review Date	07/23/2007	07/23/2007	07/23/2007
Addl Info Reqd Date	08/19/2008	08/19/2008	08/19/2008
Addl Info Reqd	CI	CI	CI

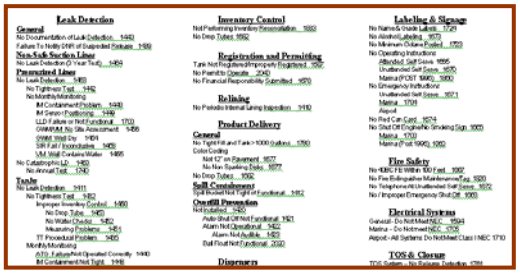
documents that were missing. “Addl Info Reqd” is the document that the permit staff is inquiring about or missing, i.e., Certificate of Insurance, Leak Detection, Affidavit.

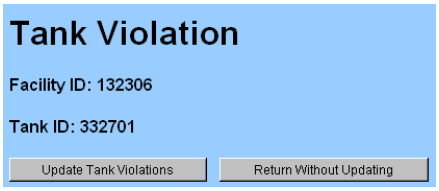
Completing the Inspection Report

By printing out the Tank Violation List and the Facility Violation List an inspector can use these lists as an Inspection Guideline or a checklist in the field.



There are also a number of guidelines that were created for inspector use. Contact your supervisor or tank specialist and they can send a copy of an inspection guideline in different formats to help during an inspection.





Every violation must be reported on the IIRA system. If the violation was corrected the same day of the inspection it should be noted on the Inspection Report and entered into the IIRA system.

Inspection Summary

There are four choices, one must be checked.

The “Inspection Report” has been approved for use as a State Order. Mark the correct box and enter your Administrative Order #; also referred to as a Case number; for example: BJW072508.01 (initials, date & order number that day). Important -- when the Inspection Report is used as a State Order a copy of the Inspection Report/State Order must be mailed to the tank owner listed on the database. Many times the owner on the database is different than the owner/operator at the site.

Inspection Summary:

- ☐ No violations noted.
- ☐ Violations are noted and corrections were made immediately.
- ☐ Discrepancies are noted and instructions for correction are provided.

- ☐ Violations are noted and this is an Administrative Order requiring compliance.* Administrative Order #_____

Enter the code section violation from the Facility or Tank Violation list. Enter Non-Compliance Item and what is required to gain compliance. Enter Compliance Date.

Code Section	Non-Compliance Items	Compliance Date

Inspection Note

This area is for inspector use. Examples of a note would be:

- Cathodic protection anode test is due 3/01/09.
- Line and leak detectors will be due for testing

Note:

Agency:

on 12/02/08.

- Samples Taken: no lead (87), mid-grade/ethanol (90), premium/ethanol (93)
- Water checks: 0” no lead, ½” mid-grade, 1” premium

Signature Box & Inspection Date

A signature of the contact person is required. This could be the owner/operator, manager, assistant manager, etc. Inspector signs and dates report. Include office telephone number or number inspector can be reached.

Signature of Contact:	Inspector (Print):	Inspector Signature:	Inspector Telephone #:	Inspection Date:
	BILL D SHANE		(608) 355-3854	

ERS-10805-E (N.6/04)

It is important to review the Inspection Report for accuracy:

- Inspection Report can be used as a State Order and must be accurate and complete.
- Code reference must be on the Inspection Report to make it a legal case.

The Inspection Report is written in a legal format for use as a first Administrative State Order. Inspectors should become familiar with the legal requirements on Inspection Report.

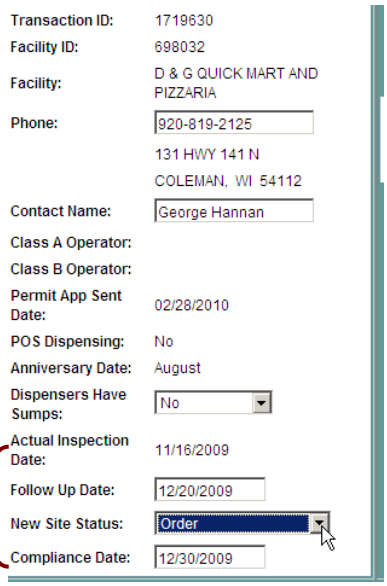
☐ Violations are noted and this is an Administrative Order requiring compliance.* **Administrative Order #**_____

This Department order is issued as a result of an inspection conducted for compliance with SPS 310 and SPS 348 Administrative Codes. You are hereby ordered to have the listed violations corrected to conform to the indicated administrative codes or statutory requirements. These violations must be corrected by the compliance date indicated and the inspector who signed the report must be notified in writing of the corrective actions taken. If you fail to comply, this order is enforceable in circuit court pursuant to s. 101.09(5), Stats., with forfeitures ranging from $10 to $5000 per day for each violation. In addition, the Department may attach a notice of violation to the deed for the property on which the violations occur. Failure to comply with this order may result in the subject tank system Red-tagged for non-compliance and shut-down until the Department has verified code compliance.

Notice of Appeal Rights: Pursuant to SPS 310.190 (1), of the Administrative code, the owner of the tank system may file a written request for a hearing to contest issuance of an Administrative Order, or any of its terms, with the Department within 15 calendar days after the receipt of this Administrative Order. All hearing requests shall be filed either by in person delivery to Department of Safety & Professional Services, 1400 E. Washington Avenue, Madison, Wisconsin 53703, or by mail addressed to the Department of Safety & Professional Services Hearing Office, PO Box 7838, Madison, WI 53708-7838, Fax Number (608) 264-8795. Enforcement action will proceed until such time as an administrative law judge has issued a decision overturning or modifying the order. You have the right to seek a stay of enforcement of the order in Circuit Court pursuant to s.227.54, Stats. This notice is provided pursuant to s. 101.02(6)(e), Stats.

Eliminating frustration later on

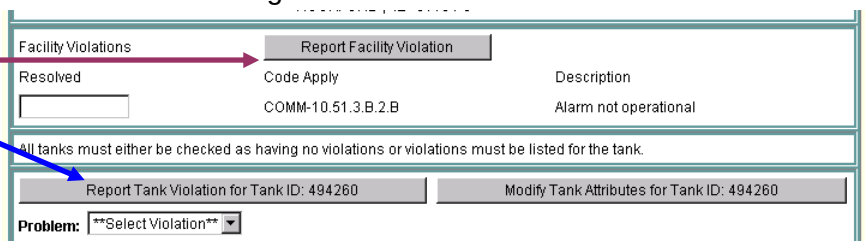
The upper left-hand corner of the facility home page includes some inspection items that must be completed in order to update and move out of this page, back into the facility list page. The four items at the bottom of the section must be appropriately addressed. If the inspection resulted in no violations the Actual Inspection Date and the New Site Status must be completed. If the inspection resulted in anything other than Inspection Completed follow-up and compliance dates must be entered.



If you have entered test dates in the attribute pages they will not stick when updating the attribute page unless you enter a site status. Therefore, it is advisable that after a site inspection you enter the site status before you begin entering the test and other information in the attribute pages. This should be very doable because you should know if you have adequate information to complete the inspection, issue orders or conduct further investigation.

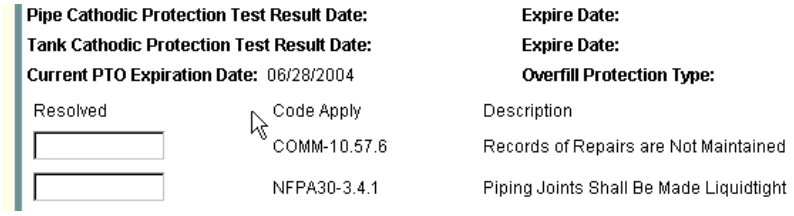
Non-compliance Reporting into the IIRA System

The Owner Data section shows information relating to the owner of the site. Beneath the owner section are two sections Report Facility Violation and Report Tank Violations.



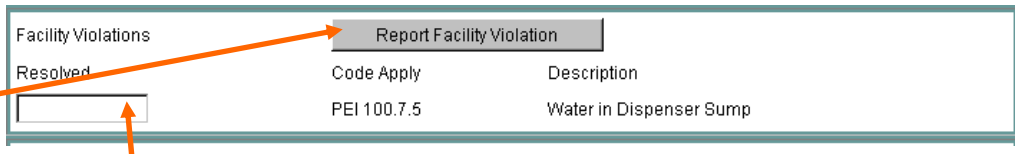
The Facility & Tank Violations List can be printed and used as a reference in the field. The lists are divided into categories and by SOC and non-SOC violations. The SOC violations are statistics that DSPS must report to the US EPA every 6 months.

The violation and resolved date for individual tanks will appear at the end of the individual tank. **Note**: the resolved date is the date of reinspection or date of compliance, example: date test results faxed – **Resolve date is not a test date**.

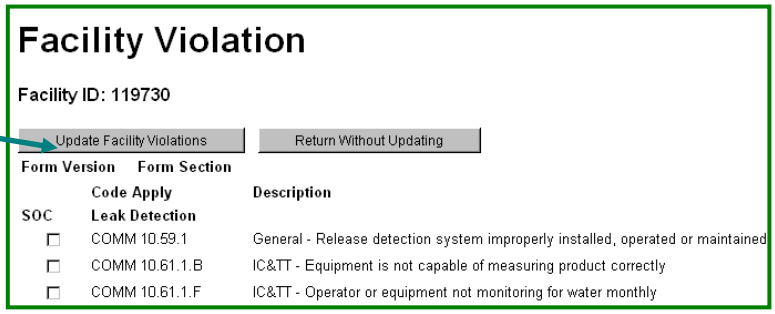


Enter Facility Violations & Resolved Dates

To enter a Facility violation, select Report Facility Violation.

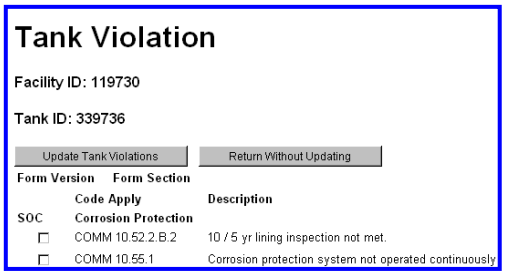


Select the code violation on the list and select the Update Facility Violations grey bar. This is a permanent record and the violation cannot be deleted once update is selected. The "Date Resolved" is entered by the inspector in the respective date box.



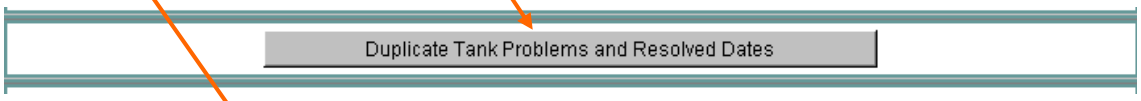
Enter Tank Violation for a single

Select tank "Report Tank Violations for violation from the Tank Violation list and update. For a single tank "Date Resolved" will be entered at the end of the tank screen. (You may use the duplicate feature for a single tank but must uncheck the other tanks so only the single tank is checked)

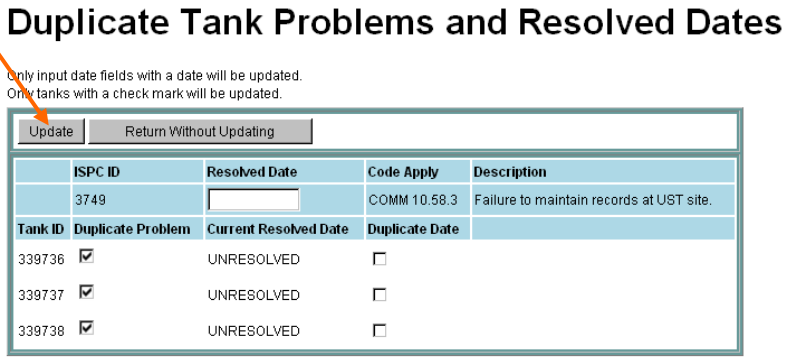


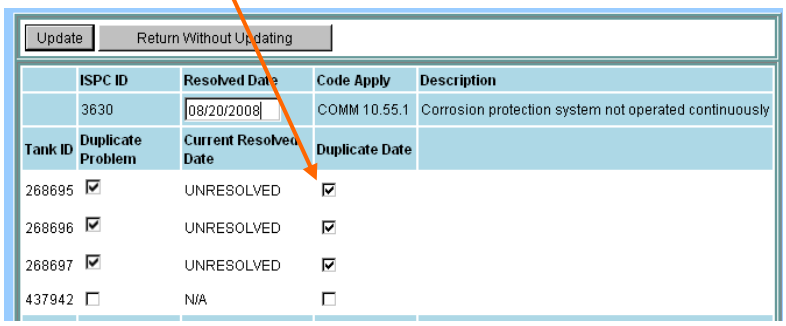
Duplicating Tank Violations & Resolved Dates

If the *violation* is for multiple tanks or all tanks (example: line & leak detector test) select the first Report Tank Violation for Tank ID#####. Select the violation and **update**. A Duplicate Tank Violation grey bar appears, select Duplicate Tank Violations. Select each tank where the violations exist and Update Tank Violation.



To enter duplicate *Resolved Date* select Duplicate Tank Violations and enter in resolve date and mark each tank that gained compliance. The Internet Inspection Reporting Application is intended to capture all violations, even if they were corrected immediately upon the inspector pointing the violation out to the responsible party (RP). In this situation the Resolved Date would be the same date as the inspection.





Note: the resolved date is the date of reinspection or date of compliance, example: date test results faxed – **Resolve date is not a test date**.

Violation page color coding

For consistency purposes a color code scheme reflects how the respective violation is to be handled:
The :yellow: highlighted violations reflect violations that require a written formal order must be issued, not just verbal directions.

The "red" font reflects violations that are automatically communicated to the bureau Environmental Compliance Specialist for follow-up.

Tank Violation

Facility ID: 698032

Tank ID: 499951

Update Tank Violations | Return Without Updating

Form Version	Form Section	
	Code Apply	Description
SOC	Corrosion Protection	
☐	SPS 310.535.1	10 / 5 yr lining inspection not met.
☐	SPS 310.520.1.D	CP System test within 6 mo. and annually thereafter.
☐	SPS 310.520.1.D	CP Systems are Not Tested/Inspected Within 6 Months of Repair
☐	SPS 310.520.1.C.2	Corrosion protection system not operated continuously
☐	SPS 310.520.1.D	Corrosion protection system not tested and documented as required
☐	SPS 310.520.2.B	Failing sacrificial anode systems
☐	SPS 310.520.1.D.2	Impressed current CP system not inspected every 60 days
☐	SPS 310.520.3.C	Inoperative impressed current systems
☐	SPS 310.520.1.A	Installation and application of corrosion protection
☐	SPS 310.545.1	T-O-S system - Corrosion protection and leak detection
SOC	Leak Detection	
☐	SPS 310.515.5.A.1	ATG - Failure to perform monthly release detection
☐	SPS 310.575.1	General - Failure to respond to release detection alarm or failed test

Also, to maintain enforcement consistency as well as provide the IIRA violations with the respective appropriate wording a series of testing related violations have been added to the IIRA violation list.

The section below has been added that addresses only orders for tightness testing. Some violations require a precision test plus an ullage test and some only a precision test.

NonSoc	Enforcement Precision Test	
☐	SPS 310.510.3.B	Failed monthly tests 2 consecutive months - Precision test required
☐	SPS 310.510.3.B	Inconsistent monthly test results (i.e., accumulation of water) - Precision test required
☐	SPS 310.445.2.C	Putting AST back into service that has been out of service for more than 365 days
☐	SPS 310.545.2	Putting UST back into service that has been out of service for more than 365 days
☐	SPS 310.500.6.B.2.B	UST installation pre-operational system tightness test

Reporting Tank Violations: Non SOC Leak Source, Leak Cause, Leak Severity

When a leak is discovered in a tank system (example: submersible, piping, hose, breakaway) that leak must be recorded. There are **three** areas that need to be selected for a **single** leak:

1. Leak Source
2. Leak Cause
3. Leak Severity

Enter this data into the related Tank ID.

Tank Violation

Facility ID: 649815

All three categories must be selected for a single leak. Example:

- Leak Source – Submersible pump leak (with containment);
- Leak Cause – Loose fittings, connectors;
- Leak Severity – Drip or droplets can be seen.

Note: entering a leak does not mean a release. There are violation codes for suspected releases.

NonSoc	Leak (A) Source	
☐	COMM 10.51	Unknown leak source
☐	COMM 10.51	Other leak (specify in IIRA comments)
☐	NFPA 30.2.6.7.1	Tank leak
☐	NFPA 30.3.2.2	Piping leak before fire valve (with containment)
☐	NFPA 30.3.2.2	Submersible pump leak (with containment)
☐	NFPA 30.3.2.2	Submersible pump leak (without containment)
☐	NFPA 30.3.2.2	Piping leak before fire valve (w\o containment)
☐	NFPA 30.3.4.1	Dispenser - fire valve and above or nozzle leak (with containment)
☐	NFPA 30.3.4.1	Dispenser - fire valve and above or nozzle leak (without containment)
☐	NFPA 30.5.3.8	Tank delivery release - spill/overfill
NonSoc	**Leak (B) Cause**	
☐	COMM 10.63	Install problem (improperly installed\ repaired)
☐	COMM 10.63	Loose fittings, bolts or connectors
☐	COMM 10.63	Spill (fuel mishandling, nozzle shutoff failure)
☐	COMM 10.63	Corrosion
☐	COMM 10.63	Physical or mechanical damage
☐	COMM 10.63	Unknown leak cause
☐	COMM 10.63	Other leak cause (specify in IIRA comments)
☐	COMM 10.63	Overfill malfunction
NonSoc	**Leak (C) Severity**	
☐	COMM 10.63	Drip or droplets can be seen
☐	COMM 10.63	Flow or Spray--Solid stream or spray can be seen
☐	COMM 10.63	Weep or slow leak not dripping or running

Reporting Tank Violations: Non SOC Red Tag

Report a Red Tag by checking the appropriate box making sure it is recorded under the proper Tank ID.

Note that for all violations (either on a facility or a tank) the violation must have a resolved date entered in order to close the investigation.

NonSoc	Red Tag	
☐	COMM 10.18.3.A	Red-tag shut-down immediate - immenent health & safety
☐	COMM 10.18.3.B	Red-tag - shut-down after release investigation
☐	COMM 10.18.3.C	Red Tag for unlisted violation - Enter violation in comments
☐	COMM 10.18.3.C	Red-tag UST - Long term violation

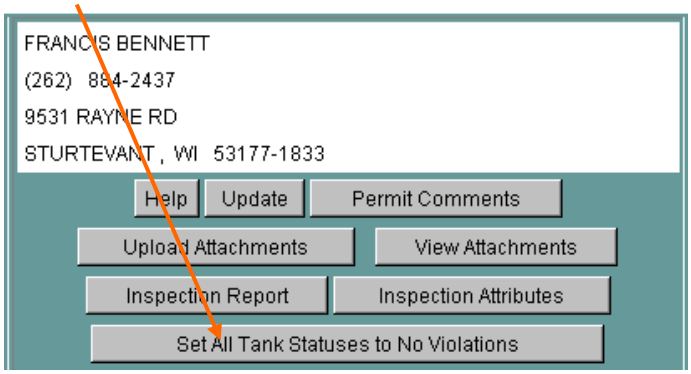
SOC	Red Tag and Record Repairs	
☐	COMM 10.64	Report Release To DNR - UST

Less frequent code violations are recorded in Unlisted Violations by code reference. (Note: if a violation is a most frequently used violation but not on the list talk to your supervisor/tank specialist and it can be added to the list).

NonSoc	General Unlisted Violations	
☐	COMM 10.002	COMM 10 Unlisted - Facility Violation - See Compliance Comments
☐	COMM 10.25	API, PEI, NFPA407 & Misc Unlisted - Facility Violations - See Compliance Comments
☐	COMM 48.100	COMM 48 Unlisted - Facility Violation - See Compliance Comments
☐	NFPA 30.1.1.1	NFPA 30 Unlisted - Facility Violation - See Compliance Comments
☐	NFPA 30A.1.1.1	NFPA 30A Unlisted - Facility Violation - See Compliance Comments

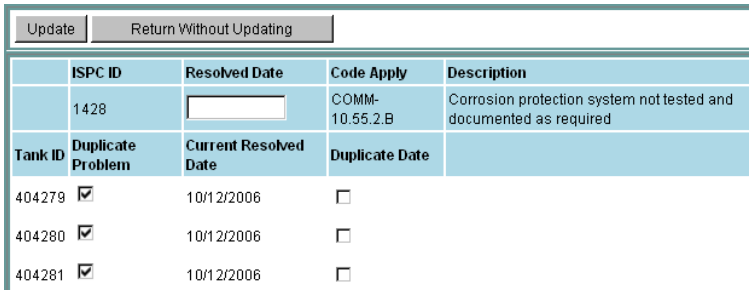
Entering “Set All Tank Statuses to No Violations”

When there are no violations the “Set All Tank Violations to No Violations Status” grey bar is selected. This feature eliminates selecting each individual tank when there are no violations. However each tank must be selected as having No Violations or Violations Found.

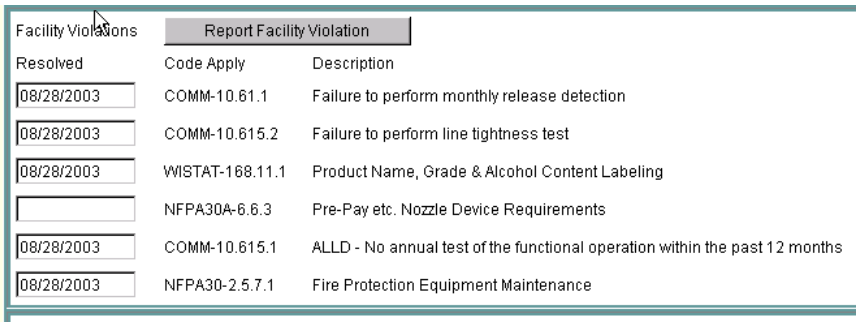


It is important to review the violations that you have entered for accuracy before updating. Violations after updating cannot be deleted. (Make a note in the comments area if a violation was inadvertently selected)

After updating the respective non-compliance violations will be displayed under the facility or the tank violation areas.



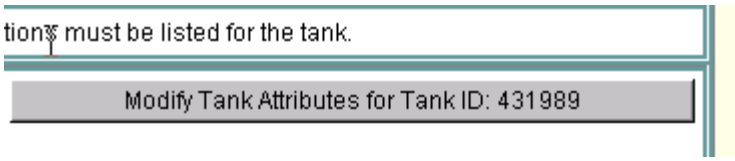
Reminder: all violations (either on a facility or a tank) must have a resolved date entered in order to close the investigation.



To view comments from the Inspection List see Handbook “Comment Exchange” for more information.

Attribute data entry - modification to existing information (Attributes)

The IIRA provides a means for inspectors to update some elements of tank data. The button to Modify Tank Attributes allows the inspector to change certain tank attributes in real time. That is, changes to tank attributes will immediately be seen on other systems such as the Tanks on the Internet and in various applications at DSPS.

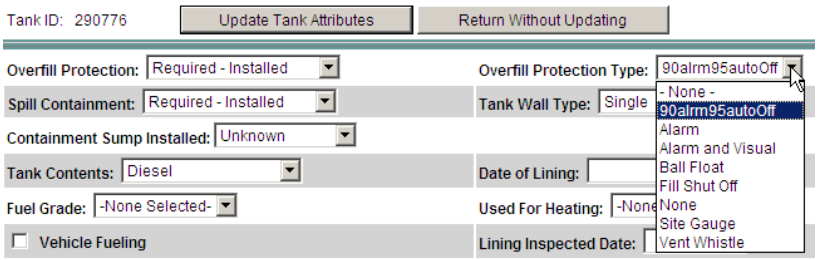


Highlighting a check box that has erroneous information and pressing the “delete” key will render the box blank of information.

Material Approval numbers are good information to have, but not necessary to close the attribute section.

Overfill and Spill prevention

These attributes may be entered into the database without documentation because the inspector can visually verify them with the exception of a ball float that may need some verification that it is installed and functioning.



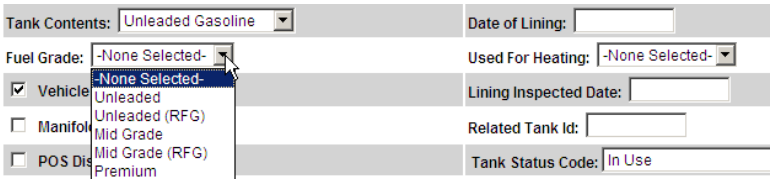
Tank Closure Orders

The "Tank Closure Order Date" is the date that orders were written requiring the operator to close the tank system. "Close Order By" will be the name of the DSPS employee or the LPO agent that initiated the compliance order. This information is important for litigation and PECFA claim review assessment.

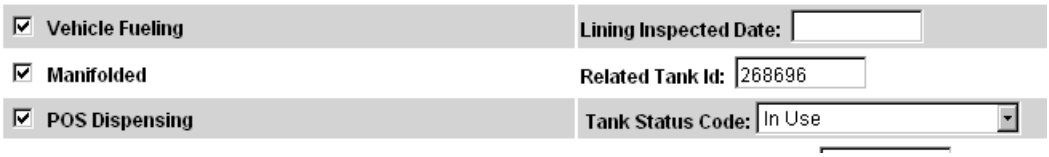
Tank Contents & Lining Inspection Date

Specific fuel grades can be selected for inspector use but not necessary to close an inspection. If the tank is used for vehicle fueling (public or private) the box must be checked.

The lining inspection date is the 10 year or 5 year cycle period that the lining inspection is required to be performed for underground tanks. This date must correspond with the date on an inspection summary report completed by the lining company.



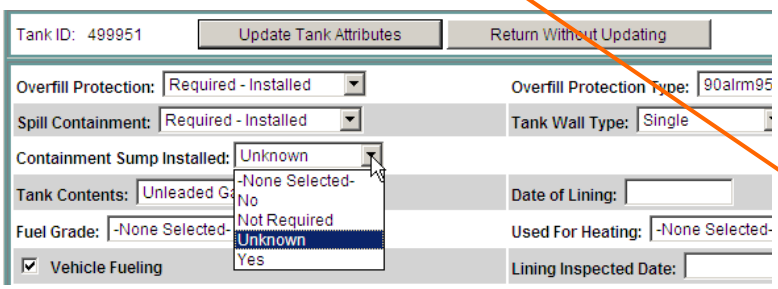
Tanks that are manifolded must be indicated by checking the box and entering the ID of the tank that the subject tank is manifolded ("related") to. Likewise, this entry will have to be performed again in the attribute section for the other tank, reversing the role of each tank. If more than two tanks are manifolded make note in the field note comments area of the related Tank ID.

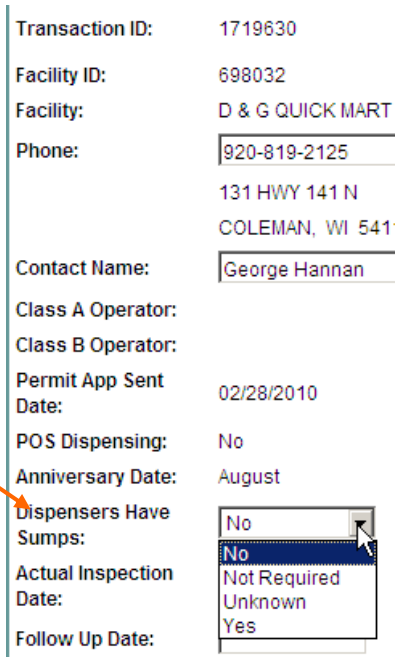


Tank and Dispenser sump containment

Because a motor vehicle fueling dispenser may be associated with multiple tanks the field to enter the containment status is on the facility home page.

Tank top sumps are within the individual tank attribute page as below.

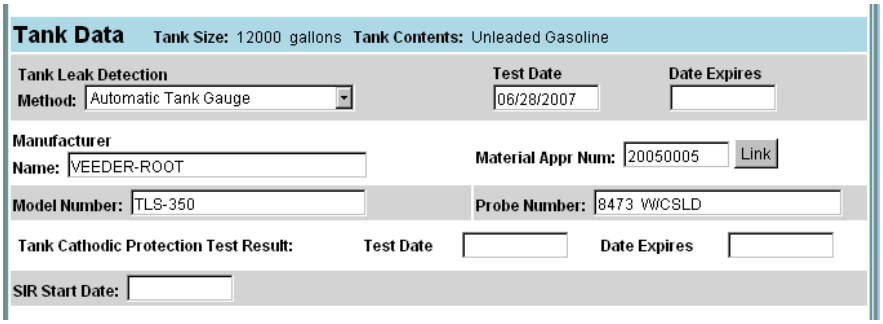




Tank Data

This section captures tank related data for system attributes that change due to equipment or methodology changes or attributes that have regulatory timelines. Keep in mind that some operators may have multiple methods of leak detection and the data must relate to the "primary" methodology or equipment. Make a note in "Comments" if you want to record more than one leak detection method. Similar to the Duplicate Tank Violations there is available a "Duplicate Tank Attributes" screen that can be used when entering more than one tank test date of leak detection, cathodic protection test and piping test results. See section "Duplicates Tank Attributes" on how to use this feature.

It is required to have available 12 months of data for an inspector to review but on the IIRA the most current PASS test is the date entered. The leak detection method determines what test results are required and entered. When Automatic Tank Gauging, Interstitial Monitoring (most monitors do not automatically print out IM so this must be done manually), Manual Tank Gauging, is the method selected a current 30-day passing test result or report date is entered in "Tank Leak Detection Test Result Date" box. **Note: ATG test results must be according to Material Approval. All tests entered into the IIRA must be valid test results.**



If SIR is the leak detection method enter in the "SIR Start Date." The SIR Test Result Date entered will be the 28th of each passing month. Example 06/28/08 for the month of June 2008.

NOTE: An expiration date is not entered when a leak detection method is monthly monitoring.

When Inventory Control & Tightness Testing (IC&TT) is the primary method a .1 gph tightness test is required at installation or corrosion upgrade, then at 5 years and at 10 years. Immediately after the 10-year tightness test monthly monitoring must be in place. This method of IC & TT is only good for 10 years after the tank installation or corrosion upgrade. **NOTE**: An expiration date must be entered when leak detection method is IC & TT of five years from prior test date.

The "Tank Cathodic Protection Test Result Date" is the most current anode test or the survey test date on an Impressed Current system. Note: Comm 10 revision effective August 2, 2002 requires that all cathodic protection systems more than 10 years old (anode and impressed current) be tested annually. If the tank system is less than 10 years old then a 3-year cycle applies.

Enter missing information regarding Manufacturers Name, Model Number, Material Approval Number (code lookup) and Probe Number based on the leak detection equipment that is being used by the owner/operator. The inspector must be familiar with the material approval that relates to the leak detection methodology for each site. Material Approvals are located on DSPS web site at www.DSPS/ER/ER-BST-HomePage.html.

Industry terminology such as "SCALD" is not a probe number. Scald is a form of a specific series manufactured by InCon using either a TS 1000 or TS 2000 monitoring equipment, among others too numerous to mention. If the leak detection is continuos, list the probe that is applicable along with CSLD, SCALD, SLD, etc. Keep in mind that the most recent material approval issued for the vendor may or may not include an older version of equipment. The original material approval that was in effect when the equipment was installed may still apply.

The system will not allow you to update "Inspection Completed" status until all current test dates are entered.

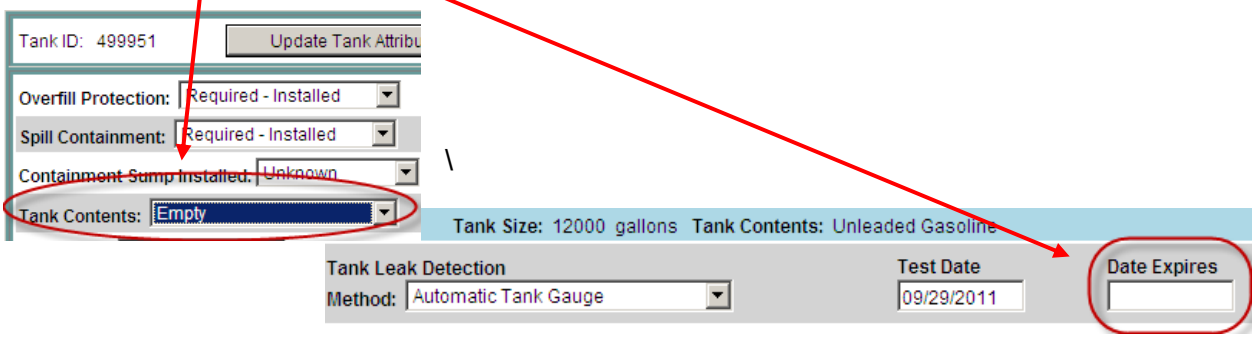
To maintain continuity with the application of the various LD methods, Interstitial Monitoring will apply to any device (electronic, pop-up or site glass) that monitors the interstitial space for leaks and Visual Monitoring will apply to human eye visual assessment for leaks such as the common method for tanks in dikes. It is a common occurrence that the manufacture of the pop-up or gauge can not be determined. Enter "Unknown" for manufacturer and "XX" for model number.

TOS – Temporary-Out-of-Service

If tanks are in TOS status properly the tanks are either empty to less than an inch in which no leak detection is required or if a tank has more than one inch the code requires the product to be monitored monthly. CP, if applicable, must be maintained. Test results on a tank with product must be entered on the IIRA. **TOS tanks require Financial Responsibility and a Permit-to-Operate.**

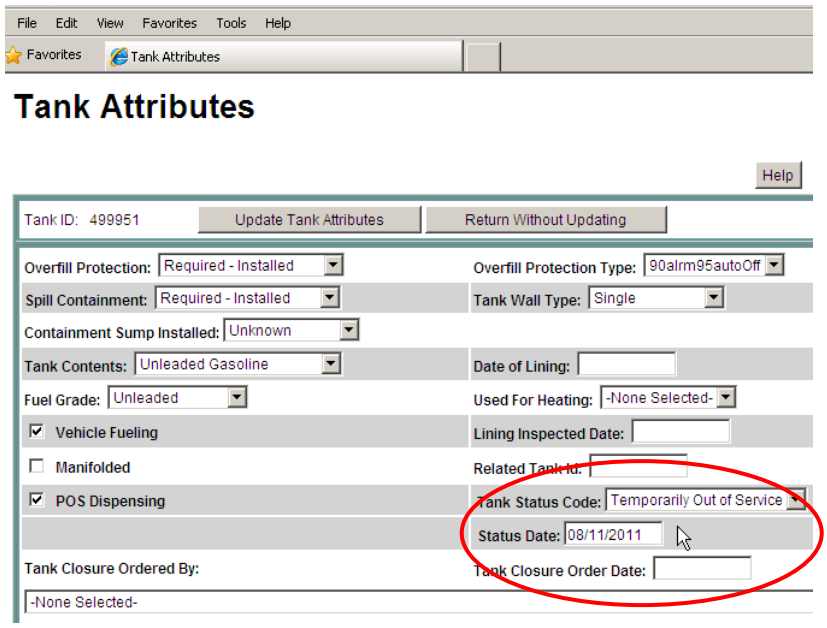
ATTRIBUTE	Tank 1	Tank 2	Tank 3
AST\UST	UST	UST	UST
System Status	Temp Out	Temp Out	Temp Out
Permit App Sent	04/28/2008	04/28/2008	04/28/2008
PTO Expires	05/28/2007	05/28/2007	05/28/2007
Have App Form			
Fin Resp Method	INSU	INSU	INSU
FR Expire Date			
FR Review Date			
Addl Info Reqd Date			
Addl Info Reqd			
Reg Obj ID	269655	269656	269657
Gallons	10000	12000	10000
Contents	Empty	Empty	Empty
Fuel Grade			

If the tank is "empty" the Tank Contents drop-down must state "EMPTY" and the Tank Leak Detection Date Expires must be "blank."



A tank that is TOS and code compliant and has been issued a Permit-to-Operate the site may be closed by selecting Inspection Completed.

An entry box has been added to the IIRA tank attributes screen so that inspectors can enter the date a tank moves from "In-use" to "TOS" or visa versa. This is very important for enforcement especially when an operator moves to TOS and does not follow through on maintaining the TOS requirements. The date should be the date that the operator discontinued the active In-use operation of the tank (NOT the date that you visited the site and discovered it in TOS status). If the actual date is not provided you should be able to determine a reasonable date for the entry. The first place to look would be the dispensing records.

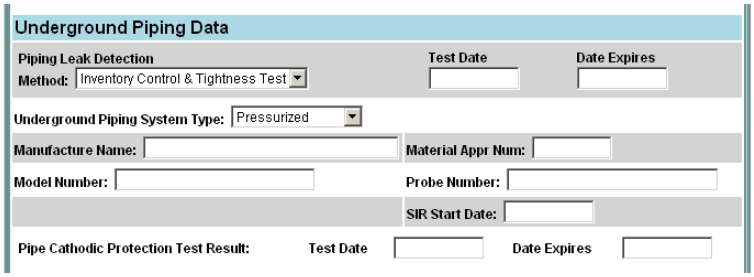


If this is a situation where the operator walked away from the site it should be considered "ABANDON" and not Temporarily-Out of-Service.

Piping Data

The Manufacture's Name, Model Number, Probe Number and Material Approval Number must be entered when using Electronic Line Monitor, Interstitial Monitoring or SIR. It is not necessary to enter this data when "Piping Leak Detection Method" is "Inventory Control & Tightness Testing." If there is more than one piping leak detection method a note of that in Permit Comments would be helpful to inspector and permit staff.

Inspectors must enter the date of the most current PASS test result or report reviewed by them. The leak detection method determines what test results are required and entered. When Interstitial Monitoring is the piping leak detection method the most current sensor status/liquid sensor report date must be entered. When Electronic Line Monitoring is the method of piping leak detection the most current .2 gph monthly monitoring pass test is entered or a .1 gph annual test is acceptable.

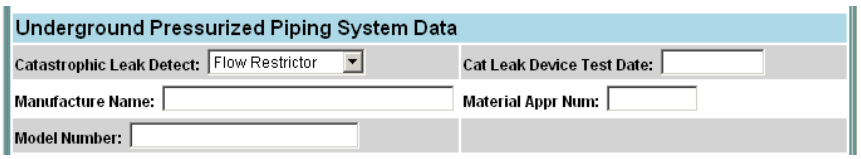


When SIR is the piping leak detection method a current month pass report is entered using the 28th of the month as the test date, example 6/28/08. **Note**: No expiration date is required to be entered on any monthly monitoring method.

When "Inventory Control & Tightness Testing" is the "Piping Leak Detection Method" enter the date the piping was tested. The test date may be annually or in the case of "Piping System Type" "Non Safe Suction," every three years. If "Piping System Type" were "Safe Suction and the "Method" is "Not Required" the test date would be left blank because no testing is required. The expiration must be entered when leak detection method is IC&TT.

The "Pipe Cathodic Protection Test Result Date" is the most current anode test or the survey test date on an Impressed Current system. Note: Comm 10 revision effective August 2, 2002 requires that all cathodic protection systems more than 10 years old (anode and impressed current) be tested annually. For example, if a tank and/or lines were tested July 1, 2002 cathodic protection testing is due on July 1, 2005, and then annually. If a tank and/or lines were tested on August 5, 2002 they would be due on August 5, 2003. If the tank system is less than 10 years old then the three-year cycle applies.

The "Pressurized Piping System Data" relates to catastrophic leak detection. The "Cat Leak Test Date" is the date that periodic function testing of the leak detection device (i.e. flow restrictor, *electronic line monitor) took place. *Electronic Line Monitor performs a 3 gph leak test continuously and the most current test date should be entered. SPS 310 requires that the 3 gph Electronic Line Monitor be tested for functionality annually per manufacturer's requirements. At that time, the dates of the 3 gph functionality test for electronic line monitor will be entered.



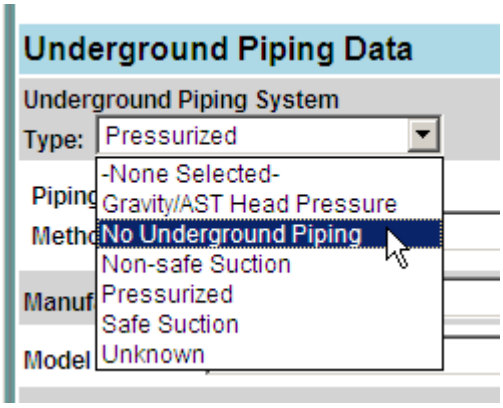
Enter any missing information; Manufacture's Name, Model Number (if known), Material

Approval Number is entered for a flow restrictor, i.e., Red Jacket FX2, or electronic line monitor, i.e., TLS 350/PLLD.

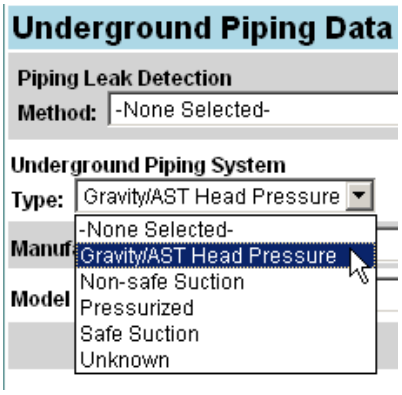
The system will not allow you to update “Inspection Completed” status until all current test dates are entered.

Piping associated with an AST

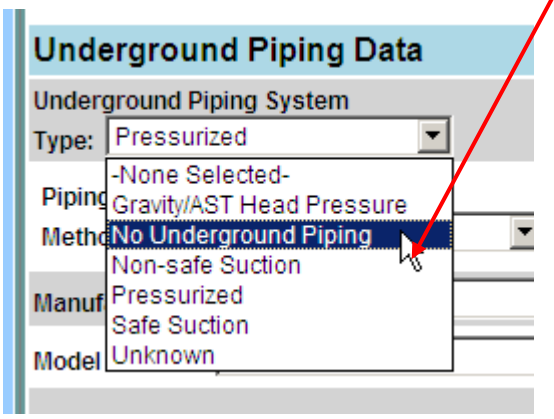
Much of the attribute data is focused on USTs and underground components and numerous edit checks are active as a mechanism to be sure the person entering the data properly enters associated data. If an *AST or a UST does not have underground pipe* the Underground Pipe Data attributes must reflect that fact by entering “No Underground Piping” for Underground Pipe System, “not required” for Piping Leak Detection and “none selected” for Piping Wall Size.

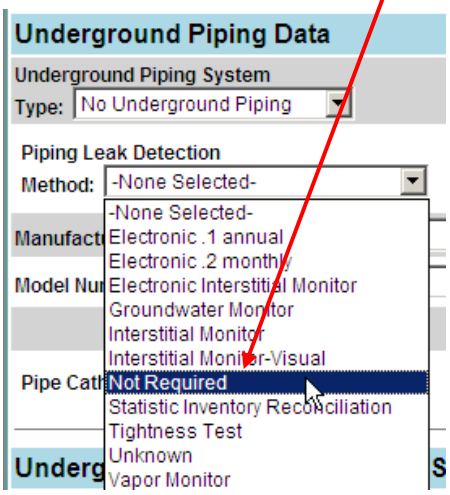


Underground Piping from an AST is considered "pressurized" due to potential head pressure or in the rare situations where the product is under pressure from a pump located at the tank. Underground pipe under pressure from a pump at the AST would be required to follow the same requirements and data entry as underground pipe from an UST with a submersible pump, including catastrophic leak detection. The underground pipe that is not pressurized from a pump, but potentially from head pressure will require an annual tightness test and subsequent test date entered. For IIRA data entry purposes Underground Piping System Type: "Gravity/AST Head Pressure" should be selected.



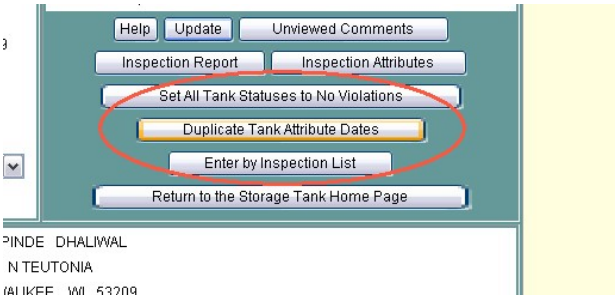
The pipe attribute section will accommodate the rare situation of a UST with no underground piping. In this situation the "Pipe Leak Detection” type must also be entered as "Not Required" to pass.



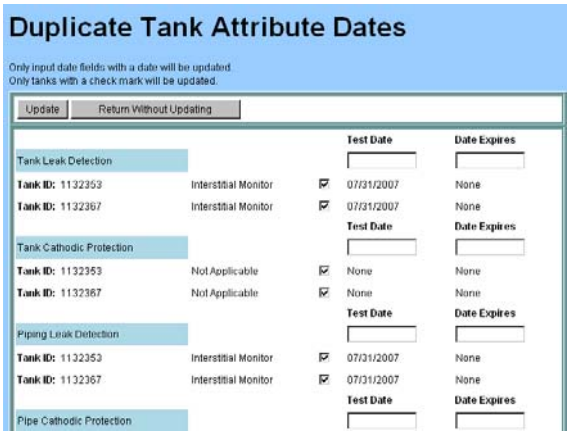


Duplicate Tank Attribute Test Dates

Frequently system tests are performed on the same date, for example, CSLD, Electronic Line Monitoring (ELM). In addition, when cathodic protection, line and leak detectors are tested by certified companies these dates will often be the same date. The "Duplicate Tank Attribute Dates" menu allows the inspector to enter the required test data once and have the application apply the data to all systems, or selected systems, on the site. This feature is intended to make the process of entering dates an easier one. The inspector is not required to use the feature, as it is still possible to enter the test dates for each and every system within the tank attributes pages.



On the Facility main page, a button for "Duplicate Tank Attribute Dates" will direct the user to a date entry page" as below.

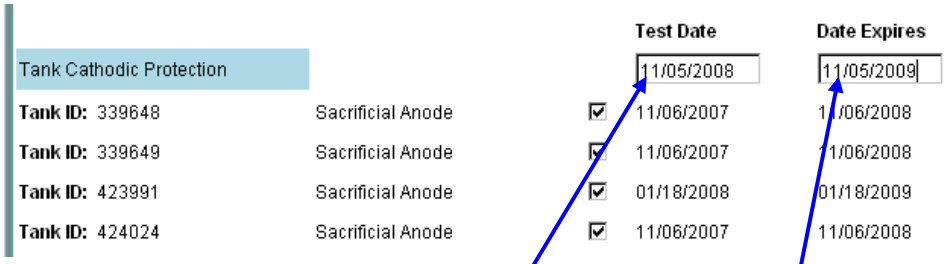


Note that all the checkboxes associated with each tank are pre-selected and filled with a checkmark.

Data that may be updated on this page include:

- Tank Leak Detection:
- Tank Cathodic Protection
- Piping Leak Detection
- Pipe Cathodic Protection
- Catastrophic Leak Detect

In this example the Tank Cathodic Protection dates can be entered and duplicated to all systems on site.



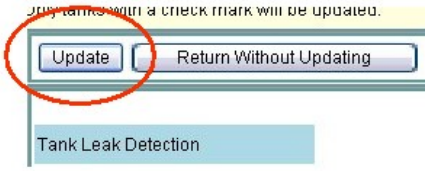
The checkboxes are used to indicate what tanks the entered test dates apply to. If you have a tank that does not have a test date, simply uncheck the tank and no date will be entered for that tank. If you do not enter dates for a system, you do not need to uncheck the checkboxes. By default the checkboxes are all checked thereby applying the data to all tanks or systems.

The date the test was performed is entered and the Test Date the cathodic test Date Expires, in this example, CP is required annually. Tank and Line Cathodic Protection will require a "Date Expires" to be able to close out the system.

The tank/line leak detection dates do not need an expiration date entered to close out the system

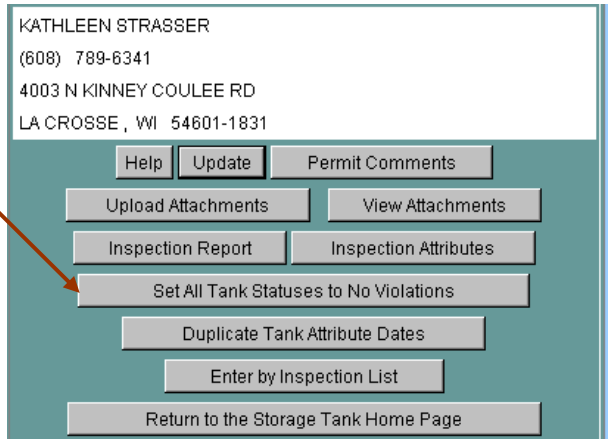
because monthly monitoring does not require an expiration date. When all dates are completed, select the “Update” button to apply data to selected systems.

If data entered is in error, all dates can be manually changed in the individual tank systems “Modify Tank Attributes” Menu.

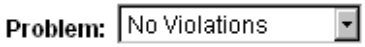


Set All Tank Statuses to No Violations

A “No Violations” feature is added that allows the inspector to “Set All Tank Statuses to No Violations” by clicking a button. Activating this button will result in all of the tanks for this location being identified with ‘No Violations” eliminating redundant entry. The "Set All Tank Statuses to No Violations" button is visible only on the "first time" in when looking at an inspection. As long as the inspector doesn't update anything the first time in, he/she will get the button when they open the facility record to record the inspection data. The program looks to see if anything has been updated. If any type of update has been done the button will be gone. Reviewing the facility information only will not update anything, and therefore the button remains. The button will only "appear" for that person or LPO agent assigned to do the inspection.



The process works as follows: The first time an inspector goes to update data the "No Violation" for all tanks button appears. If the inspector chooses to use that button he/she is done with entering all inspections for the tanks on this site. If the inspector has found violations that he/she must report, he/she enters the data to record the violations on specific tanks. Once this path is chosen the "no violation" button will not be seen again because violations have been reported and must be resolved on the subject tanks. The inspector must then go to the individual tanks that have violations and set the Problem to “Violations Found” and perform the respective entry of violations.



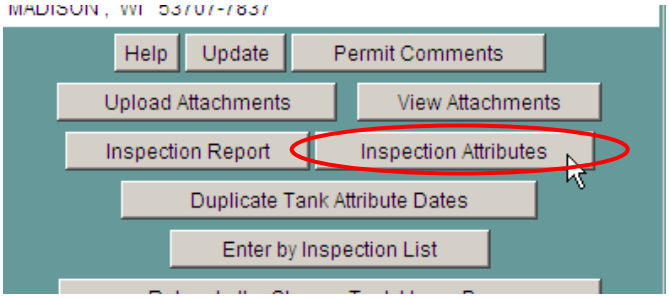
Entering Comments: Field Notes Comments and Permit Comments

All General Unlisted Violations must also be followed by a comment in the comments section. Permit Comments are part of a permanent file on Regulated Objects and the permit staff can view the comments.

Field Note area is for describing Unlisted Violations and for Inspectors own use. PECFA also views the field notes when they encounter a Red Flag violation.

The “Inspection Attributes” reference

The IIRA application provides an up-to-date database reference for tanks on a site that are subject to the annual inspection. This reference should be printed out just prior to performing the inspection because it will have the latest information relating to the tank system as well as the permit renewal status.



FLAMMABLE AND COMBUSTIBLE LIQUID SYSTEM INSPECTION REPORT

Wisconsin Department of Commerce, Division of Environmental & Regulatory Services

Personal information you provide may be used for secondary purposes [Privacy Law s.15.04(1)(m)]

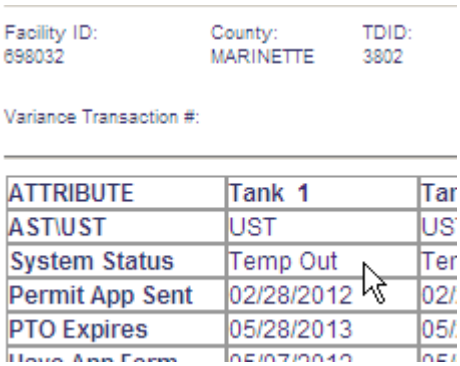
Facility Name: D & G QUICK MART AND PIZZARIA
Facility Address, City, Zip Code: 131 HWY 141 N, COLEMAN, 54112
Owner: HE HOLDINGS LLC
Transaction ID: 1719630

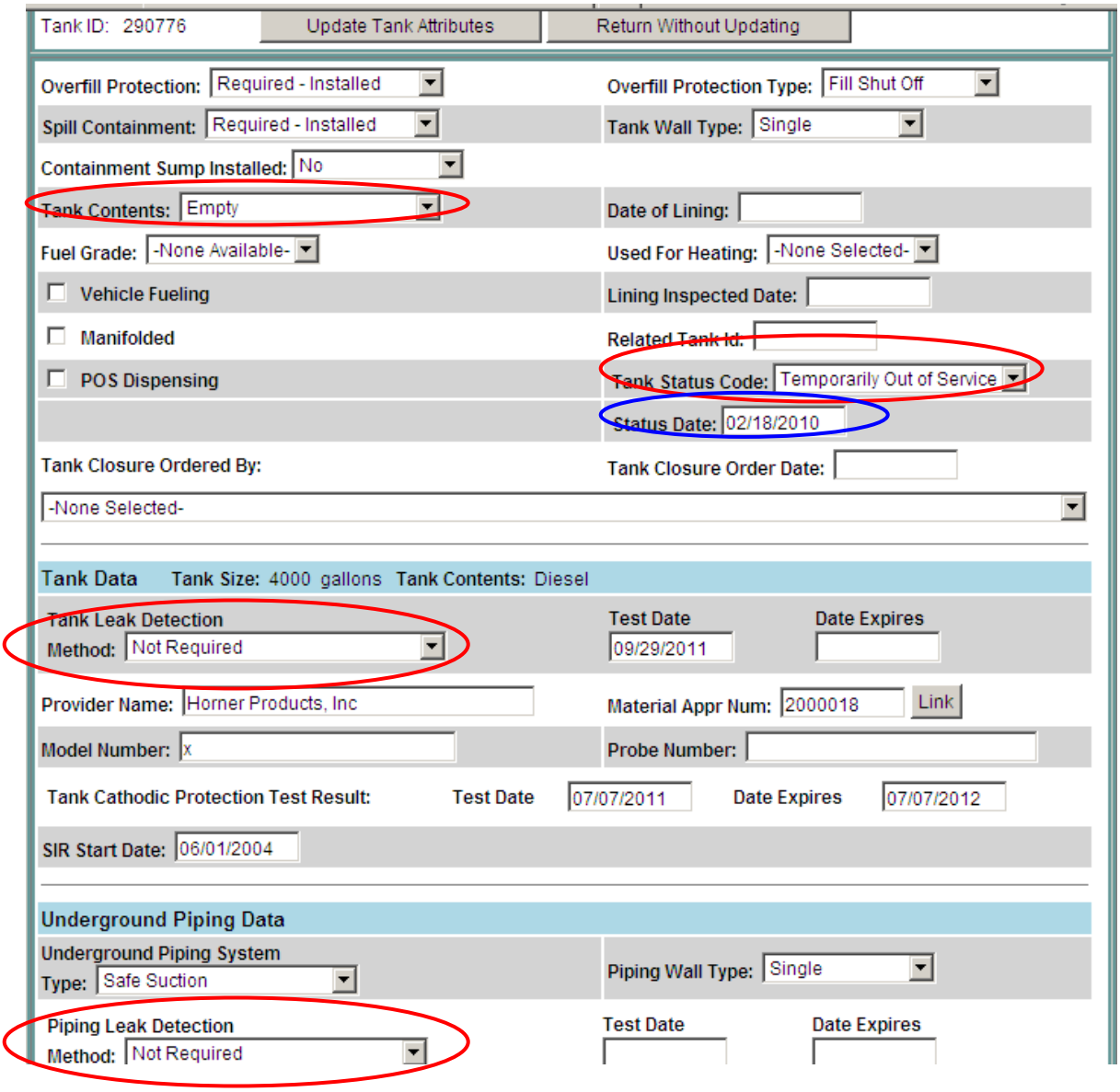
Facility ID: 698032
County: MARINETTE
TDID: 3802
Facility Telephone Number: 920-819-2125
Contact Name: George Hannan
Variance Transaction #:
Class A Operator:
Class B Operator:

ATTRIBUTE	Tank 1	Tank 2	Tank 3	Tank 4		
AST\UST	UST	UST	UST	UST		
System Status	Temp Out	In Use	In Use	Temp Out		
Permit App Sent	02/28/2010	02/28/2010	02/28/2010	02/28/2010		
PTO Expires	05/28/2011	05/28/2011	05/28/2011	10/28/2004		
Have App Form	05/27/2010	05/27/2010	05/27/2010			
Fin Resp Method	INSU	INSU	INSU			
FR Expire Date	06/02/2011	06/02/2011	06/02/2011			
FR Review Date	05/27/2010	05/27/2010	05/27/2010			
Addl Info Reqd Date						
Addl Info Reqd						
Reg Obj ID	290776	499951	499957	499958		
Containment Sump Installed	Unknown	Unknown	Unknown	Unknown		
Gallons	4000	12000	6000	6000		
Contents	Diesel	Unleaded	Unleaded	Diesel		
Fuel Grade						
Install date	11/17/1987	11/17/2000	11/17/2000	11/17/2000		
Reline date						
Lining Insp Date						
Overfill Protection	90alrm95autoOff	90alrm95autoOff	Ball Float	Ball Float		
Spill Containment	Req-Instl	Req-Instl	Req-Instl	Req-Instl		
Occ. Type	Retail Fuel Sal	Retail Fuel Sal	Retail Fuel Sal	Retail Fuel Sal		
Tank wall	Single	Single	Single	Single		
Tank const	CoatStl	Composite	Composite	Composite		
Tk LD Type	SIR	TT	TT	SIR		
Manufactr	Horner Pr			x		
Model No.				x		
Probe No.						
Tk LD test	07/24/2008	07/29/2008	07/29/2008	06/28/2009		
New date						
Tk CP test	11/19/2009					
New date						

TOS – Temporary-Out-of-Service Tanks

Must be recorded as follows:
Tank Status – Temporarily Out of Service
Status Date -
Tank Leak Detection – Not Required
Tank Contents – Empty,
Tank Leak Detection – not required,
Pipe Leak Detection – not required,

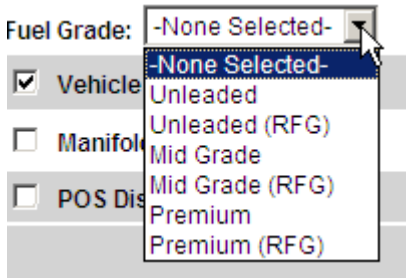




Identify the grade of the petroleum product.

This option is an elective option for those who want to use it and will not impact the ability to close an inspection.

- Fuel grade has been added to the Inspection Attributes page as displayed below.
- The fuel grade drop-down is dependent on the tank contents. Only those fuel grades associated with a specific tank content type will display in the drop down list.
- Fuel grade has been added to the Site Detail page (see Type Details below). Note, the detail page was not re-arranged to group the fuel grade next to tank contents due to the IT time and labor involved to get this into production.



The fuel grade also is displayed on the Site Detail page:

Reg Obj ID	767469	767470	767468
Containment Sump Installed	Unknown	Unknown	Unknown
Gallons	8000	6000	15000
Contents	Unleaded	Diesel	Unleaded
Fuel Grade			
Install date	10/30/2000	10/30/2000	10/30/2000
Reline date			
Lining Insp Date			
Overfill Protection	90alrm95autoOff	90alrm95autoOff	90alrm95autoOff
Spill Containment	Req-Instl	Req-Instl	Req-Instl
Occ. Type	Retail Fuel Sal	Retail Fuel Sal	Retail Fuel Sal

Report Tank Violation for Tank ID: 499951 | Modify Tank Attributes for Tank ID

Type Details

Type: UST Tank System	Bid Rate Type Desc:
Tank Status Description: Temporarily Out of Service	Marketer: Yes
Status Date if not in use: 08/11/2011	Installation Date: 11/17/2000
Tank Construction Material: Steel - FRP composite	Tank Wall Type: Single
Tank Corrosion Protect Type: Not Applicable	Tank Leak Detection Type: Inventory Cont
Overfill Protection: Required - Installed	Spill Containment: Required - Installed
Containment Sump Installed: Unknown	
Vapor Recovery Stage I: No	Stage I CARB #:
Related Tank ID:	Tank Contents: Unleaded Gasoline
Tank Size Gallons: 12000	System Upgrade Date:
Vehicle Fueling: Yes	POS Dispensing: Yes
Chemical CAS #:	Occupancy Type: Retail Fuel Sales
Date of Lining:	Lining Inspected Date:
Manufactures Name:	SIR Start Date:
Model Number:	Material Appr Num:
Fuel Grade: Unleaded	Probe Number:
Federally Regulated UST: Yes	Aboveground Piping Construction:

Tank operator PTO renewal status

The attributes print-out for tanks at a facility includes an item "Have Inv Form." This item is the 5th attribute row on the attribute list. The designated title is somewhat misleading, but it indicates if the permit staff has received a response to the most current permit renewal application. This information is provided in relation to the monthly permit expiration status notices that you receive so you have an idea of what the permit renewal communication status is between the RP and the permit unit. While it indicates that some information in relation to the

permit renewal has been received, it does not mean that the information is adequate to issue a permit.

Using the table below as an example:

- The permit unit sent a permit renewal application to the RP on 08/28/2012
- The tank permit had expired on 11/28/2012
- To date no information in relation to the permit renewal has been received.

ATTRIBUTE	Tank 1	Tank 2	Tank 3
AST\UST	UST	UST	UST
System Status	In Use	In Use	In Use
Permit App Sent	08/28/2012	08/28/2012	08/28/2012
PTO Expires	11/28/2012	11/28/2012	11/28/2012
Have App Form			
Fin Resp Method	INSU	INSU	INSU
FR Expire Date	04/15/2013	04/15/2013	04/15/2013
FR Review Date			
Addl Info Reqd Date			
Addl Info Reqd			

If you are addressing the fact that this tank does not have a current permit and the RP tells you that he/she sent the renewal application back to DSPS in September and they are still waiting for the permit, the attribute information tells you that it was not received and an order for failure to have a current permit should be issued.

The Inspection Attributes table includes permit information for those tanks that require a Permit To Operate. The "Addl Info Reqd" line serves the purpose to let the inspector know what specific information the RP has not submitted with the renewal application. The table below is a reference for the respective documentation requested.

FR Expire Date	06/02/2011	06/02/201
FR Review Date	05/27/2010	05/27/201
Addl Info Reqd Date		
Addl Info Reqd		

REGULATED OBJECT ADDITIONAL INFORMATION REQUESTED:	IIRA Code
CERTIFICATE OF INSURANCE	CI
AFFIDAVIT	AF
TANK MONITORING	TM
LINE MONITORING	LM
TANK AND LINE	TL
CERTIFICATE OF INSURANCE AND AFFIDAVIT	CA
FINANCIAL RESPONSIBILITY AND LEAK DETECTION	FR
OUTSTANDING ORDERS	OO
SITE SCHEDULE	SS
SITE SCHEDULE AND AFFIDAVIT	SA
TANK CP TESTING RESULTS	TC
LINE CP TESTING RESULTS	LC
TANK AND LINE CP TESTING RESULTS	CP
LD ANNUAL RESULTS	LD
ENDORSEMENT LISTING OWNER	EO
ENDORSEMENT AND AFFIDAVIT	EA
LD AND CP	EV
FINANCIAL RESPONSIBILITY, CP	CC
FINANCIAL RESPONSIBILITY, LEAK DETECTOR, CP	CL

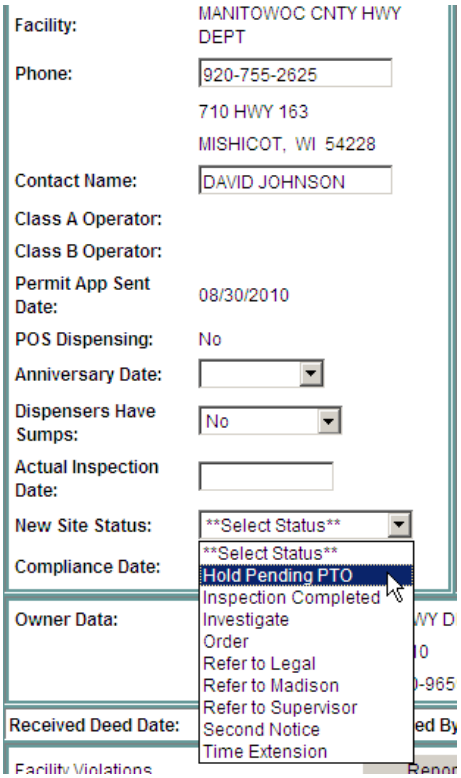
IIRA – Hold Pending PTO

A new status category has been added to the IIRA Site Status for the purposes of facilitating the permit to operate (PTO) administrative function when all other inspection and regulatory elements have been satisfied.

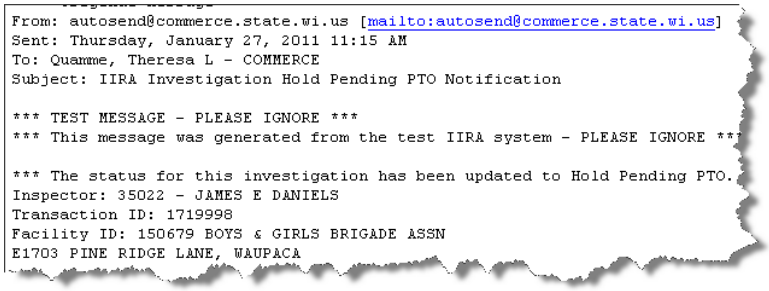
Sixty days prior to a permit renewal a permit renewal application is sent to the RP. During the permit renewal process the permit staff will assess the tank status for acceptable test dates and outstanding compliance orders. If, during this permit renewal period, an inspector has outstanding orders a permit will not be issued until the respective tests and orders have been satisfied.

When an inspector has completed his/her inspection and the only item remaining is the PTO for the tank the inspection on the respective inspector's IIRA list cannot be closed and subsequently stays on the IIRA list.

The "Hold Pending PTO" category provides a mechanism for the IIRA to recognize that the inspector's field work has now been completed, i.e., orders have been satisfied, and the process now remains in the hands of the permit staff.



The inspector must move the status to "Hold Pending PTO." This will send an e-mail message to the permit staff, such as that to the right, that the inspector has resolved the issues on the tank.



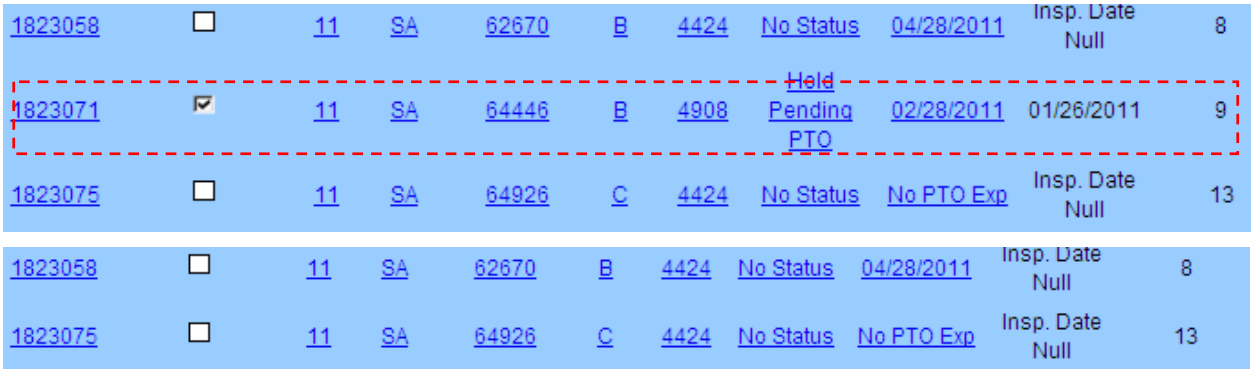
```
From: autosend@commerce.state.wi.us [mailto:autosend@commerce.state.wi.us]
Sent: Thursday, January 27, 2011 11:15 AM
To: Quamme, Theresa L - COMMERCE
Subject: IIRA Investigation Hold Pending PTO Notification

*** TEST MESSAGE - PLEASE IGNORE ***
*** This message was generated from the test IIRA system - PLEASE IGNORE ***

*** The status for this investigation has been updated to Hold Pending PTO.
Inspector: 35022 - JAMES E DANIELS
Transaction ID: 1719998
Facility ID: 150679 BOYS & GIRLS BRIGADE ASSN
E1703 PINE RIDGE LANE, WAUPACA
```

The IIRA list will reflect the "Hold Pending PTO" as expressed in the graphic immediately below.

When the PTO has been issued by the permit unit the facility will automatically drop off the IIRA list as the second graphic below.



1823058	☐	11	SA	62670	B	4424	No Status	04/28/2011	Insp. Date Null	8
1823071	☑	11	SA	64446	B	4908	Hold Pending PTO	02/28/2011	01/26/2011	9
1823075	☐	11	SA	64926	C	4424	No Status	No PTO Exp	Insp. Date Null	13

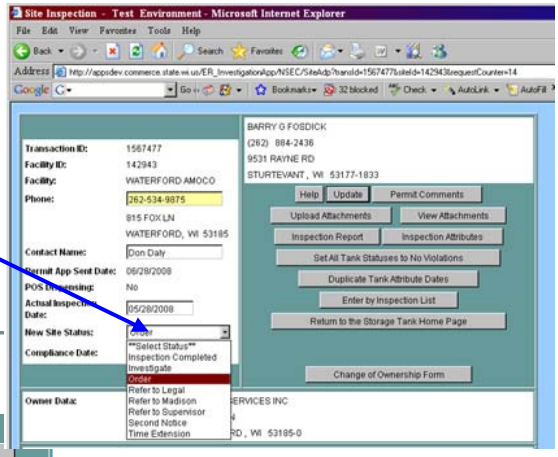
1823058	☐	11	SA	62670	B	4424	No Status	04/28/2011	Insp. Date Null	8
1823075	☐	11	SA	64926	C	4424	No Status	No PTO Exp	Insp. Date Null	13

Facilities that are in Hold Pending PTO status for more than 6 months should have orders for tank closure written.

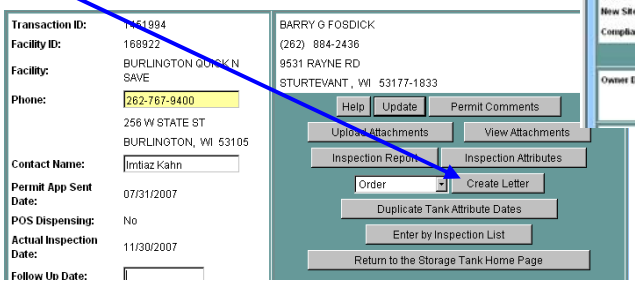
Creating State Orders

In order to Create a State Order after entering inspection data, select on the New Status field "Order." An Actual Inspection Date and Compliance Date must be entered.

Press the Update bar and the application takes you back to the *inspection list*.
Note: An order will see “Create Letter” until you hit update and system returns to the Inspection List first then you have to go back into the site.

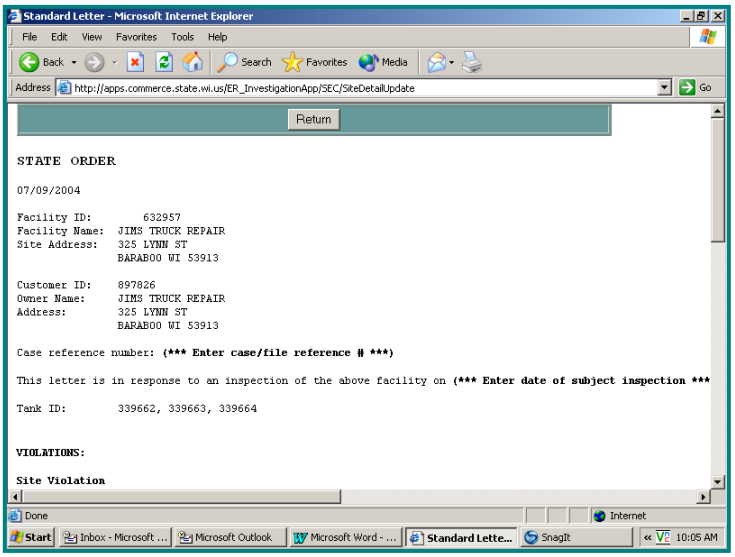


Click on the site or transaction number and a screen that includes "Create Letter" will appear. Click on the "Create Letter" bar and the order will come up.



The order is in html format and can be saved into MSWord. Highlight the order and Copy. Note: if you do a Ctl A, the “Return” bar will copy as well. This can be deleted in the document.

Open MSWord on your desktop and Paste into MSWord with state or company letterhead. The document may be edited to modify margins, text format and paragraph indents but the advantage of using this format is the violations are included in the document. You may also copy and paste order to a bland Word document and print to letterhead paper.



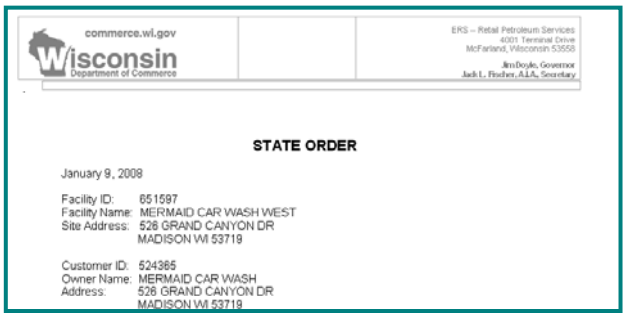
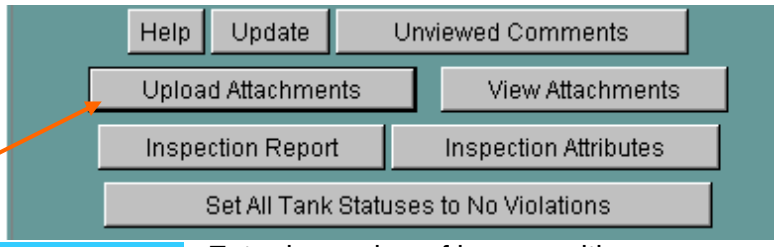
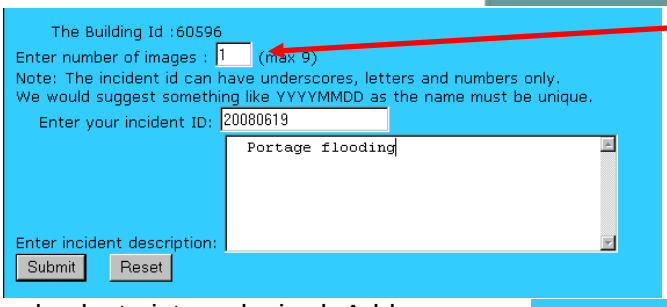


Photo or Attachment Uploaded to IIRA

This feature is intended for use in a general application, for example adding an overall picture of site, tank or specific component for future regulatory reference.

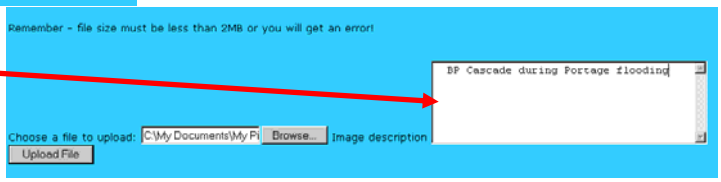


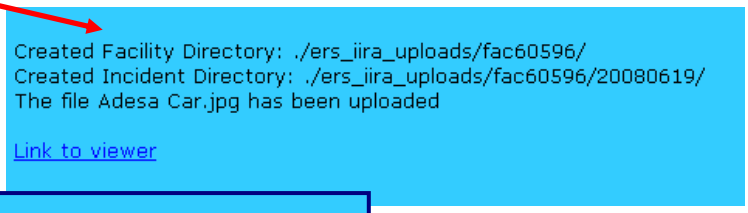
Select Upload Attachments.



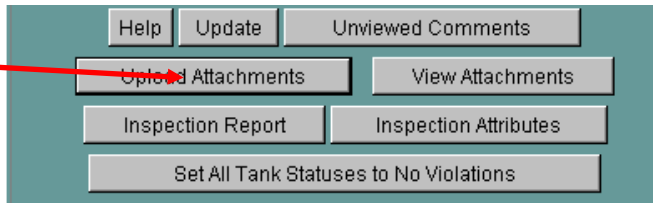
Enter in number of images with a maximum of 9. **Note**: 2 MB maximum for each photo. Enter incident ID in format noted on screen. You can enter in an incident description.

Select Submit or if needed Reset to start over. The next screen will allow you to upload a picture from your file. Browse and select picture desired. Add an Image description. Select Upload file and the picture will upload to the database and a screen indicating the picture has been upload appears. To view click on Link to viewer.





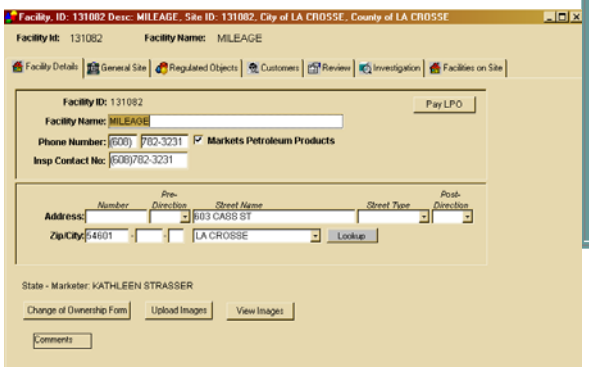
Pictures can also be viewed after uploading by selecting View Attachments from the Facility screen and selecting the Incident ID.

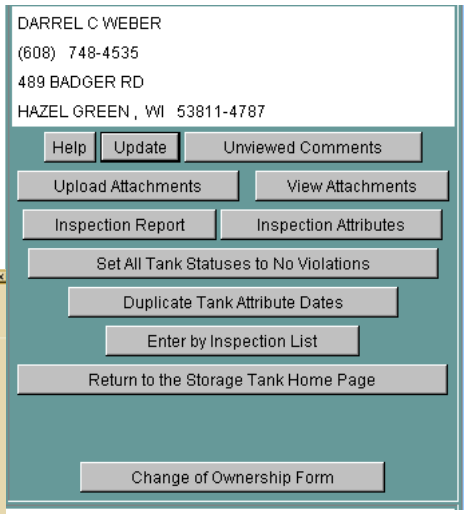


Building Id	Incident Id	Date Inserted	Description
60596	20080619	2008-09-03	Portageflooding

Change of Ownership Form

On the initial Facility page, there is a button reading Change of Ownership. Clicking this button produces a single change of ownership form for the facility and lists all tanks on one page. If your inspection is complete and the facility is no longer on your list, there is no need to create a new inspection. This form can be retrieved in one of two ways. You can use your paper file to get the transaction ID off you last checklist. Type in the transaction ID and it will bring up that inspection, and the change of ownership will be available. REG OBJ to for the margins bottom .5. This is a different print setting than the other IIRA web pages.





Additionally, you can sign on to get the form. The print settings Change of Ownership form for all should be: right, left, top and

IIRA Interaction with Internet Tank Search Application

The data entry as a result of the IIRA feeds the state tank database. Tank system attributes and inspection data is carried over to the Internet Tank Search application which is an application accessible by the public at: http://apps.DSPS.state.wi.us/ER_Tanks/ER-EN-TankSearch.htm

At the bottom of the information page for each tank an inspection history is displayed. Tank inspectors can also log onto their respective IIRA log-in page from the log-in link provided.

Inspections Click here for login page

Trans ID	Type	Status	Date	Fiscal Yr
913865	AN	CLOS	08/13/2004	2004
1044228	AN	CLNI		2005
1178844	AN	CLNI		2006
1302308	AN	CLOS	05/08/2007	2007
1452089	AN			2008

Inspection <u>type</u> codes are:

- AN – Annual inspection assigned to a DSPS inspector.
- SA – An inspection that was initially assigned to an LPO agency, but reassigned to DSPS inspectors
- LP – An annual inspection that is assigned to a LPO inspection agency.

Inspection <u>Status</u> codes are:

- CLOS – Inspection closed due to no noncompliance issues or compliance issues have been corrected and violations no longer exist.
- CLNI – Tank was not inspected the respective fiscal year.
- INVS – Inspection has resulted in the need for further investigation or assessment or additional records to determine compliance.
- Order – Noncompliance order has not yet been satisfied and inspection is still open.
- 2NOT – Second notice with compliance date.
- EXTN – Extension of compliance date.
- RLEG – Refer to Legal by supervisor or management.
- RMAN – Refer to management by inspector as a result of not gaining compliance.
- RSUP - Refer to supervisor by DSPS inspector.

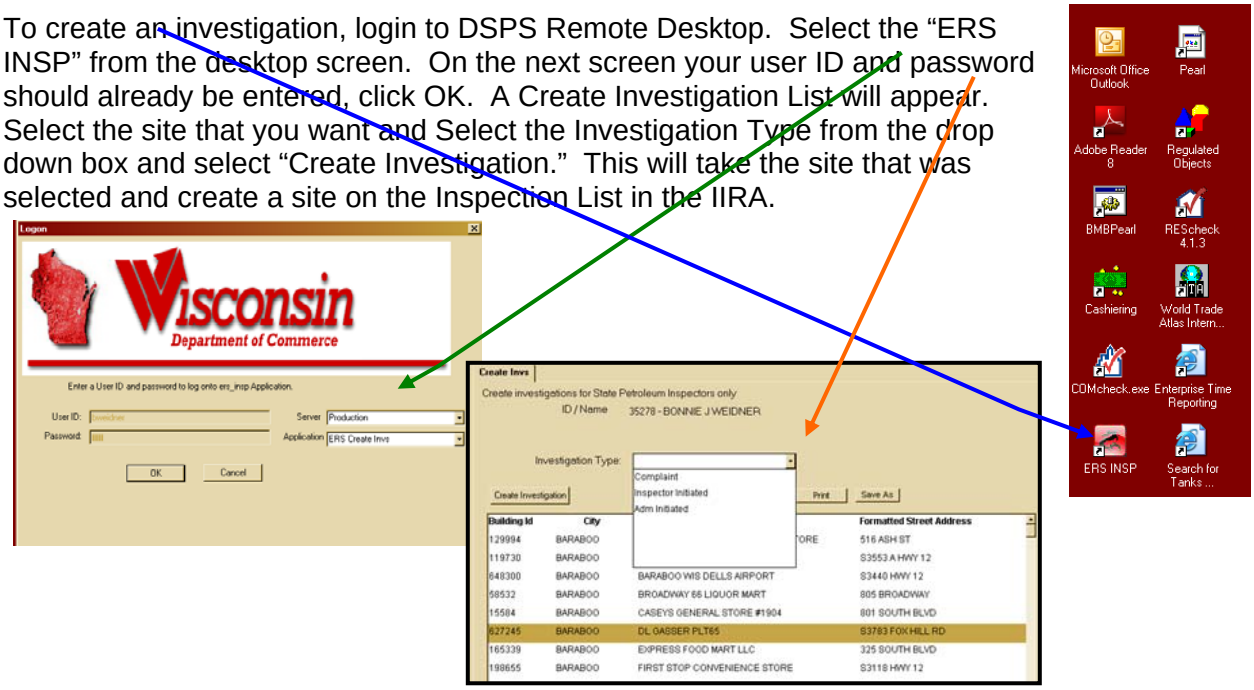
Create an Investigation

NOTE: This application is available to Department inspectors only.

When status "Inspection Completed" is selected on the Inspector's Inspection List in the IIRA the site will drop off your list until the IIRA is launched the new FY. There are times when inspectors may need to create an investigation, for example, a complaint or new owner.

Important: if a site is created and used as an inspection, the date of inspection will not be counted as an "annual" inspection, therefore, will not be counted in the "Months Since Last Inspection". The IIRA will take the last "annual" inspection date from the Inspection List. Due to this fact, to reduce the amount of create investigations for annual use, the IIRA will be launched on July 1 of each year. All inspections done or completed prior to July 1 will have to be entered by June 30th. This is to avoid inspectors having to Create an Investigation that does not count as an annual inspection and relieving the inspector of entering incorrect "Actual Investigation Date" into the IIRA.

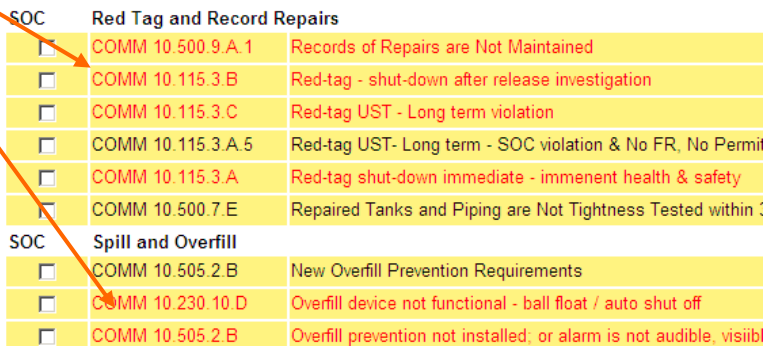
To create an investigation, login to DSPS Remote Desktop. Select the "ERS INSP" from the desktop screen. On the next screen your user ID and password should already be entered, click OK. A Create Investigation List will appear. Select the site that you want and Select the Investigation Type from the drop down box and select "Create Investigation." This will take the site that was selected and create a site on the Inspection List in the IIRA.



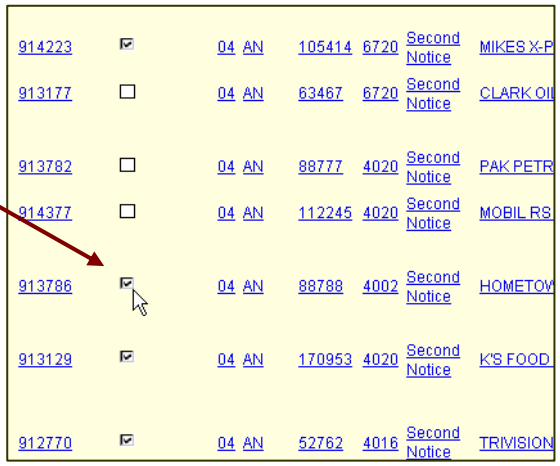
Comment exchange

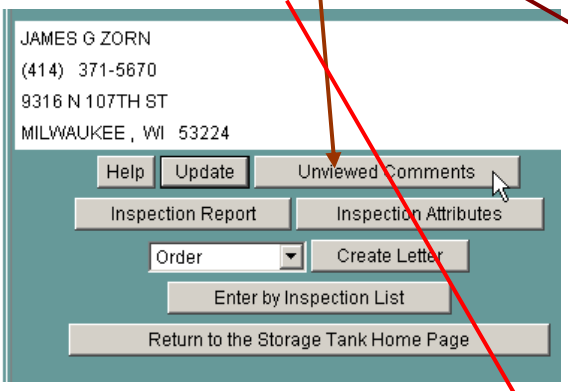
The IIRA has two comment boxes. The "Field Notes:" comment box at the bottom of the facility page is for inspector field notes and will be shared with PECFA when a "Red Flag" violation is entered. Red Flag violations are noted in red font in the IIRA violation lists. Field Notes are not viewed from the Inspection List page but on the individual Facility page.

Field notes are intended to communicate more detail, observations, etc., to the PECFA staff. They do not carry over from year to year nor do they print on the attribute page print-out.



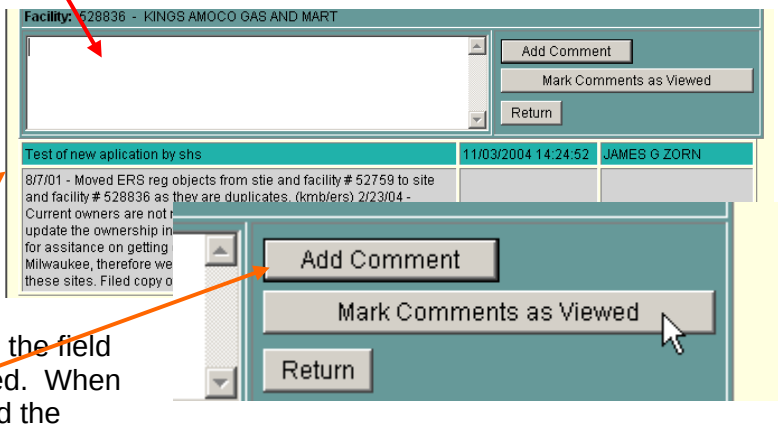
The IIRA has the ability to display and exchange comments entered by the DSPS permit staff and comments entered by the field inspector across lines. The existence of comments is reflected by a checked box on the Investigation List page. A button "Unviewed Comments" on the Attribute page takes you to the comment page on the main-frame database.





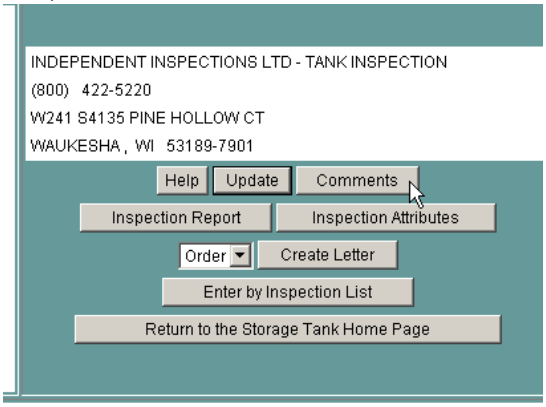
Comments entered into the Permit Comments area are shared with DSPS permit staff.

When the inspector selects the "Unviewed Comments" button a new screen view opens. The comments in the gray panel displayed were generated by the DSPS permit staff. The box with open white space is the area where the field inspector enters comments if needed. When the "Add Comment" button is clicked the comments that were entered in the box will move down to the green panel with entry date. In



order to clear the check box on the inspection list page, you must click the “Mark Comments as Viewed” button.

When the comments have been viewed, or if there are no comments generated by the permit staff, the “Unviewed Comments” button will be labeled simply “Comments” and you may click this button to document or communicate specific items for the permit staff.



Be aware that this application does not notify the permit person if there is a message, they will realize it when they go into the record. Urgent or time sensitive communications must be via e-mail.

If you have issued compliance orders that are significant to hold a permit-to-operate, this should be an item communicated in the Permit Comment box.

Understanding IIRA Administrative Processes

IIRA Sort Order

The IIRA facility list can be sorted by numerous measures. The default is the PTO Expiration Date, which is probably the least important of any of the measures.

Three measures are very important in how program management views inspector performance:

1. Fiscal Year
2. Status
3. Months Since Last Inspections

Trans ID	Unread Comments	FY	Type Code	Facility ID	Rank	TDID	Status	Earliest PTO Exp Date	Insp. Date	Months Since Last Insp	Facility Name	Site Address
1719630	☑	10	AN	698032	B	3802	Investigate	10/28/2004	12/16/2010	14	D & G QUICK MART AND PIZZARIA	131 HWY 141 N., COLEMAN , 54112

You can change the Default by performing a sort by the measure you want and then clicking on the "Change Default Sort Order" button.

An effective and efficient management approach is to use sorts by the three measures listed above.

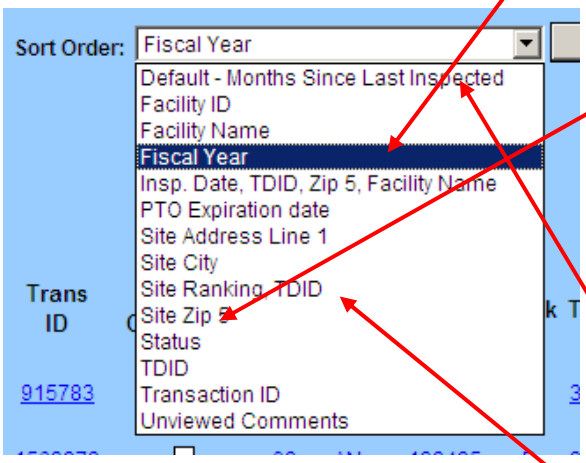
At the beginning of each fiscal year and periodically thereafter sort by "Fiscal Year." If you have any facilities that are listed in the previous fiscal year by more than 60 days from the "Inspection Date," you are not performing your inspector duties as we expect them to be conducted. There are some exceptions to the 60 day time period when an order is written, but not when the status is "investigate."

Periodically sort by "Status" so that you realize you have IIRA investigations that are not closed. Many of our inspection performance reports focus on the IIRA inspection "Status." The status "Investigate" is very suspect in how it is being used when the facility is in investigate status for more than two weeks.

A good inspection scheduling and management approach at the beginning of the fiscal year is to sort by "Months Since Last Inspection." We typically do not experience facilities that are beyond the 18 month window, but occasionally a facility will appear that is many months (i.e., 55, 161, etc.) out. When this occurs it usually means: 1) that the tank has existed, but just recently registered, 2) the facility was in an area with an inspector vacancy, or 3) some database edit moved it off the IIRA assignment for a period of time. The months since last inspection are calculated either on last recorded IIRA inspection or the recorded install date.

Inspection and Enforcement Management by IIRA List Sort

Inspectors can improve there regulatory management practice by sorting the list several ways which exhibit priorities and reminders.



Fiscal Year sort – brings facilities to the top of the list that have not been closed out from the previous year. This may be a result of forgetting to enter the inspection as closed or failure to follow-up on enforcement actions. Prior year inspections need to be dealt with before you tackle the current year inspection.

Status sort – compartmentalizes the status, such as: Order, Hold Pending PTO, Investigate, Second notice, and Time extension. This is a good reminder tool for follow-up confirming compliance or proceeding with enforcement actions.

Months since last inspection sort – brings the longest cycle to the top of the list. Targeting these facilities first helps keep the inspection cycle more uniform among all the assigned facilities.

Site Ranking sort – gives you an ideas of your most problematic facilities.

What the IIRA data entry conveys to state program management

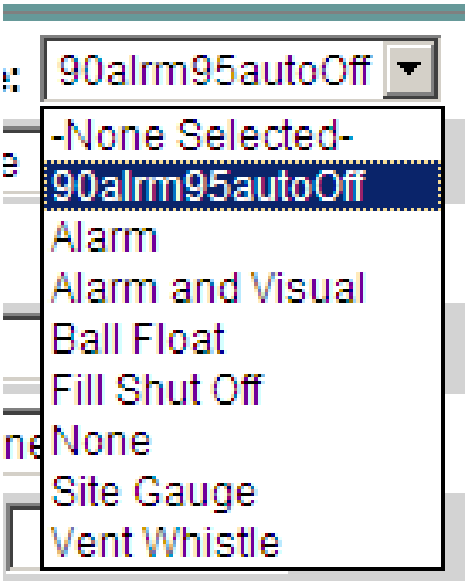
The state program management team can access IIRA statistics in real time. This data is used for federal and state reports and for inspector and agent performance evaluations. Some of the reports that are generated include:

- Inspections started, inspections not started, inspections completed; by individual inspector or LPO agent. These items can be generated by a numerical statistic or by the name of each respective facility.
- Inspection status by facility: Order, 2nd notice, red-tag, extension.
- Problems/noncompliance identified: informal (noncompliance noted, but no order issued) and formal (non compliance order issued) by individual inspector or LPO agent.
- Outstanding noncompliance orders exceeding 122 days by individual inspector or LPO agent.

What the Overfill Prevention Attributes mean:

Any of these attributes can apply to aboveground or underground tanks

<u>90 % Alarm AND 95% auto shut-off</u>
This is frequently referred to as the "NFPA Overfill Prevention." Tank has both the audible AND visual alerting device AND the auto shut-off (typically in the drop tube).
All USTs that take product by gravity drop delivery were to have this installed no later that February 1, **2011**.



<u>Alarm</u>
An audible alerting mechanism.

<u>Alarm & visual</u>
An audible alerting mechanism and a visual indicator such as a volume gauge or light.

<u>Ball float</u>
The "ball float" is the EPA vent restriction device in USTs. No longer acceptable in Wisconsin for USTs as an overfill mechanism. The EPA is drafting language to prohibit ball floats as well.

<u>Fill shut-off</u>
No audible or visual alerting mechanism, only the auto shut-off.

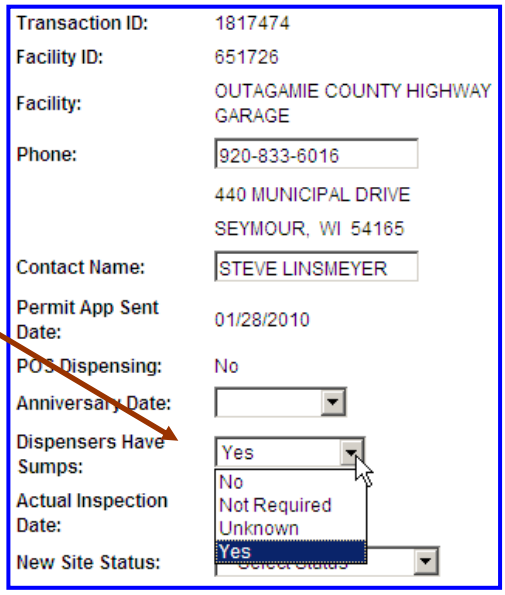
<u>Site gauge</u>
The only overfill prevention device is a tank volume gauge.

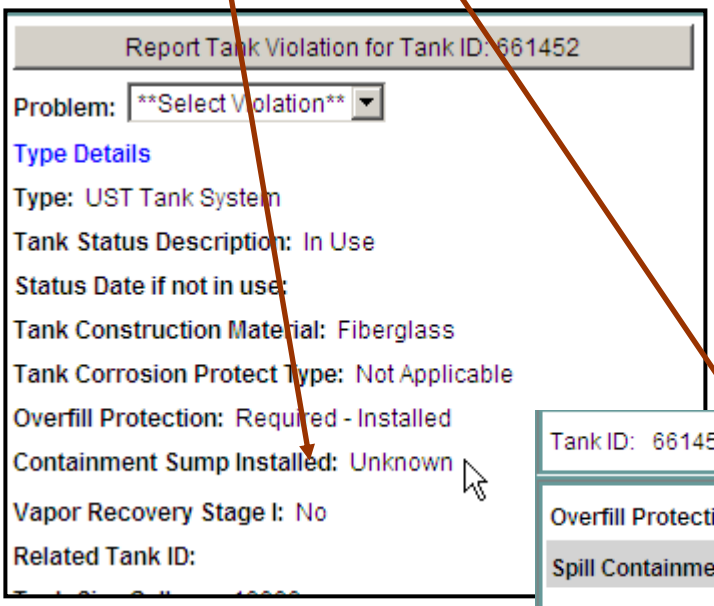
<u>Vent whistle</u>
The only overfill prevention mechanism is an audible whistle device to alert the delivery driver.

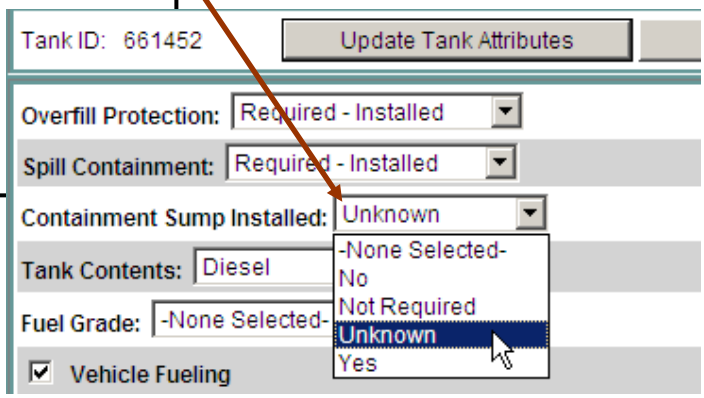
Dispenser & Tank Sump IIRA Entry Guide

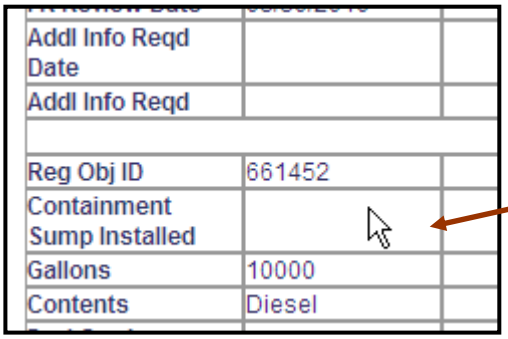
The **"dispenser sump"** attribute is located on the facility home page. It is located on the facility home page because not all tanks have dispensers and dispensers may be associated with multiple tanks. The status entry is made on the facility home page.

The **"tank containment sump"** attribute is located on the facility home page on each tank data list and on the respective tank attribute page where the entry is performed because most (but not all) USTs will have a tank top sump. The default is "Unknown" until inspector verified.







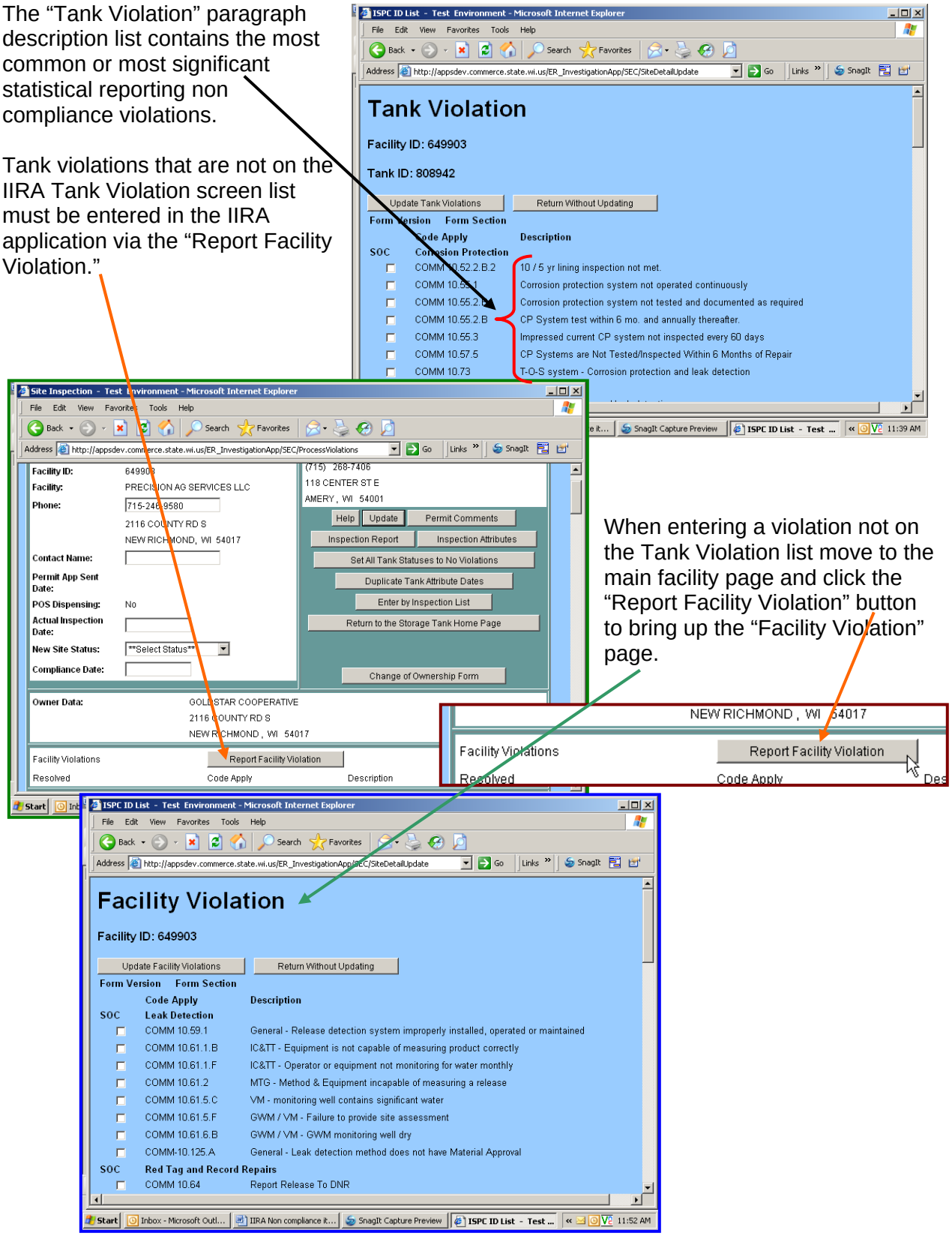


The "Inspection Attribute" page *identifies the status of the tank top containment sump only*, not the dispenser sump.

IIRA - How to enter Non compliance items not in paragraph descriptions

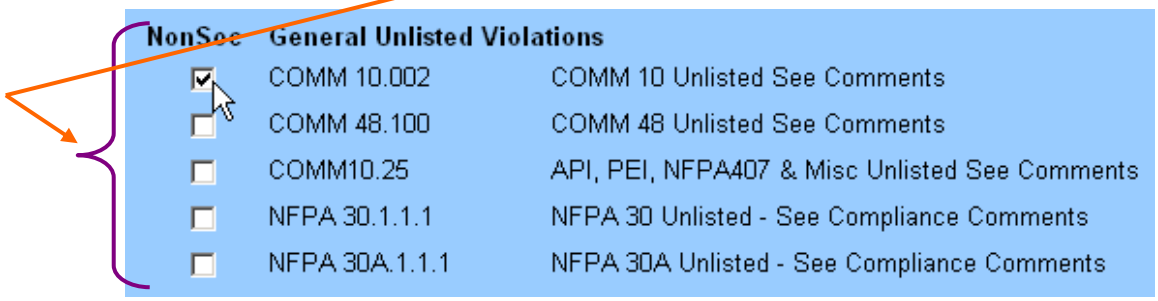
The “Tank Violation” paragraph description list contains the most common or most significant statistical reporting non compliance violations.

Tank violations that are not on the IIRA Tank Violation screen list must be entered in the IIRA application via the “Report Facility Violation.”

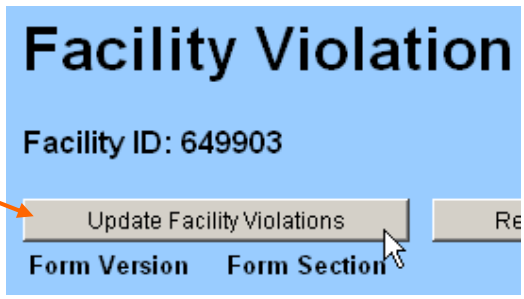


When entering a violation not on the Tank Violation list move to the main facility page and click the “Report Facility Violation” button to bring up the “Facility Violation” page.

Scroll down to the “NonSOC General Unlisted Violations“ section of this page and check the appropriate code or adopted national standard box.

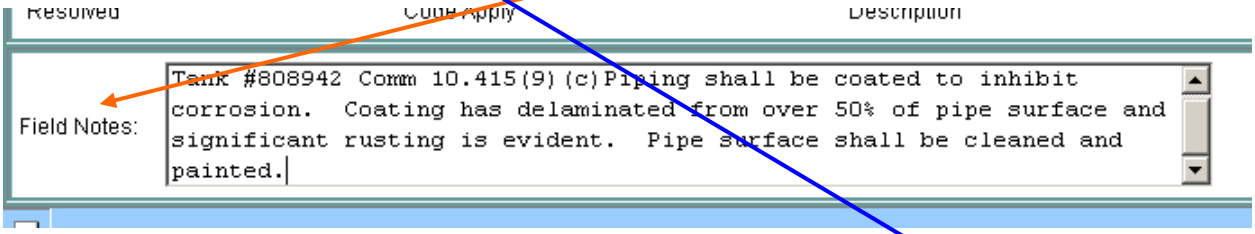


Click the update button to return to the facility page.



You will see the violation reference appear under the “Report Facility Violation button, but you still have to describe the violation.

At the bottom of the main facility page is a box to enter “Field Notes” where the narrative violation must be typed in.



When compliance is achieved enter the compliance date in the appropriate box. **DO NOT DELETE** the information that was typed in the Field Notes box.

IMPORTANT!! - If the tank has no violations that are listed on the Tank Violation List, you must set the Tank Problem: at ‘No Violations.”

Troubleshooting Guide

Tips:

- All fields/dates can be copy (right click) and paste (right click) from one tank to another.
- With some internet browsers can be set up to keep track of the dates last entered in a drop down box and then the date pops up on the screen and can be selected. In the Internet Browser: Tools/Internet Options/Content/AutoComplete check all four boxes (Web Address/Forms/User Names & Passwords or Forms/Prompt me to Save Password). This is a time saving tool and is recommended.
- The time out problem is a big issue and is being worked on. Don't leave IIRA system inactive for even a short period of time. Update frequently. Don't use the back button.
- If orders are written for tank closure, complete the tank closure order area on the modify tank attributes screen.
- If Inspection Report does not print properly, check page setup settings.
- Inspection Guideline is accessible on the DSPS web site. This is a tool for inspectors at inspections.
- When an AST is double-wall and has an interstitial site glass the Leak Detection Method must be Visual Monitoring.
- If Inspection Report or Tank Attributes print on two pages check page-setup margins settings.

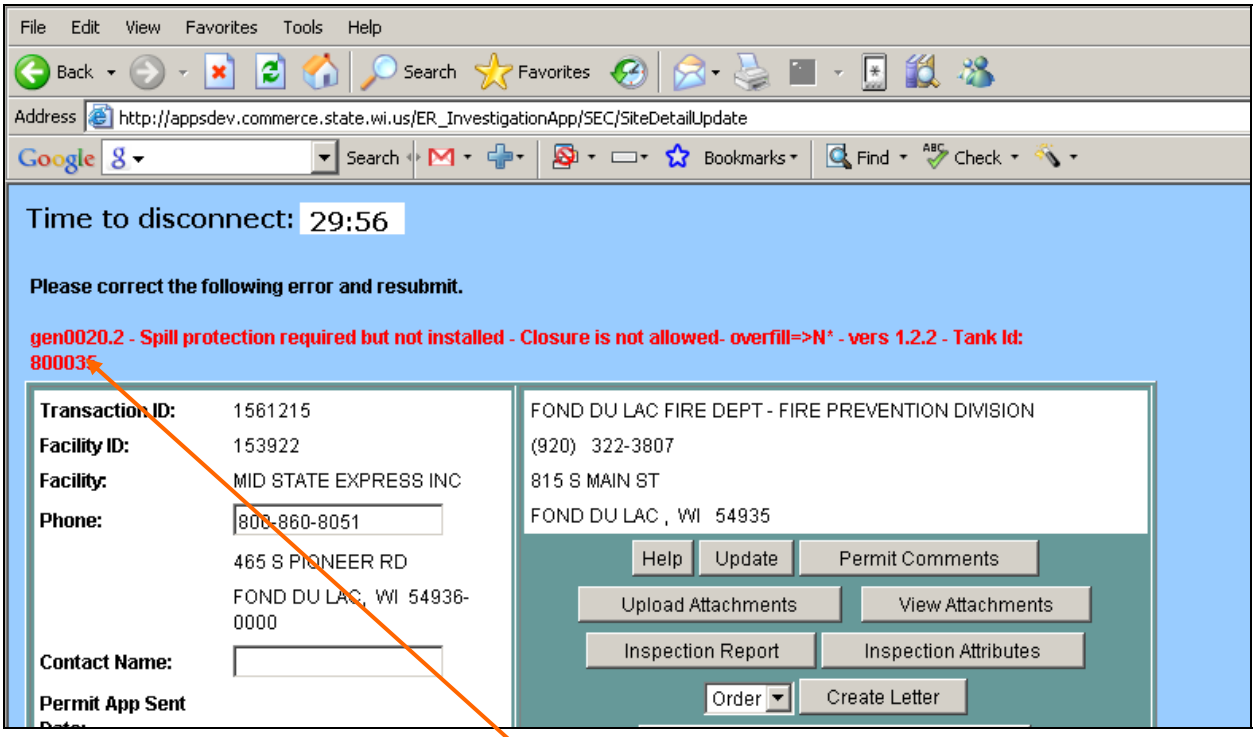
IIRA PROBLEM REPORTING

This document includes the reporting form and the instructions. In order for the DSPS IT people to adequately assess and resolve the problem they need to have more information provided specific to the error message.

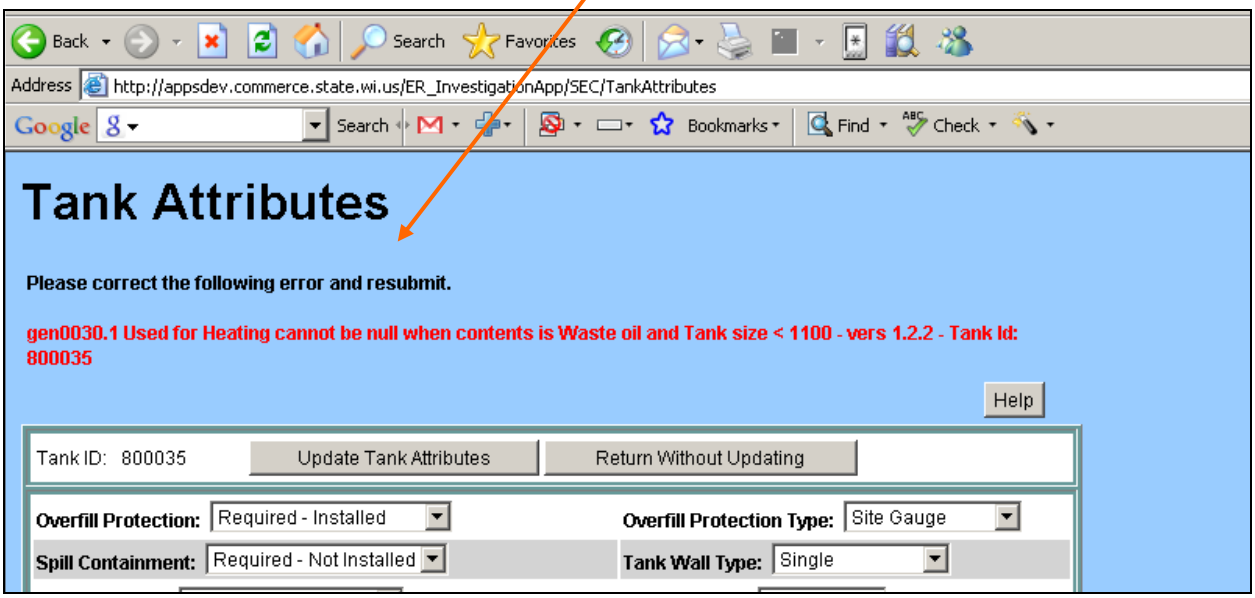
When completing the information for sending to DSPS, save the problem report as a document in your temporary file and delete the instruction pages that follow to reduce the size of the document. Send the report along with the saved attribute page to Sheldon Schall at: mailto:sheldon.schall@wisconsin.gov

Name:		
Contact telephone no.		
Transaction ID		
Tank ID		
Tank *type (Double click box):*	☐ AST ☐ UST	
Application the error message occurred in:	☐ Production (Production has a white background) ☐ Test (Test has a blue background)	
Attribute Name and value (only those that are in the same section as where the problem is) *Example*: Attribute Value Tank Size 1000 Used for Heating NO	**Attribute Name**	**Attribute Value**
Error message	See item ❷ in the explanations on the following pages	
Problem Description:		

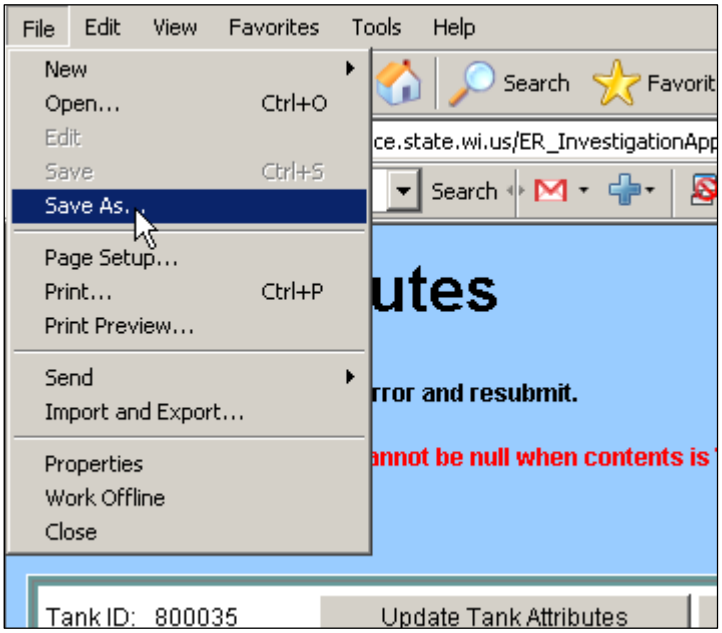
Example: Assume that you try to approve an inspection and get the following error message:



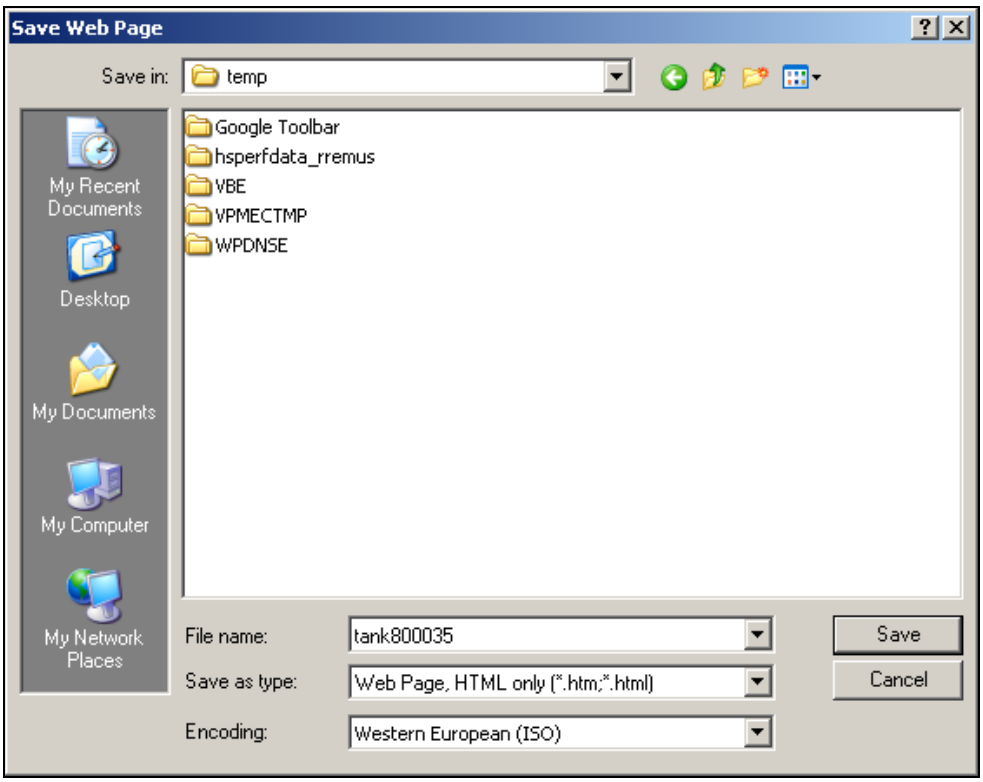
❶ The error message ends with a tank number. The edit error on the first page is of little use to IT. You must go to the tank attribute page and create the same error and then send us that page. Go to the tank attributes for that tank and press the "Update Tank Attributes" button. You should get the same error message.



❷ Because the IT people need to view the entire page of this IIRA application web page in order to determine the relationship with the error message a “screen print” <u>will not work</u>, therefore, Click on ”File” in the menu bar and then “Save As” in the drop-down of your browser to capture the entire page.



❸ Save the screen - we suggest that you use the tank id in the name. For example in this example we are putting the file in the temp directory and naming it tank800035.htm.



❹ Attach both the report and the attribute page file to the e-mail to Sheldon Schall.