Common Violations

Bureau of Weights and Measures

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION (DATCP)
COMMON VIOLATIONS – TOP COUNT FOR 2021

- Liquid and debris in sumps (Wis. Admin. Code § ATCP 93.230(10)(b))
  - 1,763 violation count – 2021
- Release Detection Methods (Wis. Admin. Code § ATCP 93.515)
  - + 760 violation count – 2021
- Release Detection Requirements (Wis. Admin. Code § ATCP 93.510)
  - + 1,199 violation count - 2021
MONTHLY MONITORING

- Failed or missing monthly monitoring reports from the ATG for tanks
  - Check your ATG daily to ensure it is functioning properly and has passing tests for each tank at least every 30 days
  - Train your employees to know what to do with the reports that print off the ATG
  - Ensure your monthly monitoring reports are on site and available for inspection
ANNUAL FUNCTIONALITY VERIFICATION - TR-WM-139

- Annual Functionality Verification Report (TR-WM-139) on site and available for inspection
  - Schedule your Annual calibration verification to be performed every 12 months by a qualified service technician working for a Wisconsin Registered Tank Specialty Firm
  - Immediately correct any deficiencies noted on the form
  - Ensure this form is kept at the facility and available for inspection
LIQUID AND DEBRIS IN SUMPS/CONTAINMENT

• Liquid or debris in the spill bucket and/or sump containment
  • Routinely conduct periodic inspections and maintenance, including checking that spill buckets and sump containments are free of liquid or debris
  • Printable copies of the periodic inspection check lists are available on the DATCP website, or you can use the checklists in the *Compliance Calendar for Gasoline Dispensing Facilities*
  • Ensure records of your periodic inspections are kept at the facility and available for inspection
INVENTORY RECONCILIATION RECORDS

- Incorrect, missing, or no inventory reconciliation records
  - Keep records of deliveries, sales, and pump-outs for each tank
  - Reconcile your inventory for each tank every month
  - Ensure you are using the correct inventory reconciliation form for your tank system
  - Forms and instructions are available on the DATCP website
  - Immediately investigate any product shortages
  - Ensure inventory reconciliation records are kept at the facility and available for inspection
A/B/C OPERATOR CERTIFICATES

• Out dated or missing A/B/C Operator certificates, and no certified operator on site
  • Confirm your A/B/C operator certificate is correct after personnel changes
  • Plan your schedule so that there is always a certified operator on-site when required
  • Ensure current operator certificates are kept at the facility and available for inspection
EMERGENCY INSTRUCTIONS

- Emergency instructions posted at the dispenser
  - Routinely conduct periodic inspections and maintenance, including checking that emergency instructions are present and readable at every dispenser
  - Replace worn or damaged signs promptly
PRODUCT LABELING

- Product identification at fill points and dispenser
  - Routinely conduct periodic inspections and maintenance, including checking that fill covers and 1 foot beyond of the surrounding concrete are painted as required by the API color code and ATCP 93
  - Conduct periodic inspections of tags or labeling at fill connections for AST’s
  - Promptly re-paint or replace identification when it becomes worn or faded
  - If you change the contents of a tank, make sure to apply the correct identification to fill points prior to the first delivery of product
  - Ensuring your fills are properly painted is the first step in preventing a misdelivery
COMMON VIOLATIONS – RECAP & SUMMARY

- Violations are preventable; address the issues mentioned here (and more) when they occur and prior to inspections
- Do not hesitate to reach out to your inspector or DATCP if you have questions or concerns

**General Inspection Territory Info**
- **Inspector:** Clark
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**General Inspection Supervisor District Info**
- Douglas Dummer
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Thank You!

Bureau of Weights and Measures
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