

Waiver to the E-15 Access Standard Request

Waiver Class 2 – Incompatibility of fuel storage and dispensing infrastructure

Retail Motor Fuel Site: Name of company and store, address, phone number, name of person submitting:

Name of Company: _____

Name of Store: _____

Address: _____

Phone: _____

Name of person responsible for submitting the request: _____

To be completed by the retail dealer:

Inspection report completed by a certified or registered installation professional is included: _____

Inventory and description of gasoline storage and dispensing infrastructure is included: _____

Cost estimation to become compatible and comply: _____

Credible evidence/supporting documentation of incompatible infrastructure is included: _____

By signing this application, the retail dealer swears and affirms that all information in the application completed and submitted by the retail dealer is true and correct.

Printed Name

Signature

Date

To be completed by Iowa Department of Agriculture and Land Stewardship:

The retail motor fuel site has a current commercial meter license for motor fuels: _____

The retail motor fuel site has been recently inspected, sells and advertises for sale motor fuels: _____

Waiver Class 2 request and submitted documents have been reviewed: _____

Cost estimations of upgrades and RFIP eligibility have been reviewed: _____

Confirmation of certified or registered professional for inspection report: _____

 Certified or registered with Iowa Department of Agriculture and Land Stewardship: _____

 Certified or registered with Iowa Department of Natural Resources: _____

 Certified or registered with Iowa State Fire Marshall: _____

Cost of improvement exceeds any RFIP base amount: _____

The Waiver Request and included documentation have been reviewed and forwarded for consideration.

Recommended action: Approve ___ Deny ___

A Class 2 incompatible infrastructure waiver to the E-15 Access Standard has been issued by the Iowa Department of Agriculture and Land Stewardship.

Signature

Date

Iowa Department of Agriculture and Land Stewardship E15 Incompatible Infrastructure Class 2 Waiver Checklist

Location name

Address

Iowa tank registration number

Insurer policy and expiration date

Number of dispensers

Tank description

Inspector name and company

Date

If the installer believes that existing equipment is not compatible with E15, provide documentation and/or photos of the equipment that needs to be updated as well as an itemized cost estimate for the upgrades. **Note:** Failure to provide credible evidence and supporting documentation detailing why each listed infrastructure component is incompatible with the use of E15 will result in the denial of the waiver application.

Table 1: Non-Equipment Costs

	Cost Estimate
Labor	
Inspection	

Table 2: UST System

Component	Manufacturer	Model	Cost to make compatible	UL Listed?	Manufacturer Approved?	Currently dispensing E10?	Documentation of incompatibility included with application?
ATG Probe, float/sensor				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Flex Connectors				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

Iowa Department of Agriculture and Land Stewardship E15 Incompatible Infrastructure Class 2 Waiver Checklist

Table 3: Dispenser System

Component	Manufacturer	Model	Cost to make compatible	UL Listed	Manufacturer Approved	Currently dispensing E10?	Documentation of incompatibility included with application?
Hoses				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Nozzle/Swivel				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Break-away				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Flex Connector				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Emergency Shear Valve				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Check valve (suction system)				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
Stabilizer Bar				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	N/A
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

The signatories below hereby swear and affirm that all the information on this checklist is true and correct.

Signature of Retail Dealer

Printed Name of Retail Dealer

Date

Signature of Certified Iowa Installer

Printed Name of Certified Iowa Installer

Date

Iowa Department of Agriculture and Land Stewardship E15 Incompatible Infrastructure Class 2 Waiver Checklist

Table 4: Other Items (if applicable)

Component	Manufacturer	Model	Cost to make compatible	UL Listed?	Manufacturer Approved?	Currently dispensing E10?	Documentation of non-compatibility included with application?
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
				Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

E15 Access Standard – Class 2 Waiver FAQ

Who determines infrastructure compatibility?

IDALS does not determine infrastructure compatibility. Pursuant to Iowa Code section 455G.31, this authority lies with the Department of Natural Resources (DNR) for storage tanks and below ground infrastructure and with the Department of Inspections, Appeals, and Licensing (DIAL) for dispensers and above ground infrastructure.

What is a retail dealer required to submit as part of a Class 2 Waiver request?

Pursuant to Iowa Code section 214A.35, retail dealers must submit an application to IDALS and include the following information:

1. An inspection report completed by a certified or registered installation professional
2. An inventory and description of gasoline storage and dispensing infrastructure
3. Supporting documentation and credible evidence of incompatible infrastructure
4. An itemized cost estimation to become compatible and comply with the Alternative E15 Access Standard (i.e. advertising for sale and selling E15 from one fuel dispenser)

What is the cost threshold to be approved for a Class 2 Waiver?

Costs to a retail dealer to comply with the Alternative E15 Access Standard (i.e. advertising for sale and selling E15 from one fuel dispenser) must exceed \$107,142 to be granted a Class 2 Waiver.

What costs can be included in the cost calculation?

Because the Alternative E15 Access Standard only requires that E15 be offered through one fuel dispenser, application costs should be limited to only those component costs and associated time and labor necessary to provide E15 at one dispenser and only include those components that are not E15 compatible. Common components that are generally eligible for inclusion are included on the Class 2 Waiver Checklist.

Additional components that may be eligible following review by IDALS can be included on the additional blank lines.

An application must include an itemized listing of costs (cost estimate) for each incompatible component. Costs may include time and labor associated with making E15 available at one dispenser. Additionally, each component that is included in the cost calculation must be supported by documentation and credible evidence to demonstrate incompatibility with E15.

Can an E10 (UL87/87A) rated dispenser be included in the cost calculation?

No. Pursuant to Iowa Code section 455G.31, DIAL (and previously the State Fire Marshal's Office), has recognized E10 dispensers as compatible with the use of E15 since 2010, following guidance issued by Underwriters Laboratory (UL).

[See DIAL memo with additional information here.](#)

What should be submitted along with the Class 2 Waiver Checklist?

Pursuant to Iowa Code section 214A.35, applications must be supported by credible evidence that the gasoline storage and dispensing infrastructure is not compatible with the use of E15.

Failure to provide credible evidence and supporting documentation detailing why each listed infrastructure component is incompatible with the use of E15 will result in the denial of the waiver application.

What are acceptable forms of supporting documentation and/or credible evidence that IDALS will consider?

Applications must include an itemized cost estimate, such as a quote proposal, from a certified installer. In addition, supporting documentation is required detailing why each listed infrastructure component is incompatible with the use of E15.

Supporting documentation may include but is not limited to the following:

- Warranties or letters from equipment manufacturers or independent testing laboratories stating compatibility limitations
- Correspondence from equipment manufacturers/suppliers stating compatibility limitations
- Written statements from a certified installer detailing the compatibility limitations for said component
- Other relevant documentation

Note: In considering waiver applications, IDALS will review submitted documentation as well as any relevant state and federal equipment compatibility regulations. IDALS may consult with relevant state and federal agencies, as well as other industry experts, in reviewing applications to verify compatibility limitations.