



Office of the State Fire Marshal

All Test Results Reports Required to be Submitted Online: 10/13/2019

On 10/13/2018, several new requirements based on the 2015 federal EPA UST regulation changes became effective in Illinois. Among these are the testing requirements most of you by now are familiar with: 3 year spill bucket testing, 3 year overfill equipment inspections, 3 year containment sump testing for qualifying sumps, and annual leak detection certification. Many owners and operators, with the encouragement of OSFM, began testing early to get ahead of the rush. For a time, the reporting apparatus was not available at the OSFM contractor portal, and contractors were told to document their results, leave the reports at the facility, and the inspectors would review the contractor's proprietary reports when conducting inspections.

That, however, was a stopgap measure, and we explained at outreach meetings that it would be temporary while the OSFM online testing results report software was being created. For the most part, test result report forms have been available online to contractors at our contractor portal for a year now. Improvements had to be made, and it has been a work in progress. However, despite the need for additional tweaking, the system has been up and running for months now, and will soon be the only reporting we will accept. This requirement is included in the revised state UST regulations, and has been in effect since 10/13/2018. It has been somewhat loosely enforced up to now, but that will change soon. **Effective 10/13/2019, all required test result reports will be submitted by your contractors online at our contractor portal, using the OSFM forms available there.** Inspectors will no longer have the discretion to accept the contractor's own forms, either paper or digital, while the inspectors are conducting compliance inspections. If testing is conducted, even if all equipment passed the testing, the testing will not be considered finished until the reports are submitted online by your contractor at the OSFM contractor portal. If there are no OSFM testing reports available in our inspection forms list for an inspector to check, the inspector will write an NOV, and compliance will be achieved when both the equipment testing has been conducted and passed, **and** the required OSFM testing results report forms have been submitted at the portal and accepted following review by OSFM staff.

Most contractors have been following this requirement for months, and there will be no problems with a facility having completed the requirements to test and report the results in conformity with OSFM requirements. For those contractors who are not yet fully engaged in the required reporting procedure, though, their clients may be exposed to NOVs as a result of them not following OSFM reporting requirements. We recommend that you discuss this with your contractors in order to be sure that you and they are on the same page regarding complying with these OSFM requirements. NOVs for testing that was conducted and passed, but not properly reported, are avoidable as long as your contractor submits the reports in a timely manner at the OSFM contractor portal, using the OSFM online forms available there.

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