



UST TALK

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Newsletter for Underground Storage Tank Owner/Operators



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Self-Certification of Your Facility...Big Changes In Store!

Attention owners and operators of Underground Storage Tank (UST) facilities! The Department of Environmental Conservation (DEC) is proposing a major change to the way we regulate your facilities. Beginning in Spring 2006 (tentatively), permit holders will have to **INSPECT THEIR OWN FACILITIES**. Once the facility is inspected and all UST components checked, the permit holder must **CERTIFY** the facility is in compliance, or submit a **RETURN TO COMPLIANCE** plan.

This is a major change from how the State inspection program currently runs. According to Commissioner Jeffrey Wennberg "We are only inspecting about 100 facilities a year; at that rate, it could be ten years between state inspections at a given facility. Self-certification allows us to see how the whole industry is doing every year, and ensures the tank system gets checked".

Based on the current inspection method, the compliance rate for UST facilities in VT is about 50%. This means every other facility has SIGNIFICANT operational problems. These problems include:

- Leaking or faulty spill buckets
- Automatic tank gauging systems in alarm mode
- Failure to conduct monitoring
- Failed electronic monitoring

Owners/operators of UST facilities will either have to conduct an inspection or hire a contractor to do the inspection. Equipment that is not operating correctly will have to be replaced or repaired. If repairs/replacements cannot be completed by the self-certification date, a Return to Compliance Plan will have to be submitted. We hope to have systems in place to allow on-line filing of self-certification forms, as well as processing paper submittals.

Extras

In addition to the UST system components, we will be gathering information on the compliance rate for three other environmental programs; Air Pollution (Stage I and Stage II Vapor Recovery), Hazardous Waste Management, and Underground Injection Control (Floor Drains). The potential to certify compliance with four environmental programs, and the potential to transfer the self-certification model to other environmental program and industries were key components in securing EPA funding!

"The hope here is that with facilities self-inspecting every year, minor problems will be discovered and corrected before they have a chance to become major problems. We believe this will lead to owners/operators being much more educated about their UST systems, and an improvement in the compliance rate" says Ted Unkles, UST Program Supervisor.

Self-Inspect My Facility?! HELP!



Some owners/operators may not be fazed by the idea of self-inspection, because they have the expertise and knowledge of the system. However, many owners/operators may not have the faintest idea on how to proceed with getting the work done. The UST Program is ready to assist!

First of all, we are developing a checklist and workbook for owners/operators to use for inspection of their facility. We are developing these documents with assistance from owner/operators and industry representatives. These materials are very complete, and are intended to allow an owner/operator to check their facility in a systematic way. Using the materials will allow the owner/operator to examine all the system components, from tank monitoring to piping, to spill and overfill protection. The materials will be mailed to owners/operators in plenty of time (60-90 days) to allow folks to get started early and not have to work frantically near the deadline.

In addition to the workbook and checklist, the UST Program will be conducting regional training workshops. The workshops are tentatively

scheduled for late winter 2005/early spring 2006. UST Program staff will be there to walk through the documents, answer questions, and provide assistance. We will be announcing dates/locations in winter 2005/2006.

Compliance Rate: Behind the Numbers

Under the current state inspection plan, we can only report on the compliance rate of approximately 100 facilities we actually inspect. With the self-certification program, we will be using statistics to report on the compliance rate of the entire VT UST industry (approximately 1100 facilities). We have received a \$200,000 grant from EPA to implement this program. Here's how it works:

- In 2005, UST staff will be conducting baseline inspections. The number of randomly selected inspections will allow us to determine, with a statistically valid degree of certainty, the compliance rate for the industry.
- After the self-certification round is complete, a statistically valid number of verification inspections will be conducted. After verification, we will be able to state the compliance rate for the industry.

Hopefully, after verification the compliance rate will have improved from the previous year!

REMINDER

Operating an underground storage tank without a valid permit is in violation of the Underground Storage Tank rules. Permits are issued for up to five years, most with an annual fee payable. Non-payment of the annual permit fee voids the remaining years of the permit. Review your underground storage tank permit and make sure it is current.



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