

US EPA ARCHIVE DOCUMENT

Retail Gasoline Sales Sector
Environmental Results Project
VT Department of Environmental Conservation
Waste Management Division

For the Period:
October 1, 2004 to March 31, 2005

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Underground Storage Tank
Section Chief

This is the first report for the VT Department of Environmental Conservation "Retail Gasoline Sales Sector, Environmental Results Project (ERP). The report covers the time period October 1, 2004 to March 31, 2005. A report for the first quarter of the grant period (October 1 to December 31, 2004) was not done.

The quarter was largely spent performing administrative tasks necessary to implement the ERP. This included drafting of regulatory revisions (ongoing), outreach to the regulated community (ongoing), getting a contract drafted and approval to hire the Cadmus Group to assist us (done), and trying to arrange for Information Technology (IT) support for this project (ongoing).

Progress Towards Milestones (based on the 11/15/04 draft timeline):

1. Contractor – Once we obtained permission from the VT Joint Fiscal Office to accept the ERP Grant, we began the process of hiring a contractor to assist us in the implementation of ERP. We sought permission to issue a sole-source contract to the Cadmus Group (Watertown MA). Cadmus has extensive experience with ERP and can provide the full range of services we feel we need. We received permission to issue the contract in March 2004. Unfortunately, the request took far longer than normal to be processed. The contract was signed and is in place as of April 5, 2005.
2. Position – In early discussions with the IT Director, it appeared as if sufficient IT resources existed to assist us in implementing our project. However, it now appears as if IT Division will not be able to perform the programming work needed to enable us to implement the ERP (specifically, re-design our UST database, link the UST database with the Underground Injection Control and RCRA databases, set up the on-line self-certification system, set up the scanning process for paper self-certification submittals). Therefore, we are hoping to use ERP funds to hire a programmer rather than a field staff or UST program specialist.
3. Industry Outreach: We had informal discussions with industry lobbyists beginning with the notification of grant award. We attended a meeting between the DEC Commission Jeff Wennberg and the lobbyists on November 5, 2004. At that meeting, the lobbyists invited us to speak at the VT Petroleum Association annual meeting in December. The annual meeting was attended by representatives of most of the larger fuel marketers in the State. There was a lively discussion of the new program, but we cannot draw a distinct conclusion as to the industry opinion on self-certification.
4. UST Regulations Revisions: We are making steady progress on this task, which is necessary in order to implement the self-certification program. Our current time line is for starting the formal review and adoption process in July 2005.

Impediments:

1. IT support: When the grant proposal was prepared, we coordinated with our IT staff to ensure our program IT needs would be able to be met. We met again with IT staff after grant award, and it appeared as if IT needs would be

able to be met. However, a subsequent resignation has left the IT Programming Section short-handed. Given current resources, IT has now revised their opinion as to whether they can meet our program needs according to our timeline. Compounding this situation is an Agency-wide shortage of IT resources, and a review of how IT resources are and should be allocated across the Agency. We are working on obtaining permission to utilize grant monies allocated for personnel costs to hire a programmer instead of a program staffer or field inspector. IT resources are critical to this project to enable us to manage the tremendous amount of data the project will generate (baseline inspections, self-certifications, return to compliance forms, follow-up inspections). Another possible solution is to hire a contractor to perform the programming work. We are working on this as our highest priority. If we are able to hire a programmer, we do not anticipate a need for assistance from EPA in this matter. If we have to hire a contractor to perform this task, we may have to file a grant amendment to use funds currently designated for personnel costs. There may be other funds within DEC available to pay for a programming contract.

Financial Report: As of March 31, 2005, we had not expended any funds. No travel was undertaken; no equipment was purchased; the contract had not yet been signed; no personnel have been hired.

QAPP Revision: Marc Roy will be replacing Peter Marshall as Project Manager. We do not have other significant revisions to the QAPP at this time.