

US EPA ARCHIVE DOCUMENT

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

For the Period:
October 1, 2005 to December 31, 2005

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This is the fourth report for the VT Department of Environmental Conservation “Retail Gasoline Sales Sector, Environmental Results Project (ERP). The report covers the time period October 1, 2005 to December 31, 2005.

Much of the time spent on the ERP in this quarter included administrative tasks necessary to implement the ERP. This included drafting of regulatory revisions (ongoing), outreach to the regulated community (ongoing), and conducting necessary upgrades to the UST database. In addition, we have been working with the Cadmus Group on the development of the inspector checklist, self-certification forms and workbook, and the statistical package. We have also completed our baseline inspections.

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

1. Contractor Tasks– Beginning in April 2005, The Cadmus Group was on board to help us develop materials necessary for the ERP. Work began with an internal review of the documents developed by Rhode Island to see what modifications were needed to make the documents work for VT. After an initial review, the documents were forwarded to Cadmus for VT-specific modifications. We have received our “final” checklist and have begun using it in the field. Cadmus is working on the self-certification forms and workbook; we reviewed a first draft in October, 2005. Cadmus is currently finishing the workbook and self-certification forms; the tentative completion date is We received our statistical package from Cadmus in August. We have used the statistical package to develop our baseline inspection phase.
2. IT Position – The IT specialist, Michael Inners, started work on 9/12/05. Michael has been working on upgrading our UST database to allow us to store and manipulate ERP data. Michael will also be developing the on-line filing of self-certification forms.
3. Industry Outreach: We attended the annual meeting of the VT Petroleum Association on 12/15/05 to present information on the ERP (among other topics). The industry appears to support the concept of annual self-inspection and self-certification. One concern raised was the potential shortage of contractors that could occur as a result of facility owners waiting until the last minute to conduct inspections/repairs.
 - a. UST Regulations Revisions: We continue to make steady progress on this task, which is necessary in order to implement the self-certification program. However, the revisions are taking longer to complete than first anticipated. Revised Regulations:
4. Baseline Inspections: We have completed our baseline inspections. We were aiming for 100 randomly-selected inspections before the “end” of the VT field season (approximately November 21). 100 inspections were conducted, which gives us the desired 95% confidence level with a margin of error of 9.2%. Our field inspectors did a great job getting out to all areas of the state and conducting 100 inspections in fewer than 90 days.

Impediments:

1. IT support: We have hired an IT specialist to work the data base, electronic filing of self-certification forms, and other items necessary to make the project as automated as possible. Based on performance so far, it does appear as if the additional staff person will be able to do the work necessary to enable us to be ready to conduct the first round of self-certifications in Spring 2006.
5. Revised UST Regulations: While we are making steady progress, it is appearing more unlikely that we will have the regulations in place before the scheduled first round of self-certifications (late spring/early summer 2006). This is especially true given a recent re-deployment of legal services; our lead attorney in the review process, Matt Chapman, has been assigned the lead for this year's legislative duties. We have several options in mind for dealing with this, including:
 - a. Pushing the first due date for self-certification back, after the effective date of the regulations;
 - b. Having the first year be voluntary self-certification, and subsequent years mandatory;
2. Pushing the first round of self-certification back to calendar 2007.

Financial Report:

Information removed by EPA as confidential business information

QAPP Revision: there were no revisions to the QAPP this quarter.

