

US EPA ARCHIVE DOCUMENT

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

For the Period:
July 1, 2006 to September 30, 2006

Marc Roy
Underground Storage Tank
Section Chief

This is the seventh report for the VT Department of Environmental Conservation "Retail Gasoline Sales Sector, Environmental Results Project (ERP). The report covers the time period July 1, 2006 to September 30, 2006.

Most of the time spent on the ERP in this quarter working was spent drafting of regulatory revisions (ongoing), and outreach to the regulated community (ongoing).

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

1. We have completed our internal review of the following items:
 - a. The Self-certification checklist and forms (non-applicability, certification, and return to compliance forms), and an instruction booklet for their use.
 - b. The Self-certification workbook (based on the EPA and RI UST workbooks).
2. IT Tasks – Our IT specialist (Michael Inners) has completed upgrading our UST database to allow us to store and manipulate ERP data. Work on other IT tasks was halted over this quarter due to priorities in other programs. Over the next two/three quarters, we will be developing the on-line filing of self-certification forms, as well as formatting tablet personal computers to allow for the direct down-load of inspection data from the field to the database.
3. Industry Outreach: We have continued to provide monthly updates on the project to industry. We are currently working with industry to convene a review group. To assist industry with their review, we have posted the draft workbook on our web site
<http://www.anr.state.vt.us/dec/wastediv/ust/envresults.htm>
In addition, we have met with industry representatives twice (August 8 and September 13, 2006). In both meetings, we have summarized revisions to the UST regulations, and provided details of the ERP.
4. UST Regulations Revisions: We have begun the internal rule-adopting process for DEC. The draft regulations have been presented to Division Directors for their review prior to introducing the documents to the larger review committees (State Agencies and then Legislature).

Impediments:

UST Service and Repair Industry: Inspections required by the Energy Act 2005 have resulted in the issuance of over 200 Notices of Alleged Violation requesting repairs or upgrades. Many of the owner/operators have not been able to meet deadlines specified in the Notices due to the lack of contractors; contractors simply cannot meet the demands of their clients within the 4-6 weeks generally given for compliance. During our meetings this summer, some members of the industry expressed concern the same shortage would

be manifest if we set a self-certification date of June. Their feeling is the amount of time between ice-out and June, and the number of available contractors, is insufficient to get repairs and maintenance done. Therefore, we are considering pushing the due date for self-certification to September 2007. This date would hopefully allow enough time for most owner/operators to conduct their self-inspection, contractors to conduct repairs, and file their certification. A September self-certification date also allows enough time for return to compliance plans to be completed before the winter weather sets in.

Financial Report:

Financial Information Deleted by EPA as Confidential Business Information

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