Division of Waste & Hazardous Substance
Tank Management Section
Underground Storage Tank
Regulatory Workshop
April 16, 2019

Agenda

- Introductions
- EPA/Compliance Date
- Regulation Promulgation Schedule
- Summary of Regulatory Changes
- Public Comments
- Next Steps

Delaware Underground Storage Tank Regulatory Revision Workshop

APRIL 2019

Agenda

- Introductions
- EPA/Compliance Date
- Regulation Promulgation Schedule
- Summary of Regulatory Changes
- Public Comments
- Next Steps

DNREC Schedule

- Delaware's schedule
  - Public Hearing:
    - Summer 2019
  - Promulgation:
    - October 2019

Delaware Specific changes

- UST Operator Training
- Financial Responsibility and Insurance; changes to assist Owners/Operators
- Out of Service and Empty requirements
- Delivery and Dispensing Prohibition
- Product Piping Slope Exemption
- 30-Day Routine Inspection
- Uncontained containment sumps
- Marinas

UST Operator Training

80% or higher constitutes a passing grade necessary to receive certification

Financial Responsibility

- Termination or nonrenewal notification to the Department
  - By insured – existing requirement
  - By insurer – new requirement
- Installation requirements – complete insurance policy
- Financial Responsibility Requirements – Part F annual submission

Financial Responsibility

- Record keeping Part A 5.1.4.14 – lifetime of Ownership
- Cause for Dispensing/Delivery Prohibition – Part A 9.2.1.4
- Insurance Policy Exclusions Prohibited Part F 2.2.4/2.2.5
  - Voluntary UST System removals
  - Self-insured Retentions

Out Of Service vs Empty – FR Considerations

Definition of Out Of Service
Is not in use – no Regulated Substance added or withdrawn from the UST System
Is *intended* to be put back In Service

Definition of Empty
All Regulated Substances have been removed from the UST System using commonly employed practices so that no more than one inch (1) or 2.5 centimeters of residue, or three tenths of one percent (0.3%) by weight of the total capacity of the UST System, remains in the UST System.

Out of Service vs Empty – FR Considerations

Requirements for *Out of Service*:
- Operation/Maintenance of corrosion protection
- Operation/Maintenance of Release Detection
- UST System testing
- Routine inspection
- Financial Responsibility

Site Assessment when UST System is Out Of Service for twelve (12) months: no longer required to render the UST System empty

Out of Service vs Empty – FR Considerations

Requirements for *Empty UST Systems*:
- Vent pipes open and functioning
- Cap and secure all other Pipes, pumps, manways, and Ancillary Equipment
- Continue corrosion protection until UST System is Removed or Closed In Place
- Within three (3) months of rendering UST System Empty:
  Site Assessment, or Removal, or a Closure In Place is required

Delivery and Dispensing Prohibition

Part A Section 9
Added dispensing prohibition to potential enforcement action when certain conditions exist:
1. Imminent threat – Part A
2. Lack of Spill/overfill prevention, Release Detection, Corrosion Protection – Part B
3. Owner/Operator out of compliance with indicated Release investigation – Part E
4. Owner/Operator out of compliance with financial responsibility requirements – Part F

Delivery and Dispensing Prohibition

"Imminent Threat" means an actual Release or a potential for a Release which requires action to prevent or mitigate damage to the environment or endangerment to public health or welfare.

Dispensing prohibition tag shall be affixed to the dispenser in conjunction with delivery prohibition tag affixed to the fill pipe.

Product Piping Slope Exemption

If seeking a UST System installation not meeting 1/8" per foot slope requirements, the following conditions shall be met:

- Product piping shall be pressurized
- Sump sensors for all Containment Sumps
- Annual line tightness testing
- Sump jumper tubes removed/product piping test boots pulled back
- Continuous interstitial monitoring
- Product piping installed with negative slope toward dispenser sumps is prohibited (except in accordance with RP 1000 for Marinas)

30-Day Routine Inspection Exemption

STP Containment Sumps may be inspected annually instead of once every 30 Days if the following is met:

- Continuous Interstitial Monitoring
- Product, Vent, Vapor, Return, and Suction Piping shall have a 1/8" per foot slope back to the tank
- Sump sensors that are part of Release Detection must be tested annually and monitored once every 30 Days

Hydrostatic Testing of Containment Sumps

- Post-construction: completely fill containment sump and held for 24 hours
- Periodic testing: sump is filled and held in accordance with the manufacturer's specifications or reference standard, whichever is more stringent

Non-liquid Tight Access Structures

- Containment sump requirements:
  - Dispenser, Tank Top, Transition and any other non-liquid Tight access structures
  - Upgraded to liquid tight prior to January 1, 2025

Marinas

For existing UST Systems at marinas there are a few important requirements identified in NFPA 30A:

- Prohibition of nozzle hold-open latch devices
- Automatic-closing dispensing nozzles
- Shut off valves

Marinas

For newly installed UST Systems at marinas or any retrofits at existing marinas. This is not retroactive.

A few important requirements in response to PEI RP 1000 standards:

- Exposed Piping must have UV protection
- Incorporation of shut off valves and auto shutoff nozzle
- Use of marine compatible materials

Federal Requirements

- Compatibility – new section Part A Section 13.0
- Date for Overfill prevention – Oct. 13, 2021
- Airport Hydrant tanks
- Field constructed tanks

Compatibility

Owners and Operators shall use an UST System made of or lined with materials that are Compatible with the Regulated Substance Containing Ethanol and Biodiesel stored in the UST System.

Compatibility shall be demonstrated by one of the following:

- certification by a nationally recognized independent testing laboratory
- equipment or component manufacturer's approval
- other method no less protective of human health and the environment

Overfill Prevention – Federal Requirement

Owners and Operators shall ensure that overfill prevention equipment is inspected a minimum of *once every three (3) years*. The first inspection shall occur prior to October 13, 2021. At a minimum, the inspection shall ensure that overfill prevention equipment is functioning in accordance with manufacturer's specifications and shall activate at the correct level.

Overfill Prevention – Delaware Requirement

- Vent line flow restrictors (ball float valves) shall not be installed for overfill prevention *after the Effective Date of these Regulations*.
- Existing vent line flow restrictors shall be removed not later than January 1, *2025* unless the following condition exists:
  - the overfill prevention equipment automatically achieves partial shut off of flow into the UST when the UST is eighty five percent (85%) full and complete shut off of flow at eighty eight percent (88%) full.

Part H – Installation, Operation and Maintenance of Field Constructed UST Systems

- One-time notice to the Department of the UST System
- Compliance with requirements of Parts A, B, C, D, E, F, & G
- Upgrade Requirements
- Routine Inspection Requirements
- Release Detection Requirements
- Closure Requirements to Previously Removed or Closed in Place UST Systems

Part I – Installation, Operation and Maintenance of Airport Hydrant Systems

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- Upgrade Requirements
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Public Comment

Due Diligence Review Opportunities

Current Regulations:
http://delcode.delaware.gov/title7/c074/index.shtml
Draft Regulations:
http://www.dnrec.delaware.gov/tanks/Documents/UST/Draft%20Regulations%201-19%20(002).pdf
Spreadsheet of Changes:
http://www.dnrec.delaware.gov/tanks/Documents/UST/EPA%20Amendments%20Spreadsheet%20List%20UST%20Regulations%202018%20Copy%201.pdf

Written Comments on the
Draft Regulations
sent to:

DNREC_USTRegulations@delaware.gov

UST Regulatory Workshop at Lukens Drive Office, 10:00 am

Name (Please Print)	Address	Phone Number	E-mail address
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Paul Hufschmidt	Dover DE	(302) 883 4955	paul@servicenergy.com
Glenn D'Antuono	105 Fieldcrest Ave Suite 505 Edison, NJ 08837	(732) 738-2909	gdantuono@speedway.com
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Kathy McCaney	3801 West Chester Pk Newtown Sq. PA	PA 610 833-3761	Kathleen.McCaney@Sunoco.com

UST Regulatory Workshop at Lukens Drive Office, 10:00 am

Name(Please Print)	Address	Phone Number	E-mail address

UST Regulatory Workshop at Lukens Drive Office, 10:00 am

Name(Please Print)	Address	Phone Number	E-mail address
Alison Quimby	———		AQuimby@wilmingtonde.gov
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Sandy Carl	Crompco	610-276-5973	Sandra.Carl@Crompco.com
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Kathy Stiller	801 Industrial St. Wilm DE 19801	302-656-9600	KStiller@brightfieldsinc.com
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Dennis Berry	689 Meeting House Road Hockessin De 19707	302 438-6839.	berydr47@AOL.com

UST Regulatory Workshop at Lukens Drive Office, 10:00 am

Public Workshop, DAQ-TMS, DNREC
Revisions to Regulation 1124 Sections 26 and 36, and Regulation 1351
April 16, 2019. **10 AM, 391 Lukens Drive, New Castle, DE**

Sign-in

Name & Affiliation	Telephone	E-mail Address	Join Review Committee?
Frank Gao, DAQ-DNREC F.G.	302-323-4542	Frank.Gao@ delaware.gov	Yes
Jim Coverdale, DAQ-DNREC	302-739-9402	James.Coverdale@ delaware.gov	Yes
Paul Hirschmann Service Energy	302 883 4911	paul@serviceenergy.com	Yes
Glenn D'Antuono Speedway LLC	732-738-2909	gdantuono@speedway.com	Yes
Josh Lemmons Coastal Pump & Tank	302-270-9020	Josh_Lemmons@coastalpumptank.com	Yes
Brad Moore Contractual Carriers	302-453-1420	BMoore@WEDistribute.com	Yes
Chris Valligny Advanced GeoServices	610-840-9195	cvalligny@ advancedgeoservices.com	No
Ellen Valentino		Ellen@MAP.com	Yes
CJ Schultz Trinkology	614-599-3410	cjschultz@trinkology.com	NO
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Aimee Kegley	3023188580	akegley@dsmre.com	No
John Olko	717-669-4006	JOlko@PetroMG.com	NO
Monica Welu	573-701 8589	monica.welu@pbfenergy.com	NO
Joshua Wolff	610-558-8521	joshua.a.wolff@uwa.com	Yes
Tony Gabatosi	3023338034	Tony.Gabatosi@gsa.gov	

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Sign-in

Name & Affiliation	Telephone	E-mail Address	Join Review Committee?
Bob Lattomus Calpine	(302) 761-7222	robert.Lattomus@Calpine.com	No
1401 Northeast Blvd	302-654-2352		
Sal's Auto Services Inc Salvatore Panaggillo	302-654-1168	Sals Auto 3000@Gmail.com	YES ~~No~~
Mid-Atlantic Petroleum.	302 438-6839	berryclr47@AOL.com	No
Steve Cornog Monridge Construction	610 721-0183	sac@monridge2.com	NO
Richard Negrete GPM Investments	(302) 697-7094	rnegrete@gpminvestments.com	yes

UST Regulatory Workshop at Richard and Robbins Building at 6:30 pm

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Tammy Swiggett	100-Saltcreek Drive	302-678-8014	Quick03@Rodnersmarkets.com
Paul Ranalli	111 Reese Ave Hampton	302-398-5054	pranalli@burrislogistics.com
Ellen Vaterlaus			Ellen@mapda.com.
Kirk McCauley			KMCCAULEY@WMDA.NET
MARK BAKER		302.684-8569	MARK@WILSONBAKER.COM
CHUCK ERNESTO		302-629-5100	CERNESTO@HERTRIGHS.COM
Jason Tyler		302-236-2874	Jtyler@frederickford.com
PARIN PATEL	595 FOREST ST	302-465-5501	The_depot2@aol.com.

UST Regulatory Workshop at Richard and Robbins Building at 6:30 pm

Name(Please Print)	Address	Phone Number	E-mail address
David Small	Duffidd Assoc	302 239-6634	dsmall@duffnet.com

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APRIL 2019

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  - By insured – existing requirement
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- Installation requirements – complete insurance policy
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Definition of Out Of Service:
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Added dispensing prohibition to potential enforcement action when certain conditions exist:

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- Containment sump requirements:
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  - Upgraded to liquid tight prior to January 1, 2025

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For existing UST Systems at marinas there are a few important requirements identified in NFPA 30A:

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Federal Requirements

- Compatibility – new section Part A Section 13.0
- Date for Overfill prevention – Oct. 13, 2021
- Airport Hydrant tanks
- Field constructed tanks

Compatibility

Owners and Operators shall use an UST System made of or lined with materials that are Compatible with the Regulated Substance Containing Ethanol and Biodiesel stored in the UST System.

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BIOFUEL AND ETHANOL

Overfill Prevention – Federal Requirement

Owners and Operators shall ensure that overfill prevention equipment is inspected a minimum of *once every three (3) years*. The first inspection shall occur prior to October 13, 2021. At a minimum, the inspection shall ensure that overfill prevention equipment is functioning in accordance with manufacturer's specifications and shall activate at the correct level.

Overfill Prevention – Delaware Requirement

- Vent line flow restrictors (ball float valves) shall not be installed for overfill prevention *after the Effective Date of these Regulations*
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Part H – Installation, Operation and Maintenance of Field Constructed UST Systems

- One-time notice to the Department of the UST System
- Compliance with requirements of Parts A, B, C, D, E, F, & G
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Public Comment

Due Diligence Review Opportunities

Current Regulations:
http://delcode.delaware.gov/title7/c074/index.shtml
Draft Regulations:
http://www.dnrec.delaware.gov/tanks/Documents/UST/Draft%20Regulations%201-19%20v002).pdf
Spreadsheet of Changes:
http://www.dnrec.delaware.gov/tanks/Documents/UST/EPA%20Amendments%20Spreadsheet%201.list%20UST%20Regulations%202018%20Copy%201.pdf

Written Comments on the
Draft Regulations
sent to:

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WMDA/CAR Service Station
and Automotive Repair Association

April 16, 2019

The Department of Natural Resources and Environmental Control
Tank Management Section (TMS)
Division of Air Quality (DAQ)

RE: Public Workshop on proposed regulations TMS and DAQ

WMDA represents independent operators of Gas stations and convenience stores that sell motor fuel. Some of our members lease from suppliers/Jobbers of motor fuel and some own their locations.

WMDA understands the need to meet Federal EPA regulation on underground storage tanks. The proposed regulations were discussed at meetings with TMS and stake holders.

Our main concern is with DAQ proposed regulations that were not openly discussed and are far beyond EPA regulation required for approved State implemented Plan (SIP) Approval.

These proposed regulations would come with high cost, will hurt Delaware businesses and consumers. Costs associated with DAQ proposal could very well spell the end for locations that are struggling now. DAQ needs to sit down with stake holders and discuss cost versus benefits and back it up with data that is not supplied by equipment manufacturers.

Kirk McCauley
Director of Government Affairs
WMDA/CAR
kmccauley@wmda.net
301-775-0221 Cell

April 16, 2019
UST Regulations Workshop
Submitted Comments by Ellen Valentino

Thank you for the fair and open process.

Below are comments that outline our remaining concerns with the draft UST regulations as presented at the Public Workshops on 4-16-19.

Part B, 1.14

In our last meeting there were a list of 5 items discussed for conditions to utilize piping without the 1/8" slope requirement. At the meeting it was determine that two of the conditions (4 and 5) would be combined with an "or", thus leaving 4 conditions to be met. In the revised regulations circulated there are now 7 conditions.

We have concerns with the following items not specifically listed and agreed to at our meeting:

- 14.1.5; This section appears to override the ability to use continuous interstitial monitoring in place of annual piping testing requirements that is available to other forms of double wall piping. This was not discussed as a condition at the meeting. It appears to be another unnecessary barrier to not using a 1/8" slope by requiring a continuous vacuum monitoring system.

- 14.1.6; This was not discussed at the meeting. Can the Department clarify how this section relates to Section 1.19.2, Piping Interstitial Monitoring Requirements?

There is another section that references 1/8" slope that is now of a concern:

- 1.31.6 Routine Inspections; Submersible sump containment sumps are permitted to be inspected once every 12 months instead of every 30 days. There is a list of conditions listed, including continuous interstitial monitoring of the piping system. However, also included is that all piping must have the 1/8" slope. This means that any system installed without slope will not be able to take advantage of the once every 12-month inspection interval. There is no reason for this. This was not discussed, but it does appear that this edit occurred back in a 2017 draft of the regulations. It wasn't impactful at the time because the slope was required elsewhere. Now it stands out as another unnecessary burden to installing a system without 1/8" slope.

Part B, 1.31.1.6 – Our members appreciate the provisions for sump inspection frequency which allow UST owners to rely on properly installed sensors for monthly release detection and not put individuals at risk every month with confined space and traffic hazards. It also reduces the probability of water intrusion with the sump lid not being removed every 30 days. However, there is an opportunity to go even further. The EPA has recognized a low-level liquid alternative integrity test method for sumps used as secondary containment and interstitial monitoring for UST system piping as "equally protective of the environment". This means that this testing method can be incorporated into the revised regulations. We urge consideration of this test method as the full sump testing method greatly increases the cost of compliance.

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