

# Storage Tank Regulatory Impact and Updates



2015 EH&S International Communications Conference

September 23, 2015

- **Agenda**
  - Introduction to Tait
  - Regulatory Changes
  - Fiscal Impact
  - Compliance Strategies
  - Q&A

- California Environmental and A&E Firm
- 51 Years in Fueling Industry
- 20+ Years of Telecom Experience
  - Nationwide Service
  - Over 80,000 Operator Inspections
  - Over 30,000 Compliance Tests
  - Hundreds of UST/AST Installations
  - Thousands of Repairs

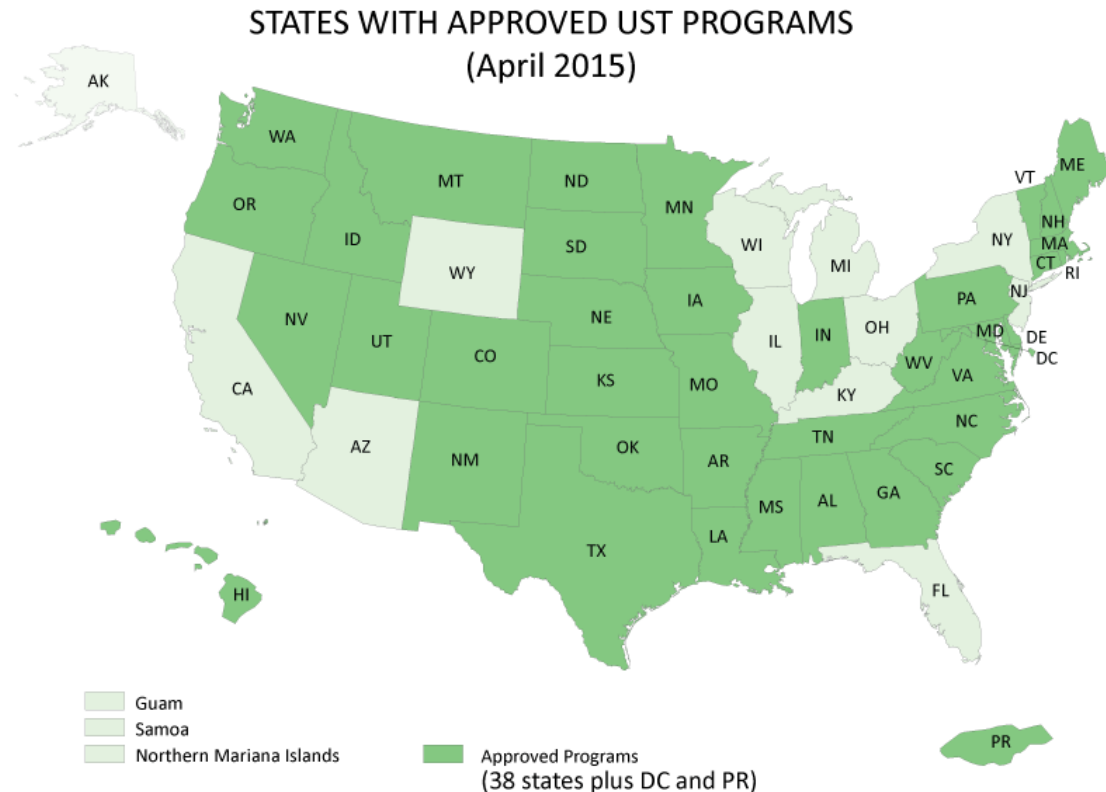
## • Timeline

- 1988 Changes
  - Leak Detection
  - Overfill/Spill Prevention
  - Cathodic Protection
- 11/18/11: Draft Released for Comment
- 4/19/12: Comment Period Closed after Extension
- 4/12-9/14: Final Regulations Drafted
- 4/30/15: OMB Interagency Review Completed
- 7/15/15: Publish to Federal Register
- 10/13/18: Implementation Deadline



## Implementation Deadline

- Non-SPA (12 States):
  - 10/13/18
- SPA:
  - 10/13/18 to submit updated plan to EPA which includes new changes
  - Up to three years from plan submission for compliance (10/13/21)



- Significant Regulatory Changes
  - Monthly Inspections
  - Annual Monitor Certification
  - Triennial Spill Bucket Testing
  - Triennial Secondary Containment Testing
  - Emergency Generator Deferral Expires



- **Annual per Site Compliance**
  - Monitor / ATG Certification - \$600
  - Monthly Inspection - \$1,800 (\$150/mo.)
  - Spill & Secondary Containment Testing - \$500 (\$1,500/3 yrs.)
  - Repairs - \$500 (\$1,500/3 yrs.)
  - **TOTAL - \$3,400 per Site (\$1,600 w/o insp.)**
    - Does not Include Internal Costs
    - EPA Estimate \$890 per Site
    - PMAA Estimate \$6K-\$10K / Site (w/ minor repairs)

- **Control Costs**
  - Formalize Vendor Network
  - Establish Multi-Year Contracts
  - Combine Services
    - Tests, Inspections, Repairs
  - Incorporate New Requirements into Existing Procedures
- **Manage Deadlines**
  - Electronic Tracking System
- **Manage Data**
  - Centralized Data Management
  - Electronic Form Submission





LAND DEVELOPMENT

RETAIL DEVELOPMENT PROGRAMS

ENVIRONMENTAL SERVICES

PUBLIC PROJECTS

# Q&A