

List of Responses by the Participants at the State of Delaware's Underground Storage Tank
Advisory Committee Meeting on October 26, 2016 to the Question:

What would you like the USTAC to work on?

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1. Understanding of changes to notice for activities.
2. Focus on non-compliant USTs.
3. Less discretion in regs (need to be clearer).
4. Alignment of Fed Regs and DNREC Tank Regs (try not to make the DNREC Regs more onerous than Fed Regs).
5. Look at developing an Ad-hoc committee that meets periodically like MD.

WEBSITE

6. Can reporting by owner be done online and stored in database? To allow for statistical analyses of monitoring, detection hydro water level, water quality in wells.
7. Date all regs – updates on website to ensure we are using current regs.
8. Website search field – able to search for specific questions (i.e., when is training required? what are reporting requirements?). Allows you to click on that section of the regulations.

TRAINING/EDUCATION

9. Operator training and training materials.
10. Should DNREC develop a “tester” certification or registration?
11. Outreach for tank owners and realtors.
12. Educational needs and mandates.

TECHNICAL

13. Stormwater coordination with MS4 industrial stormwater program.
14. How AST piping will be addressed and coordinating with AST regulations.
15. Pre-2008 double walled product lines.
16. Any DEF (Diesel Exhaust Fluid) mention in the new regs?
17. Overfill protection methods: flapper requires fuel delivery truck to have flapper tool?
18. Cleanups – Increase funding.
19. Reconsider CPM utilization with Stage II Decommissioning.
20. Mandate STP & Dispenser Sump Installation.
21. Any thought on getting fuel carriers involved since they affect the delivery of fuels to a UST System. Carriers need to be responsible to avoid overfills.
22. Provide assistance in determining how to respond to microbes in diesel – hopefully this will be resolved prior to EPA lowering sulfur content in gasoline.

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PERMITS

23. Reduce permit review time.
24. Provide an exact checklist/Rep's for install permits.
25. Reduce/Eliminate retrofit permits requirements.
26. Retrofit permit process.
27. Clear, written permit requirements for tank installations.
28. Tank installation permit process.
29. Reform permit process so it does not take 6 months for review and approval.
30. Timeliness for permits being returned/approved.
31. Decrease permitting time.
32. Streamline permitting process.
33. Review of current finances/funding – permit fee structures.

RETROFITS

34. Address emergency repairs/retrofits.
35. Guidelines for retrofit testing.

UST TESTING REQUIREMENTS

36. Clarify all testing requirements – be consistent.
37. Clear testing and compliance guidelines.
38. Monthly inspections – requirements/details of inspection items (sumps).
39. Reconsider operator inspections when containment monitoring is present.
40. Frequency of sump testing.
41. Can sump testing protocol follow federal recommended practices (3 yr. – filling sumps completely vs. above penetration).
42. Change monthly visual sump inspections to Federal annual walk through inspection.
43. For those with electronic sensors in the sumps, would like to see Reg A rewritten to allow less frequency to inspect vs those without electronic sensors.
44. Should DNREC adopt standardized forms for documenting newer testing and inspection requirements such as PEI RP1200?
45. Would DNREC consider incorporating PEI RP1200 into the regs for completing all the new testing that is mandated?
46. Accepting new technology
 - sensors for STP containments follow the EPA for STP sump checks – annually.

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- monthly release detection reports accept 3rd party reporting documents.
- 47. Release detection of piping: interstitial monitoring required? Frequency done by owner?
- 48. What detection methods to allow: interstitial monitoring.
- 49. Statistical Report – essentially a “fuel” budget, why not allowable primary detection method. Are other methods really better? Others may depend on sensors that stop working. But inventory would need to be high frequency like daily.
- 50. Focus on preventative groundwater pollution monitoring efforts.
- 51. Consider requiring double-walled spill buckets and maybe cut back on testing requirements (maybe every 2-3 years instead of annual).
- 52. What are the 30 day monthly inspections going to entail?
- 53. Frequency of walk around inspections: continuous sensors in place = less frequent vs. no continuous sensors in place = more frequent.