

In the Matter Of:

Department of Natural Resources & Environmental Control

Underground Storage Tank

Hearing

December 09, 2020

Wilcox & Fetzer

1330 King Street

Wilmington, DE 19801

email: depos@wilfet.com, web: www.wilfet.com

phone: 302-655-0477. fax: 302-655-0497



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Proposed Revisions to the)
Underground Storage Tank)
Regulations)
Docket #2020-R-WH-0005)
..

Virtual Public Hearing
Dial-In Number: 1-408-418-9388
Event Number: 173 639 9600

Wednesday, December 9, 2020
6:00 p.m.

..

BEFORE: Lisa Vest, Hearing Officer

FOR THE DIVISION: Jason Sunde, DNREC
Michael Moyer, DNREC

-- Transcript of Proceedings --

WILCOX & FETZER
Registered Professional Reporters
1330 King Street - Wilmington, Delaware 19801
(302) 655-0477
www.wilfet.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

TABLE OF CONTENTS

	Page
Introduction by Ms. Vest	3
Presentation by Jason Sunde	9
Entry of Exhibits 1 through 10	17
Conclusory Remarks by Ms. Vest	18
Certificate of Reporter	20



1 MS. VEST: Hello, and good evening.
2 I believe that all of us are now connected
3 and ready, so we are going to go ahead and
4 begin our proceedings tonight.

5 Thank you for taking your time out
6 of your busy schedules to join us tonight.
7 The date is Wednesday, Nov -- I almost said
8 November -- Wednesday, December 9, 2020, and
9 we are here to provide the virtual platform
10 for DNREC to conduct a virtual public hearing
11 on the Proposed Amendments to the Underground
12 Storage Tank Regs, or sometimes referred to
13 as the UST regs.

14 For those of you that do not
15 recognize me or know me, my name is Lisa
16 Vest, and Secretary Garvin has designated me
17 to serve as hearing officer for tonight's
18 proceeding.

19 A few opening remarks before we get
20 into the Department's presentation. As many
21 of you are aware, changes have been made to
22 DNREC's hearing protocols, originally
23 necessitated by the ongoing state of
24 emergency due to the COVID-19 pandemic.



1 First and foremost, this hearing is
2 being conducted virtually. None of us are
3 gathered together in the same room. Everyone
4 is participating individually at their own
5 respective locations.

6 While there are no sign-in sheets
7 to document physical attendance tonight,
8 WebEx does generate an attendance list for
9 such proceedings, and the Department will
10 still have a record of those who have
11 attended this evening. So, again, I thank
12 everybody for their interest in this matter.

13 At the conclusion of my
14 introduction, I will be turning the hearing
15 over to representatives from the Department
16 so that their presentation about these
17 proposed changes to the UST regs may be
18 offered.

19 There is still a court reporter
20 present. She is virtual. She will prepare a
21 verbatim transcript of the hearing tonight,
22 pursuant to the statutory requirement for
23 DNREC to do so. And, as always, that
24 transcript will be posted on the hearing



1 webpage dedicated to this matter as soon as
2 it is received.

3 DNREC wishes to ensure that
4 everyone is enabled to offer their comments
5 for inclusion into the record being generated
6 in this matter. Therefore, as is the case in
7 all of our virtual hearings, the record will
8 remain open through December 24, so that the
9 public may offer written comment for the
10 record, should they wish to do so.

11 There was also the possibility that
12 if anyone wanted to join us here virtually
13 this evening and offer live comment on this
14 virtual platform, they had the opportunity to
15 preregister before noon today. Our records
16 indicate that no members of the public did,
17 in fact, preregister; so, moving forward, we
18 will be accepting written comments, as I
19 said, through December 24th.

20 For those of you that are in
21 attendance, I would encourage you to check
22 out DNREC's webpage under the Administrative
23 Law Section for more detail concerning the
24 proposed changes to these UST regs. All



1 exhibits and documentation related to this
2 matter are posted on the Department's hearing
3 webpage specifically dedicated to this
4 matter, and the public can gain a wealth of
5 information by reviewing it. So I would
6 again encourage you to do so.

7 Briefly, all mechanisms previously
8 available by which to offer comment do remain
9 in effect: Electronic links, e-mail, and, of
10 course, the United States Postal Service.

11 Also please note that the following
12 protocols remain in place for all DNREC
13 hearings:

14 All comment received must be
15 limited solely to the subject matter of
16 tonight's hearing.

17 All comments that are pertinent to
18 that subject matter will be incorporated into
19 the hearing record that's being generated for
20 this matter.

21 In order to ensure that everyone
22 who wishes to offer comment for the
23 Secretary's consideration is accommodated,
24 the record will remain open, as previously



1 mentioned, through December 24, 2020.

2 There is only one authentic record
3 of this formal proceeding tonight, and it is
4 the official court reporter's verbatim
5 transcript.

6 The statutory purpose of tonight's
7 hearing is to build the record with regard to
8 the Department's proposed actions. A record,
9 consisting of the transcript of tonight's
10 matter, all written comments, all exhibits,
11 and eventually the hearing officer's report,
12 will be prepared and reviewed by Secretary
13 Garvin.

14 The Secretary will ultimately issue
15 an order following his review process. That
16 order will contain his decisions and the
17 reasons therefor.

18 It is important to note that no
19 decision has already been made by the
20 Department, nor will any decision be made
21 tonight with regard to this proposed
22 regulatory action.

23 Again, the comment period is open
24 through December 24th so that members of the



1 public have ample opportunity to offer their
2 comment, should they wish to do so.

3 Comments may be submitted through a
4 comment form link on the hearing page, via
5 e-mail to DNRECHearingComments@delaware.gov,
6 or, again, via the United States Postal
7 Service at the physical address for DNREC
8 indicated on the hearing page, as well as the
9 legal notices previously issued in this
10 matter.

11 It should be noted that written
12 comments to DNREC may not be submitted using
13 social media platforms such as Twitter,
14 Facebook, YouTube, or standard text
15 messaging.

16 Lastly, please remember that all
17 comment, whether it's received through the
18 postal service or via the electronic
19 mechanisms noted just now, as long as it is
20 received in writing by the Department on or
21 before December 24th, will all bear the exact
22 same weight and will all be considered
23 equally by the Secretary prior to his making
24 a final decision in this matter.



1 The ultimate decision regarding
2 this proposed regulation is made by DNREC
3 Secretary Garvin. This hearing tonight
4 merely acts as a mechanism to enable the
5 Department to thoroughly vet the proposed
6 actions to the public and to let the public
7 know the various ways and means by which
8 comment may be submitted for Secretary
9 Garvin's consideration.

10 That being said, I am going to turn
11 the platform over now to Jason Sunde, who
12 will be offering the Department's
13 presentation in this matter.

14 Jason, are you there?

15 MR. SUNDE: I am. Thank you.

16 MS. VEST: Okay. You may proceed
17 when ready.

18 MR. SUNDE: All right. Good
19 evening, everybody. My name is Jason Sunde,
20 and I am the Environmental Program
21 Administrator for the Compliance and
22 Permitting Section within the Division of
23 Waste and Hazardous Substances.

24 In tonight's hearing we are



1 discussing the regulatory revisions of 7
2 Delaware Admin Code 1351, which is the
3 Underground Storage Tank Systems.

4 The purpose of these revisions and
5 amendments to the Underground Storage Tanks
6 Systems regulations are to clarify existing
7 regulatory language, add clarifying language,
8 include a federally mandated compliance
9 deadline, and correct typographical and
10 grammatical errors.

11 The statutory basis for the UST
12 Systems regulations are found in 7 Delaware
13 Code Chapter 74, specifically the Sections
14 7405, 7407, 7408, and 7410.

15 The corrections we discuss tonight
16 are located in the following parts of the
17 regulations: Part A, definitions and
18 notification; Parts B, C, and D, the
19 installation, operation, and maintenance;
20 Part E, reporting, release investigation, and
21 remedial action; and Part F, financial
22 responsibility.

23 So the first correction that we are
24 making in Part A Section 2.0, the correction



1 is to take the words "Liquid Tight" and
2 change "UST top sumps" to "Tank top sumps."
3 This correction is to mirror the federal
4 requirement found in 40 CFR 280.13 for the
5 definition of containment sump.

6 The next change is in the
7 registration and notification requirements,
8 multiple use notification requirements, in
9 Part A Section 4.

10 The references that are being
11 included include Part H and Part I. The
12 identical requirements from Part A apply to
13 USTs regulated under the newly added Parts H
14 and I, so the references were also included
15 here.

16 Our next correction is in Part A
17 Section 4.0 again. Add the post-construction
18 testing references for Part C, Consumptive
19 Use Heating Fuel UST Systems, and Part D,
20 Hazardous Substances UST Systems.

21 Again, this is a clarification
22 adding references from Part B, which are
23 applicable to the USTs regulated under Parts
24 C and D.



1 Again, in the site assessment
2 references in the same section, again we are
3 adding references from Part C, Cumulative Use
4 Heating Fuel UST Systems, and Part D,
5 Hazardous Substances UST Systems. And we are
6 adding these references from Part B, which is
7 applicable to the USTs regulated under Parts
8 C and D.

9 Parts B, C, and D, Sections 1 and
10 2, adding the reference to include adherence
11 to manufacturer's specifications. This
12 clarification to add this reference for
13 manufacturer's specifications is for
14 consistency with the Parts B, C, and D that
15 already occur.

16 Parts B, C, D, Sections 1 and 2
17 again, installation, operation, and
18 maintenance requirements, overfill prevention
19 equipment. Again, we are adding reference to
20 include the federal mandate.

21 The first inspection shall occur
22 prior to October 13, 2021. This deadline
23 inclusion was a federal mandate in 40 CFR
24 280.35. This was dated October 2015, to be

1 implemented within three years of the federal
2 regulation extension of the effective date
3 for state-authorized states.

4 So the October 13, 2021 date is
5 applicable to USTs regulated under state
6 regulations for Parts B, C and D.

7 Part B, Sections 1 and 2,
8 installation, operation, and maintenance
9 requirements for emergency generator USTs,
10 there is a correction to change "line leak
11 detection" to "piping release detection."
12 This is a defined term correction for
13 consistency with defined terms in Part A and
14 Part B.

15 Same section, installation,
16 operation, maintenance requirements for
17 emergency generators installed on or after
18 January 11, 2008, piping release detection
19 using STPs Pump per 1.19.2, Safe Suction per
20 1.20.1, and U.S. Suction per 1.20.2.

21 This is a citation correction to
22 change the regulatory reference to the
23 appropriate Part B subsection.

24 Part B, Section 2 again,



1 installation, operation, and maintenance
2 requirements for emergency generators.
3 Piping release detection per Section 2.31.5;
4 using STP pump per 2.20.1.5 single wall pipe,
5 or 2.20.2, double wall pipe; Safe Suction per
6 2.21.1; and U.S. Suction per 2.21.2, single
7 wall pipe, or 2.21.3, double wall pipe.

8 Again, this is a citation
9 correction to change the reference to the
10 appropriate Part B subsection.

11 Part B, Section 1 again,
12 installation, operation, and maintenance
13 requirements for marina fueling facility
14 USTs:

15 Delete the word "additional" from
16 the section heading. The USTs are regulated
17 by 40 CFR 280 and, therefore, the
18 requirements specified are not considered to
19 be additional. Therefore, the word
20 "additional" was deleted from the section.

21 Part B, Section 1, installation,
22 operation, and maintenance requirements for
23 marina fueling facility USTs. NFPA 30
24 applicability: Change "after January 11,

1 2020" to "installed on or after January 11,
2 2008."

3 Again, this is a clarification.
4 NFPA 30 requirements were incorporated in
5 Delaware as part of the January 11, 2008 UST
6 regulation promulgation. Therefore, the NFPA
7 30 only applies to marina UST systems
8 installed on or after January 11, 2008.

9 Part E, Section 5: Reporting,
10 release, investigation, remedial action, and
11 no further action determinations, remedial
12 action requirements: The remedial action
13 work plan, changing the word from "hazardous
14 substances" to "regulated substances."

15 This is a defined term correction
16 using the definition in Part A, Section 2.0
17 in 7 Delaware C Sections 7907 and 7920.

18 Part E, Section 6 again:
19 Reporting, release investigation, remedial
20 action, and no further action determinations,
21 no further action requirements, institutional
22 controls: Change "replacement" to
23 "placement" of environmental covenant.

24 This is a defined term correction



1 to use the definition of institutional
2 controls as found in Part A, Section 2, and
3 in 7 Del C Section 7920.

4 Part F, Section 1, financial
5 responsibility, the applicability: Add the
6 reference to include Part H Field-Constructed
7 UST Systems and Part I Airport Hydrant Fuel
8 Systems.

9 This is a federal regulatory
10 reference clarification. 40 CFR 280.251
11 requires financial responsibility for new
12 field-constructed tanks and airport hydrant
13 fuel systems no longer deferred from
14 regulations.

15 So they have been added to the
16 regulations as Parts H and I and to part
17 (inaudible - dropped off)

18 And, finally, the financial
19 responsibility applicability: There was a
20 syntax correction changing the lower-case
21 regulated substances to an upper-case
22 regulated substances. Again, this is just a
23 syntax correction to capitalize the term
24 "Regulated Substances."

1 That concludes all of the changes.

2 On the screen right now is the
3 e-mail address for any comments that would
4 like to be received by December 24th.

5 And, finally, currently on the
6 slide is the list of exhibits that we would
7 like to have included into the record.

8 And this concludes the program's
9 presentation on the proposed regulatory
10 changes. Thank you.

11 MS. VEST: Okay. Thank you, Jason.

12 Just for clarification for the
13 record, the list of Exhibits 1 through 10
14 that are now up on the screen, are they the
15 same exhibits as are currently posted on the
16 hearing webpage dedicated to this matter?

17 MR. SUNDE: They are currently the
18 ones posted on the webpage, yes.

19 MS. VEST: Excellent. And have
20 they been changed or altered in any way?

21 MR. SUNDE: They have not.

22 MS. VEST: Excellent.

23 Let the record reflect that
24 Department's Exhibits 1 through 10, as

1 identified both in this presentation and on
2 the hearing webpage, are formally
3 incorporated into the hearing record being
4 generated.

5 Is there anything that the Division
6 wishes to add at this time for the record?

7 MR. SUNDE: We do not.

8 MS. VEST: Excellent.

9 Okay. As I said at the beginning
10 of the hearing, we do have a process for
11 folks to offer comment live at the time of
12 the hearing. There is a pre-registration
13 protocol. No one signed up to do that.

14 So at this point we are going to
15 move to just offer some concluding remarks,
16 and then the meeting will be adjourned.

17 Again, I want to thank everybody
18 for taking the time to join us tonight. The
19 record, as has been said previously, is
20 currently open to receive comment and will
21 remain to receive comment open through close
22 of business on December 24, 2020.

23 Whether the comments come in by the
24 United States Postal Service, by the



1 electronic link that is found on the hearing
2 webpage, or at the
3 DNRECHearingComments@delaware.gov e-mail,
4 regardless, as long as it is in writing and
5 received by the Department on or before
6 December 24, they will count, they will all
7 bear the same weight, and they will all be
8 presented to the Secretary upon his review of
9 the record prior to his making a decision in
10 this matter.

11 Again, I want to thank everybody
12 for taking the time to join us tonight. Stay
13 safe. This meeting is adjourned.

14 (Concluded at 6:18 p.m.)
15
16
17
18
19
20
21
22
23
24



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 14th day of December 2020.



Lorena J. Hartnett
Registered Professional Reporter

1	40 11:4 12:23 14:17 16:10	airport 16:7,12
1 12:9,16 13:7 14:11,21 16:4 17:13,24	5	altered 17:20
1.19.2 13:19	5 15:9	amendments 3:11 10:5
1.20.1 13:20	6	ample 8:1
1.20.2 13:20	6 15:18	applicability 14:24 16:5,19
10 17:13,24	7	applicable 11:23 12:7 13:5
11 13:18 14:24 15:1,5,8	7 10:1,12 15:17 16:3	applies 15:7
13 12:22 13:4	74 10:13	apply 11:12
1351 10:2	7405 10:14	assessment 12:1
2	7407 10:14	attendance 4:7,8 5:21
2 12:10,16 13:7,24 16:2	7408 10:14	attended 4:11
2.0 10:24 15:16	7410 10:14	authentic 7:2
2.20.1.5 14:4	7907 15:17	aware 3:21
2.20.2 14:5	7920 15:17 16:3	B
2.21.1 14:6	9	basis 10:11
2.21.2 14:6	9 3:8	bear 8:21
2.21.3 14:7	A	begin 3:4
2.31.5 14:3	accepting 5:18	Briefly 6:7
2008 13:18 15:2,5,8	accommodated 6:23	build 7:7
2015 12:24	action 7:22 10:21 15:10,11,12,20,21	busy 3:6
2020 3:8 7:1 15:1	actions 7:8 9:6	C
2021 12:22 13:4	acts 9:4	capitalize 16:23
24 5:8 7:1	add 10:7 11:17 12:12 16:5	case 5:6
24th 5:19 7:24 8:21 17:4	added 11:13 16:15	CFR 11:4 12:23 14:17 16:10
280 14:17	adding 11:22 12:3,6,10,19	change 11:2,6 13:10,22 14:9,24 15:22
280.13 11:4	additional 14:15,19,20	changed 17:20
280.251 16:10	address 8:7 17:3	changing 15:13 16:20
280.35 12:24	adherence 12:10	Chapter 10:13
3	Admin 10:2	check 5:21
30 14:23 15:4,7	Administrative 5:22	citation 13:21 14:8
4	Administrator 9:21	clarification 11:21 12:12 15:3 16:10 17:12
4 11:9	ahead 3:3	clarify 10:6
4.0 11:17		clarifying 10:7
		Code 10:2,13

comment 5:9,13 6:8,14,22 7:23 8:2, 4,17 9:8
comments 5:4,18 6:17 7:10 8:3,12 17:3
compliance 9:21 10:8
concludes 17:1,8
conclusion 4:13
conduct 3:10
conducted 4:2
connected 3:2
consideration 6:23 9:9
considered 8:22 14:18
consistency 12:14 13:13
consisting 7:9
Consumptive 11:18
containment 11:5
controls 15:22 16:2
correct 10:9
correction 10:23,24 11:3,16 13:10, 12,21 14:9 15:15,24 16:20,23
corrections 10:15
court 4:19 7:4
covenant 15:23
COVID-19 3:24
Cumulative 12:3

D

date 3:7 13:2,4
dated 12:24
deadline 10:9 12:22
December 3:8 5:8,19 7:1,24 8:21 17:4
decision 7:19,20 8:24 9:1
decisions 7:16
dedicated 5:1 6:3 17:16
deferred 16:13
defined 13:12,13 15:15,24
definition 11:5 15:16 16:1
definitions 10:17

Del 16:3
Delaware 10:2,12 15:5,17
Delete 14:15
deleted 14:20
Department 4:9,15 7:20 8:20 9:5
Department's 3:20 6:2 7:8 9:12 17:24
designated 3:16
detail 5:23
detection 13:11,18 14:3
determinations 15:11,20
discuss 10:15
discussing 10:1
Division 9:22
DNREC 3:10 4:23 5:3 6:12 8:7,12 9:2
DNREC's 3:22 5:22
DNRECHEARINGCOMMENTS@ DELAWARE.GOV 8:5
document 4:7
documentation 6:1
double 14:5,7
dropped 16:17
due 3:24

E

e-mail 6:9 8:5 17:3
effect 6:9
effective 13:2
electronic 6:9 8:18
emergency 3:24 13:9,17 14:2
enable 9:4
enabled 5:4
encourage 5:21 6:6
ensure 5:3 6:21
environmental 9:20 15:23
equally 8:23
equipment 12:19
errors 10:10

evening 3:1 4:11 5:13 9:19
eventually 7:11
exact 8:21
Excellent 17:19,22
exhibits 6:1 7:10 17:6,13,15,24
existing 10:6
extension 13:2

F

Facebook 8:14
facility 14:13,23
fact 5:17
federal 11:3 12:20,23 13:1 16:9
federally 10:8
field-constructed 16:6,12
final 8:24
finally 16:18 17:5
financial 10:21 16:4,11,18
foremost 4:1
form 8:4
formal 7:3
forward 5:17
found 10:12 11:4 16:2
fuel 11:19 12:4 16:7,13
fueling 14:13,23

G

gain 6:4
Garvin 3:16 7:13 9:3
Garvin's 9:9
gathered 4:3
generate 4:8
generated 5:5 6:19
generator 13:9
generators 13:17 14:2
good 3:1 9:18
grammatical 10:10

H	L	mirror 11:3 moving 5:17 multiple 11:8
hazardous 9:23 11:20 12:5 15:13 heading 14:16 hearing 3:10,17,22 4:1,14,21,24 6:2,16,19 7:7,11 8:4,8 9:3,24 17:16 hearings 5:7 6:13 Heating 11:19 12:4 hydrant 16:7,12	language 10:7 Lastly 8:16 Law 5:23 leak 13:10 legal 8:9 limited 6:15 link 8:4 links 6:9 Liquid 11:1 Lisa 3:15 list 4:8 17:6,13 live 5:13 located 10:16 locations 4:5 long 8:19 longer 16:13 lower-case 16:20	N
I	M	necessitated 3:23 newly 11:13 NFPA 14:23 15:4,6 noon 5:15 note 6:11 7:18 noted 8:11,19 notices 8:9 notification 10:18 11:7,8 Nov 3:7 November 3:8
identical 11:12 implemented 13:1 important 7:18 inaudible 16:17 include 10:8 11:11 12:10,20 16:6 included 11:11,14 17:7 inclusion 5:5 12:23 incorporated 6:18 15:4 individually 4:4 information 6:5 inspection 12:21 installation 10:19 12:17 13:8,15 14:1,12,21 installed 13:17 15:1,8 institutional 15:21 16:1 interest 4:12 introduction 4:14 investigation 10:20 15:10,19 issue 7:14 issued 8:9	made 3:21 7:19,20 9:2 maintenance 10:19 12:18 13:8,16 14:1,12,22 making 8:23 10:24 mandate 12:20,23 mandated 10:8 manufacturer's 12:11,13 marina 14:13,23 15:7 matter 4:12 5:1,6 6:2,4,15,18,20 7:10 8:10,24 9:13 17:16 means 9:7 mechanism 9:4 mechanisms 6:7 8:19 media 8:13 members 5:16 7:24 mentioned 7:1 messaging 8:15	O
J		occur 12:15,21 October 12:22,24 13:4 offer 5:4,9,13 6:8,22 8:1 offered 4:18 offering 9:12 officer 3:17 officer's 7:11 official 7:4 ongoing 3:23 open 5:8 6:24 7:23 opening 3:19 operation 10:19 12:17 13:8,16 14:1,12,22 opportunity 5:14 8:1 order 6:21 7:15,16 originally 3:22 overfill 12:18
January 13:18 14:24 15:1,5,8 Jason 9:11,14,19 17:11 join 3:6 5:12		P
		pandemic 3:24 part 10:17,20,21,24 11:9,11,12,16,

<p>18,19,22 12:3,4,6 13:7,13,14,23,24 14:10,11,21 15:5,9,16,18 16:2,4,6,7, 16</p> <p>participating 4:4</p> <p>parts 10:16,18 11:13,23 12:7,9,14,16 13:6 16:16</p> <p>period 7:23</p> <p>Permitting 9:22</p> <p>pertinent 6:17</p> <p>physical 4:7 8:7</p> <p>pipe 14:4,5,7</p> <p>pipng 13:11,18 14:3</p> <p>place 6:12</p> <p>placement 15:23</p> <p>plan 15:13</p> <p>platform 3:9 5:14 9:11</p> <p>platforms 8:13</p> <p>possibility 5:11</p> <p>post-construction 11:17</p> <p>postal 6:10 8:6,18</p> <p>posted 4:24 6:2 17:15,18</p> <p>prepare 4:20</p> <p>prepared 7:12</p> <p>preregister 5:15,17</p> <p>present 4:20</p> <p>presentation 3:20 4:16 9:13 17:9</p> <p>prevention 12:18</p> <p>previously 6:7,24 8:9</p> <p>prior 8:23 12:22</p> <p>proceed 9:16</p> <p>proceeding 3:18 7:3</p> <p>proceedings 3:4 4:9</p> <p>process 7:15</p> <p>Program 9:20</p> <p>program's 17:8</p> <p>promulgation 15:6</p> <p>proposed 3:11 4:17 5:24 7:8,21 9:2, 5 17:9</p> <p>protocols 3:22 6:12</p>	<p>provide 3:9</p> <p>public 3:10 5:9,16 6:4 8:1 9:6</p> <p>pump 13:19 14:4</p> <p>purpose 7:6 10:4</p> <p>pursuant 4:22</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>ready 3:3 9:17</p> <p>reasons 7:17</p> <p>received 5:2 6:14 8:17,20 17:4</p> <p>recognize 3:15</p> <p>record 4:10 5:5,7,10 6:19,24 7:2,7,8 17:7,13,23</p> <p>records 5:15</p> <p>reference 12:10,12,19 13:22 14:9 16:6,10</p> <p>references 11:10,14,18,22 12:2,3,6</p> <p>referred 3:12</p> <p>reflect 17:23</p> <p>regard 7:7,21</p> <p>registration 11:7</p> <p>regs 3:12,13 4:17 5:24</p> <p>regulated 11:13,23 12:7 13:5 14:16 15:14 16:21,22,24</p> <p>regulation 9:2 13:2 15:6</p> <p>regulations 10:6,12,17 13:6 16:14, 16</p> <p>regulatory 7:22 10:1,7 13:22 16:9 17:9</p> <p>related 6:1</p> <p>release 10:20 13:11,18 14:3 15:10, 19</p> <p>remain 5:8 6:8,12,24</p> <p>remarks 3:19</p> <p>remedial 10:21 15:10,11,12,19</p> <p>remember 8:16</p> <p>replacement 15:22</p> <p>report 7:11</p> <p>reporter 4:19</p> <p>reporter's 7:4</p>	<p>reporting 10:20 15:9,19</p> <p>representatives 4:15</p> <p>requirement 4:22 11:4</p> <p>requirements 11:7,8,12 12:18 13:9, 16 14:2,13,18,22 15:4,12,21</p> <p>requires 16:11</p> <p>respective 4:5</p> <p>responsibility 10:22 16:5,11,19</p> <p>review 7:15</p> <p>reviewed 7:12</p> <p>reviewing 6:5</p> <p>revisions 10:1,4</p> <p>room 4:3</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>Safe 13:19 14:5</p> <p>schedules 3:6</p> <p>screen 17:2,14</p> <p>Secretary 3:16 7:12,14 8:23 9:3,8</p> <p>Secretary's 6:23</p> <p>section 5:23 9:22 10:24 11:9,17 12:2 13:15,24 14:3,11,16,20,21 15:9,16,18 16:2,3,4</p> <p>Sections 10:13 12:9,16 13:7 15:17</p> <p>serve 3:17</p> <p>service 6:10 8:7,18</p> <p>sheets 4:6</p> <p>sign-in 4:6</p> <p>single 14:4,6</p> <p>site 12:1</p> <p>slide 17:6</p> <p>social 8:13</p> <p>solely 6:15</p> <p>specifically 6:3 10:13</p> <p>specifications 12:11,13</p> <p>standard 8:14</p> <p>state 3:23 13:5</p> <p>state-authorized 13:3</p>
--	---	--



<p>states 6:10 8:6 13:3 statutory 4:22 7:6 10:11 Storage 3:12 10:3,5 STP 14:4 STPS 13:19 subject 6:15,18 submitted 8:3,12 9:8 subsection 13:23 14:10 substances 9:23 11:20 12:5 15:14 16:21,22,24 Suction 13:19,20 14:5,6 sump 11:5 sumps 11:2 Sunde 9:11,15,18,19 17:17,21 syntax 16:20,23 systems 10:3,6,12 11:19,20 12:4,5 15:7 16:7,8,13</p>	<hr/> <p style="text-align: center;">U</p> <hr/> <p>U.S. 13:20 14:6 ultimate 9:1 ultimately 7:14 Underground 3:11 10:3,5 United 6:10 8:6 upper-case 16:21 UST 3:13 4:17 5:24 10:11 11:2,19,20 12:4,5 15:5,7 16:7 USTS 11:13,23 12:7 13:5,9 14:14,16, 23</p>	<hr/> <p style="text-align: center;">Y</p> <hr/> <p>years 13:1 Youtube 8:14</p>
<hr/> <p style="text-align: center;">T</p> <hr/> <p>taking 3:5 Tank 3:12 10:3 11:2 tanks 10:5 16:12 term 13:12 15:15,24 16:23 terms 13:13 testing 11:18 text 8:14 therefor 7:17 Tight 11:1 time 3:5 today 5:15 tonight 3:4,6 4:7,21 7:3,21 9:3 10:15 tonight's 3:17 6:16 7:6,9 9:24 top 11:2 transcript 4:21,24 7:5,9 turn 9:10 turning 4:14 Twitter 8:13 typographical 10:9</p>	<hr/> <p style="text-align: center;">V</p> <hr/> <p>verbatim 4:21 7:4 Vest 3:1,16 9:16 17:11,19,22 vet 9:5 virtual 3:9,10 4:20 5:7,14 virtually 4:2 5:12</p>	
	<hr/> <p style="text-align: center;">W</p> <hr/> <p>wall 14:4,5,7 wanted 5:12 Waste 9:23 ways 9:7 wealth 6:4 Webex 4:8 webpage 5:1,22 6:3 17:16,18 Wednesday 3:7,8 weight 8:22 wishes 5:3 6:22 word 14:15,19 15:13 words 11:1 work 15:13 writing 8:20 written 5:9,18 7:10 8:11</p>	