



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Environmental Cleanup & Brownfields

2022 ANNUAL ENVIRONMENTAL CONFERENCE

Pennsylvania Chamber of Business and Industry

October 27, 2022

Tom Wolf, Governor

Ramez Ziadeh, Acting Secretary

An Overview

Pennsylvania regulates both Aboveground (AST) and Underground (UST) Storage Tanks.

- **21,195 USTs (7th largest in U.S.)**
 - 240 to 80,000 gallons in capacity
 - Allegheny County has most (1,708)
 - Forest County has least (11)
- **17,477 ASTs**
 - 255 to 21 million gallons in capacity
 - Allegheny County has most (1,831)
 - Sullivan County has least (2)

An Overview

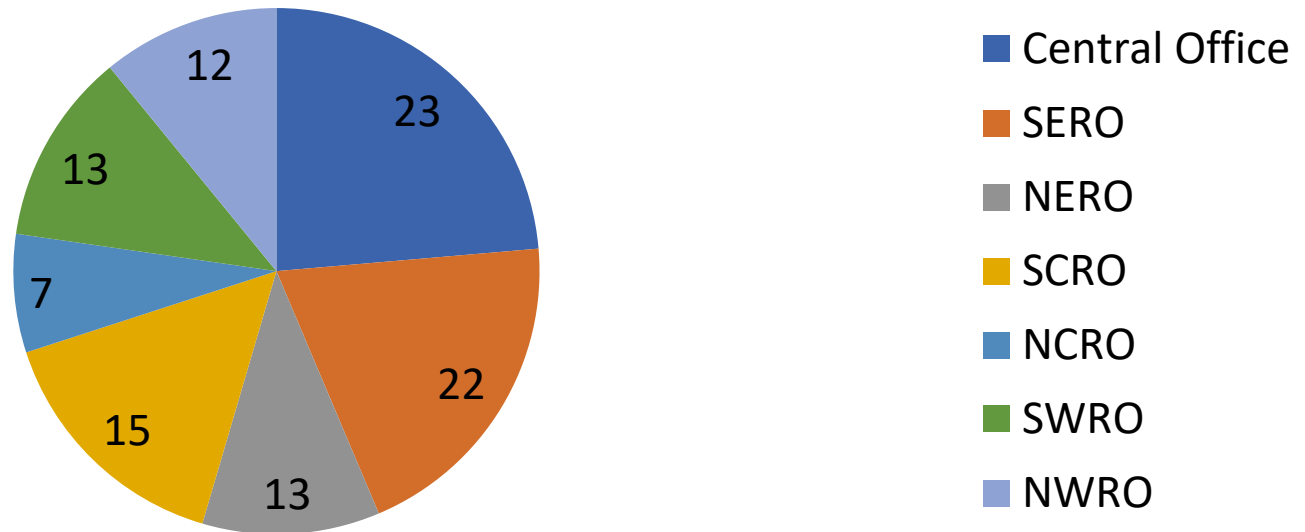
- Oversee over 880 certified individuals and 290 certified companies.
- Within last year, performed over 7,000 inspections at over 3,700 regulated facilities.
- From October 1, 2021, through March 31, 2022, Pennsylvania ranked 8th in the highest number of UST inspections performed in the nation and more than DE, MD, VA, and WV combined.

An Overview

- Pennsylvania has had over 19,900 confirmed UST and AST releases and has overseen over 16,700 cleanups.
- Currently oversee 17 state-lead UST cleanup sites using USTIF allocations.

An Overview

Personnel (105 positions)



78% of staff in Field Operations

An Overview

- AST and UST Registration Fees (start 1989) - \$2.8 million
- Penalties, Interest, Cost Recovery (start 1989) - \$630,000
- Reimbursement from USTIF (start 2008) – up to \$7.0 million annually beginning in 2018
- EPA Grant – \$2.3 million

A Look Back

Final Rulemaking: Storage Tank and Spill Prevention Program

(25 Pa. Code Chapter 245)

Effective December 22, 2018

- Added UMI Certification
- Emergency generator tank systems now required to perform release detection
- Added periodic testing requirements
- Added walkthrough inspections

A Look Back

Added UMI Certification

- 24 Companies added UMI Certification to their qualifications
- 63 Individuals have become UMI Certified
 - 8 of these individuals went on to obtain UMX Certification

A Look Back

Emergency generator tank systems now required to perform release detection

- The removal of the release detection deferral for emergency generator tanks was set to affect 605 UST systems
- 558 of the 605 UST systems remain (29 more have since been installed)
- 71% performing Interstitial Monitoring for Tank Release Detection
- 50% performing Interstitial Monitoring for Piping Release Detection

A Look Back

Added periodic testing requirements

- At least every 3 years the following components must be tested:
 - Containment sumps used for interstitial monitoring
 - Spill prevention equipment
 - Overfill
- At least annually the following components must be tested:
 - Electronic and mechanical components of release detection equipment

A Look Back

Containment sumps used for interstitial monitoring

- 9,103 UST systems were affected by the containment sump testing requirement
- Currently, 8,459 UST systems perform interstitial monitoring for piping release detection
- Alternate methods to using water
- Low level sump test method

A Look Back

Spill prevention equipment

- Almost all UST systems affected by this requirement
- Compliance with testing both spill prevention and containment sumps
 - 2020: 72.6%
 - 2021: 75.1%
 - 2022: 81.2%

A Look Back

Overfill

- At the time of the rulemaking, a total of 3,306 UST systems were reported to have ball float valves as the current form of overfill prevention
- Today, this number is 1,126
- Compliance with testing overfill:
 - 2020: 71.4%
 - 2021: 72.3%
 - 2022: 77.8%

A Look Back

Electronic and mechanical components of release detection equipment

- Almost all UST systems affected by this requirement. Compliance with testing of tank release detection equipment:
 - 2020: 83.5%
 - 2021: 79.3%
 - 2022: 81.5%

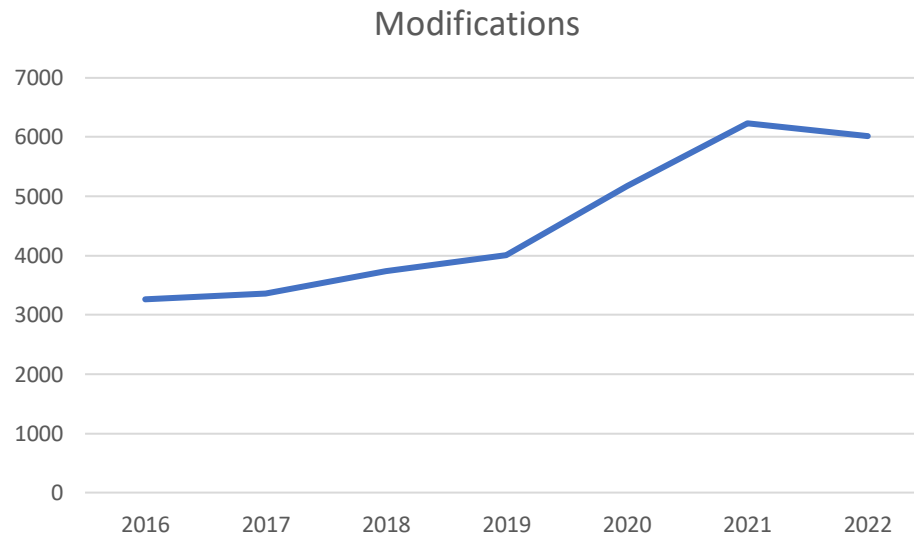
A Look Back

Walkthrough Inspections

- Almost all UST systems affected by this requirement. Compliance with walkthrough inspections:
 - 2020: 74.2%
 - 2021: 76.7%
 - 2022: 80.2%

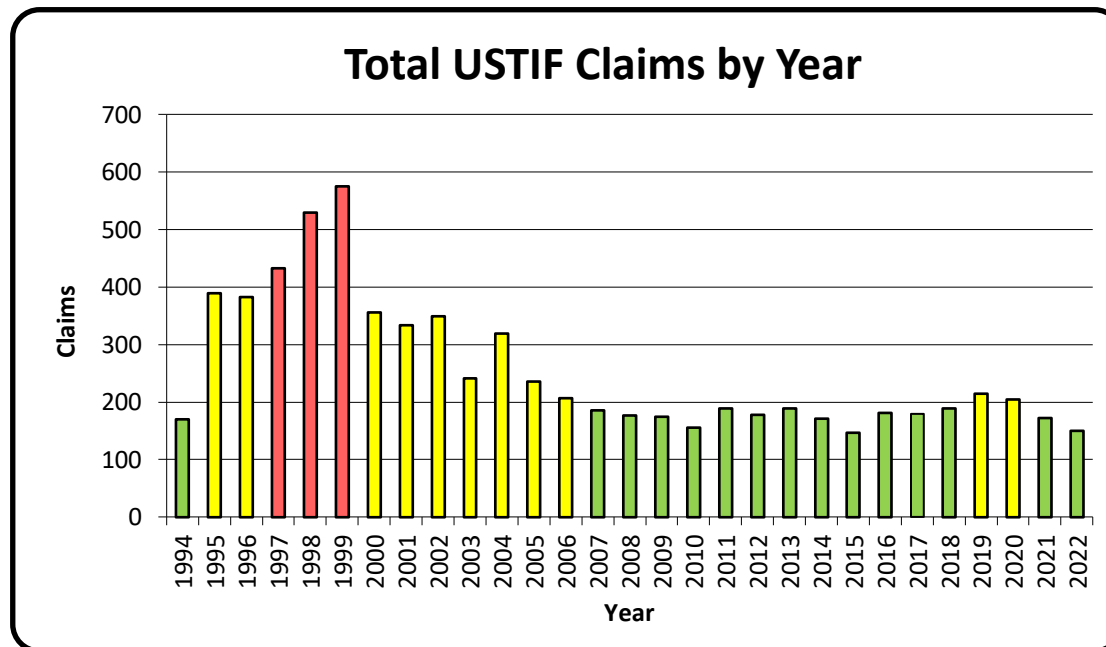
Impacts

Increase in modifications



Impacts

Initial increase in USTIF Claimsfollowed by decrease

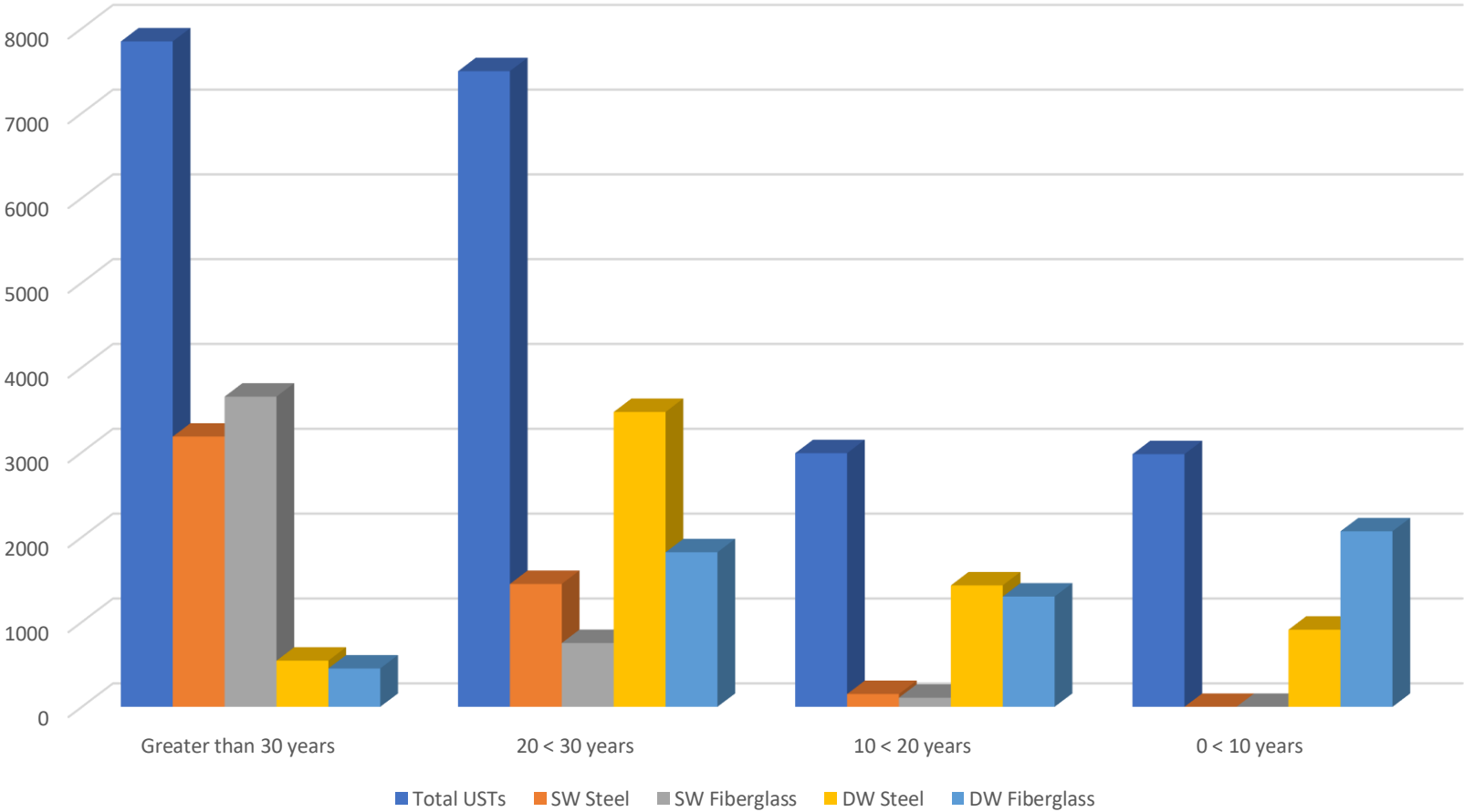


Current Focus

- Improving compliance
 - Public Outreach
 - Enforcement
 - Alternate Fees
 - Public Knowledge
- Age of Systems
 - Tanks
 - Piping
 - Components

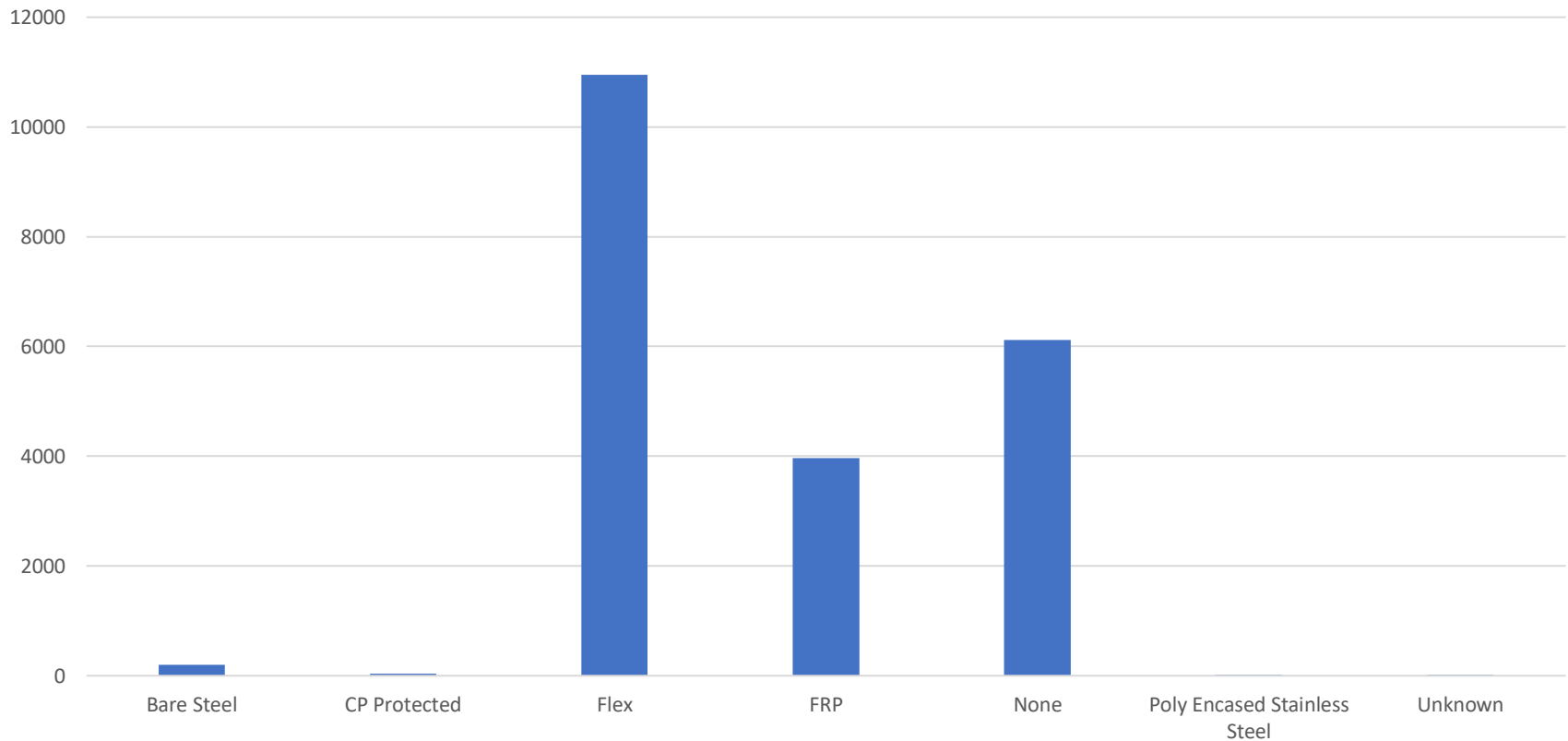
Pennsylvania USTs

Tank Construction Through the Years



Piping Systems

Underground Piping Systems by Outer Wall Construction



Current Focus

- UST lifespan
 - Popular systems no longer being supported
- Cost Planning for Facilities
 - the increase in Evs/alternate fuels
 - the increased cost of capital
 - the risk a facility may be taking on delaying tank replacement for 10-15 years.

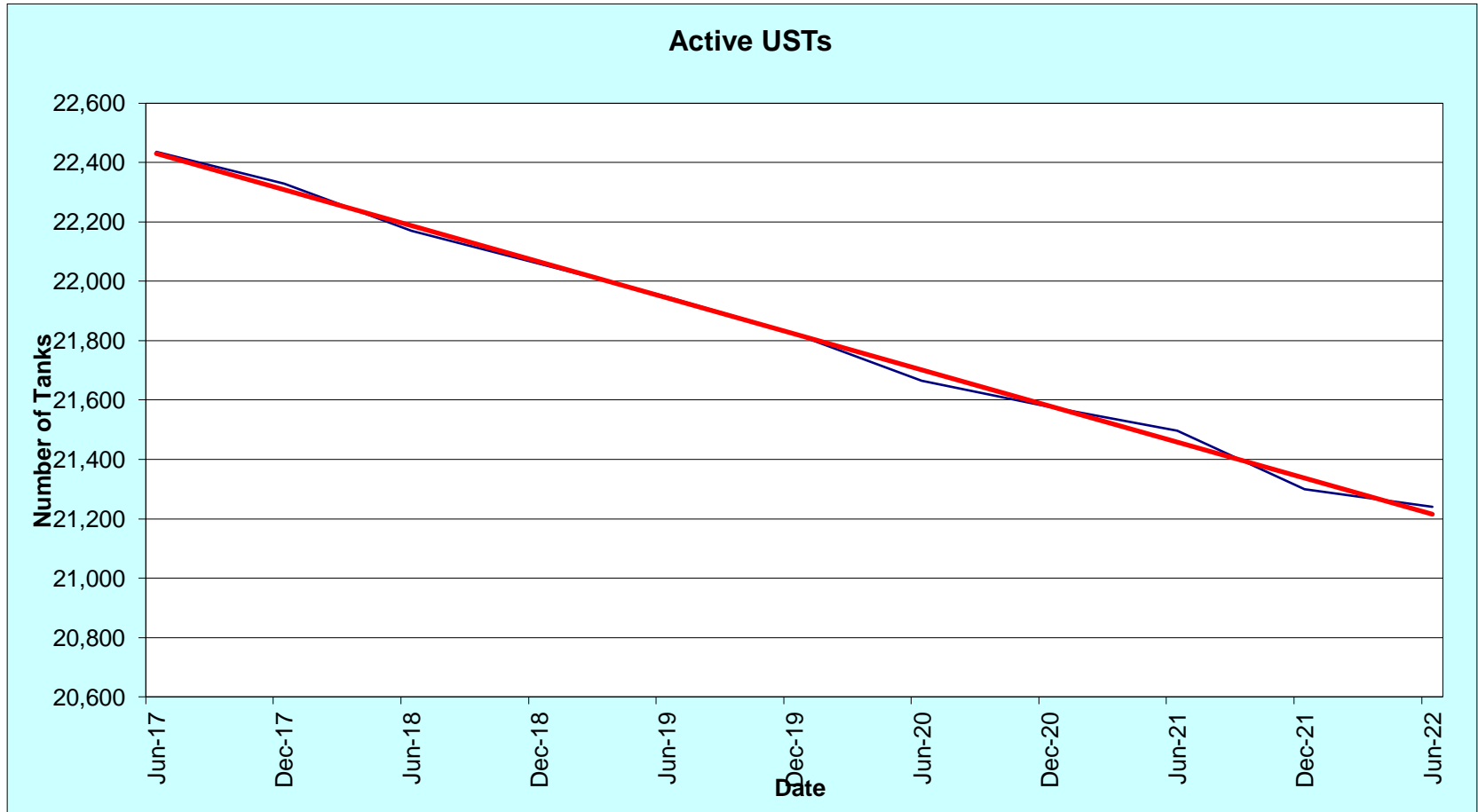
What the Numbers Say

UST Active Tanks as of 06-30-2022

Tank Capacity in Gallons	6/30/2017	12/31/2017	6/30/2018	12/31/2018	6/30/2019	12/31/2019	6/30/2020	12/31/2020	6/30/2021	12/31/2021	6/30/2022	% Change 5 Years	% Change 3 Years	% Change 1 Year
111 to 5,000	5,697	5,657	5,594	5,523	5,439	5,340	5,238	5,199	5,136	5,045	5,011	-12.04%	-7.87%	-2.43%
5,001 to 10,000	11,506	11,422	11,316	11,209	11,122	11,035	10,938	10,865	10,808	10,712	10,649	-7.45%	-4.25%	-1.47%
10,001 and Greater	5,232	5,250	5,259	5,327	5,387	5,449	5,488	5,513	5,552	5,542	5,580	6.65%	3.58%	0.50%
Total for UST Tanks	22,435	22,329	22,169	22,059	21,948	21,824	21,664	21,577	21,496	21,299	21,240	-5.33%	-3.23%	-1.19%

Total AST/UST Tanks	40,271	40,066	39,874	39,788	39,796	39,676	39,458	39,339	39,172	38,820	38,694	-3.92%	-2.77%	-1.22%
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What the Numbers Say



What are we seeing

- Alternate to replacement
 - Rigid bladders
 - Stand alone systems
- Tank shortage in the industry
- Trained staff shortage
 - Certification requirements vs. safety
 - Suspicious activity
- Biofuels Tank Upgrade
 - Compatibility proposal at Federal level
- Addressing water in tanks

Looking Forward

- Funding
 - Storage Tank Fund
 - Regulated Community
- Staffing
 - DEP
 - Regulated/Certified Community
- Technology
 - OnBase Public Upload
 - Tank Handling App
 - E-permitting

e-permitting

Online Storage Tank Registration & Fee Payment System

Currently:

- Pay storage tank registration fees
- Register a new facility for a current tank owner
- Amend registration information for an existing facility (add/remove tanks, change substances, etc.)
- Update contact information, both individually and en masse

Coming Soon:


- Facility ownership changes


e-permitting


How does it work?


- Create a DEP Greenport account
- Enroll in the e-permitting application
- Use the e-permitting application

Welcome to the new GreenPort powered by the PA Keystone Login!

 Department of Environmental Protection

 Department of Conservation and Natural Resources

 Pennsylvania Department of Agriculture

 Milk Marketing Board

Login to your account

Note: Do not use your Old DEP GreenPort account created before 03/20/2021.

Username


Password

What is GreenPort?
Forgot Username?
Forgot Password?
Need your account unlocked?

Register a new GreenPort account

When you register a new GreenPort account, you automatically create a new Keystone Login account.

PA Keystone Login is an account management system for commonwealth online services. You can use your PA Keystone Login username and password to log into any online service that participates in PA Keystone Login.

Powered by
 **PA KEYSTONE LOGIN**
Keystone Login FAQ

Home Create Admin Maintenance User Settings eLogin

Dashboard

ePermit Dashboard

Prior to paying facility registration fees, please verify that the facility information is correct. Facility contact information may be updated in the Verify Facility Information screen. Client and facility information found to be in error must be corrected through the submittal of a Storage Tanks Registration/Permitting Application Form to the Division of Storage Tanks.

Select clients or facilities to verify the information provided. You can select multiple clients and facilities by clicking in the boxes to the left of the records below. To verify multiple facilities, click on the "Verify Selected Facilities" button at the bottom of the page. To verify an individual facility, click on the "Edit" link beside the facility record. Payment can only be made once client/facility information is verified and a green icon appears in the status column. After you have verified the accuracy of the information, click the "Pay & Submit" button to pay registration fees for the selected facilities.

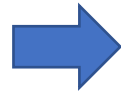
Client ID	Client Name	Authorization Type	Overall Status					
<input type="checkbox"/>	84338 UPS INC	Storage Tank Registration and Permitting						
<input type="checkbox"/>	221652 ARCELOORMITTAL STEELTON LLC	Storage Tank Registration and Permitting						
Facility ID	Facility Name	City	Invoice Number	Invoice Date	Balance Due	Due Date	Status	Edit
<input type="checkbox"/>	22-20209 ARCELOORMITTAL STEELTON	STEELTON	1104640	05/12/2021	\$650.00	07/12/2021		
<input type="checkbox"/>	142586 OCI INC	Storage Tank Registration and Permitting						
<input type="checkbox"/>	36134 SHEETZ INC	Storage Tank Registration and Permitting						
<input type="checkbox"/>	1159 ADMIXTURES INC	Storage Tank Registration and Permitting						

Total: \$0

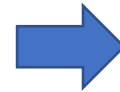
e-permitting

Example – New facility registration

Applicant
creates submission
in e-permitting



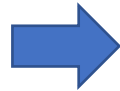
Appears on DEP
dashboard for
review



DEP reviews,
determines if
any correction
needed



If correction needed,
notice sent back to
applicant. If good,
application processed



Applicant
receives email
that submission
is processed



Applicant logs into
e-permitting, pays
fee if necessary,
receives certificate

e-permitting

What did we eliminate?

- Mail/email handling
- Data entry time
- Temporary registration letter generation time
- Invoice generation and mailing time
- Payment generation and mailing time
- Certificate generation and mailing time

e-permitting

Who can use e-permitting?

- Storage tank owners and their employees
- DEP-certified tank installers and removers
- DEP-certified company representatives

e-permitting

Who does it benefit?

Storage Tank Owners:

- Registration certificate issued immediately following payment
- Registration submissions processed quickly – certificate in hand, selling fuel

Storage Tank Installers/Removers:

- Value-added service to customer
- Tracked submission of installation and removal activities

DEP:

- Reduced review/staff time; eliminates 90% of data entry
- Allows more time to work on conventional submissions
- Less follow-up for incomplete submittals
- Significant reduction in registration fee processing time – no mail, no proofing, no data entry

e-permitting

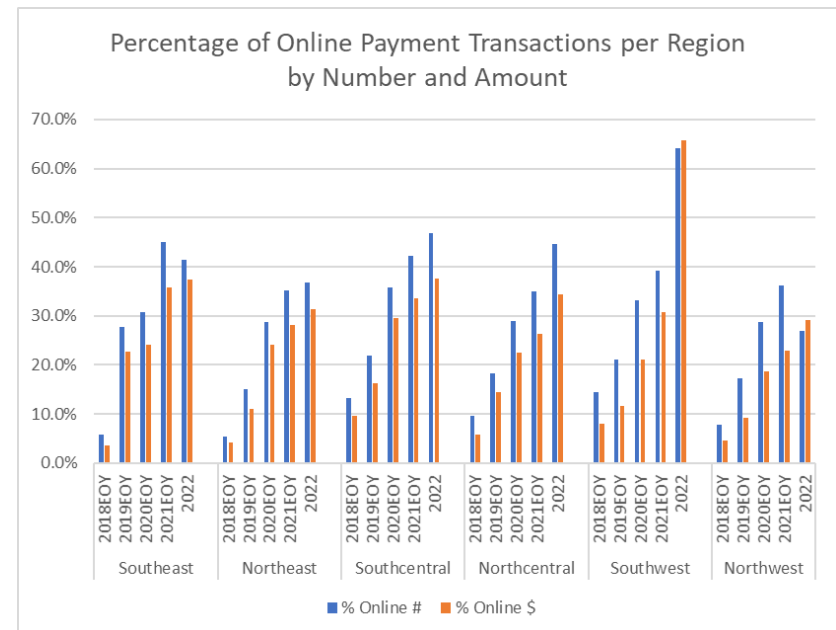
Usage so far

Registration Fees:

- Over \$3.1 million collected since going live in early 2018
- Steadily increasing usage; approaching 40% utilization currently

Registration Submissions:

- Over 250 submissions to date
- Mostly large tank owners to this point



e-permitting

Challenges

- Large corporate accounting processes that require paper check payment
- "Old-school" tank owners who don't trust the internet
- Difficulty of account creation and application navigation

e-permitting

Where do we go from here?

- Completion of ownership change functionality (coming soon!)
- Marketing, training, push for widespread adoption and usage
- Enhancements focused on simplicity, ease of use, user input
- Expansion of capabilities

Questions/comments?

Contact

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