State UST Regulations for Field Constructed Tanks (FCTs) > 50,000 Gallons,

Current Regulations on FCTs

(HAR 11-281)

- Design & construction requirements for tank and piping (corrosion protection)
- Release reporting, investigation, and confirmation
- Release response action
- Closure and change-in-service

~~Current Regulations on FCTs~~

~~(HAR 11-280)~~

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Proposed Regulations version 12.2017

Estimated effective date - October 2018

(HAR 11-280.1)

- By 2018
  - Secondary containment & interstitial monitoring or approved alternative design and release detection for all newly constructed FCTs
- By 2021
  - UST system permitting & notification
  - Spill & overfill control and under-dispenser containment
  - Compatibility
  - Reporting & recordkeeping
  - Equipment repair, testing, and maintenance
  - Walkthrough inspections
  - Release detection
  - Financial Responsibility
  - Operator Training

Additional Oversight Authority with the AOC at the Red Hill Facility

Effective date - September 28, 2015

Regulatory Evaluation and Approval of…

- Tank Upgrade Alternative Process & Decision (every 5 year interval)
- Improvements to Tank Inspection, Repair and Maintenance Protocols
- Facility Specific Release Detection Methods
- Corrosion Detection Methods
- Inspection Procedures including Non-Destructive Testing Evaluation
- Improvements of Operating Protocols including Response to Alarms
- Environmental Assessments including Fate &Transport Modeling and monitoring well network installation
- Updates to Contingency Plans and Qualitative Risk Assessment Plan

Additional advantages of the AOC over the rules

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~~LOCAL PARTICIPATION~~Local Participation

- Requires opportunity for public participation annually
- Involves local subject matter experts & local stakeholders

~~TANGIBLE RESULTS~~Tangible Results

- Requires immediate changes to training, operational procedures
  - (e.g. filling procedures) & response to alarms
- Increase frequency of tank tightness testing
- Evaluation & selection of better, redundant release detection methods
- Deadline when tanks without approved upgrade will not be allowed to operate

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The Administrative Order on Consent

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