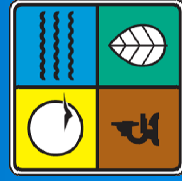


Missouri's Composite UST Inspection Program

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USTs in Missouri

➤ 3,684 UST Facilities

➤ 9,873 Tanks



The Components

- DNR Inspection Review Staff
- DNR Inspectors
- Contract Inspectors
- Petroleum Storage Tank Insurance Fund

The Roles

- DNR Review Staff
 - Review records for non-PSTIF insured facilities
 - Review all incoming inspections (DNR and contract inspections)
 - Conduct follow-up: compliance determinations, letters, and enforcement actions
 - Compare audit inspections and contract inspections
 - Oversee contract inspectors

The Roles

- DNR Inspectors
 - Temporary Closure Inspections
 - Hazardous Substance Tank Inspections
 - New Installation Inspections
 - Complaint Investigations
 - Audit (contractor oversight) Inspections
 - Enforcement Case Re-inspections



The Roles

- Contract Inspectors
 - Active petroleum facility inspections
 - Issue first letter outlining issues noted
 - File incoming responses

The Roles

- Petroleum Storage Tank Insurance Fund
 - Annual policy renewal requires record submittal
 - Retain all submitted records
 - DNR and PSTIF share access to all submitted records and documentation

Compliance Determination

Referral to Attorney General

DNR Review Staff

NOV LOW
Letter

Non-PSTIF owners

PSTIF

DNR Inspector

Contract Inspector

Practical Benefits

- May require fewer DNR staff/ state employees
- One inspection used by both DNR and PSTIF
- Fewer state funds used for UST inspections
- Sharing records = reduction of duplicative submittals for owners/ operators
- Enforcement and Inspection Review are now combined



Unexpected Benefits

- Consistency within the department
- Consistency between DNR and PSTIF
- Point of contact for the regulated community
- Enhanced responsible party / DNR and consultant / DNR working relationships
- Improved working relationship between DNR and PSTIF

How have we changed?

- We do not check observation/monitoring wells for evidence of a release
- No cathodic protection “surveys”
- Records are not reviewed on-site during the inspection
- Water and product levels are not manually measured during the inspection
- Less field technical assistance and training

Have we *really* changed?

- Compliance rates remain excellent
- Suspected releases are found, reported, investigated and addressed
- Review staff provide technical assistance and training

Have we *really* changed?

- “Lockout” violations are being reported and resolved within 14 days
- Violations are still being documented (reports and/or photographs)
- Finding additional “issues” that we did not previously evaluate



Questions



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