



An Owner/Operator Perspective on The Mutual Benefits of Trust



Cumberland Farms: Who we are

- Home grown, family owned business
- Headquarters: Westboro, MA
- Over 550 company operated stores
- We're part of the fabric of the community
- Vested interest with environmental regulations
- Participate in stakeholder meetings



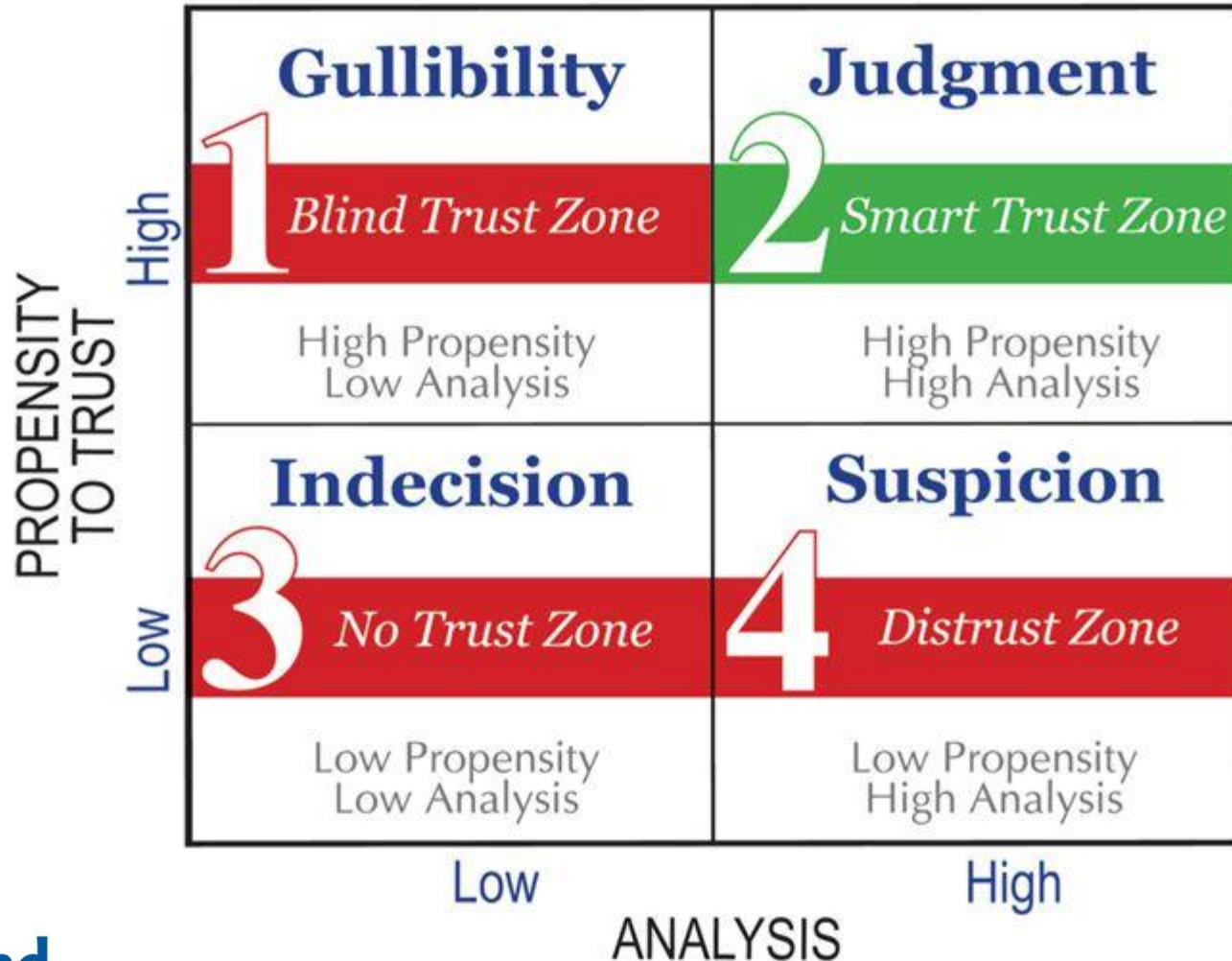
American
Red Cross





OxBlue®

The Smart Trust™ Matrix



Smart Trust



Don't trust
anyone

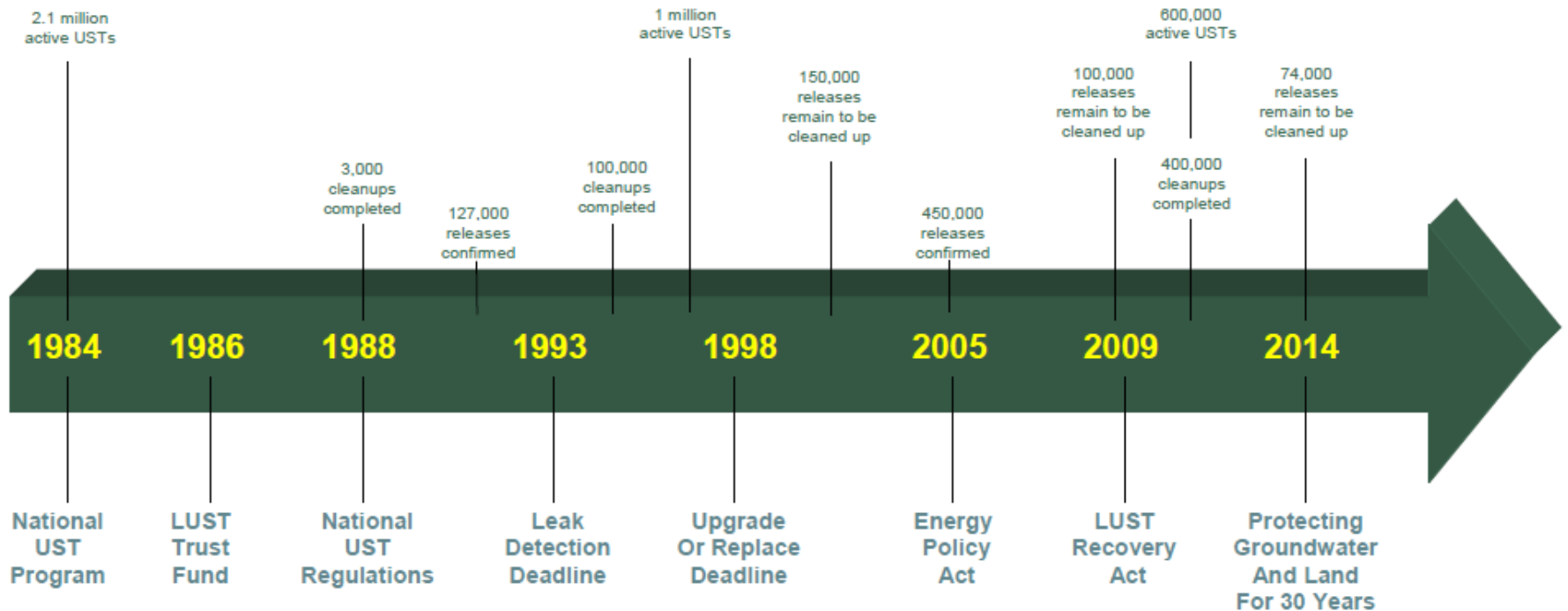


Blind Faith

Regulatory Interpretation



30 Years Of The UST Program



Source: Office of Underground Storage Tanks
www.epa.gov/oust

November 2014



Get Involved!



UST
Regulations



FEDERAL REGISTER
The Daily Journal of the United States Government



New England Interstate Water Pollution Control Commission
Worcester, MA 01602-0004
www.neiwpcc.org

Worcester, MA 01602-0004
400 South Street, Suite 410
Lewell, MA 01846-0004

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L.U.S.T.LINE

A Report On Federal & State Programs To Control Leaking Underground Storage Tanks

Testing Containment Sumps

by Marcel Almon

Not so long ago in a land far, far away, there were no underground storage tank sumps. They did not exist. There was no need for them because the soil around a subsurface pump or beneath the dispenser was a wonderful absorbent for any spilled product. Even large leaks most often disappeared into the earth and so were not a problem (unless they found their way into storm sewers, utility vaults, basements, or water wells). The openings at grade along the top of a tank were called manholes, though most were far too small to allow a man (or a woman) to enter. Removing the manhole cover revealed a fill pipe or a subsurface pump manifold. Both were surrounded by dirt, often smelly dirt.

But things have changed over the last 50 years, and all but a few disasters would say for the better. Since that time not so long ago, containment sumps have come to be recognized as essential elements in secondary contained piping systems, and critical elements in leak detection and leak-containment strategies for UST pressurized piping. Today containment sumps are common in most states and ubiquitous in some states. The secondary containment has been the rule for a quarter century or more.

While containment sumps have been a common component of secondarily contained piping systems since the early 1960s, they have been slow to achieve explicit mention in the regulations. The 2003 Energy Act specifically required under-dispenser sumps for new installations and certain dispenser replacement scenarios, but it did

8. YOU TAKE THE HIGH-LEVEL, AND I'LL TAKE THE LOW-LEVEL

AND I'LL GET IT DONE LONG BEFORE YE...

Inside

- PEI's RP1200 Sump Testing Method
- Annual Containment Sump Inspections
- Test Water
- Compliance to 2015 Compliance
- An Elder for UST System Caretaker?
- Cathodic Protection
- SPR Rules, Listing, Site Report
- APR Revisited
- Self-Insured Retention on Tank Insurance Policies
- Refractive Index and Gaps in Coverage

Continued on page 2

Protect Stakeholder Reputation



The Economics of Trust

States with trust

- 2017 avg. per site annual spend
 - \$2828.14
- Avg. 2.0 surface spills per site
- Avg. 58 pages of regulation

States without trust

- 2017 avg. per site annual spend
 - \$3606.56
- Avg. 2.0 surface spills per site
- Avg. 102 pages of regulation

\$800 cost ▲ = 16,000 Gals @ 5cpg



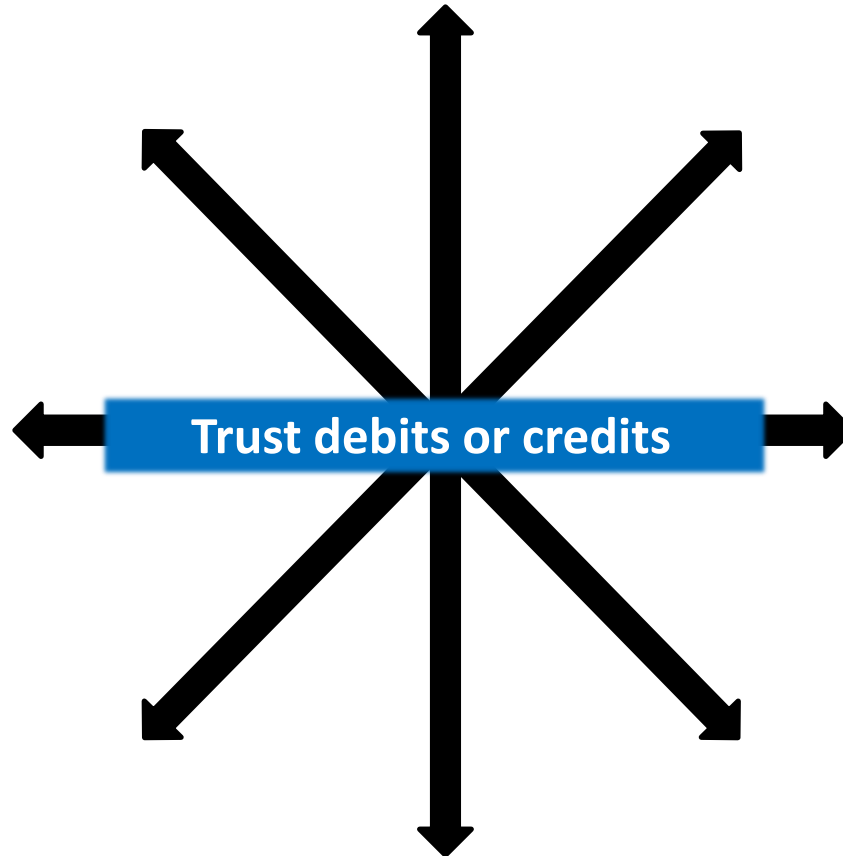
Challenges for Building Trust

Regulator Perspective

- Training
- New Regulations
- Onsite Paperwork
- Water intrusion

Stakeholder Perspective

- New Program Roll Out
- Employee Turnover
- Contractor availability and cost
- Recordkeeping and time management





Case Study



Tell us what you think!

