



# A Tour of Region I Single Wall and Age Based Closure Deadlines

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# Welcome to Region I!!

- CT – Home of PEZ Candy
- VT – Home of Ben & Jerry's and Phish
- RI – First US Open @ Newport GC in 1895
- ME – Top Supplier of Lobster
- NH – Mt. Washington, 231 MPH Winds!
- MA - Home of...



- Birthplace of Matt Jones (Fall River, MA)!

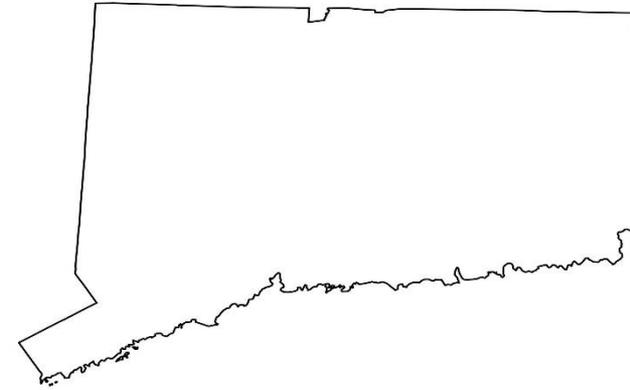
# Maine

- Remove tank by age 30
- 10 year extension
  - Passing tightness testing initially and in years 6 through 9
  - All components brought up to current standards
- Double-walled required after 9/16/91
- Last single-walled removed in 2020
- Finance Authority of Maine (FAME) has a compliance loan program,  
[www.famemaine.com](http://www.famemaine.com)



# Connecticut

- 1985 - Remove tanks by age 30
- Double-walled required after 10/1/03
- Tanks Beyond 30 Years Are Red-Tagged



# Rhode Island

- Single wall tanks and single-walled piping installed prior to 5/8/85 permanently closed by 12/22/17
- Installed between 5/8/85 and 7/20/92 permanently closed within 32 years of the date of installation
- Exemptions for consumptive use
- Double-walled required June 1992



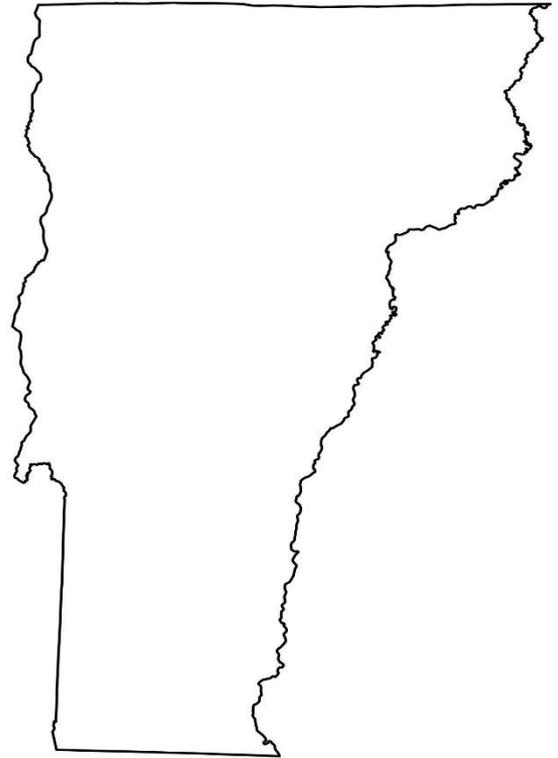
# Massachusetts

- 2007 - All single wall steel tanks closed by 8/7/17
- Exemption for consumptive use (heating oil)
- Exemption for tanks relined prior to 8/8/07
  - Permit and approval by head of Fire Dept.
  - Legally valid warranty for relining
- Double-walled required after 1/1/89



# Vermont

- 5/30/13 – No Single Wall Tank Can Be Lined
- 1/1/16 – Closure of Single Wall Tanks w/Pressurized Piping
- 1/1/18 – Closure of Single Wall Tanks w/Intrinsically Safe Piping
- Double-Walled Tanks Required After 9/1/87
- 0%-2% Interest Loan Program



# Thoughts...

- “Risk based phase-in schedule is much more manageable”
- “Getting removal deadlines out far in advance to not only the owners but also their contractors”
- “Mass mailings targeted at owners with tanks needing to be closed within 5 years”
- “Give plenty of notice...plan ahead...get the work done cheaper”
- “Removals led to the discovery of new releases, but lower than expected”
- “(DW) Tanks do not pose a significant risk to the environment and put an unnecessary financial burden on the tank owners”

# New Hampshire – Pre 1997

- 9/17/85 – 300 Degrees of Secondary Containment
- 9/17/85 – Replacement Schedule Based on Age
  - >34 Years – 12 Months
  - 30-34 Years – Within 18 Months
  - 25-29 Years – Within 24 Months
  - 23-24 Years – Within 36 Months
  - 20-22 Years – Within 48 Months
  - <20 Years – Replaced at 25 Years Old
- 11/1/90 - Secondary Containment for New Pressurized Piping



# New Hampshire – 4/22/97

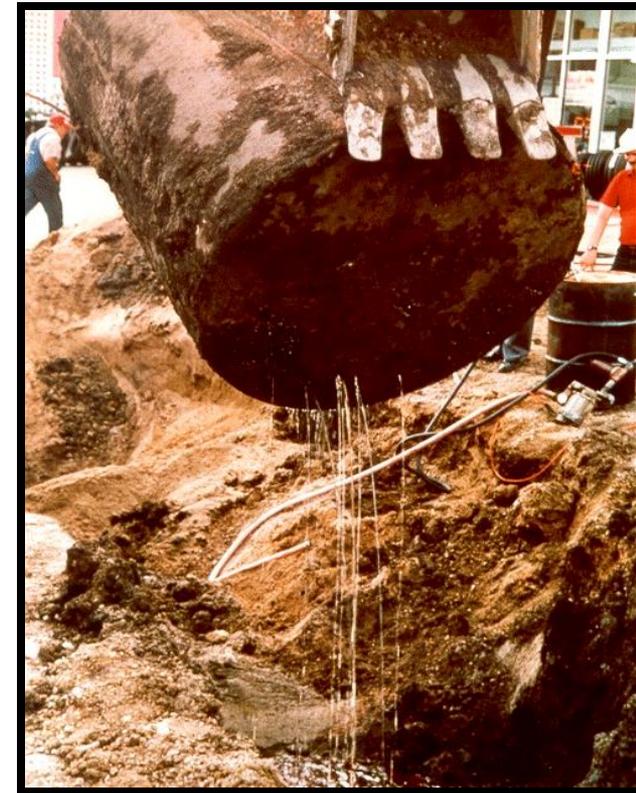
- 360 Degrees of Secondary
- Single Wall Closure Deadline
- All existing single wall UST systems without secondary containment and leak monitoring shall be permanently closed by 12/22/15
- Double-walled tanks, double-walled piping, and piping/dispenser sumps

# By The Numbers

- 2014 – 477 Facilities
- 12/22/15 – 266 Facilities
- Spring 2017 – 55 Facilities
- Currently 6 Facilities Remain
  - 12 Tanks Total
  - All Red-Tagged/Temporarily Closed
  - 4 On-Premises Use Heating Oil Tanks
  - 1 Kerosene and 1 Diesel at C-Stores
  - 6 Tanks @ DoD Facility w/FCTs

# Oil Remediation Program

- Planning Ahead
- Budgeted \$1 Million Extra for Deadline Closures
- 2014 to 2017 –
  - 571 Closures Since
  - 6% (36) Resulted in New LUST Sites
- Active LUST Sites Continue Downward Trend
- Contamination Mainly Found at Dispenser Pad, Sumps and Spill Buckets



# Outreach

- 2005 - Statewide Meetings Held
- 2010 – Monthly Operator Training Classes
- April 2015 – Closure Reminder Letter



# Enforcement Strategy

- Tiered Enforcement Approach Based on Risk
  - Easily Explainable to Owners/Operators/Politicians
- Enforcement Letters Issued
  - 200 Actions
  - Mostly LOD/Intent to Red Tag
  - Administrative Orders, Orders by Consent
  - AG Referral



# Funding Source - MtBE Cleanup Fund

- Established 2014 - \$276 Million
- Funding for MtBE Contamination Investigation
- Funded Closure of over 110 Regulated Facilities
  - Over 250 Regulated Tanks
- Continue to fund closures of newly discovered gasoline tanks

# What Didn't Work? Do Different?

- Alternate Funding Sources
- New Contractors/Consultants
  - No Familiarity with NHs Rules
  - Improper Closure Techniques
- Price Gouging
  - 2x-3x Normal Costs
- Spread Out Deadlines Based on Risk
- Data Tracking
  - Piping Installed Date
- Further Outreach

# What Worked?

- MtBE Funding
- Planning ahead
  - Outreach/Training
  - Budgeting
- Installation Plan Review
- Risk Based Enforcement Approach
- Teamwork – Communication

# Special Thanks!

- Ted Unkles, VTDEC, Retired! Congrats Ted!
- Jaymi Cleland, VTDEC, [jaymi.cleland@vt.gov](mailto:jaymi.cleland@vt.gov)
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