



NJDEP UST Compliance and Enforcement

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Onsite Compliance



Site Outreach



**Onsite
walkthroughs for
new compliance
managers**



**Compliance
Advisories**



Free seminars



**Membership
meetings /
trainings**

Fuel Merchants
Gasoline and C-
Store Association
(GCA)



Common help

- Call and ask
- Self – disclose a violation
- Administrative Consent Order
- Request a delivery ban
- Double check on site setup and/or compliance status prior to purchase

Contractor Certification



Installation – Entire / Repair



Closure



Testing



Cathodic Protection – Tester /
Specialist

Contractor Outreach



**Required classes for
licensed contractors**



Free seminars



Membership meetings

Petroleum Equipment
Contractors Association (PECA)



**Set up manufacturer
classes in state for easier
recertification**



Common help

- Call and ask
- Call with site on phone
- Rundown options for clients
- Help with certification applications
- Disclose a major violation

Always, always,
always on the
phone

Be consistent,
truthful and
encourage
questions.





STRONGER TOGETHER: TANK OWNER PERSPECTIVE VENDORS + REGULATORS

CROSSAMERICA AT A GLANCE

Name & Title

Jeremy Holland
Director of Facilities



Fuel Distribution

1,800+ locations/34 states



Site Ownership

1,00 locations/32 states



Fuel Volume

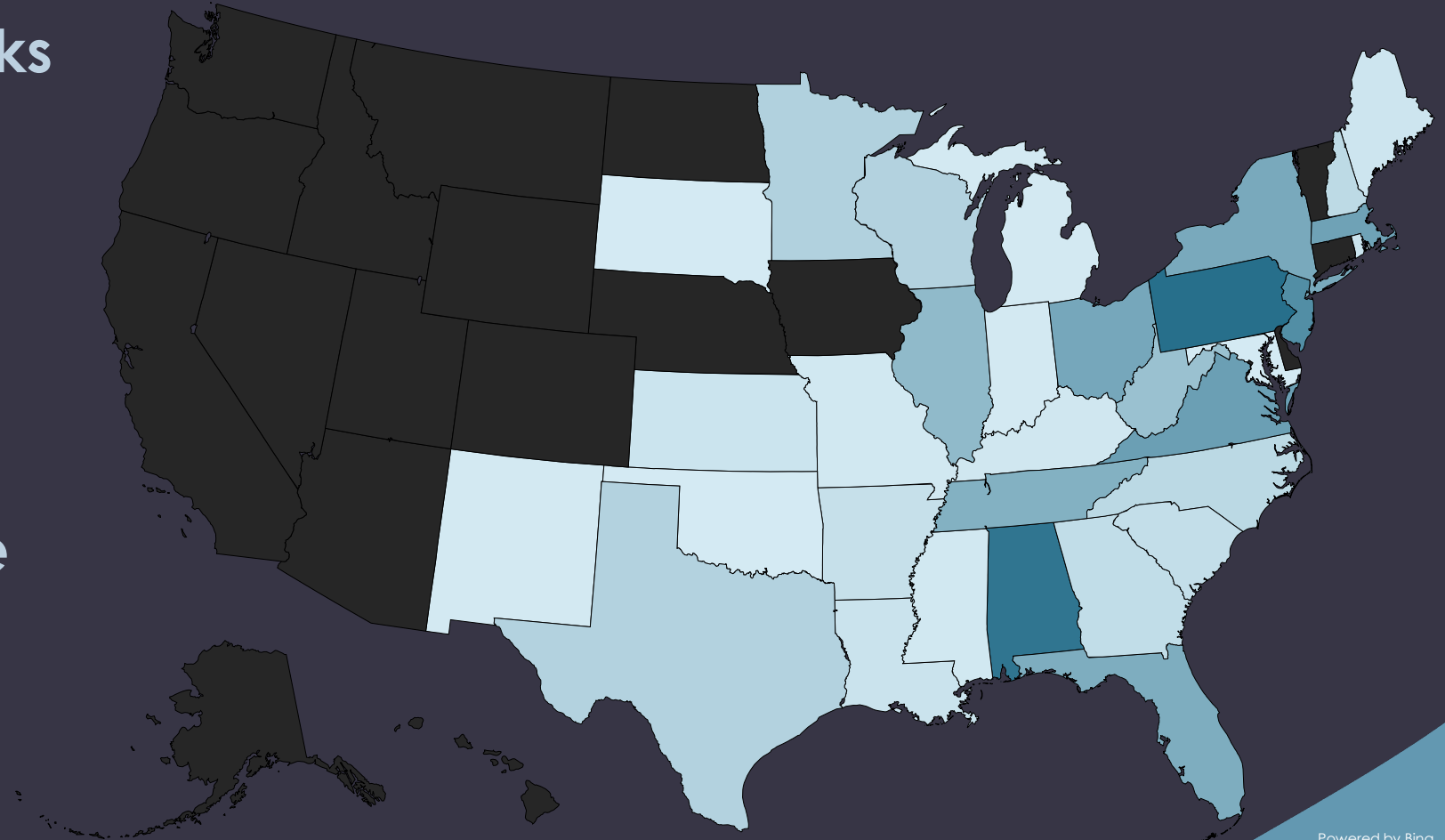
3.8M gallons/day

Fun Fact

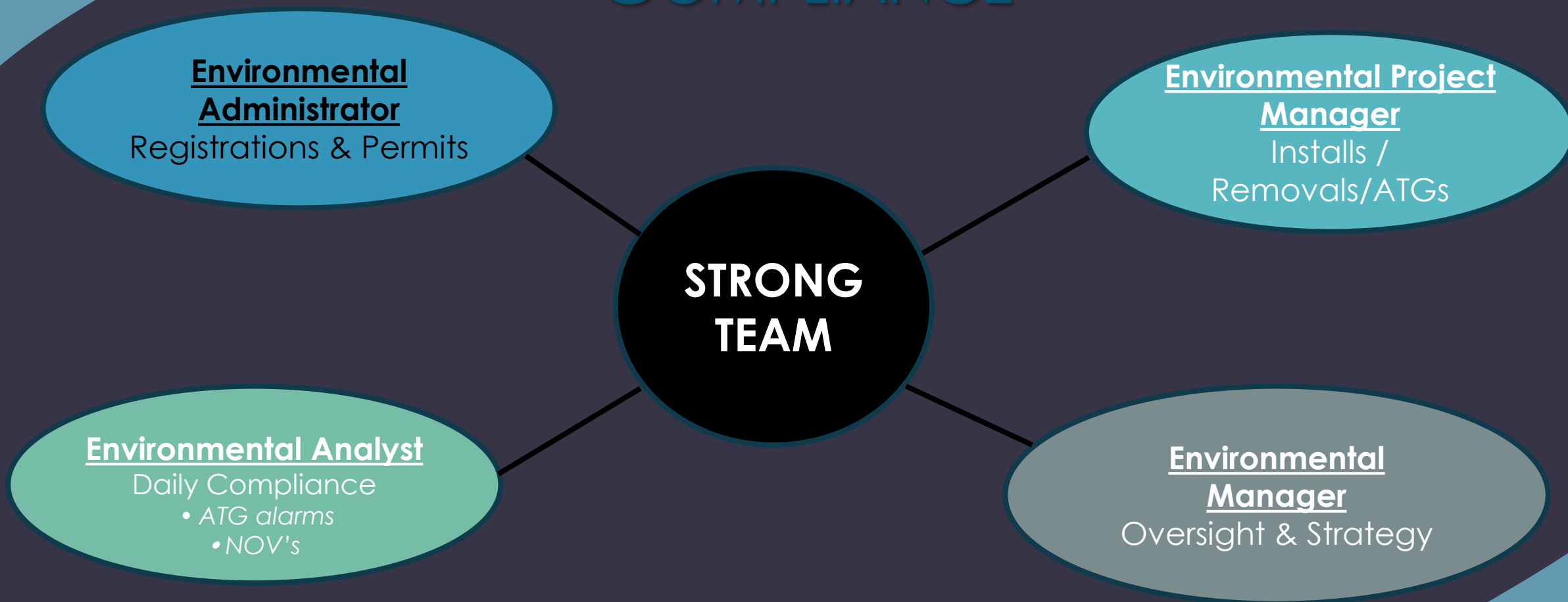
On any given day,
our team helps
move enough fuel
to fill **about 6**
Olympic-sized
swimming pools

THE COMPLIANCE BREAKDOWN

- Own over **3,000 tanks** across **32 states**
- **12,400 ATG alarms** in the past year
 - **almost 3 dozen daily!**
- **~1,500 compliance tests** per year
- **Hundreds of state and federal inspections** every year



THE TEAM BEHIND OUR COMPLIANCE



It's a lot of alarms and a lot of inspections, but it takes the right mix of people to keep everything running smoothly.

STRONG VENDOR RELATIONSHIPS



Teamwork



Support



Trust



Share

PARTNERSHIP



Regulatory
Reports



Form
Assistance

Joint
Inspections



Urgent
Response

TOOLS THAT KEEP US ON TRACK



- 1. **Automates** alerts 2. **Simplifies** reporting 3. **Keeps** everyone on same page

CROMPCO TEST FAIL- IUM FAIL LOG Enhance Integrate Automate HLPN +3 Invite / 15

Main table Pete Table File gallery MA - Katie +

New bis # Search Person Filter Sort Hide Group by

✓ CROMPCO OPEN FAILURES

☐	Bis #		COT	Type of Project	Project Status	Date notified of is...	TYPE OF FAILURE	What is the issue
☐	PA0219	+	COMPANY OP	3rd Party Test Fail	CAP COMPLETED	Aug 5	Overfill/Monitor Cert	• Overfill is Incomplete at this site beca
☐	PA0158	+	COMPANY OP	3rd Party Test Fail	Crompco Retest...	Aug 6	Federal Stage I/ PV ...	Need to meet a bucket truck to comple
☐	MA0013	+	LESSEE DEALER	3rd Party Test Fail	Waiting on Sche...	Aug 13	Overfill	• Overfill Fails because the outside Auc
☐	MA0116	+	COMPANY OP	3rd Party Test Fail	Waiting on Sche...	Aug 13	Monitor Cert/EVR Dr...	• Monitor Cert fails because the Middle
☐	MA0066	+	LESSEE DEALER	3rd Party Test Fail	IN PROGRESS	Aug 5	Containment	• Both Dispenser Pans visually fail beca
☐	PA0334	+	LESSEE DEALER	3rd Party Test Fail	Crompco Retest...	Aug 14	CP	• CP Fails on both Premir

Help

Our failure log system tracks issues by project, type, and urgency so nothing slips through the cracks.

TOOLS THAT KEEP US ON TRACK

- 1. Track test dates 2. Check vendors schedule 3. Never miss a deadline

Annual, Overfill, SB, UDC, STP, Testing ▾

Enhance Integrate Automate / 2 JF AC +1 Invite / 6 ↻ ⋮

Main table --- Kanban Pete Q Calendar Katie File gallery Table Table Table +

New item ▾ 🔍 Search 👤 Person ⚙ Filter ▾ ⬆ Sort / 1 ⚙ Hide 📁 Group by ⋮

✓ 3rd Party Testing Schedule and test reports

☐	Item		ANNUAL TESTING LAST TEST D...	OVERFILL LAST TEST DATE	SPILL BUCKETS (LAST TEST)	UDC SUMPS (LAS...	STP SUMPS (LAST ...	REGULATORY REQUIREMENTS
☐	AL0001	⊕	Feb 14, 2025	Mar 8, 2023	Feb 19, 2024			AL - spill buckets every 3 years - DW exemp
☐	AL0002	⊕	Mar 26, 2025	Apr 3, 2023	Mar 28, 2024			AL - spill buckets every 3 years - DW exemp
☐	AL0003	⊕	Feb 14, 2025	Mar 9, 2023	Feb 19, 2024		Feb 19, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0004	⊕	Feb 26, 2025	Mar 8, 2023	Feb 19, 2024		Feb 19, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0006	⊕	Apr 4, 2025	Apr 14, 2023	Mar 21, 2024		Mar 21, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0007	⊕	Nov 8, 2024	Oct 31, 2023	Nov 8, 2024		Nov 8, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0008	⊕	Apr 10, 2025	Mar 20, 2023	Jan 25, 2024		Jan 25, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0009	⊕	Oct 16, 2024	Sep 14, 2023	Oct 16, 2024			AL - spill buckets every 3 years - DW exemp
☐	AL0010	⊕	Feb 20, 2025	Mar 10, 2023	Feb 22, 2024		Feb 22, 2024	AL - spill buckets every 3 years - DW exemp
☐	AL0011	⊕	May 22, 2025	May 22, 2023	May 21, 2024			AL - spill buckets every 3 years - DW exemp

Tracking compliance testing dates.

WORKING WITH REGULATORS

Stay Compliant



NJ Administrative
Consent Orders



Plan Early



NJ EVR



Deliver Strong Results



Violations & penalties
down **90% since 2020**

3 Key Takeaways

- Plan Early
- Bring vendors along
- **Treat regulators as partners, not adversaries**

Questions

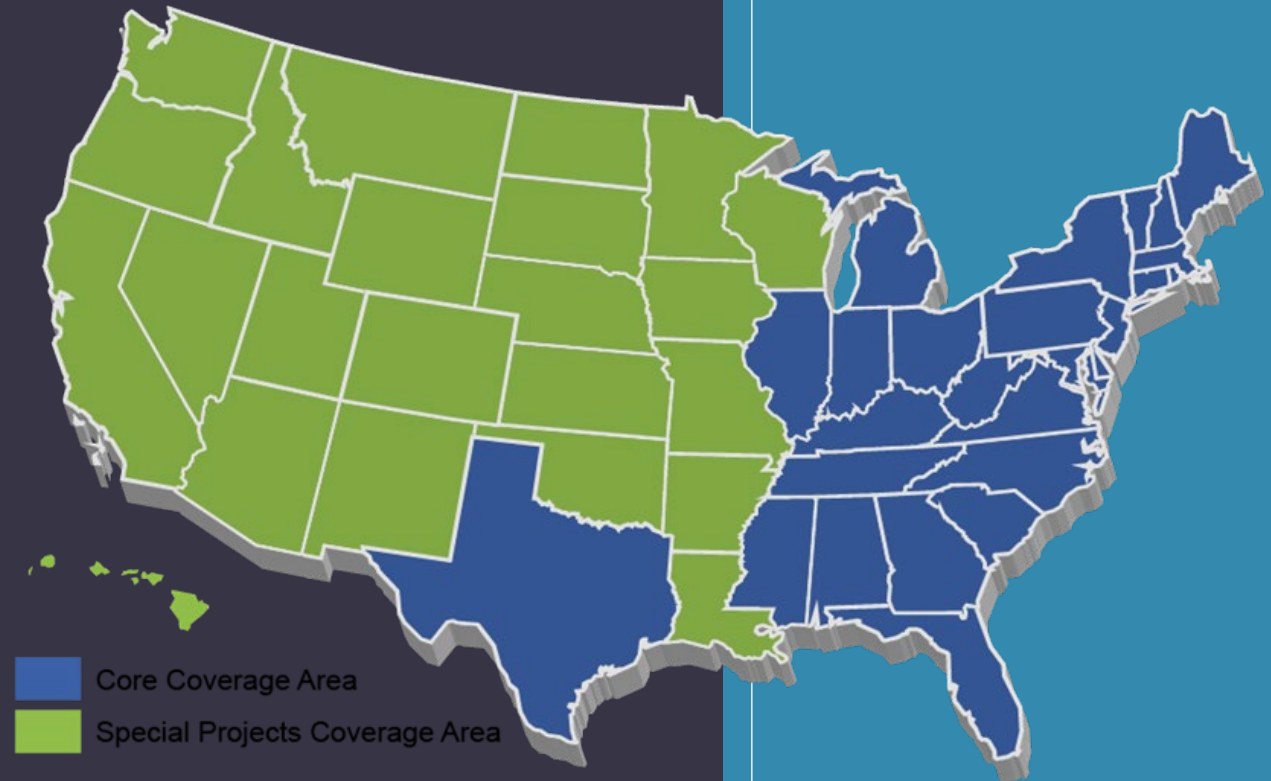


RELATIONSHIPS: STATE, OWNERS & CONTRACTORS

- Edward S. Kubinsky Jr.
- Director of Regulatory Affairs, Training and Certification
- OWL Services USA
- ed.kubinsky@owlservices.com
- 610-633-9732

Primary Coverage Areas

- OWL Services provides its core compliance, testing and associated services throughout the **East Coast** of the United States, portions of the **Midwest** and **Texas**. With strategically located crews working within these areas, OWL Services is responsive to your needs, where you need us and when you need us.
- Our resourcefulness has enabled us to accommodate customers located within our **Special Projects Coverage Area**, which includes **most of the United States, including Hawaii**.



Service provider/licensed contractor's job:

- Protect the environment and ensure equipment works ☺
- Meet regulatory requirements - keep AHJ (Authority Having Jurisdiction) happy ☺
- Keep the customer happy by performing required services ☺



WORKING TOGETHER - HOW THE SERVICE PROVIDER CAN HELP THE AHJ

- Support test results
- Provide photo documentation if available
- Provide test results to the agency if owner cannot produce them during an inspection
- Consider the AHJ a partner, not the enemy
- Work with the AHJ & owner to set up on-site meetings

WORKING TOGETHER - HOW THE SERVICE PROVIDER CAN HELP THE OWNER

- Always provide a passing result (just kidding!!)
- Provide regulatory guidance without involving the AHJ and drawing unwanted attention
- Provide solutions
- Provide support during inspections
- Consider the customer a partner working to achieve compliance

WORKING TOGETHER - HOW THE AHJ CAN SUPPORT THE OWNER AND SERVICE PROVIDERS

- Provide regulatory guidance & interpretations when requested
- Educate service providers and O/O's
- If requested, provide data about a site if not publicly available
- Consider the owner and service providers as partners in getting a job done and not the enemies

WORKING TOGETHER

- How legacy Crompco started to “get to know” the AHJ while working with the owner



WORKING TOGETHER EXAMPLES

- September 2012: Site demo with US EPA



WORKING TOGETHER EXAMPLES

- June 2024: site demo with MA DEP



WORKING TOGETHER EXAMPLES



- July 2025: site demo with PA DEP

WORKING TOGETHER EXAMPLES

- April 2025: Error made when performing containment testing



WORKING TOGETHER EXAMPLES

- April 2025: NJ DEP contacts us to let us know about issues they are seeing



WORKING TOGETHER EXAMPLES

- May 2025: Error in State UST Database



WORKING TOGETHER EXAMPLES

- August 2025: Error with public uploading system



Pennsylvania
**Department of
Environmental Protection**

June 26, 2025

NOTICE OF VIOLATION

JEREMY HOLLAND
CROSSAMERICA PARTNERS
645 HAMILTON ST STE 400
ALLENTOWN, PA 18101-2130

Facility Operations Inspection PAST DUE as of: 3/7/2025

RE: PA0316-300 WILLOWBANK, FACILITY NO. 14-15469
Bellefonte Boro, Centre County

WORKING TOGETHER EXAMPLES

- Partnering with industry for training needs



WORKING TOGETHER EXAMPLES

- Partnering with industry for training needs



WORKING TOGETHER EXAMPLES

- Partnering with AHJ & industry for use of new technology



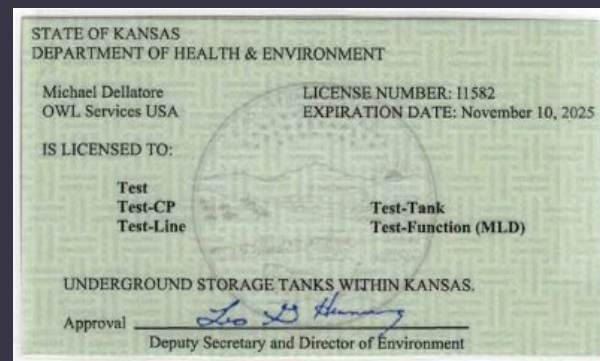
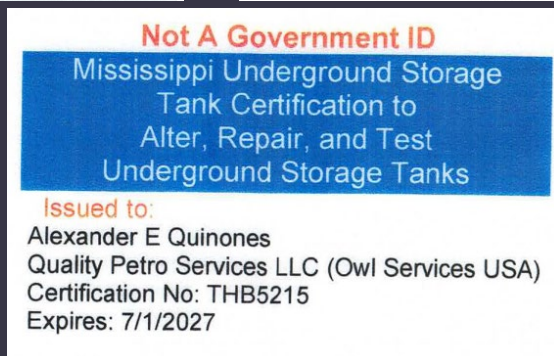
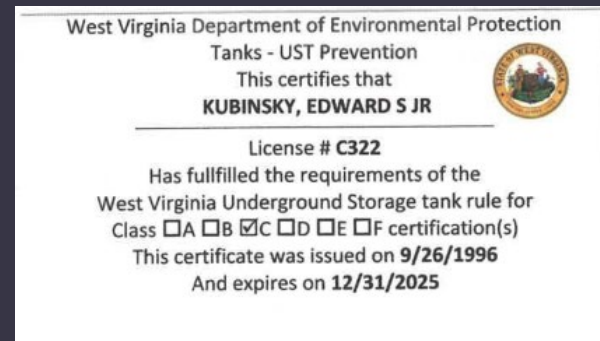
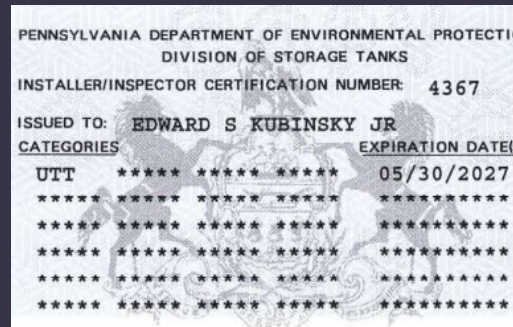
WORKING TOGETHER EXAMPLES

- Partnering with AHJ & industry for use of new technology



WORKING TOGETHER: SUGGESTION FOR DEVELOPING BETTER RELATIONSHIPS

- Certification & Service Provider Licensing



WORKING TOGETHER: SUGGESTION FOR DEVELOPING BETTER RELATIONSHIPS

- Technician Qualification/Registration (Look to Industry)

	OKLAHOMA CORPORATION COMMISSION PETROLEUM STORAGE TANK DIVISION https://oklahoma.gov/occ.html (405) 521-4683 FAX: (405) 521-4945 PO Box 52000 - Oklahoma City, OK 73152-2000		
October 08, 2024			
Gabriel Olivera 1815 Gallagher Road Plymouth Meeting, PA 19462			
Current Licenses	License #	Effective Date	Expiration Date
TESTER	2644	10/1/2024	12/31/2025

	Division of Oil and Public Safety
Qualified Service Technician Gabriel Olivera	
has satisfactorily completed the requirements necessary to be certified as a Qualified Service Technician in the State of Colorado.	
Expires: 5/14/2028	ID#: COQST-554

WORKING TOGETHER: USE RESOURCES & CONTRACTORS THAT HAVE A TEAM WORKING TO HELP MANAGE COMPLIANCE

Need a Strong Team:

Sandy Carl & John Olko – managing compliance testing scheduling for over 5,000 UST sites & technician certifications

Francyne Klein & Diane Loughrey – handling all regulatory submittals, licensing

Jim Uhler – internal data integrity, licensing & technician support

Wayne Rolland – scheduling & technician support

Jack Hooton – IT system development & support

Tools that help us manage compliance

Dashboard

Customers

Locations

Invoices

Schedules

Work

List

Visits

Quotes

Projects

Schedule

Customers > Cross America Partners, L... > #PA0488 - Speedway

Location #PA0488

ACTIVE X

Speedway
1518 South 4th Street
Allentown PA 18103
Lehigh County
Allentown City
6107978307
Time zone: EDT
(11) Compliance Rules
5 Compliant 5 Upcoming 1 Past Due

Visits

#	
W-99127 100994	
W-114281 116196	
W-64990 66615	
W-19878 20968	

Name	Due Date
Overfill Drop Tube (3-Year Test; service code 1795)	03/03/2028
Spill Bucket (Fills Only, 3 year test except FL, DE, MD, MS; service code 105)	03/18/2027
Stage I Pressure Decay Test (3-Year Federal Test, PA Only; service code 2356)	03/18/2027
Stage I P/V Valve Test (3-Year Federal Test, PA Only; service code 51)	03/18/2027
3rd Party Compliance Inspection for USTs (PA IUM 3-Year; service code 91)	05/28/2028



Tools that help us manage compliance

 **Customers**

Locations

Invoices

Schedules

 **Work**

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Speedway
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Visits

Invoices

#	Contact	Date
 W-99127 100994	Cross America Partners, LP	05/28/20 Anytime
 W-114281 116196	Cross America Partners, LP	03/03/20 Anytime
 W-64990 66615	Cross America Partners, LP	03/18/20 Anytime

Name	Due Date
Leak Detector Test (Annual; service code 28)	03/03/2026
Monitor System Inspection (Annual; service code 100)	03/03/2026
E-Stop (Annual Test for 7-11, Speedway, Alliance, Warren, Cross America, Hertz, Leon, Lukoil; service code 154)	03/03/2026
Annual Walkthrough (Annual Inspection; service code 3751)	03/03/2026
Line Tightness Test (Annual Test Per Customer Rules; service code 98)	03/03/2026

Fleet



Tools that help us manage compliance

Location #PA0488 ACTIVE X

Speedway
1518 South 4th Street
Allentown PA 18103
Lehigh County
Allentown City

📞 6107978307

Time zone: EDT

(11) Compliance Rules

5 Compliant 5 Upcoming 1 Past Due

Name	Due Date
Shear Valve Inspection/Test (Annual; service code 109)	01/01/2025



Tools that help us manage compliance

Location Compliance			
☐	Name	Requirement	Due Date
☐	Leak Detector Test (Annual; service code 28)	1 Year	03/03/2026
☐	Monitor System Inspection (Annual; service code 100)	1 Year	03/03/2026
☐	Overfill Drop Tube (3-Year Test; service code 1795)	3 Years	03/03/2028
☐	Spill Bucket (Fills Only, 3 year test except FL, DE, MD, MS; service code 105)	3 Years	03/18/2027
☐	Shear Valve Inspection/Test (Annual; service code 109)	1 Year	01/01/2025
☐	Stage I Pressure Decay Test (3-Year Federal Test, PA Only; service code 2356)	3 Years	03/18/2027
☐	E-Stop (Annual Test for 7-11, Speedway, Alliance, Warren, Cross America, Hertz, Leon, Lukoil; service code 154)	1 Year	03/03/2026
☐	Annual Walkthrough (Annual Inspection; service code 3751)	1 Year	03/03/2026
☐	Line Tightness Test (Annual Test Per Customer Rules; service code 98)	1 Year	03/03/2026
☐	Stage I P/V Valve Test (3-Year Federal Test, PA Only; service code 51)	3 Years	03/18/2027
☐	3rd Party Compliance Inspection for USTs (PA IUM 3-Year; service code 91)	3 Years	05/28/2028



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OWL

