

UST Compliance While Dealing with Workforce Challenges

Bureau of Environmental Cleanup
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Pennsylvania
Department of
Environmental Protection

Workforce Challenges & Increasing Compliance

- Southcentral Region covers 15 counties, 2,878 facilities, 8,711 tanks (UST and AST), 4,844 UST
- Supervisor position was vacant for 4 months prior to hiring a new Supervisor in January 2024
- Designated compliment is 5 Water Quality Specialist Employees (Inspectors)
 - In-place staff consisted of 1 experienced WQS, 1 WQS with 2 years of experience, 1 Environmental Trainee (less than 1 year experience) and 2 vacant positions
- One trainee started February 2024 and another April 2024
- 2 months into the supervisor position, staff consisted of 2 experienced inspectors and 3 trainees



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Workforce Challenges & Increasing Compliance

- First 4 months in position
 - Provide oversight for in-place, experienced inspectors
 - Ensure current trainee was receiving proper guidance and training
 - Handle administrative tasks required to post, interview for, and fill two vacant positions
- Focused on hiring candidates with less professional experience, but strong backgrounds in information technology, as program was shifting to a digital platform (mobile app, OnBase, etc.)
- Considered that candidates with less professional experience may result in their retention with the program exceeding the usual 1 to 3 years



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Workforce Challenges & Increasing Compliance

- Training period is 1 year and is primarily self-led for review of materials, regulations, etc.
- Paired trainees with experienced inspectors to conduct/observe field work as well as supervisory staff taking them into field for training
 - Able to experience skills and inspection methods of different individuals to ultimately create their own unique style for conducting inspections
 - Gained experience with use of mobile application and other IT tasks
- Trainees were primarily focused on follow-up work related to backlog of inspections with “minor” violations
 - Primarily addressed through submission of records or other easily obtainable records or documents



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Workforce Challenges & Increasing Compliance

- Inspectors needed a leader with the time to address their needs, due to vacancy of position for 4 months
 - Provided continual guidance for trainees
 - Set goals for day/week tailored to experience level of the individual inspector
 - Utilized our tracking spreadsheet to log inspections, due dates, status, etc.
- Ensuring experienced staffs' availability to the trainees was paramount in their development
 - Telework schedule shared amongst the team
 - Maintained accurate weekly itineraries for all staff
 - Utilized Teams messaging, email, phone, and in person office/field days



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Workforce Challenges & Increasing Compliance

- Emphasis on conducting field inspections with Supervisor as much as possible
 - Demonstrate how to ID tank components
 - Review of records
 - How to handle difficult situations or persons
 - When is escalated enforcement necessary?
- Training opportunities scheduled as available
 - Facility operator training
 - Cathodic protection training
 - Inspector training conducted by Central Office staff



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Workforce Challenges & Increasing Compliance

- Staying engaged with the team
 - Daily morning calls
 - Address general issues with mobile app or other IT issues
 - Check in with each inspector on specific cases
 - Request updates or further enforcement actions as needed
 - NOV's: Notice of Violation
 - NOPA's: Notice of Proposed Assessment
 - FO's: Field Orders
 - Ask about previous day's inspections
 - Any issues?
 - Answer questions with components or construction
 - Allows inspectors to discuss strange/difficult facilities or owners, and ask for advice



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Workforce Challenges & Increasing Compliance

- Good communication between entire team
 - Free exchange of information between Supervisory staff, Compliance staff, and the inspectors
 - Issues and remedies
 - Allow seasoned inspectors to offer insight into similar situations or offer advice to newer inspectors
 - What to look for onsite
 - How to speak to Facility Owners and the Regulated Community
 - How to face adversity
- Can lead to alternate solutions to problems or situations that another may not have thought of



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Workforce Challenges & Increasing Compliance

- Positive work environment
 - Providing positive feedback
 - Constructive criticism
- Open Lines of Communication
 - Knowledge is a resource that should be shared
- Utilize tracking spreadsheets
 - Personal and Program
 - Shows inspectors how reports are generated
 - Allows staff to track their own facilities and update the main spreadsheet as needed
 - More efficiency observed in for inspection and enforcements
 - Allows for inspectors to plan their days weeks in advance



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Workforce Challenges & Increasing Compliance

- Training of new inspectors
 - Adapted training strategies or motivational techniques to each inspector
 - Account for personalities, experience, work habits, learning habits, etc.
 - Everyone is different and learns differently
- Each inspector is required to be in the field at least 2 days per week and conduct at least 2 inspections each field day
- Inspections need to be entered into the mobile app within 48 hours of completion



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Workforce Challenges & Increasing Compliance

- Strategies for Increasing Compliance
 - Contacting facilities prior to their 3rd party FOI due date
 - Was testing completed or scheduled?
 - Are records available and organized?
 - Contacting facilities after 3rd party FOI has been performed
 - Ensuring the facility management understands why they are in violation and how to get out of violation
 - Performing Follow-Up Inspections
 - Verify progress is being made to close violations
 - Show importance of onsite organization
 - Hands on teaching of why the regulations are in place
 - Overall best interest of the responsible officials to want to stay in compliance



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Workforce Challenges & Increasing Compliance

- Generated a list of tanks by age of installation
 - Conducted CEIs on older systems
 - Widely varying results – fully compliant vs immediate shut down due to no testing or release detection records



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- New ownership facilities
 - 1 year time-frame for first FOI to be conducted
 - Trying to perform a CEI prior to FOI Helpful to inspect these facilities and explain to owner what is required and ensure testing and release detection are being conducted properly



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Workforce Challenges & Increasing Compliance

- Pre-approved Field Orders
 - Template Field Order approved by our legal department
 - Has checklist for violations and section for comments and violation summary/site history
- Allows us to suspend permits at facilities easily
- Examples include:
 - Failed spill equipment or overfill equipment testing
 - Lack of annual testing records
 - No TRD or PRD records
 - Lack of response for document requests
- Generally, a facility will receive a penalty if a Field Order is issued

Get In Touch

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