

L.U.S.T.LINE

A Report on Federal & State Programs to Control Leaking Underground Storage Tanks

Petroleum Releases in Rhode Island: Inside the Underground Storage Tanks Financial Responsibility Fund

By Cheyenne Ellis

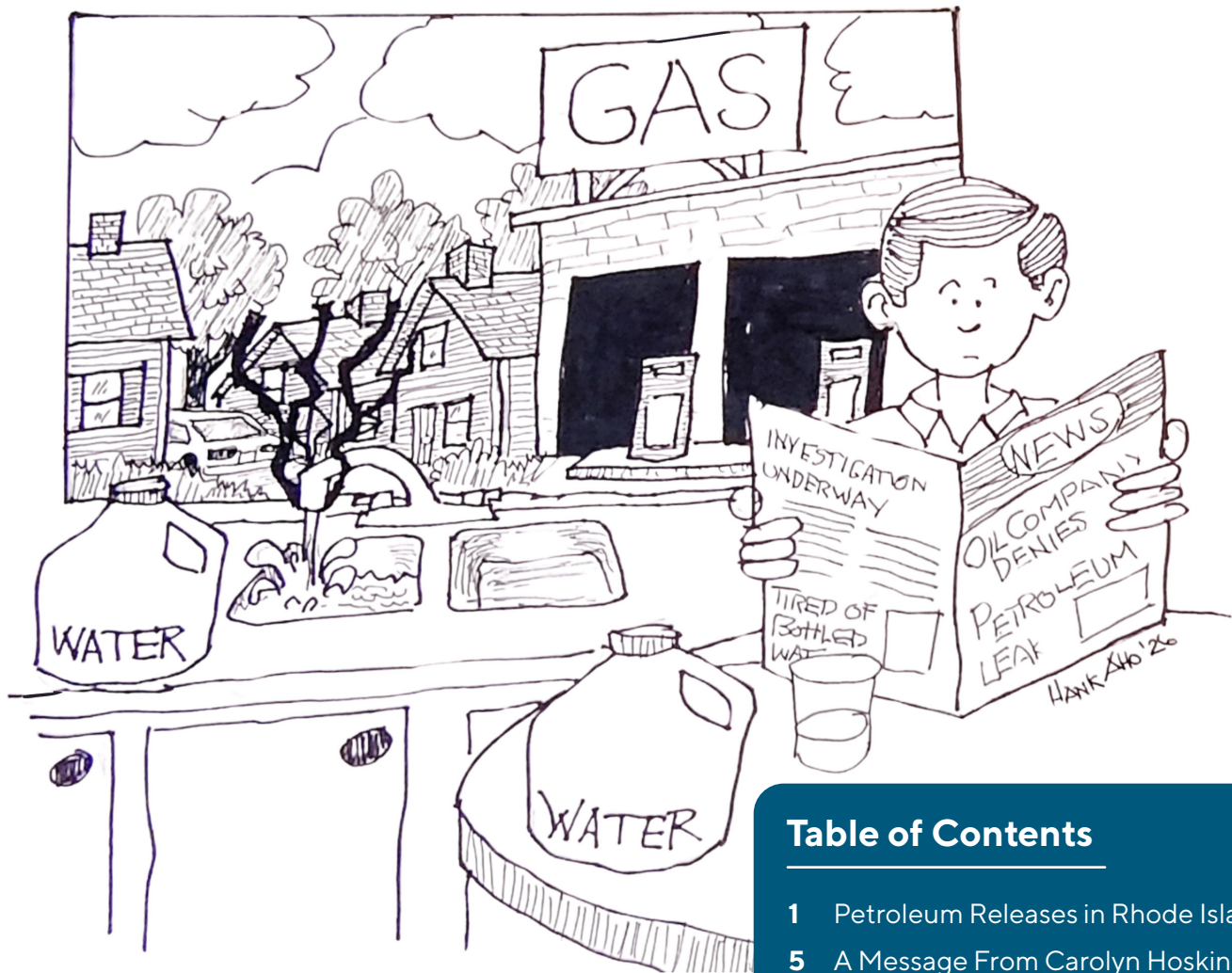


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A History of USTs in Rhode Island

In 1983, CBS's "60 minutes" aired a [special](#) on leaking underground storage tanks (LUSTs) that had been polluting the water supply of Canob Park, a small Rhode Island village, for almost two decades. The neighborhood consisted of 43 homes whose only potable water came from private wells, and a commercial district that included four gas stations.

The disaster had first come to light when a Mobil gas station reported a potential leak in the late 1960s. A local fire chief found the water supply at the scene to be so contaminated that it was "almost ignitable." Mobil sent an engineer to investigate, who also confirmed a leak had

occurred, but the town council was unable to pursue action against the oil company as there were no laws and regulations around petroleum releases in place. Shortly after, a second local gas station owned by Exxon was suspected of having a leaking fuel tank.

"Two or three out of every 10 gas stations in this country are leaking gasoline into the ground, possibly into your drinking water," said "60 Minutes" host Harry Reasoner, citing a consultant from the petroleum industry.

By the time the episode aired, Canob Park residents had been unable to use their water for more than 14 years. They also could not sell their properties due to the contamination and were forced to rely on bottled water for all their daily needs including cooking, bathing, and drinking.

Due to backlash from the publicity and the development of state and federal regulations around USTs, the corporations agreed to construct and fund a municipal water system to replace the contaminated wells. It was installed in 1985, nearly 17 years after the first documentation of possible contamination. Finally, after many years of remediation, the Rhode Island Department of Environmental Management (RIDEM) issued a "No Further Action" letter to the Exxon site in 2015. However, the Mobil station continues to perform semi-annual monitoring due to residual contamination in the bedrock to this day.

The U.S. Environmental Protection Agency (EPA) credits the episode for bringing national attention

L.U.S.T.Line

James Plummer, NEIWPCC Environmental Analyst
Cheyenne Ellis, NEIWPCC Information Officer
Susan Sullivan, NEIWPCC Executive Director
Daniel Lee, U.S. EPA Project Officer

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NEIWPCC is a regional commission that helps the states of the Northeast preserve and advance water quality. We engage and convene water quality professionals and other interested parties from New England and New York to collaborate on water, wastewater, and environmental science challenges across shared regions, ecosystems, and areas of expertise.

NEIWPCC
650 Suffolk Street, Suite 410
Lowell, MA 01854
Telephone: (978) 323-7929
lustline@neiwpcc.org
www.neiwpcc.org



Figure 1. NEIWPCC Environmental Analysts Kyla Foley (left) and Katerina Peña (right).

to the impact of petroleum leaks from underground storage tanks (USTs) on drinking water supplies. In 1984, Congress added [Subtitle I](#) to the Solid Waste Disposal Act, which formed the National Underground Storage Tank Program and directed the EPA to develop a regulatory program for USTs storing petroleum.

Rhode Island's UST Financial Responsibility Fund

At that time, there were an estimated 2.1 million USTs across the nation. To help manage the load, the EPA partnered with states and interstate organizations like NEIWPCC to implement these new regulations. Soon after, Rhode Island passed additional statewide regulations for facilities that store petroleum to prevent and remediate future incidents like the Canob Park disaster.

In 1993, the EPA approved RIDEM to manage its own UST program. These responsibilities included overseeing the registration, modification, and closure of fuel tanks, as well as the cleanup of leaking underground storage tanks. The Rhode Island program continues to be an important player in protecting water quality from leaks caused by USTs, ensuring that cleanup continues at old sites and that any new releases are met with prompt action.

The program established the Rhode Island UST Financial Responsibility Fund, which covers eligible

remediation costs for state and federally regulated tanks that have experienced a petroleum release. This acts similar to an insurance program that allows tank owners to demonstrate financial responsibility in the event of a leak, per state and federal regulations.

The fund is supported by a tax of \$0.005 per gallon that is collected by distributors of motor fuel, such as gas stations, throughout the state. The money directly supports cleanup efforts at LUST sites, in accordance with Rhode Island's UST regulations.

Two of NEIWPCC's environmental analysts — Kyla Foley and Katerina Peña — work with RIDEM to improve the efficiency and accessibility of the financial responsibility fund to ensure that environmental cleanup can begin in a timely manner.

"Fast remediation leads to faster environmental recovery, resulting in cleaner and safer water throughout Rhode Island," said Peña.

Both employees have been tasked with making the fund's application process more efficient and easier to use. This has involved updating and developing new forms, including a guide on ineligible expenses that do not qualify for reimbursement.

"The original document had not been updated since 1999," said Foley. "We modernized it to better align with our current practices."

The revised form provides additional specificity on which expenses do not qualify for reimbursement, removes activities that have since become eligible, and was reformatted to comply with current RIDEM branding. The updates have resulted in fewer financial surprises down the line for applicants — and fewer ineligible expenses to sift through for staff. Foley and Peña are also improving the [website's](#) usability by making forms easier to access and providing clear instructions about the application process.

Additionally, they are working to minimize financial barriers in the program. In 2025, they developed a deductible relief program, designed to lower the up-front costs for gas stations in areas of increased environmental and economic risk for owners and operators who have been in sufficient compliance with state regulations. These changes are intended to support independently owned gas stations, which often do not have funds set aside in the event of releases that can cost millions of dollars to clean up.

"There are many mom-and-pop shops in Rhode Island," said Peña. "Oftentimes, these businesses have been passed down for generations." By reducing the deductible amount, small gas stations can act promptly when a leak is detected, rather than pushing off the process until they can afford it.

Additionally, Foley and Peña recalculated the average labor and equipment rates using data from previous claims from the past few years. Allowable rates have increased as costs have risen due to inflation, giving applicants more flexibility in hiring workers for their remediation projects and increased reimbursements.

Foley and Peña participate in NEIWPCC's [Region](#)

[1 Tanks Workgroup](#), where they network and share resources with professionals from other member states. And, they learned more about other reimbursement programs like theirs during sessions at the [2025 National Tanks Conference](#).

"It was great to see how other states operate and take note of policies and practices that we may be able to implement into our fund in the future," said Foley.

Both environmental analysts review claims for reimbursement each quarter that come in from ongoing cleanup efforts. Each open case can continue to request reimbursements for fund-eligible expenses so long as they remain in compliance with Rhode Island's rules and regulations. A site receives a "No Further Action" letter when groundwater monitoring wells have tested below the water quality standards for petroleum contamination for a period determined by RIDEM.

They also conduct compliance reviews and inspections and oversee project budgets. Their next project aims to either improve the current database or develop a new one to track and store claims to the fund.

"Our goal is to just be able to remediate LUST sites as quickly and efficiently as possible," said Peña.

Continuing Threats From USTs

In the decades since the Canob Park petroleum leak occurred, there has been significant progress in the cleanup of underground storage tanks in Rhode Island and across the nation. The EPA reports that more than 581,000 sites have been remediated across the country since the National Tanks Program began in 1984. By 1998, all active USTs had to be upgraded or replaced with systems that met federal leak detection requirements and offered improved protection from spills, overfills, and corrosion.

Despite this, leaking underground storage tanks continue to present a risk in Rhode Island. Approximately 120,000 residents rely on private drinking water wells, according to the Rhode Island Department of Health. Natural underground water supplies are vulnerable to contamination by petroleum releases, which can result in serious environmental and health risks for the surrounding communities.

"Rhode Island has a pretty low water table," said Peña. "We also have a lot of bedrock, which can fracture. It makes a lot of pathways for petroleum to migrate through."

Contamination risks can also come from USTs that have been abandoned or do not have an owner who can pay for the cleanups. Leaks from these tanks often go undetected until removal occurs.

1

STEP 1: Apply to the Fund

FIRST: Apply to see if your site is eligible for the Fund.

Click the plus (+) sign below to access the application forms and instructions.

+ Apply to The Fund: Instructions and Forms

+ Review Process Details

2

STEP 2: Initial Request for Reimbursement

AFTER you have been admitted into the RI UST Fund, please follow the instructions below.

Click the plus (+) sign below to access the application forms and instructions.

+ Initial Request for Reimbursement Instructions and Forms

3

STEP 3: Returning Applicants and Resubmittals

If you are continuing to request Reimbursement from the RI UST Fund, please follow the instructions below.

Click the plus (+) sign below to access the application forms and instructions.

+ Supplemental Claims Instructions and Forms

+ Resubmittals

Figure 2. Screenshot of the updated Rhode Island Underground Storage Tank Fund webpage, featuring a step-by-step application process.

NEIWPCC has had a long history of supporting UST-related challenges like these. Since 1984, staff have worked with state, Tribal, territorial, and federal regulators to reduce the number of LUST sites. This has included hosting the National Tanks Conference, which brings together hundreds of industry professionals to share resources and learn about emerging issues, policies, and equipment.

Additionally, NEIWPCC offers two workgroups for professionals to collaborate on UST/LUST topics: one for staff who work in its member states and another for those who operate in Indian Country. NEIWPCC also develops and implements trainings including a free, self-paced online [operator training](#) for Class A and B operators.

"NEIWPCC remains committed to carrying on the legacy of supporting UST programs across the country," said James Plummer.

Read more about the Canob Park incident in [Issue 80](#) of LUSTLine.

Cheyenne Ellis is an information officer at NEIWPCC. She can be reached at cellis@neiwpcc.org.

A Message From Carolyn Hoskinson

Director, U.S. EPA's Office of Underground Storage Tanks (OUST)



365 Days in 180 Minutes – EPA Three-Hour Calls Provide Insight Into the State of the Tanks Prevention Program

A few months after the conclusion of each fiscal year, my office has lengthy discussions with each EPA regional tanks program. These discussions are colloquially known as the “three-hour calls.” The calls are a great opportunity to discuss priorities and evolving needs. It helps us to shape the year ahead and to report out and understand the previous year. We identify trends, gaps, and success stories. These conversations are invaluable to understanding the program at a national level.

We also use the three-hour calls to get our finger on the pulse of how our state program partners are doing. Our regional counterparts continually interact with the states and have a strong sense of the challenges that states are facing and the pioneering efforts they undertake to address those challenges. The conversations help us identify needs for additional guidance, outreach, and training. The calls also help us understand the story behind the data we receive on program performance measures, providing a richer view of overall program health. In this article, I describe some of the issues we heard about for prevention programs across the country and the innovative approaches that states are taking to address their challenges.

State tanks programs truly are the front line for preventing UST releases and have numerous responsibilities. The states implement and enforce regulatory standards, requiring proven prevention measures such as corrosion protection, spill and overfill prevention, secondary containment for tanks and piping, and reliable release detection. State agencies mandate periodic testing, monitoring, and walkthrough inspections, verify performance through onsite inspections and records reviews, and use enforcement tools to correct noncompliance before it leads to a leak. States also train and support Class A/B/C operators, provide technical assistance and outreach, and maintain data systems

to track equipment, testing results, and violations. In addition, many states also certify installers and testers, and oversee installation, repairs, and upgrades to ensure proper construction and compatibility with the stored fuel. Through these many prevention-focused activities, agencies reduce the likelihood of releases that threaten soil, groundwater, and public health.

I listed all these activities to illustrate the sheer volume and complexity of state tank program responsibilities, and the above is not even an exhaustive list. It was confirmed on our three-hour calls that many states are doing all this while continuing to experience staffing shortages, and funding constraints. Their tanks program staff have to cover multiple programs. Affected states are using cross-training and work-sharing to cover multiple programs to handle activity surges or slowdowns. For example, in Texas, this is impacting the ability to conduct inspections. In the case of New Jersey, their business tax saw a significant reduction in recent years, so collected penalties help make up some of the difference to fund their UST program.

Likewise, through the three-hour calls we confirmed how UST owners and operators continue

“Through these many prevention-focused activities, agencies reduce the likelihood of releases that threaten soil, groundwater, and public health.”

A Message From Carolyn Hoskinson...continued

to face the many pressures of running a business while trying to understand and implement technical requirements. Protecting the environment and complying with all requirements is no small feat. Some of the most common underground storage tank violations noted during our annual calls this year (covering fiscal year 2025, October 2024 – September 2025) include:

- Record-keeping issues, such as missing monitoring records, and failure to keep required testing and maintenance records.
- Testing issues, such as line leak detectors not being tested and piping tightness tests not done after repairs or modifications.
- Release detection issues, such as not conducting required monitoring for tanks or piping, failing to test release detection equipment, mispositioned or inoperative sensors, ignored or unresolved alarms, and missing monitoring records.
- Issues with containment sumps, including ones that do not hold liquid, are unsealed or damaged, and water or product present in sumps.
- Walkthroughs not performed or documented, including failure to keep required records.
- Spill and overfill testing issues, including cases of spill buckets and overfill devices not being inspected or tested at required intervals.

In addition to violations, state programs encountered challenges with respect to contractor availability, diesel and ethanol corrosion, and temporarily out-of-service tanks. While persistent problems remain and new challenges crop up, the state tanks programs are working diligently and resourcefully to make things work. In our end of year discussions, we heard about some great examples of enhanced communication, compliance assistance, and service provider requirements. I will briefly describe some illustrative examples of state efforts to reach program goals, and again often in the face of diminishing resources.

Several states continue to enhance their outreach efforts to the regulated community. Where feasible and where it makes sense, states engage in individual outreach to owners and operators. For example, Michigan makes it a practice to conduct in-person outreach meetings to regulated entities and contractors. Vermont has made an investment in outreach and compliance materials related to testing requirements and operator training. They also send out reminders to owners and operators 30 days before required annual and triannual testing. EPA Regions do this

as well and have found it effective for UST owners and operators in Indian Country. Business owners, and especially small businesses that make up a significant portion of the regulated community, have many stresses and demands for time and attention. Providing and reviewing facility-specific information can make a real difference in compliance and increased understanding. Our regions also find that advance planning helps to make the most of in-person support. For example, several regions have a phone call prior to a visit and follow-up calls as necessary after a visit.

At times, travel budget and logistics do not allow for individual face-to-face interactions, so states have online resources available for owners and operators to reference on their own time. Some states add office hours and online training webinars to supplement online resources with more personal and interactive opportunities. More and more, states are incorporating technology to improve their program and the data they handle to understand program performance. A significant number of states have ongoing database projects. In general, states continue to look for opportunities to use electronic processes – including tablets for inspections, electronic data submission to see data ahead of inspections, and sending automatic notifications to the regulated community.

In addition to working directly with owners and operators, many tanks programs have found success by requesting additional information and standards from service providers in their state. For example, Utah has additional requirements for service providers and requires them to submit data on repairs and testing to the state as well as to the owner/operator. Oklahoma added a requirement for UST service provider/contractor licensing (i.e., certification) which over time will improve compliance with better quality testing and work. These enhancements will also help with record-keeping, a prevalent type of violation.

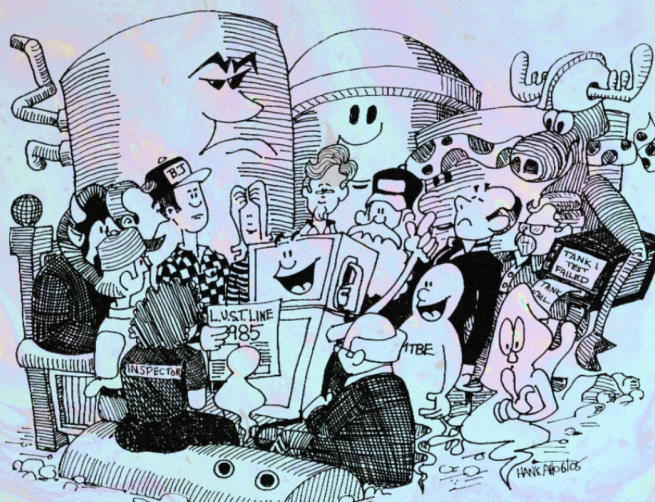
My staff and managers are visiting various states and regions throughout the country. One thing is clear – the tanks workforce continues to innovate and to remain dedicated to running the best and safest environmental programs in the country. Despite significant challenges, I am encouraged by the level of dedication to the tanks program across the country. It is wonderful to see the states come together at venues such as the all-states meetings that our EPA regions host each year. Our partners such as ASTSWMO and NEIWPCC also offer training and events to facilitate information sharing and problem solving. My office is committed

A Message From Carolyn Hoskinson... continued

to promoting information sharing in a variety of venues and methods. Through the years we have maintained awareness of common issues related to compliance so that we can focus efforts on guidance documents, training, and other resources that may be of use. For example, in response to what we heard from regional inspectors and Tribes, we recently developed additional guidance for the EPA notification form for USTs. Inspectors, owners, and operators can refer to this guidance to address common errors in filling out the notification form. We hope the availability of this guidance leads to improved compliance, better environmental

protection and data, and smoother on-site inspections.

I am so encouraged by the mindset of continuous improvement in the prevention program across the country. We have heard about all these improvements, in some cases directly from states, and in other cases via our regional EPA managers and staff. In my next article, I will detail some of the challenges and approaches that we saw on the cleanup and revitalization side of the tanks program. If you would like to share details about your approach, successes, or lessons learned in a future LUSTLine article, contact [James Plummer](#) at NEIWPC.



Become a LUSTLine Author

Share your knowledge with the community!

We are looking for UST professionals willing to write about their research, case studies, and field experiences. Other article ideas are also encouraged.

Contact us



Resources for New Professionals

The following pieces provide an introduction to some of the most prominent organizations and programs in the underground storage tank industry for those who are new to the field.

Get to Know ASTSWMO

By Anna Gayle Griffiths

The [Association of State and Territorial Solid Waste Management Officials, Inc. \(ASTSWMO\)](#) is an organization representing the 50 states, five territories, and the District of Columbia ("states" herein). Our primary functions are to enhance the state and federal partnerships, promote effective state programs, and provide member states with technical assistance, training, and forums for information exchange. ASTSWMO has five subcommittees that represent different federal statutes: CERCLA/Brownfields, Hazardous Waste, Materials Management, Federal Facilities, and Tanks.

The [Tanks Subcommittee](#) has three task forces dedicated to compliance and inspections, UST releases and remediation, and state trust funds/financial assurance. For each task force, the 10 EPA regions have a dedicated representative that serves a three-year term. These regional representatives meet monthly to discuss issues relevant to their state programs, task force project work, and EPA/industry updates. Existing publications produced by the task forces can be found [here](#). Below are links to recently completed projects and current topics of focus for each of the task forces.

Release Prevention

- [UST 101 webinar](#).
- Common compliance violations.
- Source and cause of UST releases.
- Start-up testing/installation inspections 101.

Leaking Underground Storage Tanks

- [2026 LUST Trust Fund Fact Sheet](#).
- LUST 101 [Part 1](#) and [Part 2](#) webinar.
- High resolution site characterization.

Financial Responsibility

- [FR 101 webinar](#).
- Abandoned tanks.
- Deductibles and incentives.
- Rate establishment.

ASTSWMO developed a space for resources, guides, and regulations to be compiled and shared. Check out existing content and contribute resources to the [Tanks Resource Compendium](#).

ASTSWMO hosts two conferences annually. The 2026 Mid-Year Meeting was held May 20-21 in Moran, Wyoming. Presentation materials can be found [here](#). The [2026 Annual Meeting](#) will be held October 29-30 in Arlington, Virginia.

The Tanks Subcommittee is currently seeking a Region 7 representative for the Financial Responsibility Task Force. If you are interested in becoming an active member of the ASTSWMO Tanks Subcommittee, please fill out our interest form [here](#).

Anna Gayle Griffiths is a tanks program manager at ASTSWMO. She can be reached at annag@astswmo.org.

Environmental Solutions in Practice: ITRC's Training and Technical Resources

By Taylor Voelkel

The [Interstate Technology and Regulatory Council \(ITRC\)](#) is a national coalition of environmental regulators, practitioners, and stakeholders who share a common goal of advancing practical solutions to today's environmental challenges. ITRC operates as a program of the Environmental Research Institute of

the States (ERIS), a 501(c)(3) education and research nonprofit affiliated with the Environmental Council of States.

ITRC works to reduce interstate barriers that can slow the adoption of innovative environmental technologies. We do this by developing technical

and regulatory guidance documents, focus and fact sheets, technology information sheets, and other products, each accompanied by training and educational resources designed to help environmental professionals apply science in real world settings. Our work spans a wide range of environmental challenges, from site management, remediation, and optimization tools and strategies to providing the latest science on individual contaminants.

ITRC's strength comes from its people, with more than [1,000 members](#) who actively serve on project teams, develop training materials, and drive the organization's work forward. We are committed to developing evidence-based solutions rooted in consensus.

Since 1995, ITRC has produced more than 150 written products, many of which provide solutions to common challenges experienced by environmental professionals working on LUST sites. For example, in January 2026, we released the [Vapor Intrusion Toolkit](#), which includes a new Vapor Intrusion Technical and Regulatory Guidance and dozens of fact sheets, technology information sheets, and checklists on a range of topics including petroleum vapor intrusion.

One key priority for ITRC is educating the environmental community, which is done largely through our series of live and archived web-based training courses. ITRC has a longstanding partnership with U.S. EPA's Clean Up Information Network (CLU-IN) to deliver free training led by ITRC volunteers who are experts in the environmental community. These

sessions translate ITRC's written products into clear and accessible learning opportunities that support both new and experienced practitioners.

Our 2026 training series includes dozens of live training sessions on several topics including Introduction to Hydrocarbons, Vapor Intrusion Introductory Concepts (two parts), Pump and Treat Optimization, and contaminants of emerging concern. Learn more about and register for our upcoming training opportunities on our [online training webpage](#). The webpage also includes links to our archived training materials and YouTube channel.

This year, ITRC also launched the Petroleum Training Curriculum Workgroup in response to increased turnover in the environmental field and a growing generational gap in the workforce. The workgroup is developing a comprehensive petroleum training curriculum that serves as a one-stop resource for new environmental professionals. Learn more about this workgroup and ITRC's other active project teams on our [website](#).

ITRC remains committed to supporting environmental professionals through high-quality technical resources and training. All are encouraged to explore ITRC's guidance documents, participate in training opportunities, and actively collaborate on our project teams through ITRC membership.

Taylor Voelkel is a project manager for the Interstate Technology and Regulatory Council. She can be reached at tvoelkel@ecos.org.

In Memoriam:

Kristopher Kenyon McCandless (1964 - 2026)

The Virginia Department of Environmental Quality (DEQ) is saddened to share the passing of Kristopher "Kris" McCandless of Nokesville, Virginia, on March 14, 2026, at the age of 62. Kris was a certified professional geologist with nearly four decades of experience in the environmental field, including many years in private consulting before joining the petroleum program at the DEQ's Northern Regional Office in 2015.

Kris was a geologist at heart and brought that passion to every aspect of his work. His ability to analyze complex petroleum cases, combined with his willingness to mentor and train others, made him a respected and valued member of the DEQ team. He also served the broader tanks community through his extensive involvement with the Interstate Technology and Regulatory Council (ITRC), where he contributed as a team member,

technical trainer, and Virginia's point of contact.

Beyond his technical expertise, colleagues will remember Kris for his enthusiasm, generosity, and commitment to the communities he cared about. He and his wife Joanna were devoted supporters of dachshund rescues and active leaders in their local Corvette club.

Kris is remembered with great respect by those who worked with him. His expertise, good humor, and generosity of spirit left a lasting impact throughout DEQ and the broader tanks community.

In Kris's memory, we are reminded that life is not only to be lived, but to be treasured and cherished. And for those who share his love of geology, the next time you pass a road cut or see exposed geology, we hope you will think of Kris.

Oneida Nation Runs UST Bootcamp for Tribal Professionals

By Victoria Flowers



Since 2004, the Oneida Nation (“the Nation” herein) has provided compliance assistance (CA) to owners and operators of federally regulated underground storage tanks on the Oneida Reservation through the U.S. Environmental Protection Agency’s (EPA) Direct Implementation Tribal Cooperative Agreement.

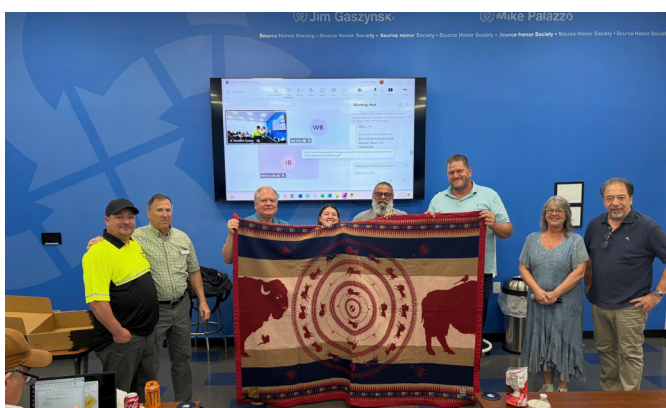
This training consisted of on-site training at the facility and classroom experience that included service providers from the petroleum equipment industry, hydrogeologists from the Wisconsin Department of Natural Resources, and risk managers who discussed the impacts of petroleum releases on the environment and financial liability. This empowered the associates and management to react quickly to alarms and potential releases, and to contribute to the protection of the Nation’s natural and built resources and economic success.

Starting in 2007, the success of the Nation’s training program was shared at the National Tanks Conference, the National Brownfield Conference, the Petroleum Equipment Institute’s (PEI)

convention at the National Association of Convenience Store Conference, the EPA Region 5 Tribal Environmental Program Managers Conference, and Wisconsin’s Petroleum Marketer and Convenience Store Association’s – Tribe’s Only meeting.

Soon after the presentations began, the CA team started receiving requests from Tribes across the country

about participating in this training. As a result, the CA assembled a team that consisted of service providers, equipment manufacturers, representatives from the insurance industry, regulators, and other Tribal professionals to deliver presentations. The CA procured a 3D cutaway model of an UST by





A Note From NEIWPCC

"I attended the most recent UST Boot Camp a few months ago and was blown away by the quality and breadth of the training. Attendees were zoned in, asking great questions and sharing their own experiences, adding fodder for discussion and group think. Visiting Source University for the first time and seeing the variety of equipment available, I would advocate for anyone involved in underground storage tanks to visit and nerd out with the knowledgeable staff."

- James Plummer

fabricating and acquiring many pieces of equipment that make up a fuel dispensing system to create a more immersive and tactile experience. Tribes from across the country began attending these sessions and soon after, the first UST Boot Camp was launched. We soon received numerous requests to host these trainings at other Tribal facilities. The CA program retrofitted a trailer to haul the equipment to various locations, which allowed for a pop-up experience outside of gas stations to inform community members about their local facilities.

In 2018, the Boot Camp began offering classes at Source University in Arlington, Texas, with participant support funding available from NEIWPCC. Source University offers a unique experience for students, with two complete UST systems set up in a warehouse that are cutaway to expose otherwise hidden parts. Equipment manufacturers, service providers, EPA, and construction professionals are frequently invited to give presentations about their role in ensuring the safe and proper operation of an UST system with a strict "tell don't sell" policy enforced. This is coupled with a visit to the Choctaw Nation's truck stop in Durant, Oklahoma, to do a monthly walkthrough, tank top inspection, and spill response training.

The benefit of this training is twofold. Firstly, the interaction between Tribal professionals who specialize in fields including environmental compliance, retail operations, and economic development allows Tribes to learn from each other and share their lived experiences. Secondly, these interactions have raised awareness in the service industry about the needs that exist in Indian Country

and improve service providers' understanding that by servicing facilities in these communities they are having a larger impact on the community than just enabling folks to pump gas.

To date, the Oneida Nation UST Boot Camp has trained more than 700 individuals, representing more than 160 Tribal Nations. Classes fill almost immediately, with many inquiring about future opportunities.

Victoria Flowers is the environmental compliance coordinator for the Oneida Nation of Wisconsin. She can be reached at vflowers@oneidanation.org.



Understanding PEI: Continuing to Strengthen the Energy Handling Equipment Industry

By Scott C. Boorse

Who/What is PEI?

The Petroleum Equipment Institute (PEI) is the leading international trade association representing companies involved in the manufacture, distribution, installation, service, and testing of petroleum marketing and energy handling equipment. Founded in 1951 and headquartered in Tulsa, Oklahoma, PEI serves a global membership base spanning all 50 U.S. states and more than 80 countries.

PEI's membership reflects the full ecosystem of the energy handling equipment industry — manufacturers, distributors, service providers, and contractors supporting infrastructure such as retail and commercial fueling stations, terminals, bulk plants, and related fueling systems.

At its core, PEI functions as the industry's central authority and knowledge hub, providing technical practices, education, and connectivity that enable safe, reliable, and efficient fuel and fluid handling operations. PEI members are the primary link between energy and transportation.

Why PEI Matters

For professionals and organizations operating in the fuel and energy handling space, awareness about PEI is essential for three primary reasons:

1. Industry Standards and Best Practices

PEI develops and maintains peer-reviewed Recommended Practices (RPs) that address critical operational, safety, and compliance challenges. These technical documents are widely recognized across the industry and regulatory community as foundational guidance for installation, maintenance, testing, and inspection activities.

In a sector where improper handling of equipment can result in environmental, safety, and financial risks, these practices provide a consistent, vetted framework for decision-making and execution.

2. Workforce Development and Professional Growth

The industry continues to face workforce challenges, including technician shortages and increasing technical complexity. PEI plays a central role in addressing these gaps by offering training, education, and certification pathways that help professionals build competency and credibility.



For companies, engagement with PEI directly supports employee development, operational consistency, and long-term workforce sustainability.

3. Industry Connectivity and Advocacy

PEI convenes the industry through conferences, committees, and working groups — creating opportunities to share knowledge,

address emerging challenges, and align on solutions. These connections are vital for staying ahead of regulatory changes, technological advancements, and evolving customer expectations.

Resources, Tools, and Events Offered by PEI

PEI delivers a robust set of resources designed to support both organizations and individual professionals across the industry.

Technical Resources and Recommended Practices

PEI's RPs serve as one of its most recognized and impactful offerings. These documents are developed through industry collaboration and address real-world operational issues — from equipment installation and inspection to maintenance, testing, and decommissioning.

Associated RP testing allows professionals to validate their understanding of these practices, reinforcing consistency and accountability across the field.

Training and Education

PEI offers a comprehensive portfolio of training and educational tools, including:

- Online coursework and learning paths.
- Technical manuals and reference materials.
- Entry-level through advanced training programs.

These resources are designed to support understanding of the design, installation, operation, maintenance, and testing of energy handling equipment.

Scott Boorse is the vice president of technical programs and industry affairs at PEI. He can be reached at sboorse@pei.org.

Tribal Waste and Response Steering Committee and EPA UST Priorities Document

By Tracy Horst

The [Institute for Tribal Environmental Professionals \(ITEP\)](#) Tribal Waste and Response Steering Committee (TWAR SC) is a U.S. Environmental Protection Agency (EPA) Tribal Partnership Group comprised of subject matter experts from federally recognized Tribal Nations and Alaska Native Villages from various EPA regions. The TWAR SC has two main objectives which includes the development of the annual Tribal Lands and Environmental Forum (TLEF) and an EPA Priorities Document that is produced every two years.

TLEF was first hosted in August of 2010 and has continued in a new community each year with participation from as many local Tribes as possible. Each year, there is a field trip to a Tribal gas station to provide participants with an education about all things UST-related, both inside and outside of the station. This year's forum will be no different as we will travel to The Chickasaw Nation of Oklahoma's site in Davis. For two days following the field trip, there are various tracks hosted by Tribal and EPA members to help attendees learn how to improve operational compliance and maintenance at their own facilities.

In addition to TLEF, the TWAR SC creates a biannual priorities document. The intention of the document is to communicate the needs of Tribes, influence policy, and determine useful actions for the protection of health, culture, and natural resources in respect to issues related to the EPA Office of Land and Emergency Management.

The current Priority Document includes the following items related to the Office of Underground Storage Tanks:

1. Include an equipment manufacturer's component in the Facility Specific Compliance Plan (FASCOMP) tool, and present training and updates on involvement at the 2026 and 2027 TLEFs. This should include resources and handouts.
2. Demonstrate the FASCOMP tool at the regional level for Tribal environmental staff, so they can ensure compliance at their facilities.
3. Work with the Tribal Convenience Store Association and the National Association of Convenience Stores to roll out the online A/B Operator Training.
4. Target education to Tribal environmental professionals to understand how to work with owner/operators to establish roles and responsibilities that improve compliance with UST closure and removal plans.

5. Continue to provide outreach materials and training to the service industry highlighting the difference between State and Tribal (i.e. Federal) processes for UST operations.
6. Continue providing training for Tribes about state-funded financial responsibility, which includes the topic of how Indian Country UST facilities may participate in some state-funded programs.
7. Work with OBLR to create resources and opportunities for collaboration to address UST related issues through the 128(a) Program.
8. Provide education related to emerging fuels to Tribal professionals.

These priorities were shared with EPA in January 2026 and will potentially remain in place through December 2027, at which time updates will be available.

Two great resources for information related to ITEP and the TWAR SC include:

1. <https://itep.nau.edu/twarp/>.
2. <https://triballands.org/>.

The TWAR SC encourages all Tribal environmental professionals to share their questions or concerns with them. Waste and Response contacts include Manager [Todd Barnell](#) and Assistant Manager [Julie Meikowski](#).

Tracy Horst is the director of environmental compliance for the Choctaw Nation. She can be reached at thorst@choctawnation.com.

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All previous issues, dating back to 1985, are available for viewing in the LUSTLine Archive.

A categorized list of articles is also available in the LUSTLine index.

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News and Resources

A Message From NEIWPCC's UST/LUST Program Coordinator: James Plummer



Wanted: Tanks Nerds

Even though I'm a social butterfly, I still find it challenging to join a new community. However, when I started in this role two years ago, I felt immediately welcomed and embraced by the tanks community. It's certainly due in part to my position mandating my involvement with folks in organizations all over and at varying levels, but it's also the outcome of this community's nerdiness about its underappreciated niche. There's a substantial sense of ownership and pride that folks in this space exude, and they are eager to share their insights, experiences, and networks.

I am fortunate to be in a role that provides abundant opportunities to connect with well-seasoned folks on a regular basis, but I know that not everyone is afforded that luxury. For new professionals, there's a maze of guidance, training materials, and past webinars, let alone the sea of connections yet to be made that could inspire solutions or simply assist with the absorption of tanks vernacular.

In this issue of LUSTLine, we ventured to help make the landscape a little less daunting by (re) introducing some of the organizations that exist in this space. There's so much great work happening and our job is to make sure you know about it.

In that vein, if you aren't familiar with NEIWPCC, I'm here to help. In 1947 (don't worry, I'm not going to talk through the whole organizational history), an act of the U.S. Congress created the New England Interstate Water Pollution Control Commission to support regional coordination on environmental issues. In the 1970s and 1980s, as USTs were gaining public attention and states were responding at different paces, NEIWPCC facilitated connections among states and coordinated with the U.S. Environmental Protection Agency (EPA) to move the needle on compliance and cleanups. Since then, we've continued to coordinate with EPA, states, and Tribes to support improved leak and spill prevention and more efficient remediation of contamination.

Not to toot our horn too much, but NEIWPCC's early involvement in the UST regulatory landscape is exemplified by this excerpt from the [first issue of LUSTLine](#) published in August 1985: "Much of the credit for the advanced state of UST regulatory program development must also go to the New England Interstate Water Pollution Control Commission (NEIWPCC). This consortium of six New England states and New York has provided a forum for several decades for Northeast states to share information on stream standard classification and achievement of clean water goals. They later turned their attention to groundwater issues and began in January 1984 to hold regular meetings to formalize and foster compatible state UST regulatory programs. Through this interstate communication, the first tank pioneers were able to lead the way for others to follow."

For example, New Hampshire was able to craft its draft underground tank regulation within one year by picking key components from New York's, Connecticut's and Rhode Island's packages. These state programs had already been through 2-3 years



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of assessing and defining the UST problem. Finally, NEIWPCC made a regional effort to increase public awareness of UST issues through production of a brochure and a slide-tape show.”

We should reinstate the use of slide-tape shows as a public outreach tool. That’ll get people’s attention. I’m assuming you need one of those Kodak carousel things? I’ve never seen one. I was born between CD’s overtaking cassettes and mass MP3 piracy. If you’ve somehow managed to hold onto a copy, let us know.

As I’m looking through the first issue, I’d encourage you to scan through the [LUSTLine Archive](#). In the past 96 issues, there are probably upwards of 500 articles that contain a plethora of insights and snapshots of tanks history. You can also navigate archived articles sorted by topic in the [LUSTLine Index](#) if you’re looking for information on something specific. If you don’t find what you’re looking for, let us know and we can dig into it in a future article!

I found some other interesting tidbits in the first issue, so I thought I’d share a couple:

- In 1984, Maine completed a Survey of Existing Underground Oil Storage Tanks which demonstrated, according to long-time LUSTLine author and contributor Marcel Moreau, “that they really didn’t know anything,” and that, “when you know there are a lot of tanks out there you know nothing about, you can really justify the need for notification requirements and for registration requirements.”
- Some things don’t seem to change: “States that have already implemented notification programs and those now developing programs realize that increased public awareness and participation in UST regulation depends on an effective communications strategy. States have identified a number of useful communication tools such as workshops, press releases, direct mail, and public forums. The most effective tool, however, seems to be the use of trade associations in communicating the UST requirements to the tank owners.”
- Take a look if you work in California, Connecticut, Florida, Maine, Massachusetts, Michigan,

New Hampshire, New Mexico, New York, Pennsylvania, Rhode Island, or Vermont. The issue really provides a snapshot of the landscape at the time including the state of states’ notification and registration requirements, communications strategies, and regulation development. If you have a historical document from your organization or agency that shows what was going on in 1985, send it our way. We’d love to spotlight it in a future article.

The first issue also mentions the possibility for a “national 2- or 3-day conference on UST regulation.” NEIWPCC has co-sponsored the National Tanks Conference (NTC) since 2005, and many of the presentations have been recorded and can be viewed in the [NTC Archive](#) as well as on [NEIWPCC’s YouTube channel](#). Speaking from my experience at the NTC in Spokane, Washington in 2025 (and ignoring my bias as the lead event organizer), NTC is the best opportunity to learn about the shifting tanks landscape and connect with folks across boundaries, both geographic and technical. Bridging the gap between funding, compliance, and cleanup by bringing together regulators from Tribes, states, territories, and federal agencies, alongside consultants, equipment manufacturers, and other industry experts, creates a learning environment focused on connections and curiosity. Peer organizations also host great events. You’ll find me at the PEI Convention at the NACS Show and ASTSWMO’s Annual Meeting. Shoot me a note if you’ll be attending and want to chat.

Other Ways NEIWPCC Supports the Tanks Community

We’re a couple of years away from the next National Tanks Conference, but there are other ways we’re helping folks connect in the meantime. NEIWPCC recently launched the [Online Tanks Community](#), a safe space exclusively for regulators to ask questions, share resources, and network with peers at the federal, Tribal, and state levels. If you haven’t already done so, you can create an account on the website. Once you’re in, you can create your profile, post questions, see who else is in the



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community, and join an upcoming community call.

For several years, NEIWPCC has been supporting the [National Work Group of Leak Detection Evaluations \(NWGLDE\)](#) which comprises of experienced state and federal staff. NWGLDE maintains their listing pages which display storage tank and associated piping leak detection equipment and methods that have undergone independent third-party evaluations and have been found by NWGLDE to meet the evaluation requirements contained in accepted protocols. NWGLDE meets twice a year to review listings and evaluate new equipment and methods. If you're a state employee interested in seeing what they're all about, feel free to reach out to any of the [members](#) to learn more and get involved. If you'd like to have your equipment included on NWGLDE's list, you can download [this file](#) for information on the requirements and procedures for submitting the proper documentation.

Every other month, NEIWPCC hosts Tribal Tank Talk Tuesdays, an opportunity for staff working with USTs in Indian Country to meet virtually to ask questions, share resources, and connect about priorities. These meetings frequently inspire the organization of in-person trainings and the development of online content.

Last year we released our free, self-paced online [Class A and Class B UST Operator Training and Exam](#). It was developed in partnership with EPA's Office of Underground Storage Tanks and although it was designed to support operators in Indian Country, it is available and helpful for all operators. While passing the exam demonstrates required knowledge for the federal requirements, states and other implementing agencies may have different requirements.

In addition to creating opportunities for networking and information exchange, over the past 10 years or so we've had the honor of hosting exceptional experts to showcase their work via webinar. Mixed in among National Tanks Conference session recordings are dozens of webinars available for your viewing. UST and LUST videos have been categorized into searchable tables on [NEIWPCC's website](#).

We've also been developing two new self-paced courses, which will be available soon. One is geared towards UST inspectors and provides insights and perspectives from experts across the country while the other walks you through an introduction to federal LUST regulations. Keep an eye out!

While this spiel points to a lot of different resources that we have accessible, it's certainly not the threshold of what's out there. Getting involved and asking questions is the best way to stay informed and find solutions. There are a lot of nuances in the world of USTs, and we aren't alone in trying to navigate it. Digging deeper into the weeds, you too may find yourself in a web of nerdiness surrounded by a cacophony of enthusiastic tanks professionals at the next National Tanks Conference.

The more time I spend in this space, the more I see that the folks involved just want to share their wealth of wisdom and experience. It's a luxury to be immersed in such commitment and energy. I welcome you to get involved in any way you can and reach out if there's any help that we can provide. I'll look forward to hopefully seeing you soon!

James Plummer can be reached at jplummer@neiwpc.org or 978-349-2520.

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