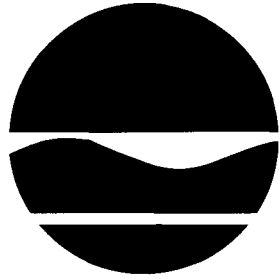


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# TAINIK BULLETIN

## DEC's Enforcement Initiatives Yield Results Efforts prevent pollution and encourage compliance

In a recent news release, DEC Commissioner John P. Cahill announced the success of a series of wide-ranging initiatives that last year resulted in significant increases in environmental compliance and DEC enforcement actions.

Commissioner Cahill stated that "Under Governor Pataki's leadership, New York State has become a national leader in environmental protection and conservation. The Commissioner further stated that "Governor Pataki asked me to build upon the environmental enforcement successes when I started the job in 1997 and, with his continued support, DEC has successfully implemented programs that are protecting New York's environment and natural resources by cleaning up contamination, reducing pollution and increasing environmental compliance by businesses and individuals."

DEC issued 2,455 consent orders to polluters in 1999 and imposed \$7.25 million in civil penalties, up significantly from the 800 consent orders and nearly \$4 million in penalties imposed in 1998. Under a consent order with DEC, an individual or company agrees to come into compliance with state and federal environmental laws and regulations, clean up pollution, and pay a penalty for its environmental violations.

In separate actions last year, Commissioner Cahill required polluters who refused to sign consent orders to pay \$388,750 in penalties. Last year violators also agreed to provide \$2.9 million in environmental benefit projects, which mitigate penalties and provide environmental and public health protection or improvements in the areas where environmental insults occurred.

"Protecting New York's air, land and water is an immense responsibility, and Governor Pataki has given DEC the tools and opportunities needed to do this important work in new

and innovative ways, benefitting the environment and New Yorkers of today and the future," Commissioner Cahill said. "Enforcement, when applied fairly and consistently, is an effective tool for ensuring environmental compliance and deterring future violations."

Commissioner Cahill attributed much of last year's environmental enforcement success to several recent program initiatives and a good working relationship with Attorney General Eliot Spitzer.

"The State Department of Environmental Conservation will continue to work in cooperation with Attorney General Spitzer to protect the natural resources of New York State and hold polluters accountable," Commissioner Cahill said. "I commend DEC staff for their dedication to the environment and the principle of firm but fair enforcement, which contributes every day to our environmental success."

DEC launched an enforcement initiative in December 1997 designed to bolster compliance with regulations requiring registration and tightness testing of petroleum bulk storage tanks. After providing tank operators with a 60-day grace period and an additional 60 days to voluntarily comply after receiving notices of violation for noncompliance, the program in 1999 issued 605 orders on consent which include \$548,250 in penalties. The initiative has also resulted in the permanent closure of 3,232 petroleum bulk storage tanks over the last two years.

This initiative, combined with DEC's petroleum bulk storage tank inspection program, helps prevent petroleum spills or minimize their size, including those involving the gasoline additive methyl tertiary butyl ether (MTBE). In related efforts, DEC referred 223 oil spill cases to the attorney general for legal action, helping to minimize spills and encourage prompt site cleanups.

# Facility Inspections: What are They Telling Us?

Since the inception of the state petroleum bulk storage (PBS) program almost fifteen years ago, DEC and delegated counties have conducted thousands of PBS facility inspections. In the beginning, inspectors checked for basics, such as facility registration, posting of the registration certificate, inventory records and secondary containment for aboveground storage tanks.

With the maturing of the PBS program and after the federal deadline (December 22, 1998) to upgrade, replace or close substandard federally regulated USTs (underground storage tanks), the state's inspection of PBS facilities has entered a new era. DEC is now performing uniform PBS facility inspections statewide that are tracked by DEC regional and central offices. Collecting these data on a statewide basis allows us to evaluate the rate of compliance of PBS facilities in New York State.

Last year, DEC performed about 2,600 PBS facility inspections in Regions Two through Nine.\* Examining the data, three areas of facility operation stand out with a noncompliance rate of 25 percent or more. These three requirements, found in Part 613 of the State PBS regulations, are:

- keeping proper tank inventory records,
- monitoring cathodic protection, and
- leak monitoring of tanks and piping systems.

One-quarter to one-third of the PBS facilities inspected by DEC have serious compliance problems. Release detection is key to ensuring storage system integrity. Without proper monitoring, facility owners and operators are blind to whether their UST systems are tight or leaking. It is important to have the necessary hardware in place that is required by state and federal law and regulations. On the other hand, if this equipment is inoperable, or the owner or operator ignores it or doesn't know how to use it for release detection, it might as well not be installed. It only gives the facility owner or operator a false sense of security. In other words, we think that all is right with the world, because we have all the necessary "bells and whistles."

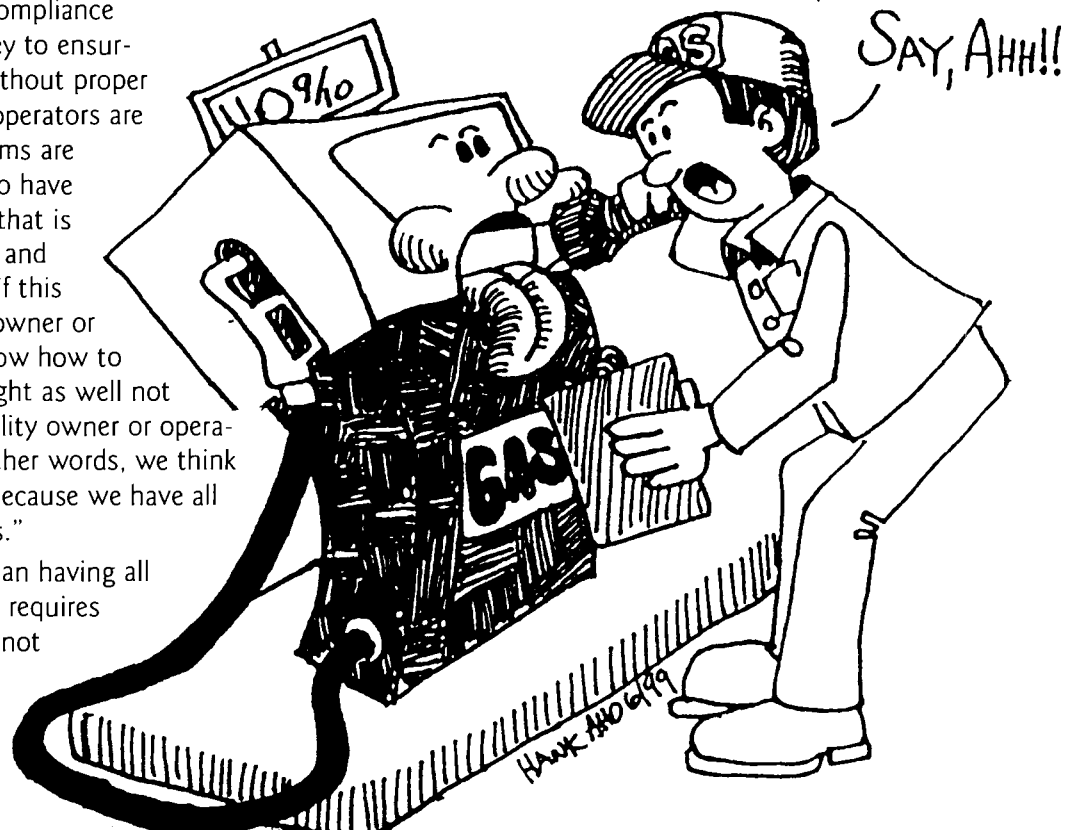
Full compliance means more than having all the required hardware in place. It requires sound facility management. This not only means the facility's construction is up to snuff, but that, operationally, the facility is in full compliance. Operational compliance means

that not only is the physical hardware present, but that it's in working order, the operator knows how to use it and is using it, and all necessary facility records are being kept. This shows that the system is working and could detect a leak.

DEC's facility inspection efforts will continue. This year, some 3,000 facilities are scheduled to be inspected in Regions Two through Nine. We look forward to finding more facilities in full compliance. Realistically, we will probably find a significant number with compliance problems. When we find violations, the DEC inspector will direct the facility owner or operator to bring the facility into compliance, thereby protecting the lands and waters of the state.

Noncompliance increases the risk that leaks and spills will occur thereby exposing the environment to harmful contamination and the owner/operator to liability for cleanup costs. Our experience from dealing with many cleanups has been that the cost and effort of dealing with a storage tank leak or spill greatly exceeds the cost of operating a well-run facility that meets regulatory standards. When a DEC inspector discovers a violation, not only is the owner or operator notified, but there is a penalty based on the seriousness of the violation, the environmental threat and the economic advantage that might have been gained by noncompliance.

\* The PBS program in DEC Region One has been delegated to Nassau and Suffolk Counties.



## Petroleum Facilities in Compliance

In March 1998, DEC contacted approximately 8,000 owners of petroleum bulk storage facilities\* suspected of being out of compliance with state regulations. These facilities were given sixty days to complete a valid registration and demonstrate that their storage tanks had been tested for tightness. The intent of the program was to bring facilities into compliance and to reduce the risk of leaks and spills to the environment. As a result, DEC confirmed the following violations:

- 3,500 bulk storage facilities were either not registered or overdue for renewal,
- 3,200 bulk storage facilities contained tanks that were overdue for tightness testing,
- 800 facilities needed to be both registered and tightness tested.

Nearly all of these petroleum bulk storage facilities have since been brought into compliance by having their tanks registered and tightness tested or in some cases, both. Some have removed tanks or closed them properly.

As a result of enforcement efforts over the last twelve months, more than 3,600 petroleum bulk storage facilities that had unregistered or untested tanks now comply with state regulations.

For more information on recent DEC enforcement initiatives, see the article in this issue entitled "DEC's Enforcement Initiatives Yield Results."

\*There are some 43,000 petroleum bulk storage facilities in New York State, with approximately 90,000 registered storage tanks. By definition, a petroleum bulk storage facility stores more than 1,100 and less than 400,000 gallons of petroleum products.

## So, How Come We Still Have Spills and Overfills?

Well, we've made it right up to the deadline and with the relatively high rate of compliance, spills and overfills are a thing of the past, right? — WRONG!

Last week, we were notified of a spill that occurred during product delivery that had the owner, operator and delivery truck driver trying to corral about 300 gallons of maverick product. AND, this occurred at a facility where the tank systems had all been upgraded with spill and overflow prevention equipment. It seems the delivery driver walked away from the hose for just a moment (the moment, the hose detached from the tight-fill fitting). Before the driver could turn off the valve, over 300 gallons had escaped!

A reminder of the exact wording from the State Petroleum Bulk Storage regulations may be in order here. According to Subsection 613.3(a), Responsibility for Transfer, *"The operator, when on the premises or when in control of a petroleum transfer, shall be responsible for transfer activities. If the operator is not on the premises or not in control of a petroleum transfer, the carrier will be responsible for transfer activities. The operator or carrier must employ practices for preventing transfer spills and accidental discharges. Prior to the transfer, the operator or carrier must determine that the receiving tank has available capacity to receive the volume of petroleum to be transferred. The operator or carrier must monitor every aspect of the delivery and must take immediate action to stop the flow of petroleum when the working capacity of the tank has been reached or should an equipment failure or emergency occur."*

To ensure a safe transfer of product, either the operator or the carrier must take responsibility. Having the latest devices is a good start, but taking positive steps to make sure operations at your facility meet the standards is the only way to remain in compliance.

## TANK BULLETIN NOW ONLINE

We are pleased to announce that you can access the *Tank Bulletin* online. To access current or past issues of the bulletin, check out our website at [www.dec.state.ny.us/website/der/pr4data.html](http://www.dec.state.ny.us/website/der/pr4data.html). Click on DER Newsletter—*Tank Bulletin*. This will give you access to current or past *Tank Bulletin* articles.

# Bulk Storage Programs Shift Emphasis

For over fifteen years, DEC staff have worked with tank owners and operators to help them comply with state and federal requirements for the storage and handling of petroleum and hazardous substances. Our goal has been to achieve compliance by educating the regulated community in the prevention of leaks and spills in order to protect the lands and waters of the state. We have supplemented these efforts with thousands of facility inspections statewide and special enforcement drives, such as the Petroleum Bulk Storage (PBS) Enforcement Guidance Memorandum (EGM). The PBS EGM, which expired February 10, 2000, allowed thousands of facilities known to be in violation of registration and/or tank testing requirements to come into compliance within a specified period without penalty.

In the past, DEC's bulk storage compliance strategy has relied heavily on voluntary compliance through education. Now, there has been a significant change in direction of which tank owners and operators should be aware. To achieve compliance, the Department's emphasis is shifting to enforcement. DEC is working in conjunction with EPA Region Two to bring those who have been unwilling or unable to comply with the bulk storage regulations into compliance. This goal will be accomplished through a process of identification, notification and enforcement.

## What does full compliance mean?

Full compliance means that the facility is in compliance with all applicable sections of state bulk storage (petroleum

and chemical) and federal UST regulations. Besides being registered and performing the necessary tests and inspection, it means that:

- necessary equipment (e.g., leak detection) is installed and functional,
- facility personnel are trained in equipment use,
- equipment is used properly,
- appropriate records are maintained

## Deadlines

Significant federal and state bulk storage deadlines include:

### December 22, 1998

- upgrading, replacing or closing federally regulated underground storage tanks (USTs).

### December 22, 1999

- upgrading, replacing or permanently closing federally regulated USTs that were temporarily closed.
- upgrading of aboveground storage tanks and transfer stations at state-regulated chemical bulk storage (CBS) facilities.

to demonstrate compliance, and

- the operator knows how to respond, should there be a release of stored substances.

## New York's PBS Strategy

With the arrival of the year 2000, New York's petroleum bulk storage (PBS) program is approaching its fifteenth year. New York has 35,904 registered facilities with 75,073 tanks. There are also 7,086 facilities and 14,611 tanks in the delegated counties of

Nassau, Suffolk, Rockland, Westchester and Cortland. To ensure compliance, DEC plans to inspect over 3,000 facilities in Regions Two through Nine this year. The inspections will be facilitated by a uniform inspection form and hand-held computers.

Under state regulations, inspectors will be checking for facility registration, tank testing and inspection, inventory recordkeeping, leak detection and cathodic protection, secondary containment systems, proper tank closure, spills, and releases.

Under the federal regulations, inspectors check whether tanks and piping systems have cathodic protection and leak detection, spill and overfill prevention devices, and whether a site assessment has been performed when a federally regulated UST is closed. When a federal UST is noted, a copy of the inspection report is forwarded to EPA Region Two for enforcement action.

## New York's CBS Strategy

The December 22, 1999, chemical bulk storage (CBS) deadline includes requirements for upgrading aboveground storage tanks (ASTs) and transfer stations. (See the related article in this issue on secondary containment for transfer stations.) DEC previously solicited copies of portions of the Spill Prevention Report (SPR) from all CBS facilities. DEC requires submission of the report cover, the table of contents and the signature page signed by an authorized representative of the company.

*continued next page*

At present, the rate of total compliance with Section 598.1(k) of the CBS regulations is 40 percent. Guidance on preparing the SPR can be obtained from DEC by calling the Bulk Storage Helpline and requesting a copy of the brochure, *Preparing a Spill Prevention Report*.

### EPA UST Enforcement Strategy

Many owners and operators with federally regulated USTs seemed to think nothing much would happen after the December 22, 1998, deadline. Some have viewed EPA as a "paper tiger" in regard to enforcing regulations, but EPA now has inspec-

tors working full time on state inspection sweeps. Some of those who thought nothing much would come of missed deadlines are having second thoughts as their violations are discovered and they receive stiff fines and penalties. With a phase-in period of ten years, ignorance of the federal UST requirements is not an acceptable excuse.

### A Word to the Wise

Hopefully, a word to the wise will be sufficient to increase compliance and cut down the contamination of land and water from releases of petroleum and hazardous substances. No

system is foolproof, but taking prudent measures to contain and control the storage and handling of petroleum and hazardous substances makes sense and is sound business practice.

### Where Can Information be Obtained?

Information on the state PBS and CBS regulations can be found on DEC's website at [www.dec.state.ny.us](http://www.dec.state.ny.us) or by calling the Bulk Storage Helpline at 518-457-9412. Information on federal UST requirements can be found on EPA's website at [www.epa.gov/OUST](http://www.epa.gov/OUST) or by calling the RCRA Superfund Hotline 1-800-424-9346.

## Secondary Containment at Transfer Stations

Throughout 1999, secondary containment at transfer stations was an item in the chemical bulk storage (CBS) program that drew the most attention and represented a significant compliance challenge for industry.

Part of the upgrade requirements having a regulatory deadline of December 22, 1999, related to transfer stations. These requirements are set forth in §598.5(d) and §599.17(c) and require the transfer of hazardous substances to take place within a transfer station equipped with a permanently installed secondary containment system for the delivery vehicle and transfer hose. Because the design of a suitable transfer station must address day-to-day site operations, precipitation, etc., the responsibility to design a reasonable containment volume and to achieve compliance with the CBS regulations rests with the owner/operator. The design must satisfy Parts 598-599, particularly the performance standards found under §599.17(c).

The relative size of the pad and associated containment volume is a function of many site-based factors, not the least of which include the frequency of deliveries, volume transferred per delivery, rate of transfer, degree of difficulty in handling the hazardous substance, etc. Based upon all relevant factors, the owner/operator must conduct a risk analysis for the chemical delivery operations that occur at the facility. The size of the containment volume should be increased as the relative risk from various factors increases. The relative risk of forecasting the frequency and volume of spills is site specific and dependent upon the nature and size of the chemical operations at that facility. Thus, while the CBS regulations allow for flexibility in design on a site-by-site basis, it becomes the responsibility of the owner/operator to construct a transfer station that is scaled to provide effective containment in the event of a spill. Properly designed transfer stations prevent injuries to personnel and reduce costs associated with spill clean up, hopefully avoiding the need for site remediation and the high costs associated with clean up.

Because many transfer stations are located outdoors, they are subject to precipitation and maintenance problems. To address precipita-

tion that accumulates, the facility owner may construct a 'shed roof' structure to divert rain and snow away from the pad. Another option is to install a valved drain into the pad or sump to permit the discharge of uncontaminated water. A facility's transfer protocol must require the drain be closed during receipt of a delivery. Once the delivery is complete, the tank truck has left the site, and the transfer pad is clean, the valve could be opened. The discharge of accumulated surface water is regulated by the Department's Division of Water. The Division of Water has released guidance on this topic entitled Chemical Bulk Storage (CBS) Secondary Containment Area Stormwater Management, dated April 4, 2000. Owners/operators also need to understand that certain county programs, such as those on Long Island, prohibit the use of a sump drain to a dry well, whether the drain is valved or not.

For many facilities, the biggest challenge under §599.17(c) is the requirement for the installation of permanent secondary containment systems for transfer stations. For facilities where curbside deliveries are the only option, this requirement is particularly difficult. Such facilities may submit a variance request for consideration to the DEC. Based upon conditions unique to the applicant, a request for variance must demonstrate how the specific regulatory requirement would impose a substantial economic, technological or safety burden upon the applicant. The applicant must also demonstrate that its proposed activity will have no significant adverse impact on public health, safety, welfare or the environment, and will be consistent with the Environmental Conservation Law and the performance expected from the application of 6 NYCRR Part 598.

A letter was mailed to all registered facilities on November 4, 1999, advising those facilities which intend to seek a variance from any of the section 598.5 upgrade requirements that such requests must be submitted before expiration of the deadline, but in no event later than the close of business on December 21, 1999. If the DEC receives a variance request after that date and the required upgrades have not been completed, the facility will be deemed to be in violation of the CBS regulations.

# Release Detection for USTs

**R**elease detection is a key to assuring the integrity of underground storage tanks (USTs). The continuous nature of many of these systems allows the tank owner or operator to check for leaks from the UST system at almost anytime. This feature goes a long way to secure UST systems, and the early detection of leaks protects the land and waters of the state from petroleum contamination.

Leak detection monitoring for underground storage tanks is a requirement of both the state petroleum bulk storage (PBS) regulations and federal underground storage tank (UST) regulations. New York State's regulations require weekly monitoring of leak detection systems, while the federal regulations require monthly monitoring. Both regulations require the testing or monitoring of underground product piping associated with USTs.

State PBS regulations require that petroleum USTs installed after 1986 have secondary containment. The overwhelming majority of underground storage tanks installed today are corrosion resistant double-walled tanks. In accordance with state PBS regulations, double-walled USTs must have the interstitial space monitored. Interstitial monitoring is the release detection method most often used in New York.

State PBS regulations allow in-tank monitoring devices, automatic tank gauges (ATGs) or monitoring wells, when a single-walled UST is used with other types of secondary containment. Federal UST regulations allow statistical inventory reconciliation (SIR) systems and manual tank gauging for small USTs, but SIR and manual tank gauging are not recognized by the state.

If an unprotected UST were upgraded with corrosion protection (cathodic protection or a tank lining) and a leak detection system was added (ATG, SIR or monitoring wells) to meet the EPA upgrading requirements, the tank must still be tightness tested once every 5 years and the owner or operator must still keep inventory monitoring records. The addition of a leak monitoring system to a tank that was upgraded with cathodic protection or a tank lining does not exempt the tank from periodic tightness testing in conjunction with inventory monitoring.

The monitoring of release detection devices presents problems associated with each device in determining if an actual release has occurred. The person conducting the release detection test must determine if the conditions for a proper test have been met and if the equipment is operating properly. Only when this is accomplished, can the results of a release detection test be accepted with confidence. In this article, the proper operation of various release detection methods will be discussed so that confidence in the results can be obtained.

## Automatic Tank Gauging (ATG)

For automatic tank gauging (ATG) devices, no product can be dispensed from or filled into the tank during the test unless the ATG is using a continuous in-tank leak detection system. The tests normally run for one to three hours. The operator of the tank must make sure that adequate down time is available for the weekly release detection test. Each ATG test also requires a minimum amount of product in the tank for a proper test. The operator is responsible for making sure that the tank contains enough product for a valid test each week.

## Statistical Inventory Reconciliation (SIR)

For statistical inventory reconciliation systems, proper inventory readings must be taken each day the tank is used. If the inventory readings are not taken consistently and to the nearest one-eighth inch, fluctuations may occur that will result in the release detection analysis being either a failure or inconclusive. Each failure or consecutive inconclusive result would require a tank tightness test to be performed. False indications of tank failure or inconclusive results would make SIR impractical.

Owners and operators using SIR should take special care to read the SIR reports they get. While the front page may indicate a passing result, problems with the site or with how the data were obtained may be inside.

When your UST system fails a SIR monthly analysis, you need to investigate the cause of the failed test. The SIR vendor may, on the basis of the analysis of the data, be able to provide you with areas to examine, such as a miscalibrated totalizer. You must repair or replace any defective equipment immediately.

If within 48 hours the FAIL cannot be linked to a cause not related to leakage, you must report the failure to the DEC on Spill Hotline, 1-800-457-7362.

If SIR is used in lieu of inventory monitoring, reports must be generated every ten days.

It should be noted that New York State does not accept SIR as a stand-alone method of leak detection. SIR can be used to meet the EPA UST requirements on single-walled tanks that have been upgraded with corrosion protection. These tanks would also have to have a tightness test once every 5 years in conjunction with inventory monitoring. All double-walled state-of-the-art tanks must have the interstitial space monitored. The advantage of using SIR in conjunction with your other leak detection methods is that SIR can detect leaks from the entire system - tanks and piping.

## Product or Vapor Sensors

Release detection methods that use continuous or automatic probes or sensors must be checked monthly to determine if the

system is operating. Once a year, the probes or sensors must be evaluated according to the manufacturer's requirements to verify the system is operating properly. It is important that the weekly checks, along with the annual test, are recorded in the release detection records.

It must be documented that vapor and groundwater monitoring wells have been properly constructed. It is crucial to demonstrate that vapors or spills can migrate into the well for detection. For groundwater monitoring wells, it must be documented that the water level is within the slotted portion of the well. This is necessary to show that any discharge would be able to move into the well. For vapor monitoring, the ability of the vapor detector to detect a new release above the background level is critical. Under the federal UST regulations, monitoring wells can be used as a method of release detection only when the depth to groundwater is 20 feet or less.

### Manual Tank Gauging (MTG)

The federal UST regulations [40 CFR 280.43(b)], allow manual tank gauging (MTG) to be used as a sole method of release detection for tanks of 1,000 gallons or less. This method may also be used for tanks between 1,000 and 2,000 gallons, in place of the manual inventory control found in Section 280.43(a). New York State accepts MTG as meeting the inventory monitoring requirements for unmetered tanks (tanks storing heating oil or used oil), as required in Section 613.4(a)(2) of the State PBS regulations. To be able to use manual tank gauging as release detection, a minimum 36-hour down period is required each week. Product levels are taken at the start and end of the down period and any difference is compared to the allowable amount found in the Table MTG of the federal regulations. If this down period is not available each week, then release detection is not being performed for that month.

MTG is similar to New York's annual standpipe analysis. A standpipe test can be used in lieu of inventory monitoring for tanks that are solely regulated by the state, when the tank is unmetered or if the tank stores petroleum for consumptive use on the premises. To find out more about this test and the variables that can affect its accuracy, call the toll-free Bulk Storage Helpline, 518-457-9412 for the publication Standpipe Testing of Underground Storage Tanks.

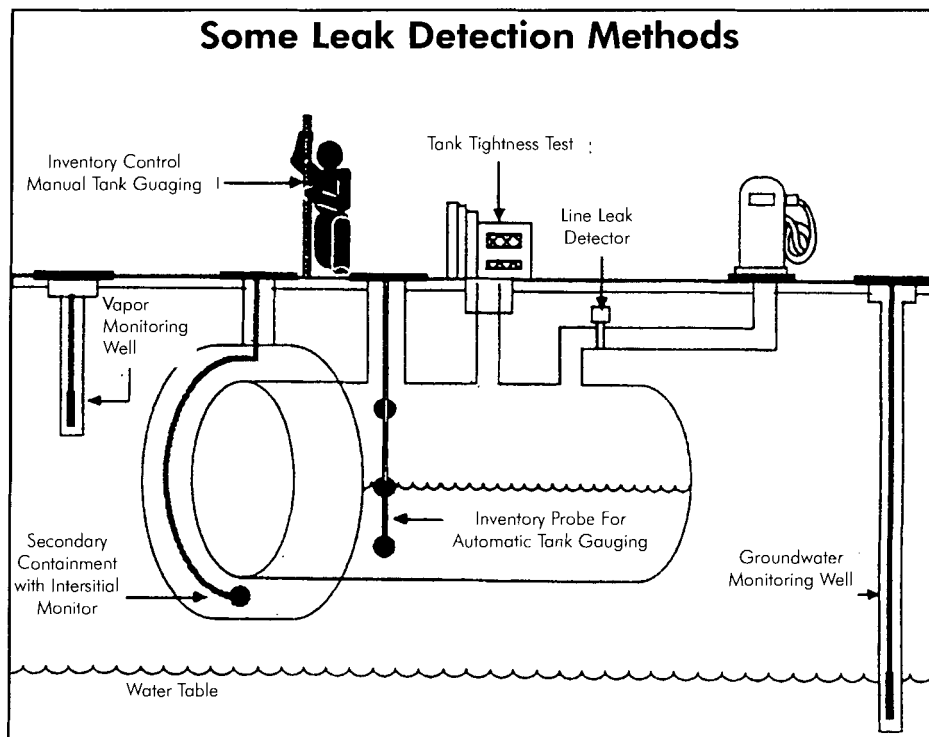
### Precision Tank Tightness Testing

Tightness tests acceptable to DEC are listed in the National Work Group List of Leak Detection Evaluations. An acceptable

test or set of tests must test the entire tank system. For some methods (e.g., volumetric underfill tests), this means that not only one test, but three tests must be performed: a product test, an ullage test and a line test. If a volumetric overfill test is used, then only a product and line test need to be performed, on the tank and piping system. Non-volumetric tests, which utilize vacuum or tracer compounds, can also be used. Depending on the tank system, a tank test may need to be supplemented with a line test to provide a full system test.

The final necessity for proper release detection is for the operator to be totally familiar with the sampling devices. Equipment must be operated, maintained and calibrated in accordance with the manufacturer's requirements. Logs must be kept, as part of the facility's records, showing that proper leak detection has been accomplished. When these tasks are completed, more reliable release detection will be provided.

*A wealth of information on leak detection can be obtained by getting a copy of The List of Leak Detection Evaluations for Underground Storage Tank Systems - Seventh Edition which was published in April 2000. This 390-page document was prepared by the National Work Group on Leak Detection Evaluations, consisting of state and EPA UST program staff. The List contains information on UST and piping leak detection system evaluations that have met certain criteria. The most recent version of the List is available in electronic form for free viewing, printing, and downloading at [www.epa.gov/swerust1/pubs/ldlist.htm](http://www.epa.gov/swerust1/pubs/ldlist.htm).*



# Insurance Provider Booklet Available from EPA

The U.S. Environmental Protection Agency (EPA) has developed financial responsibility regulations to ensure that federally regulated underground storage tank (UST) owners and operators can pay the costs of cleaning up leaks from USTs and compensate third parties for bodily injury or property damage resulting from leaks.

The financial responsibility regulations (40 CFR, Part 280, Subpart H) allow UST owners and operators to choose from a variety of financial mechanisms to comply with the regulations. One of these mechanisms is insurance.

To facilitate access to UST insurance, EPA developed a booklet entitled *List of Known Insurance Providers for Underground Storage Tanks*, (EPA 510-B-99-003, July 1999). The booklet is based on information EPA received from companies, agents and brokers. The listed companies, agents, and brokers may be able to help you, as a federally regulated UST owner or operator, find the UST insurance to fulfill your responsibility obligation.

Copies of this booklet are available at no cost by calling NSCEP at 1-800-490-9198 or EPA's RCRA Hotline at 1-800 424-9346. A copy of the most up-to-date version can be read or downloaded from the Internet at <http://www.epa.gov/swrust1/pubs/index.htm#inslist>.

For additional information on financial responsibility for federally regulated UST, call the EPA Hotline at 1-800-424-9346 or 703-412-9810 and request a free copy of *Dollars and Sense: Financial Responsibility Requirements for Underground Storage Tanks* (EPA 510-K-95-004). This booklet clearly and concisely summarizes the financial responsibility requirements.

For financial mechanisms specific to New York, call the toll-free Bulk Storage Helpline at 1-888-457-4351.

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