

Proposed WCHD Underground Storage Tank Permits & Fees

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Public Workshops & DBOH Meetings

Public Workshops

- Tuesday, September 21 @ 11 am
- Wednesday, September 22 @ 1:30 pm
- Wednesday, September 22 @ 5 pm

DBOH Meetings

- Thursday, October 28 @ 1 pm
 - Business Impact Presentation
- Thursday, December 16 @ 1 pm
 - If Business Impact Statement approved





Questions & Comments

By email:

- wrubio@washoecounty.gov
- Ifranklin@washoecounty.gov

Via the Web:

- Bit.ly/ehscomments

By Phone:

- 775-328-2434





USTs In Washoe County

- Program implemented in 1989
- First official Interlocal Agreement with NDEP 2001
- WCHD has performed routine UST inspections under the interlocal agreement with NDEP through October 2020





UST Regulations

- 40 CFR 280 via <u>US EPA website</u>
- <u>NRS 459.800 459.856</u> (Storage Tanks)
- <u>NAC 459.9921 459-9995</u> (Storage Tanks)
- <u>NAC 445A.226 445A.22755</u> (Water Controls)





Why we are here

- WCHD is working with NDEP
- Re-establish WCHD as the regulatory authority for the Underground Storage Tank Program
 - UST Inspections, Release Determination, and continuation of Underground Storage Tank installation plan review, approval, and permitting through construction review.





What

Changed

in

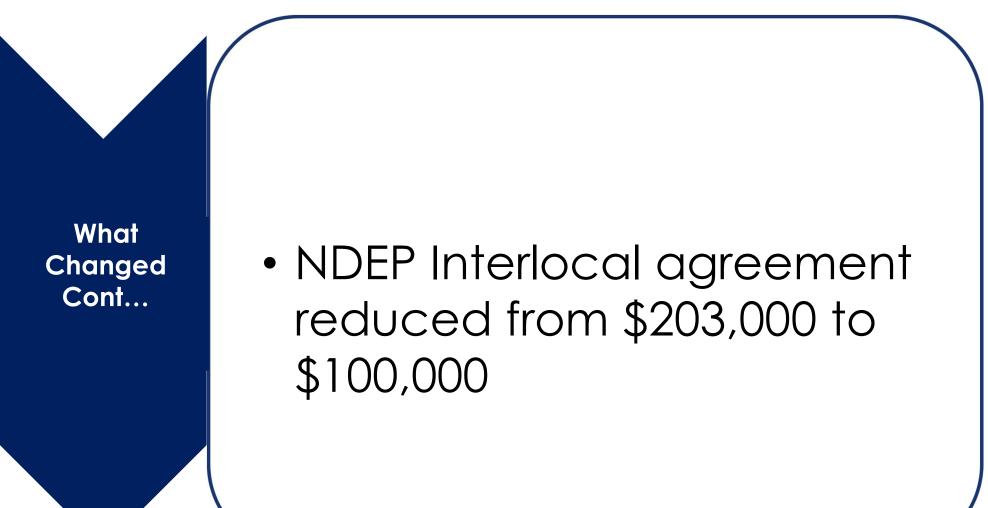
2020

COVID-19 and SB4

- SB4 required dedicated staffing resources
- Safe Drinking Water and UST programs re-assigned 4 total staff to meet the SB4 inspection requirements
- NDEP Bureau of Corrective Actions received approximately 50% less funding from EPA for new cycle





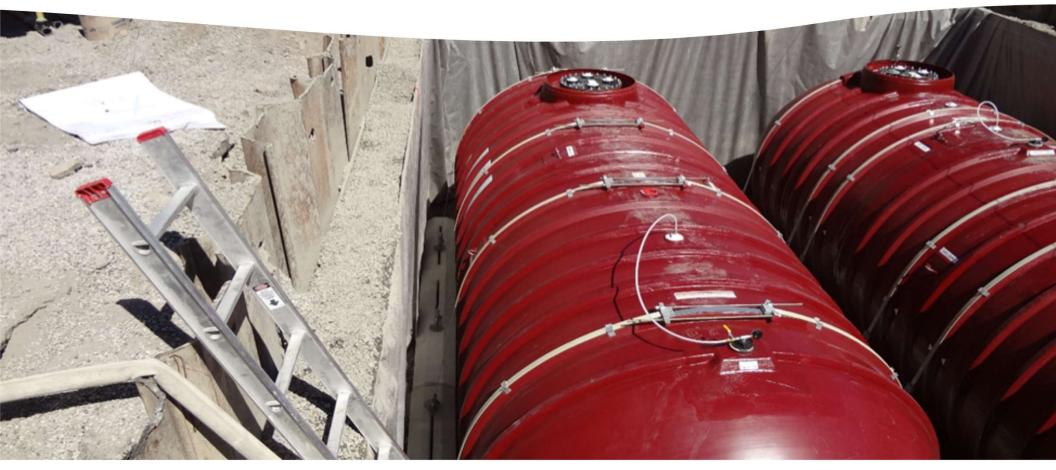






UST Inspections

• Physical inspection of site, including opening all dispensers, fill ports, sump lids, controls, alarms, etc.







UST Insp

- Record keeping review: required 30-day monitoring, annual testing, 3-year testing, proof of financial responsibility, staff training documentation, etc.
- Report and Letter writing, reinspection of deficiencies, submittal and review of missing documentation, onsite education, Federal and State UST requirements, discussion with operator and permit holder, issuance of NOVs, etc.







UST Installation



Public Health



UST Piping Installation









UST Removal







UST Streamlined (Past to Proposed)

- Prior UST program was staffed at 1.64 FTE's
- Current proposal is 1.1 FTE's for 218 total permits
- Current proposal will include higher level of service
 - Physical Inspection every other year
 - Compliance follow-up every other year to ensure compliance with EPA and State of Nevada, NDEP
 - 109 physical site inspections annually
 - 109 compliance inspections annually





What happens if WCHD doesn't Permit

- NDEP will have oversite of all UST facilities in Washoe County
- WCHD will no longer:
 - Conduct routine UST facility inspections
 - Provide education
 - Determine fuel releases
 - Conduct construction plan review
 - Conduct new UST install inspections
 - Conduct UST decommissioning inspections







- Less local emphasis on protection of ground water resources for public health
- Loss of local oversight and review of UST installations and removal
- Greater potential for fuel releases to adversely affect the public health of the region with no local oversight
- Greater potential for compliance issues







- NDEP staffing resources and response times may be affected
- As Federal grant funding continues to be reduced NDEP will more than likely need to start assessing fees to supplement the UST inspection program.





Proposed WCHD Permit Fee

- February 27, 2014, the DBOH directed the WCHD that fees reflect the full cost of service provision, including a proportional share of infrastructure support
- \$875.00 Annual Permit Fees for:
 - underground storage tanks at fueling stations
 - underground tanks for emergency generators
 - Underground tanks for waste oil
- WCHD maintains interlocal agreement with NDEP at \$100,000
 - Monies offset permit costs





Implementation Plan

- If permits and fees are approved;
 - All facilities are notified after January 1, 2022
 - Permits and fees required no later than July 1, 2022
- Provides 6 months of lead time to work with facilities to obtain appropriate operating permits in Washoe County

