

# Proposed WCHD Underground Storage Tank Permits & Fees

**Contacts:**  
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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](mailto:wrubio@washoecounty.gov)
- [lfranklin@washoecounty.gov](mailto:lfranklin@washoecounty.gov)

## Via the Web:

- [Bit.ly/ehscomments](https://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 US EPA website
- NRS 459.800 – 459.856 (Storage Tanks)
- NAC 459.9921 – 459-9995 (Storage Tanks)
- NAC 445A.226 – 445A.22755 (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



**What  
Changed  
Cont...**

- NDEP Interlocal agreement reduced from \$203,000 to \$100,000





# UST Inspections

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



# UST Insp

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- Record keeping review: required 30-day monitoring, annual testing, 3-year testing, proof of financial responsibility, staff training documentation, etc.
- Report and Letter writing, re-inspection 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



# 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 oversight 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



**What  
Happens  
Cont...**

- 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





**What  
Happens  
Cont...**

- 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

