



Oneida Environmental, Health, and Safety Division

Oneida's Compliance
Assistance Program for
Underground Storage Tanks

Victoria Flowers
Environmental Specialist
Oneida Tribe of Indians of
Wisconsin

Harvesting Bergamot

Bureau of Indian Affairs Partners in Action
June 23-25, 2015

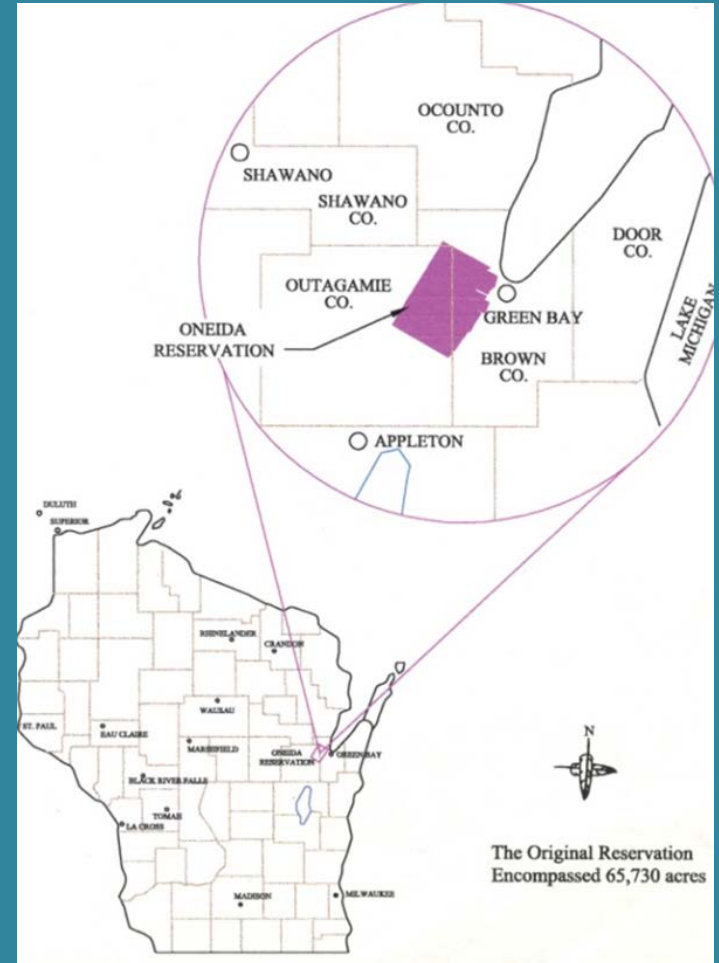
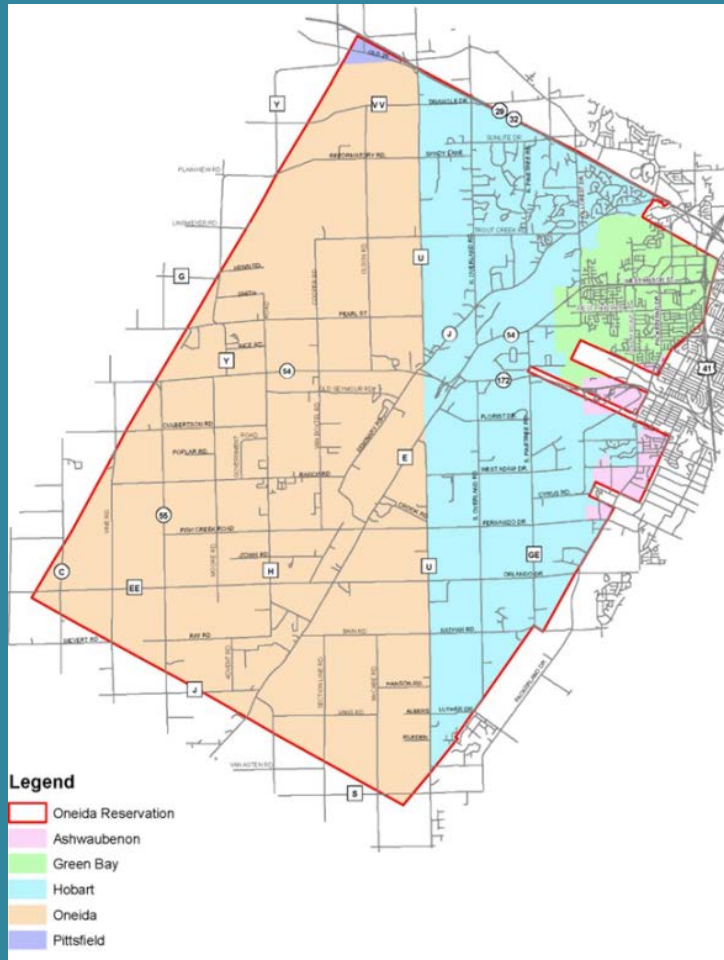


Outline

- A little about Oneida
- Program Purpose
- UST Basics
- History & Development
- Federal Roles & Responsibilities
- Successes
- Future Plans
- Conclusion



A Little About Oneida



Land Use

Residential

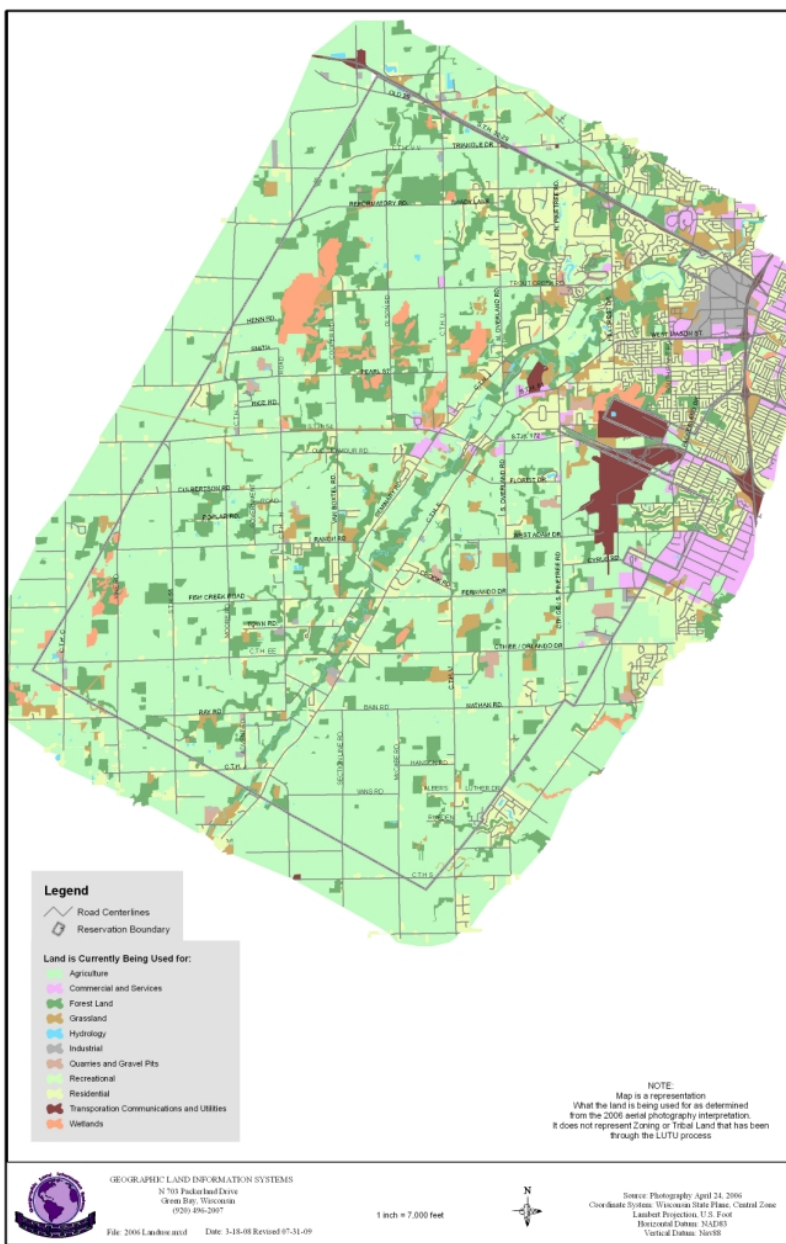
Forests

Wetlands

Commercial/Services

Transportation/Communications/
Utilities

Agriculture



Unique Features



Victoria Flowers,
Environmental Specialist

Unique Features



Victoria Flowers,
Environmental Specialist

Program Purpose

- Underground storage tanks (USTs) are operated and maintained properly to prevent releases of fuel to the environment
- Owners/operators are aware of their responsibilities
 - Financial responsibility
 - Leak detection
 - Spill and overfill protection & response
 - Front line operators

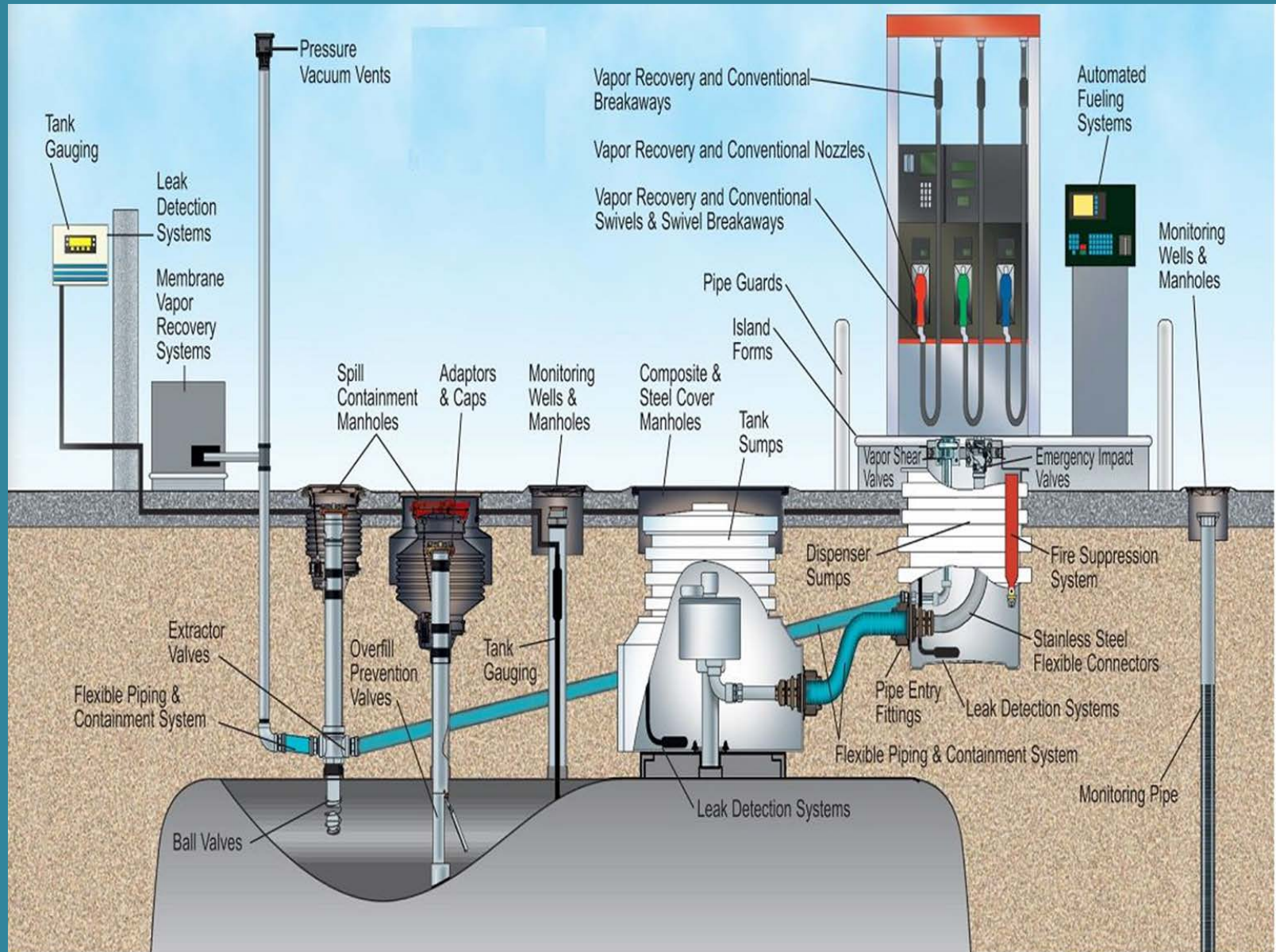


UST 101

- Federally regulated
 - Larger than 110 gallons
 - 10% or greater of the total volume, including piping is underground
- Not federally regulated
 - Farm or residential tanks less than 1,100 gallons motor fuel
 - Home heating oil tanks
 - Septic or holding tanks
 - Above ground tanks (different set of regulations)



UST 101

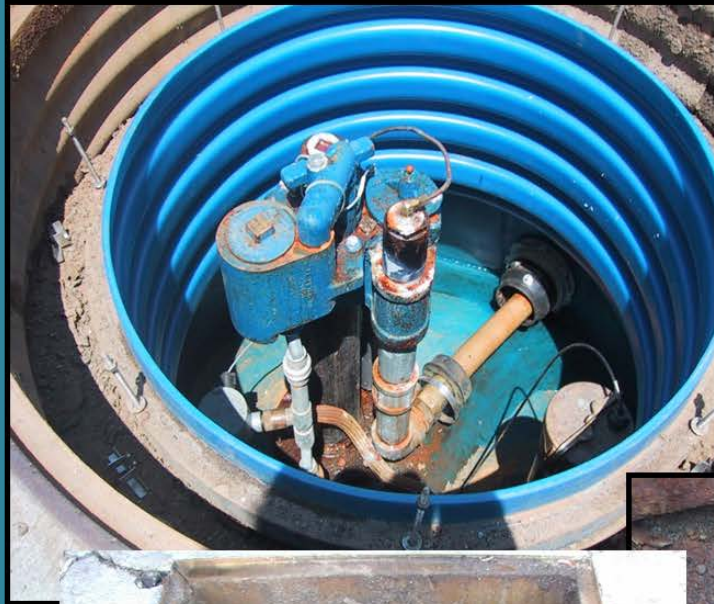


UST 101



Sump Areas:

UST 101



STP Sumps



UST 101

Automatic Tank Gauge (ATG):

- Fuel levels
- Alarm if there is a low level or high level of fuel. i.e. (overfill alarm)
- Fuel loss from tank or fuel lines.



UST 101

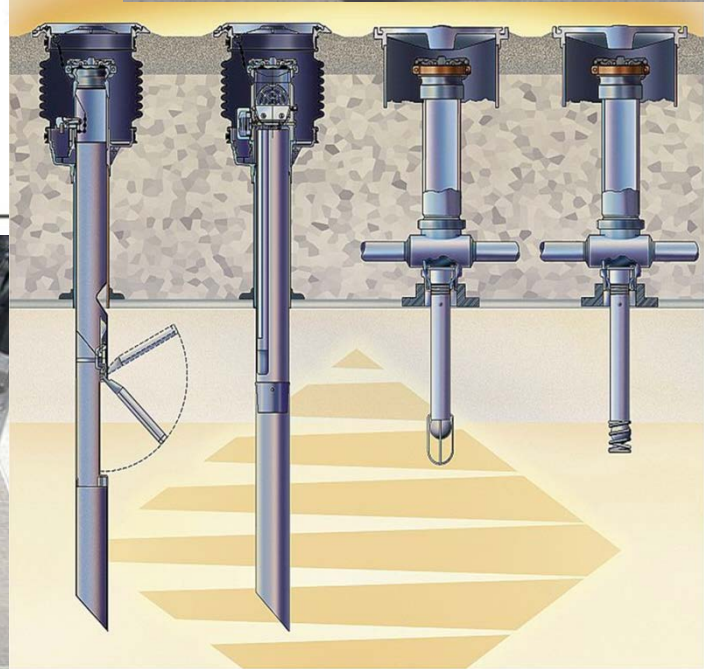
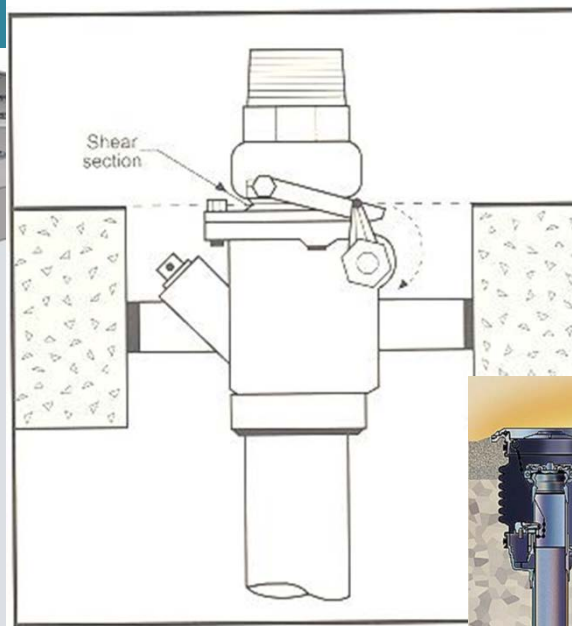
- This is the size of **monthly** leak an ATG must be able to detect:



Two tenths of a
gallon
(0.2 gallons)



UST 101



UST 101

Regulatory Authority:

- 1984 Congress amends the 1976 Resource Conservation and Recovery Act (RCRA)
 - Subtitle I (USTs)
- 1985 EPA enacts Chapter 40 of the Code of Federal Regulations, parts 280, 281, 282...
 - Technical standards for operation & release response
 - State program approval

UST 101

Regulatory Authority:

- 2005 Energy Policy Act
 - EPA responsibility for UST compliance in Indian Country
 - Direct Implementation Tribal Cooperative Agreements (DITCA)
- 2015 rule revisions to 40 CFR 280, 281 & 282

Program Development

Goal: To improve rates of significant operational compliance (SOC) of underground storage tanks in the Oneida Reservation.

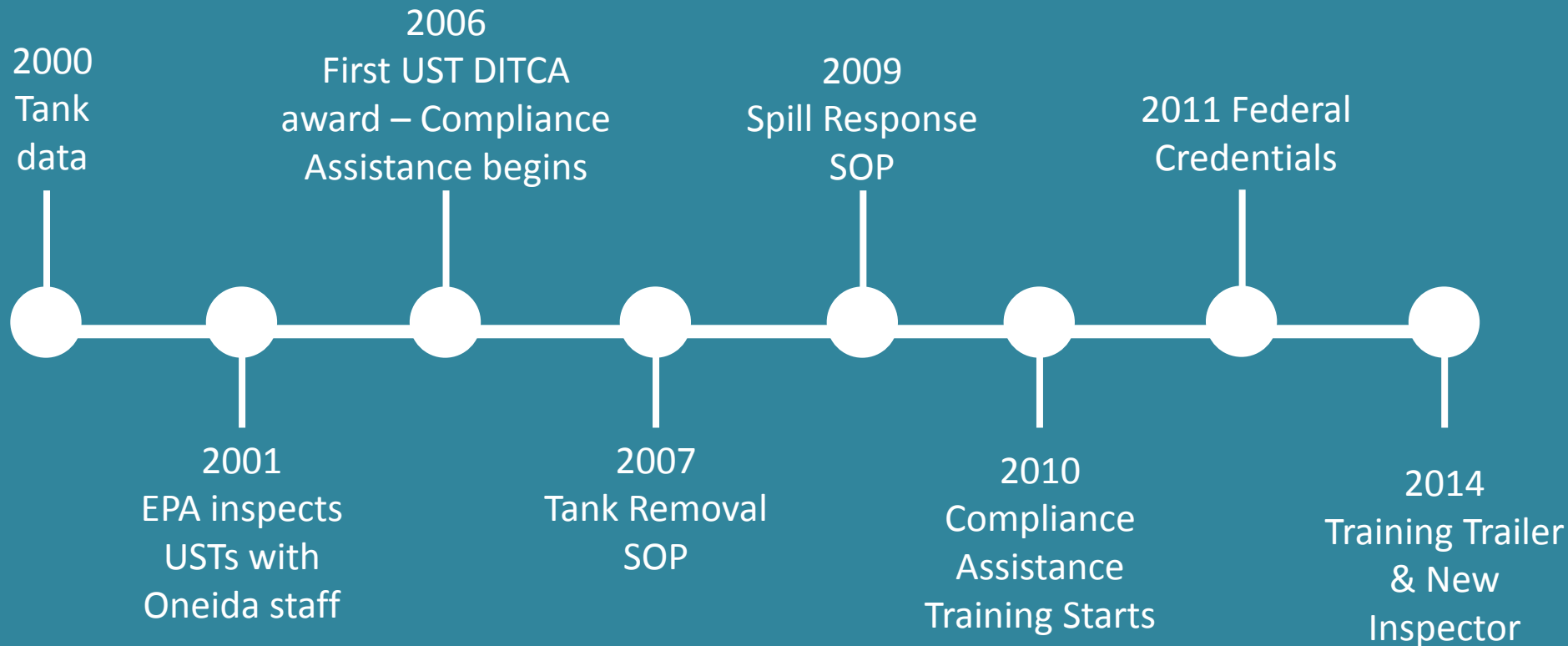


Significant Operational Compliance

- Compliance with:
 - Spill, Overfill, and Corrosion Protection
 - UST Leak Detection
 - Compliance with both



Oneida's Compliance Assistance History



Universe of Sites

- Six Tribal gas stations
 - Including installation and removal oversight
- 10 non-tribal businesses
- Compliance assistance to other Wisconsin Tribes
 - Including UST plan review and oversight assistance



Implementation & Delivery

- Target audience identified
 - Station managers, owners, environmental and maintenance staff.
- Communication tools
 - Handbooks, flyers, newsletters, direct mailing, props
- Method of delivery
 - Classroom
 - Different locations
- Provide Scholarships for Tribal staff



Measuring Success

Rate of SOC (Oneida)	100% since 2006
Number of trainings offered	7
Total Number of Attendees	181
Compliance Assistance visits in Oneida	153
Compliance Assistance visits to other WI Tribes	10
State Credentialed Inspector	Since 2010
Federal Credentialed Inspector	Since 2011



Future Plans

- Co-host training/trade show
- Compliance Assistance Trailer to deliver on-site awareness training
- Bureau of Indian Affairs Partners In Action Conference
- Tribal Lands and Environment Forum
- Boot Camps and Credentialed Training
- Newsletters



Conclusion

- Oneida's Compliance Assistance Program is available to all Wisconsin Tribes
 - Site visits & individual trainings as schedule allows
- Owner/Operator Awareness and UST Boot Camp Trainings twice a year
- Developing other opportunities to reach Tribal station managers and environmental staff
- Peer to Peer training opportunities



Yaw^ko!

Victoria Flowers, Environmental Specialist

Oneida Tribe of Indians of Wisconsin

P.O. Box 365

Oneida, WI 54155

vflowers@oneidanation.org

Office - (920)869-4548

Cell – (920)366-6720

