



Association Updates

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NASAP Membership

As of publication of this newsletter, there are 30 states represented in NASAP's contact mailing list.

Twenty states in the country have AST regulatory programs (see table below).

Representatives of 6 member states make up the leadership team (see table below).

Continued below

A Brief History of NASAP

Since 1999, the National Association of State Aboveground Storage Tank Programs (NASAP) has been a loosely organized group of representatives from state aboveground storage tank (AST) regulatory agencies. NASAP has been focused on AST workshops, information sharing, and program coordination between states, and with EPA.

From 1999 to 2002, the National Governor's association used EPA grant money to hold annual state AST program workshops at the National Institute for Storage Tank Management's (NISTM) annual AST conference.

After the grant expired in 2002, the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) entered into a cooperative agreement with EPA's Oil Spill Program to support an AST workgroup called "Study of State and Territorial Aboveground Storage Tank Program Activities for the Protection of Waters of the United States." In 2003, the workgroup adopted the name National Association of State AST Programs, and worked through 2008 under the cooperative agreement between EPA and ASTSWMO. Between 2003 and 2008, NASAP conducted annual meetings at the NISTM AST conference, participated in industry and EPA workgroups on national AST standards and regulatory changes, and provided comments on draft standards.

Continued below

Upcoming Events

NASAP Conference Call —
January 24, 2019
1:30-3:30 PM EST

NISTM Florida State Storage Tank Conference, Tampa, FL—
January 16, 2019

NISTM Arizona Storage Tank Conference, Tempe, AZ—
February 28, 2019

NASAP Annual Meeting,
Orlando, FL—April 1, 2019
(tentative)

NISTM National AST Conference, Orlando, FL—April
2-4, 2019

NISTM Pennsylvania Storage Tank Conference,
Washington, PA— May
16, 2019

NISTM Hawaii Storage Tank Conference, Honolulu, HI—
July 30, 2019

NISTM Minnesota Storage Tank Conference, Bloomington, MN—September, 2019
(TBD)

Member Spotlight: Pennsylvania



Pennsylvania's Storage Tanks Program was formed in August 1989, as a result of the Pennsylvania Storage Tank and Spill Prevention Act (Act 32 of 1989, as amended). Aboveground storage tank (AST) technical requirements under Act 32 were enacted in 1997.

The Pennsylvania Department of Environmental Protection (DEP) Division of Storage Tanks currently regulates 17,737 ASTs at 5,487 facilities. Pennsylvania's regulations define an AST as a container greater than 250 gallons that stores regulated substances, which include petroleum substances when liquid at ambient conditions; hazardous chemicals (mostly under the Comprehensive Environmental Response, Compensation, and Liability Act with Reportable Quantities); and nonpetroleum oils, such as biodiesel, synthetic fuels, wood-derived oils, and inedible seed oils. Ethanol, when intended for blending with motor fuel, is also considered a regulated substance.

Pennsylvania DEP's revised storage tank regulations became effective on December 22, 2018

Continued below

NASAP Membership (cont'd)

NASAP Leadership Team

AK—Sarah Moore
CO—Mahesh Albuquerque
MN—Chris Bashor

NJ—Chris Lucien
PA—Alex Eckman
WV—Ruth Porter

States With AST Regulatory Programs by EPA Region

Region 1	Region 5
◇ CT	◇ MI
◇ ME	◇ MN
◇ NH	◇ WI
◇ DE	Region 6
Region 2	◇ NM
◇ NJ	Region 7
◇ NY	◇ MO
Region 3	Region 8
◇ MD	◇ CO
◇ PA	◇ SD
◇ VA	Region 9
◇ WV	◇ CA
Region 4	Region 10
◇ FL	◇ AK

A Brief History of NASAP (cont'd)

From 2008 through 2018, under the leadership of Chris Bashor (MN), NASAP continued informal dialogue between state members and EPA, primarily to share technical information, provide guidance, and comment on EPA rules and guidance documents. In 2015, ASTSWMO began providing limited funding for NASAP members to continue NASAP meetings at the annual NISTM AST conference.

In March of 2018, NASAP divided leadership responsibilities between several active states to begin formalizing the group's activities. At this time, NASAP members decided to pursue an official relationship with ASTSWMO in order to increase NASAP's ability to represent state regulatory agencies and assist them with AST regulations. ASTSWMO's board has not yet approved a broad partnership with NASAP, but the organization will continue limited travel support for the NASAP annual meeting and NISTM technical conference.

Member Spotlight: Pennsylvania (cont'd)

In accordance with 2015 updates to the federal underground storage tank regulations, the DEP Division of Storage Tanks has revised state regulations for both underground and aboveground tanks. The revisions to DEP's storage tank regulations became effective on December 22, 2018. The revised AST regulations:

- ◇ Add conditions under which facilities must provide DEP with revisions to their Spill Prevention Response Plans;
- ◇ Increase the monitoring requirements for vaulted ASTs;
- ◇ Shorten inspection intervals for vaulted ASTs to 3 years, consistent with underground facility inspection rules; and
- ◇ Reduce the in-service integrity inspection interval for ASTs under 21,000 gallons from 10 years to 5 years.

Most violations observed in Pennsylvania are maintenance related. DEP anticipates that shortened inspection intervals for small ASTs will improve compliance with the rules for operation and maintenance. During a previous rulemaking, DEP shortened underground storage tank inspection intervals from 5 years to 3 years, and this resulted in increased compliance.

Want your state to be featured in an upcoming newsletter?

Submit an article describing your state's AST program or developments impacting it to Alex Eckman at eckman@pa.gov to be included in a future publication of the NASAP newsletter.

Questions or comments? Email Alex Eckman at eckman@pa.gov

