



COMPLIANCE MANAGEMENT STRATEGIES



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Overview

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- Where did Compliance Management start in NY?
 - Part 612, Part 613, and Part 614
 - Effective 12/27/1985

- Where are we now?

- Where are we headed?
 - Proposed regulations



Where did we Start?

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- Compliance Management is mainly about limiting the potential for and size of UST leaks.
- Release Detection
- Inventory Reconciliation



Where did we Start cont...

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- Important changes along the way
 - Paradigm shift – moving from reacting to preventing
 - Changing federal regulations (Energy Policy Act of 2005)
 - Equipment and technology better & smarter

Where are we Now?

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- What are the 3 main ways an owner/operator can manage compliance?
 - Do it yourself
 - Some third party assistance
 - Mostly third party assistance



Do it Yourself Strategy

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■ What does this entail?

- Release Detection
- Inventory Reconciliation
- Alarm Management
- Document Management
- Operator Training
- Inspection Management
- Permitting
- Testing
- NOV Resolutions
- Release Reporting
- Changing Regulatory Environment



Some Third Party Assistance

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- Who is doing this?
- What are some issues with partial third party assistance?

Mostly Third Party Assistance

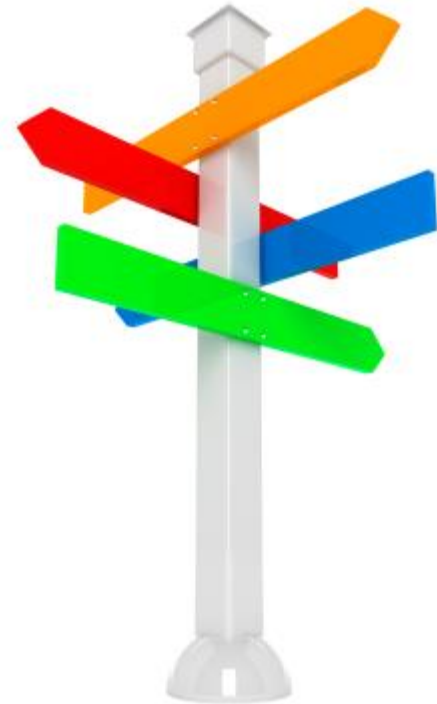
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- Who is doing this?
- How is it done?
- What are some issues with mostly third party assistance?
- What is the liability?

Where are we Going?

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- New State and Federal UST Regulations
- Stage II Decommissioning
- Compliance Data
- Fuel Management



Industry Trends that will Affect Compliance

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- Exit of Major Oil Companies
- Consolidation
 - C-stores
 - Hyper-marketers
- Technology
 - Double walls, flex piping
 - Tablets, apps, etc...



Thank You

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