



Colorado • Wyoming Petroleum Marketers Association • Convenience Store Association

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Wyoming Environment Quality Council
Herschler Building
122 West 25th Street
Cheyenne, WY 82009

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Terri A. Lorenzon, Director
Environmental Quality Council

Re: Comments To Modify Chapter 17 Regarding Petroleum Storage Tank Operator Certification

The Wyoming Petroleum Marketers Association And Convenience Store Association members sell over seventy percent of the gasoline and diesel fuel sold in Wyoming. The Association members own, lease and operate above ground and under ground petroleum storage tanks, which will be affected by the changes to modify Chapter 17 of the Wyoming Water Quality Rules and Regulations. We encourage the Environmental Quality Board to analyze Section 46, which requires the Licensing of Operators of Petroleum Storage Tanks and the effect on Wyoming petroleum marketing business.

The Congress passing the Energy Policy Act of 2005 required the EPA to publish guidelines that specify training requirements for the three classes of operators of petroleum storage tanks: The EPA In May of 2007 issued the guidelines for operator training. The guidelines are for the classifications of:

- Persons having primary responsibility for on-site operations and maintenance of underground storage tank systems.
- Persons having daily on-site responsibility for the operation and maintenance of underground storage tank system.
- Daily, on-site employees having primary responsibility for addressing emergencies presented by a spill or release from an underground storage tank system.

Within the Energy Policy Act of 2005 it required the EPA to consider:

- Training programs that are being used by tank owners and operators as of August 8, 2005
- The high turnover rate of tank operators
- The substantial differences in the scope and length of training needed for the three classes of operators.
- Are developed in cooperation with tank owners and operators.

Wyoming started the proposing storage tank operator regulations prior to the EPA guidelines being final. Wyoming is required to have the regulation in place by August 9, 2009. The Association recommends to table Chapter 17 until meetings can be held with tank owners and operations as required under the EPA guidelines. As proposed in Chapter 17 the state would use the International Code Council as the certification for the training of petroleum storage tanks operators, which is used by one other state, which is California.

Sincerely,



Roy Turner
Executive Vice President