



# An Owner/Operator Perspective



# Cumberland Farms

---



# Gulf Station

---





# Gulf Terminals

## Gulf Oil Distribution System

-  proprietary
-  other



# Chelsea Terminal

---



# Cumberland Farms – Gulf: Who we are

- 584 Cumberland Farms stores in 8 states
- 400 Gulf Owned Stations in 9 states
- 2,800 Gulf licensed stations in 33 states
- 12 Petroleum distribution terminals
- +7,000 employees



# Cumberland Farms – Gulf: Who we are

- Headquarters: Framingham, MA
- Home grown, family owned business
- Charitable contributions: \$600,000
- We're part of the fabric in the community
- Vested interest with environmental regulations





# UST Compliance- Mission Possible

---

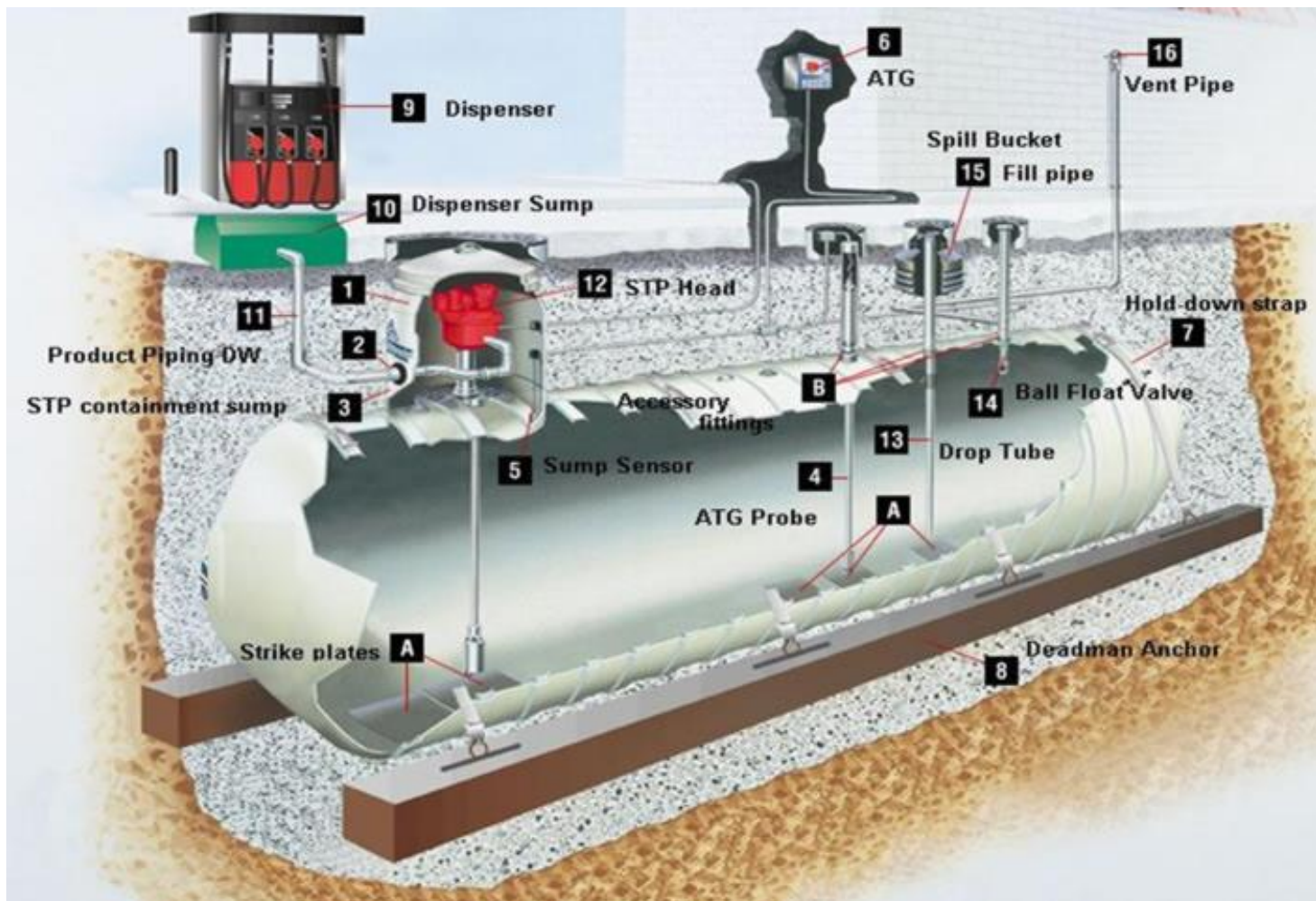


**Ray Leather**  
Environmental  
Compliance





# Welcome to Tanks 101!

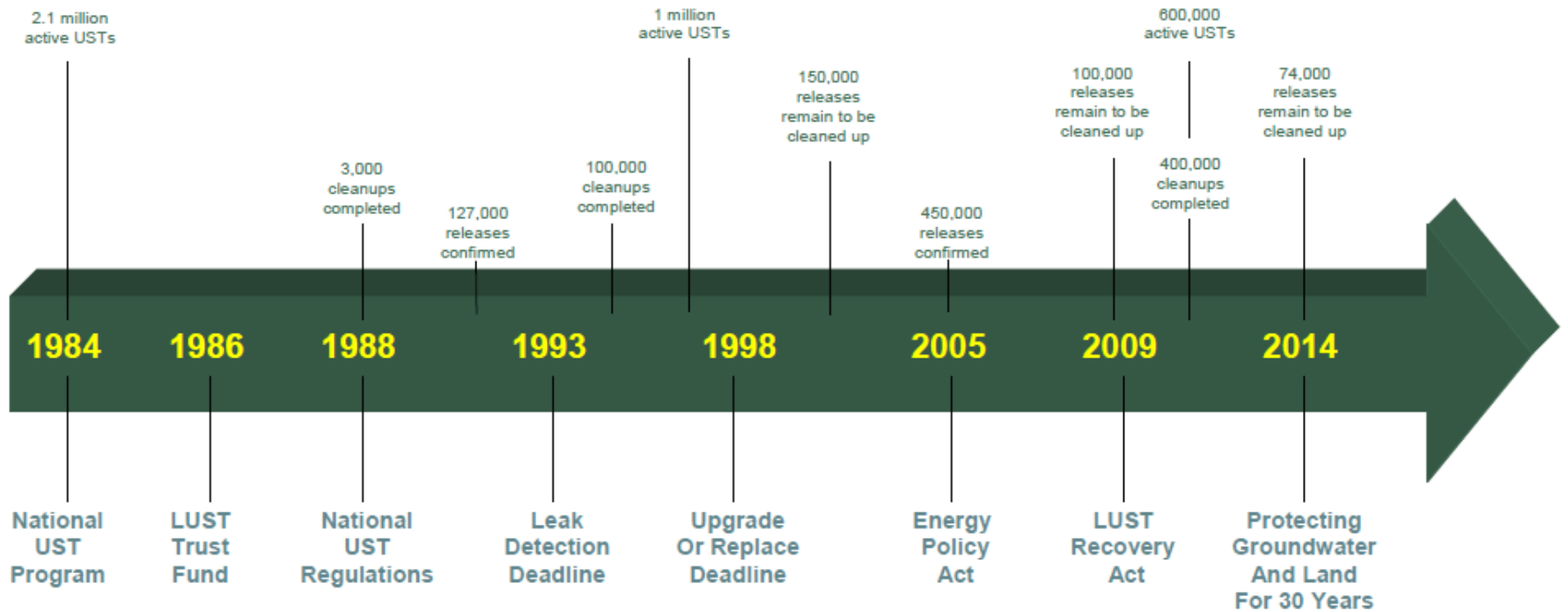


# UST Compliance-National Background

---

- November 8, 1984 – Subtitle 1 to the Solid Waste Disposal Act
- 1988- 2,000,000 regulated tanks
- Currently 670,000 Registered, Regulated Tanks
- 1998 UST Upgrade (Spill, Overfill, Corrosion Protection, Monthly RL)
  - \* 1998 UST Upgrades – Not Achieving Results- USTs Still Leak  
Government Accountability Office (GAO)  
Report to Congress (2004)
- 400,000 Confirmed Releases to Date
- Only 60 Percent Achieving Operational Compliance, (leak detection, tightness testing, paperwork, training, inspections)
- USTs Still Not in Significant Compliance

# 30 Years Of The UST Program





# UST Compliance

---

Regulatory “State of the Union”

Results of GAO Report > 2005 Energy Act

1. UST Operator Training

A. Class A

B. Class B

C. Class C

2. Mandatory Inspections

3. Red Tagging (Out of Service)

# UST Operator Training

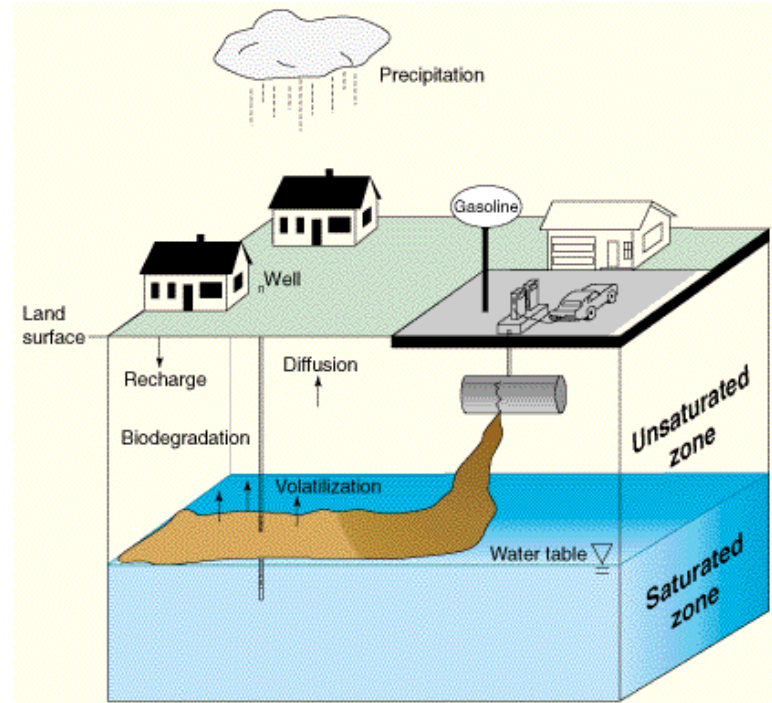
---

- Class A Operators
  - Person with primary responsibility to operate and maintain compliance at the station. Must have a broad understanding of statutory and regulatory requirements to operate a UST system.
- Class B Operators
  - Person with responsibility to implement the regulatory requirements and standards in the field. Often required to conduct a monthly inspection of the station.
- Class C Operators
  - First line of response to events indicating an emergency condition. All employees at a store are trained as Class C Operators. (Must be trained by a Class A or B Operator.)

# Compliance & Environmental



The Compliance team keep the stations in compliance with current Federal, State, and Local regulations by performing tank testing and filling out the proper paperwork. Environmental Compliance handles surface spills.



The Environmental team handles spills that occur below the surface, install monitoring wells and remediate the site, following all Federal, State and Local regulations.



# Tank Compliance = 3 Legged Stool

---



Compliance Program Team  
Expertise, Forms & Training

Quality Control  
Store Manager  
UST System Monitoring  
Emergency Response

Quality Assurance  
State Inspector

# UST Compliance Core Functions

---

- Permitting
- Testing
- Training
- Regulatory Knowledge
- Inspections
- Release Detection
- Spill Response
- Financial Assurance



# Some Interesting Facts

---

- 3,390 Regulated USTs between CFI and Gulf
- ~22,000 Individual Tests Performed on USTs in FY'13 – None Missed!
- ~6,000 Class B Inspections Performed since 8/8/13
- ~7,000 Class C Operators Trained through LMS



# Compliance Program

---

- On our Toes instead of our Heels



- Street Smarts Compliance and Environmental Response Actions

# Typical Spills





8:29AM ET

**HLN** MORNING EXPRESS





# Annual Managers Training

- 41 trainings performed annually
  - 27 CFI Trainings
  - 14 Wholesale Trainings
- Using an in house trainer has lead to a \$47,000 savings annually
- Trainings are hands on and interactive
- Store managers enjoy the sessions and calls and questions increase when they return to their own stores





# Proactive Compliance



# Environmental Tote

- Keeps paperwork organized
- Easily accessible
- User friendly
- “The face” to the Regulators
- Reduces NOVs and fines

*STREET SMART COMPLIANCE – ON OUR TOES, NOT OUR HEELS*

**LOCATION:**  
 Name: Cumberland Farms #01702  
 Address: 100 Crossing Blvd.  
 Framingham, MA  
 Phone #: 508-270-1400  
 Division #: N/A  
 Station #: N/A  
 Facility #: 01702  
 Store #: N/A  
 State I.D. #: MADEP

**FIRE SUPPRESSION MSDS inside**



*QUESTIONS?  
 CALL COMPLIANCE DEPARTMENT  
 800-225-9702*

**TABLE OF CONTENTS (2 folders per title):**

1. Site Plan
2. Tank Registrations, Licenses and Permits
3. UST System Testing
4. Stage II Form C (MA Only)
5. Weekly Release Detection CSLD/Liquid Status
6. Inventory Reconciliation (current year)
7. Delivery BOLS
8. Weekly Stage II Inspections
9. AST Inspections
10. ASM/Account Rep Monthly Checklists
11. State Inspection Forms
12. Waste Manifests
13. Maintenance Records
14. Employee Training Logs
15. UST Financial Responsibility
16. Drinking Water Sampling
17. Blank Inspection Forms
18. Miscellaneous Files

	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6
Capacity	10,000	10,000	10,000	550		
Construction	SWFG	SWFG	SWFG	SWFG		
Burial Date	7/1/84	7/1/84	7/1/84	1/1/85		
Piping Construction	SWFG	SWFG	SWFG	N/A		
Contents	SUL	RUL	RUL	HEATING OIL		

Cumberland Gulf Group of Companies · Environmental Compliance Dept., Framingham, MA - 3/02/2010

# UST Operator Training



## Class C UST Operator Facility Specific Worksheet

The purpose of this worksheet is to document that Class C Operators have been trained on facility-specific underground storage tank (UST) components. This worksheet **must be completed at the facility** where the Class C Operator will be working to complete the training provided by the online course, 'Fueling Station Safety.' This worksheet must be completed BEFORE the Class C Operator assumes responsibility for responding to emergencies and dispensing a regulated substance.

UST Facility Name \_\_\_\_\_ UST Facility ID # \_\_\_\_\_

UST Facility Address \_\_\_\_\_

- I have shown the Class C Operator the Emergency Shut off Switch.

NOTE: The emergency stop switch shuts off power to all the dispensers and fuel pumps. The emergency stop switch is different from the "Stop" or "All Stop" button on the point-of-sale (POS) console. The emergency stop switch is required by national fire codes. Contact a qualified petroleum storage system service contractor if you cannot locate the emergency stop switch.

- I have shown the Class C Operator the number to use to call the fire department for this facility this number is posted on the CFI Emergency Response Yellow Card and is posted in a clearly visible location.
- I have shown the Class C Operator the CFI Emergency Response Yellow Card with the contact information for who should be notified in an emergency.
- I have shown the Class C Operator the Automatic Tank Gauge (ATG) and provided instructions on how to respond to various alarm messages that may appear on the display.

NOTE: If you do not know how to read the display or what messages to expect if there is a problem with the storage system, look in the tank monitor manual to find this information or call Facility Support Services and they will explain this information to you.

I have shown the Class C Operator the locations and proper identification of the following items:

- Dispenser
- Hose
- Nozzle
- Breakaway Coupling
- Emergency Shut Off Switch
- Overfill Alarm (if applicable)

**A CLASS C UST OPERATOR MUST BE ON-SITE AT ALL TIMES DURING NORMAL BUSINESS HOURS**

I hereby certify I have completed this worksheet together with the Class C Operator:

Station Manager or Area Sales Manager Name: \_\_\_\_\_ Date: \_\_\_\_\_

Station Manager or Area Sales Manager Signature: \_\_\_\_\_

I have completed this worksheet together with the person named above:

Class C Operator Name: \_\_\_\_\_ Date: \_\_\_\_\_

Class C Operator Signature: \_\_\_\_\_

I hereby certify that the Class C Operator has completed the 'Fueling Station Safety' and Cumberland Farms Knowledge Zone Class C Operator Training:

Designated Class A or B Operator Name: \_\_\_\_\_ Date: \_\_\_\_\_

Designated Class A or B Operator Signature: \_\_\_\_\_



**KEEP THIS DOCUMENT ON-SITE AT ALL TIMES**



# UST Operator Training

## Designated Underground Storage Tank (UST) Operator Monthly Visual Inspection Checklist

Facility Name:		Date:				
Facility Address:						
City:		Zip Code:				
UST Inspector:						
Certification #:		Expiration Date: / /				
Signature:		Phone: ( )				
Y = Yes, N = No, NA = Not Applicable						
Item	MONITORING PANEL / ALARM HISTORY			Y	N	NA
1	Monitoring system is powered on and in proper operating mode.					
2	Monitoring system is <b>not</b> currently showing any alarms or warnings.					
3	Alarm history report/log for the previous month is available, and has been reviewed by the Designated UST Operator. <i>(Attach a copy of the alarm history report/log to this form if available.)</i>					
4	Each alarm for the previous month has been responded to appropriately.					
5	Sensors located in tank-top containment sumps have <b>not</b> alarmed in the past month.					
5a	- List all priority compliance alarms occurred in the past month: _____					
<b>UST SYSTEM INSPECTION</b>						
6	Tank-top containment sumps are free of alarm, tank pad and lids are in good condition. <i>Note: Visual inspection of sumps is required by contractor in sumps where an alarm has occurred in the past month for which there is no service record.</i>			Y	N	NA
	Sump Location:		Sump Location:			
	Sump Location:		Sump Location:			
	Sump Location:		Sump Location:			
7	Spill containment structures are free of water, debris, and hazardous substance. Containment bucket is in good condition. Spill caps, lids, poppets, and drain all in good condition. Drop tube is not obstructed.			Y	N	NA
	Tank 1 – Contents:		Tank 3 – Contents:			
	Tank 2 – Contents:		Tank 4 – Contents:			
8	Under-dispenser containment areas are free of water, debris, and hazardous substance. Hanging Hardware is in good condition.			Y	N	NA
	Dispenser 1 / 2		Dispenser 9 / 10			
	Dispenser 3 / 4		Dispenser 11 / 12			
	Dispenser 5 / 6		Dispenser 13 / 14			
	Dispenser 7 / 8		Dispenser 15 / 16			
<b>PAPERWORK INSPECTION</b>						
9	UST Registration is visible.					
10	Monthly release detection results are available and complete.					
11	Line tightness & LD testing was completed within required timeframe.					
12	Monitoring system certification has been completed within past 12 months.					
13	Cathodic Protection reports and rectifier checks complete.					
14	Other required testing/maintenance was completed within required timeframe. <i>(List test/maintenance items below.)</i>					
	Test/Maintenance:					
	Test/Maintenance:					
	Test/Maintenance:					
<b>FACILITY EMPLOYEE TRAINING</b>						
15	C Operators have received the required on-the-job training & sign off by B operator.			Y	N	NA

Note: Any answer of "N" should be explained in the comment section on the following page, and will require follow-up action.







# THE OLD POST

ILLUSTRATED WEEKLY NEWSPAPER

Member of the Associated Press.  
Aenean commodo ligula eget dolor.  
Aenean. Aenean commodo ligula eget  
dolor. Aenean. Cefhciebce fcdcdcd.

Est. 1869

Wednesday, September 7, 2011

Price 6d

## PREMCOR FINED \$4 MILLION FOR UST RELEASES AT CLARK GAS STATIONS

The Ohio Attorney General's Office has ordered Premcor Refining Group, Inc., to clean up petroleum releases from leaking underground storage tanks at 55 Clark gas stations that it used to own and operate in the state. Premcor agreed to pay \$4 million in civil penalties and to clean up the sites in order to satisfy the terms of 26 separate consent orders filed in the counties that had releases. The agreement also orders Premcor to pay \$3,000 per county for enforcement costs, a total of \$78,000 for 26 counties, in addition to the civil fine.



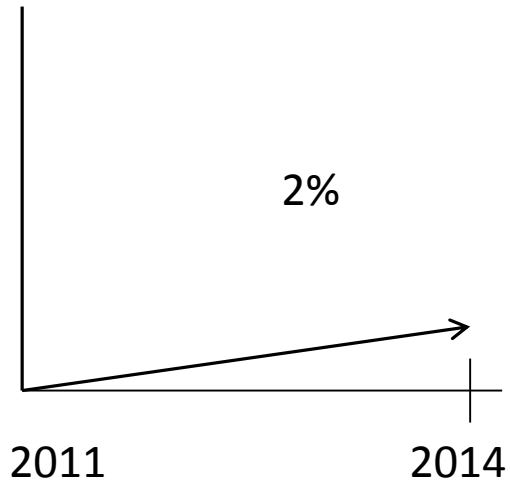
\$5,000 Fine = 100,000 Gals @ 5cpg



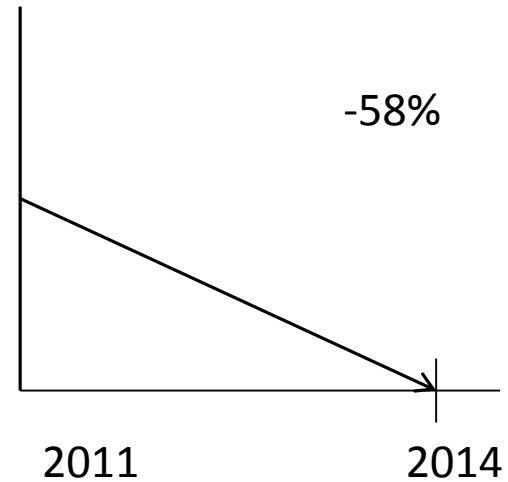
# The Bottom Line!

---

## NOV's



## Fines



# Do or Do Not, There is no Try!

---



# Vapor Intrusion – The New Frontier

---

- Engineered Vapor Barriers
- Major Construction Projects & Divestments
- Average annual depth to GW < 15'
- Chlorinated compounds in soil and/or GW
- Site specific criteria
- Depth to GW > 15' modified vapor barrier



# Vapor Barriers



# The Future

---

“The Only Thing That is Constant Is Change”

*Heraclitus*

