

# PIPELINE BULLETIN BOARD

## SUBMISSION OF CLOSURE DOCUMENTATION

Many owners submit their fee statements indicating that they have removed their tanks during the prior program year. In order to remove an owner from our active files, documentation is needed to verify the removal. This information should be submitted at the time of removal so that an Annual Fee Assessment Statement will not be needlessly issued.

Any one of the following will be accepted as proper documentation:

1. The narrative portion of the closure report;
2. A notarized letter providing the following information:
  - 1) date of removal
  - 2) number of USTs
  - 3) facility address; or a
3. Removal permit or inspection report with the inspector's signature.

If you are replacing the same number of tanks, coverage will transfer to the new tanks provided the removals took place prior to the installation. Owners should submit a copy of the replacement permit and the signed inspection report to this office for documentation.

## ONE-YEAR ELIGIBILITY FILING REMINDER

An application for eligibility must be filed with the Board's office within one year of the date the release was required to be reported to the State Fire Marshal.

Eligibility applications continue to be denied because they were not filed within the one-year deadline.

Remember, the Ohio Supreme Court upheld the Board's authority to impose the one-year filing requirement. It was deemed as "necessary and appropriate" to administer the Fund.

Don't jeopardize Fund reimbursement. Request an eligibility application even if you think you have a clean closure, and file the application immediately after the release is reported to the Fire Marshal.

## RAPS EXCEEDING COST ESTIMATE AND COMPLETION SCHEDULES

The Board's rules require the pre-approval of RAP costs and if those costs will be exceeded, the owner must immediately notify the Fund's Director of the estimated additional costs. During a review of claims it has been noted that some current remedial action plans (RAPs) are exceeding the estimated total costs and completion schedule.

Owners with sites that fall into this category will be receiving a letter from this office indicating that they must submit revised estimates for costs and the completion date for pre-approval and a brief progress summary for achieving acceptable action levels. If a modification to the RAP or the selection of another remedial alternative in order to produce more effective results is being evaluated these revisions must be submitted to [BUSTR](#) and to the Board for cost pre-approval.

Further reimbursement of RAP implementation costs may be held pending a response to the letter.

## WASTE OIL TANKS

It seems annually that we assess prior year fees to an owner because they have not assured a waste oil tank. Waste oil tanks are regulated by [BUSTR](#) and therefore must be assured with the Fund.

Waste oil tanks must have also met the corrosion protection standards dictated by the December 22, 1998 upgrade deadline.

Releases from waste oil tanks that are not assured or that do not meet the current performance standards will not be eligible for reimbursement from the Fund.