

| EPA Proposed Requirement Description | Increased Cost Per Facility | Increased Costs For Industry | Cost Information | PMAA Alternative Proposal | PMAA Proposal Cost per Facility | PMAA Proposal for Industry |
|---|-----------------------------|------------------------------|---|---|---------------------------------|----------------------------|
| Release Prevention | | | | | | |
| Walk Through Inspections including; Spill Prevention Equipment, Sumps, Dispenser cabinets, Monitoring/Observation Well Covers, Impressed Current Cathodic protection systems and Release Detection Systems (see appendix A) | \$3,600.00 | \$803,365,200.00 | Costs assume that a Third Party will need to perform the inspection. Typical station personnel do not have the right work classification to perform the inspection. It will cost \$300 per month to hire contractor. | PMAA agrees that Monthly Walk Through Inspections make sense, however they should be based on they type of equipment installed at the UST systems. See the attached Schedule of proposed inspections in Appendix A | 150.00 | \$33,473,550.00 |
| Over-Fill Prevention Equipment Tests | \$135.00 | \$30,126,195.00 | The cost to have Overfill Prevention tested will be \$400 to test three Overfill devices. Overfill only needs to be tested once every three years, therefore it will cost \$135 annually. | PMAA endorses this proposed rule, however if the manufacturer has a specification for inspection, that should be allowed to be used and should only be required once every 5 years. | 80.00 | 17,852,560.00 |
| Spill Prevention Equipment Tests | \$750.00 | \$167,367,750.00 | It will cost \$350 to have the Spill Buckets tested & \$400 to dispose of wastewater. 20 gallons of waste water is anticipated to be generated by three Spill Buckets and one Stage I bucket. Disposal of one drum of waste water is \$400. | PMAA agrees that Spill Prevention Equipment(Spill Buckets) should be tested at the time of installation. PMAA also thinks that all existing Spill Prevention Equipment Should have one passing test within three years of the implementation. No further testing should be required. PMAA has attached testing data over time to support no further testing after the initial test. | \$750.00 | \$167,367,750.00 |
| Periodic Testing of Secondary Containment including; UST Interstitial Space, Double-Wall Piping Interstitial Space and Containment Sumps | \$1,050.00 | \$234,314,850.00 | It will cost \$250 per UST to test the interstitial space. It will also cost \$100 per line to test the interstitial space and \$2,100 to test 7 sumps and dispose of waste water. Based on three USTs, four dispensers it will cost \$3,150 to test every three years or \$1,050 annually. | PMAA supports the requirement to test secondary containment at the time of installation. PMAA also supports the requirement to have all containment sumps have one passing test within three years of the implementation. No further testing should be required. PMAA has attached testing data over time to support no further testing after the initial test. | 3,150.00 | \$702,944,550.00 |
| Testing Repairs to Spill & Over-Fill Prevention Equipment and Interstices | \$175.00 | | It will cost an additional \$175 to have the repaired Spill Bucket or Overfill tested. We are assuming that the test will be performed by the technician doing the repair. If an independent contractor is required the cost would be \$350. | PMAA endorses this proposed rule. Equipment repairs should be tested before returning to service. | 175.00 | |
| Eliminate Flow Restrictors in Vent Lines for all New Tanks and When Over-fill Devices are Replaced | \$2,200.00 | | It will cost \$650 per drop tube for materials and \$250 in labor to install. | PMAA endorses this proposed rule. However, Flow Restrictors should allow to be used as a secondary form of Overfill Protection. | 2,200.00 | |
| Release Detection | | | | | | |
| Operability Tests for Release Detection Methods | \$300.00 | \$66,947,100.00 | It cost \$300 to have a contractor certify a typical Leak Detection system. | PMAA endorses this proposal. UST owners should rely on technology. Equipment needs to be checked periodically for proper operation. | 300.00 | 66,947,100.00 |

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| Add SIR/CITLD to Regulations with Performance Criteria | | | PMAA endorses this proposed rule. | It makes sense to have a consistent and uniform performance criteria. | | |
| Response to Interstitial Monitoring Alarms | \$350.00 | | It will cost \$350 to have a service contractor come to the site to investigate alarms. Many containment areas cannot be accessed by station personnel. | PMAA endorses this rule. Electronic monitoring provides the best form of Leak Detection. Alarms need to be responded to and investigated. | 350.00 | |
| Eliminate groundwater and vapor monitoring as release detection methods | | | | PMAA endorses this proposed rule. | | |
| Remove deferral for emergency generator tanks | | | | Not PMAA's fight | | |
| Other | | | | | | |
| Require notification of ownership change | \$100.00 | | The cost represents the time it will take to fill out new Registration forms. | PMAA endorses this proposed rule. | 100.00 | |
| Closure of lined tanks that cannot be repaired according to a code of practice | | | | PMAA endorses this proposed rule. | | |
| Requirements for determining compatibility | | | | | | |
| Remove deferrals for airport hydrant fuel distribution systems and UST systems with field-constructed tanks | | | Not PMAA's Fight | Not PMAA's fight | | |
| EPA ct-related Provisions | | | | | | |
| Operator training | \$500.00 | \$111,578,500.00 | It will cost \$500 to provide training for Class A/B/C Operators that need to be certified. | This rule is in affect in many parts of the country. | 500.00 | |
| Secondary containment for new installations | \$50,000.00 | | The cost to include secondary containment is estimated to be 10% of the total installation cost. The typical UST system replacement is estimated to be \$500,000 | PMAA endorses this proposed rule. We think for new installations this makes sense. | 50,000.00 | |
| Under Dispenser Containment for all New Dispensers | \$5,000.00 | | It will cost \$5,000 per dispenser to install Under Dispenser Containment as the rule is written. The concrete island will need to be replaced or modified, the electrical connections will have to be removed and replaced. | PMAA does support the idea of Under Dispenser Containment, provided that it is only required for new UST & Piping installations or if the horizontal piping needs to be replaced as part of the dispenser replacement. | 1,000.00 | |

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| EPA Proposed Regulation Annual Costs | \$6,960.00 | \$1,553,172,720.00 |
| EPA Proposed Regulation One Time Costs | \$57,200.00 | |

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| PMAA Alternative Annual Costs | \$1,555.00 | \$347,009,135.00 |
| PMAA Alternative One Time Costs | \$57,200.00 | |

* The costs are based on Conventional UST Systems consisting of three USTs per system. Industry costs assumes 223,157 facilities.