



Division
Petroleum Storage Tank

Director
Robyn Strickland

2023 Summer Roundtable
June 12, 2023 – 1:00 p.m. (CST)
Will Rogers Memorial Office Building
Concourse Theater, Suite C50

OCC topics for discussion:

Discussion on E15 dispenser labeling:

- Effective / required on dispensers on November 1, 2023
- OCC did not request the bill but was not opposed to it / discussion with bill sponsors
- 40 CFR Part 1090.1510 as of February 1, 2023 (why was a date in the legislation?)
- Label including dimensions will be posted on website

Discussion on tank removal without a Licensed Remover:

- This has become a real concern for staff / input from industry
- 17 OS 311(a) - provides up to \$10,000 per day violation
- 17 OS 311(b) – "In determining the amount of the fine, the Commission shall include but not be limited to consideration of the nature, circumstances and gravity of the violation and, with respect to the person found to have committed the violation, the degree of culpability, the effect on the ability of the person to continue to do business, and any show of good faith in attempting to achieve compliance with the provisions of the Oklahoma Petroleum Storage Tank Consolidation Act."
- Chapter 26 Appendix G and Chapter 25 Appendix S tables "may be used as a suggested fine amount in a Formal Enforcement Action, but not to exceed the statutorily set limitations in 17 O.S. 311(a)"
- Recommended fine is currently \$5,000

Discussion on tank, line, and cathodic protection testers:

- Testing Mon–Fri only and PST staff must be present
- Reinspect/retest after results have been submitted to PST
- Licensing testers
- Require a licensed installer on site when testing tanks, lines, CP, electric, breaking concrete, or drilling through concrete that has any part of a tank system that is underground (includes ASTs with underground piping)

Industry suggested topics for discussion:

- Credit card convenience (“swipe”) fee at the dispenser