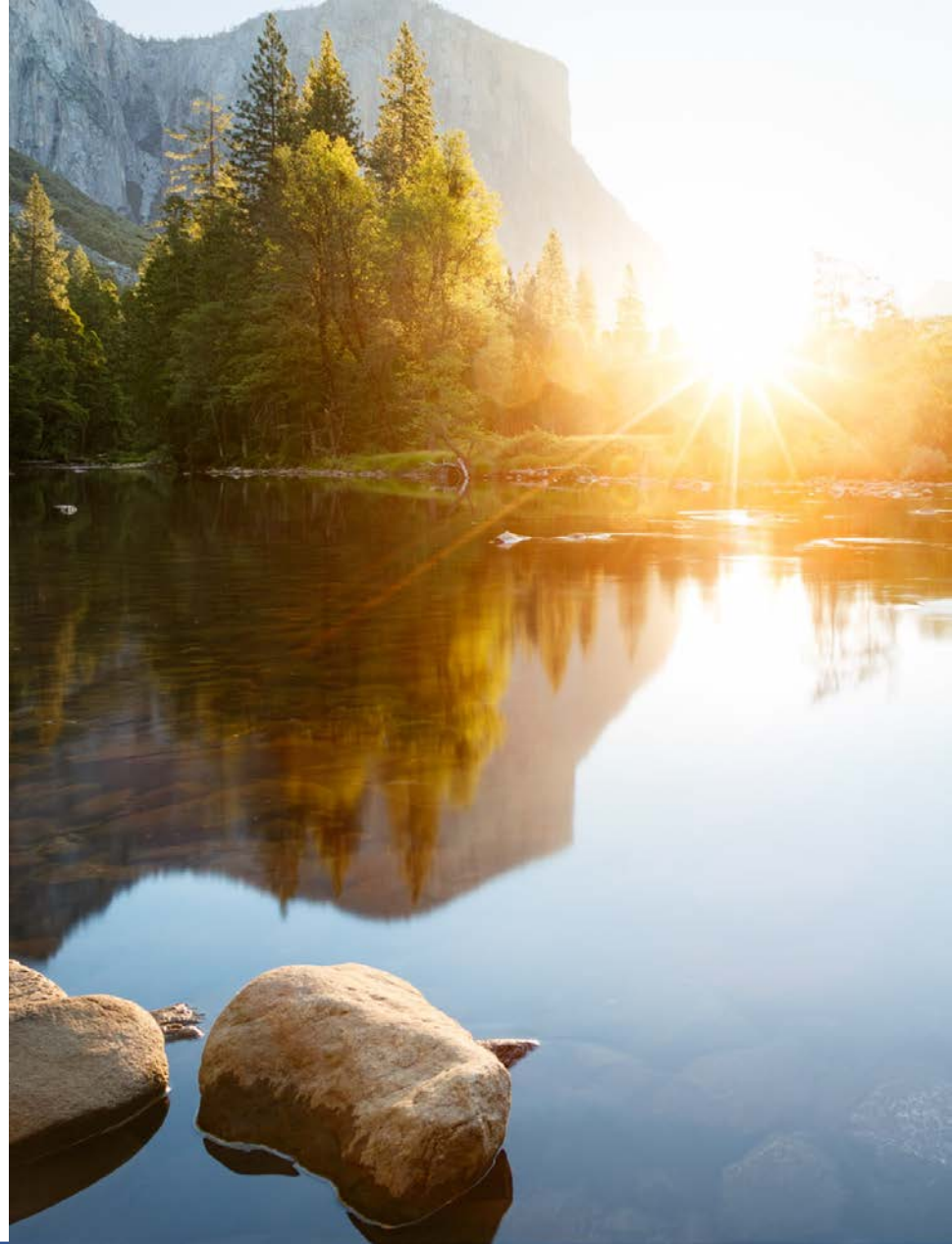


WELCOME

2025 Annual Stakeholder & Consultant's Day Meeting

Housekeeping

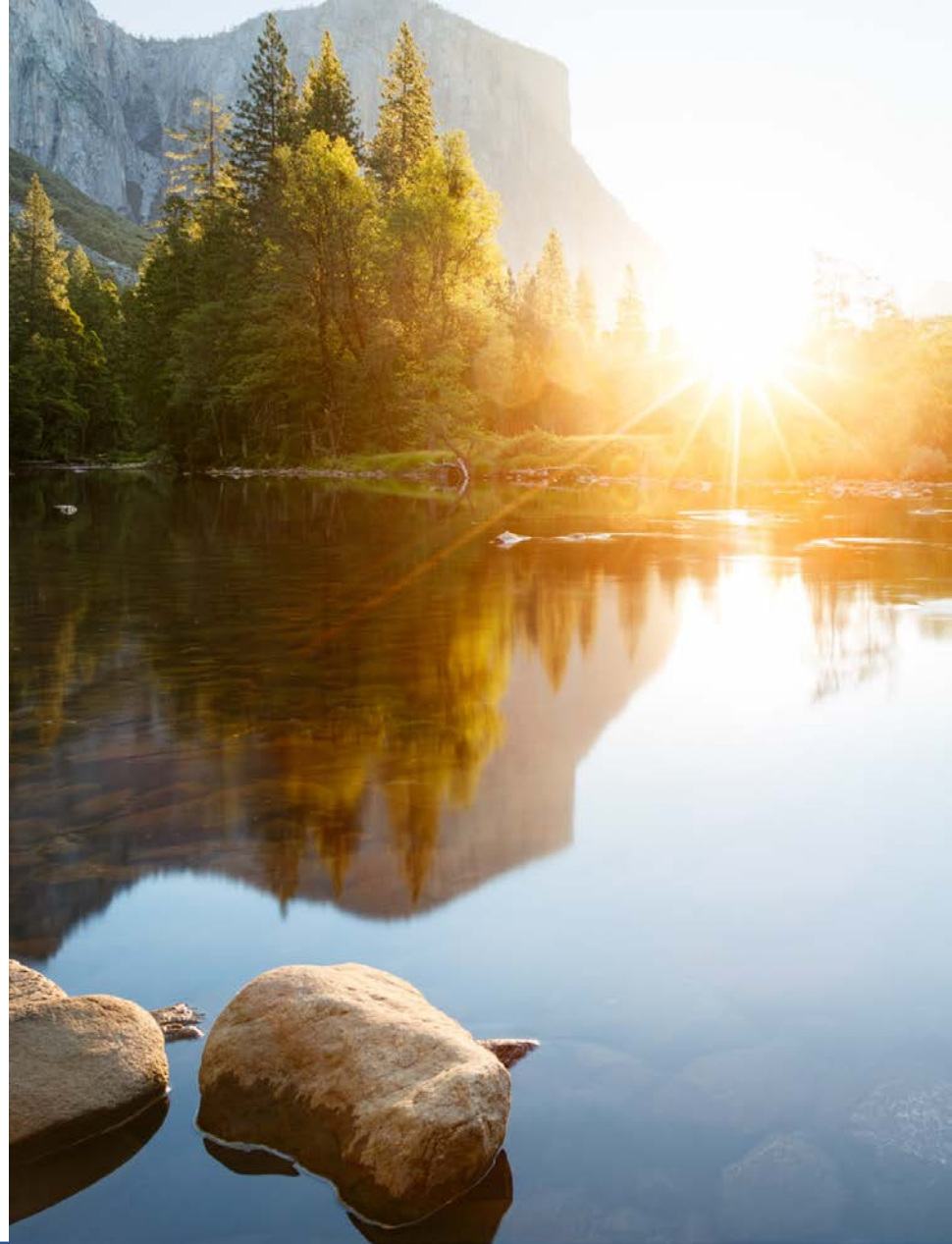
- Exits & Restrooms
- Meals
- Breaks
- Questions
 - “Parking Lot”



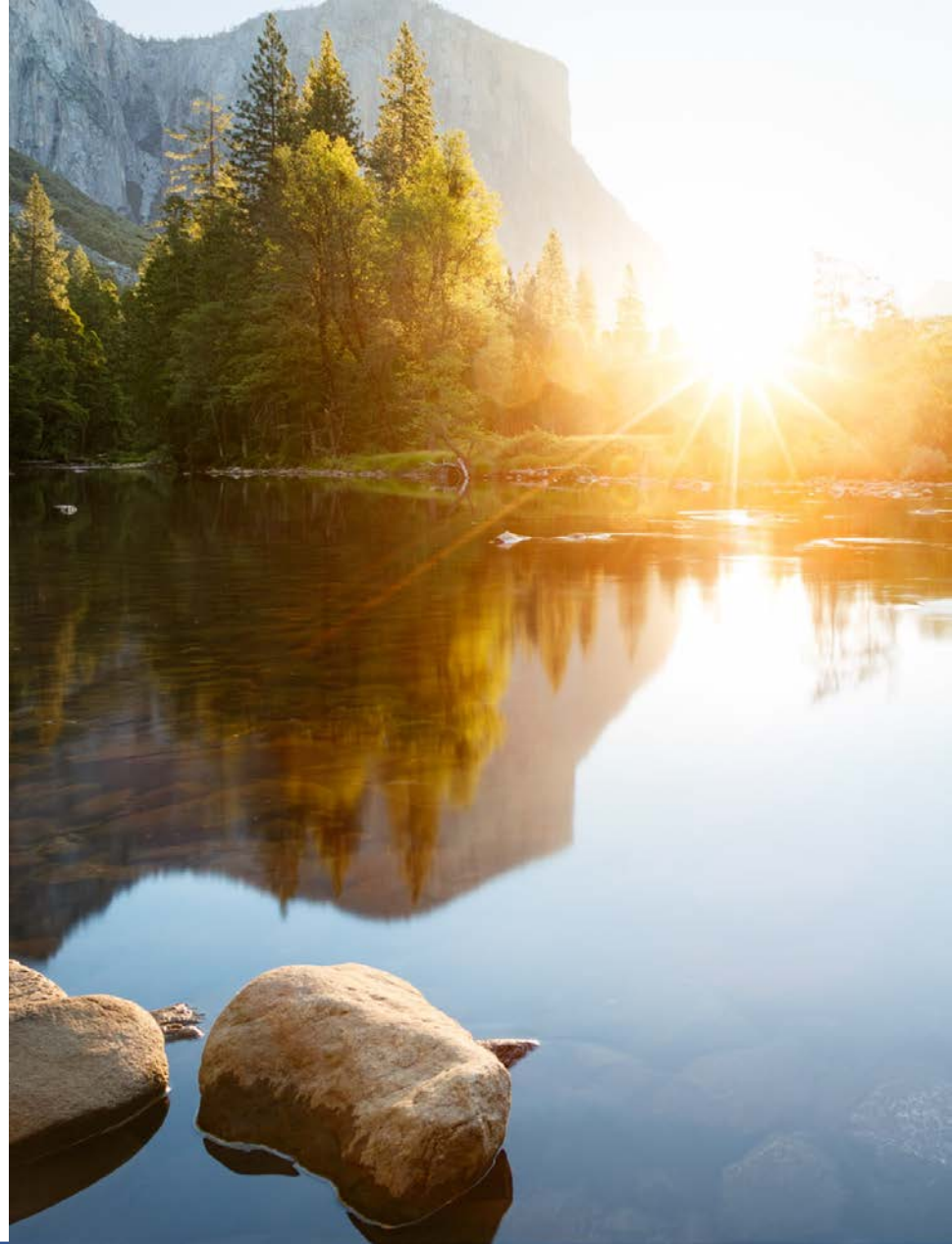
Understanding the Regulatory Framework to Bring a Release from Confirmation to Closure

Topics

- The “Why”
- Whose role is what?
- Key statutes/rules
- Risk-based Corrective Action Guidance (RBCA)
 - Soil & Groundwater
- Petroleum Vapor Intrusion (PVI)
- Pulling all data together for closure
- Petroleum Mixing Zone (PMZ)

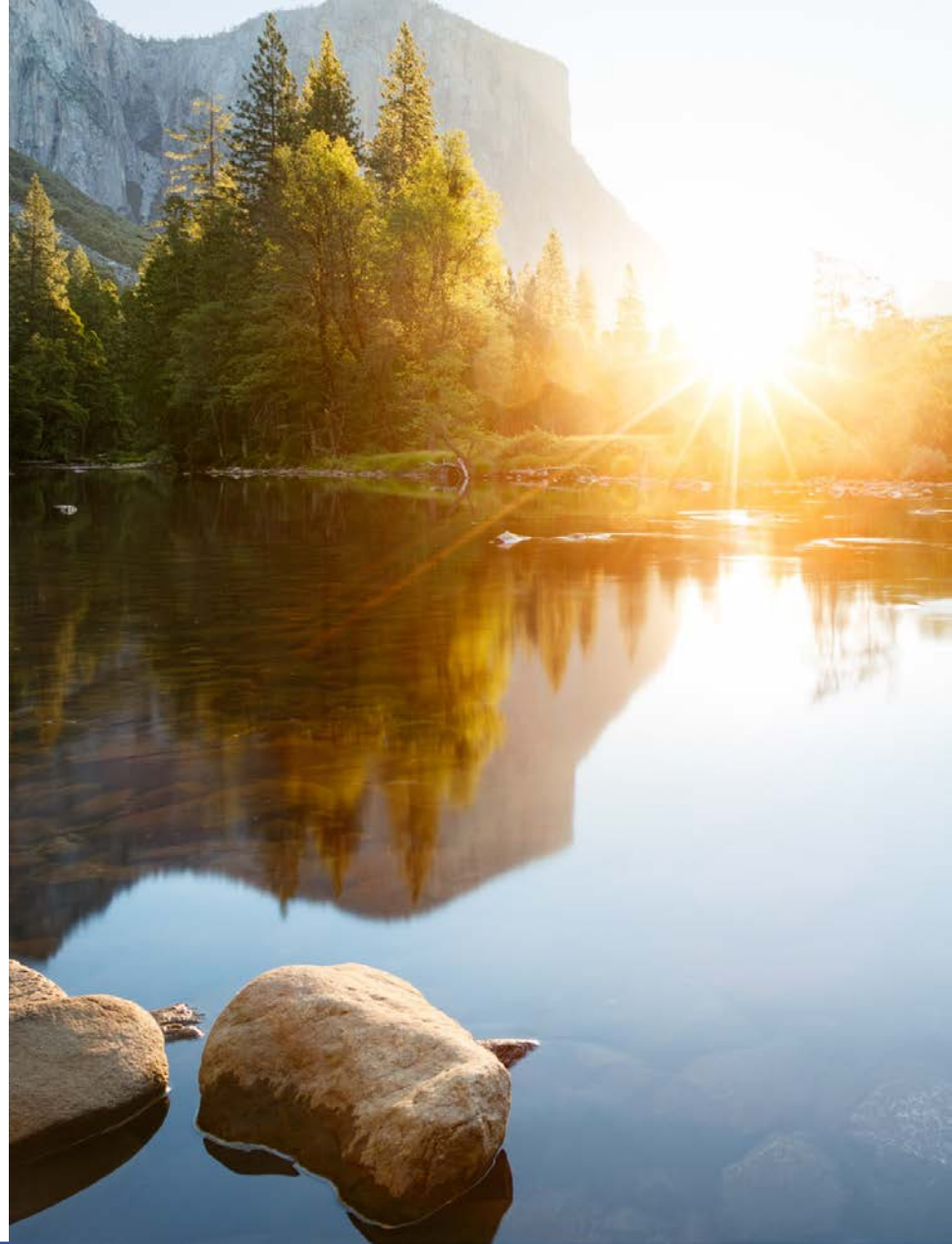


The “Why”



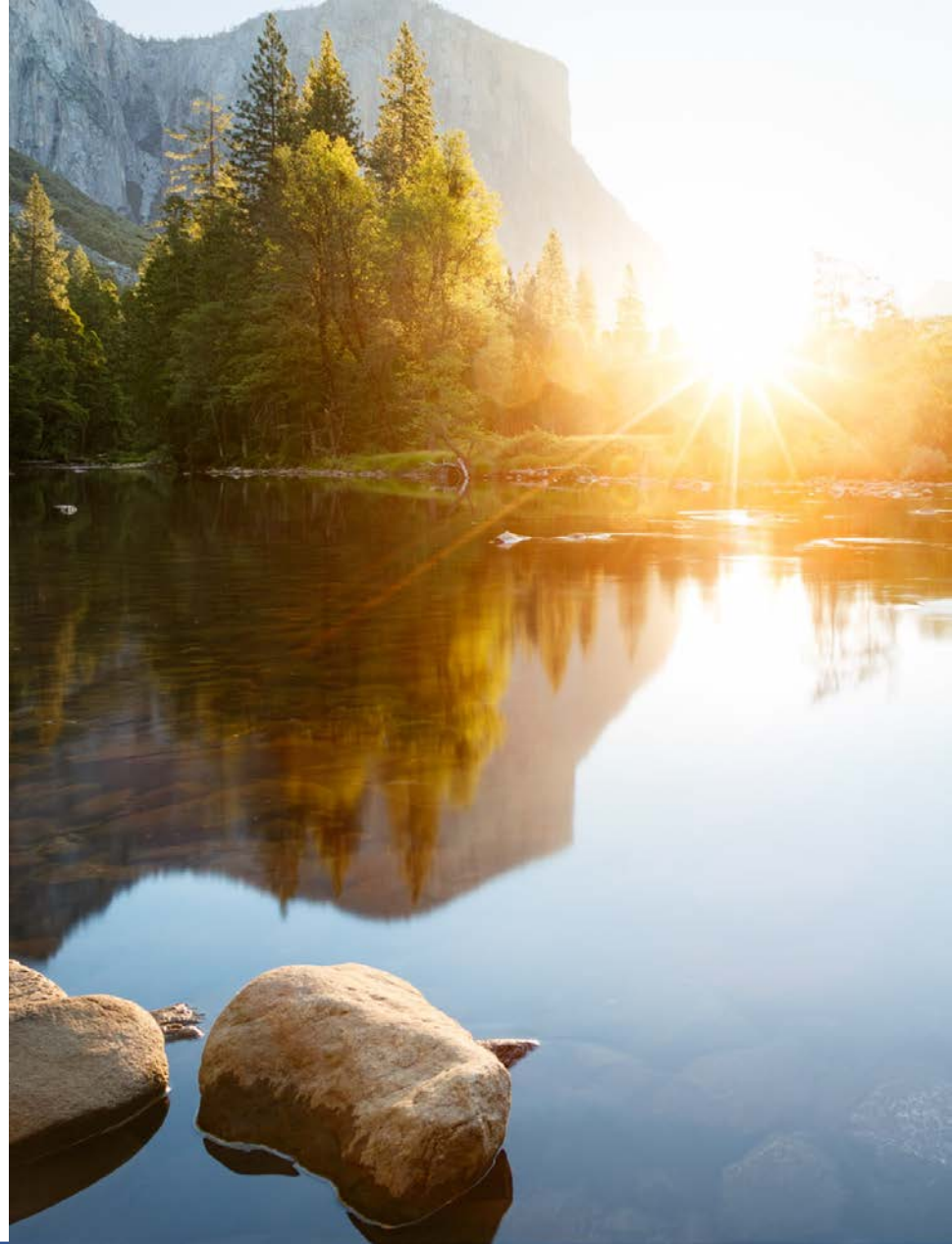
Agenda – Part I

- Roles (Handout & New Letter Formats)
 - Owners/RPs
 - Env Consultants
 - DEQ
 - Other Government Entities
 - i.e UST/EPA/Tribes
 - Financial Assurance
 - PTRCB



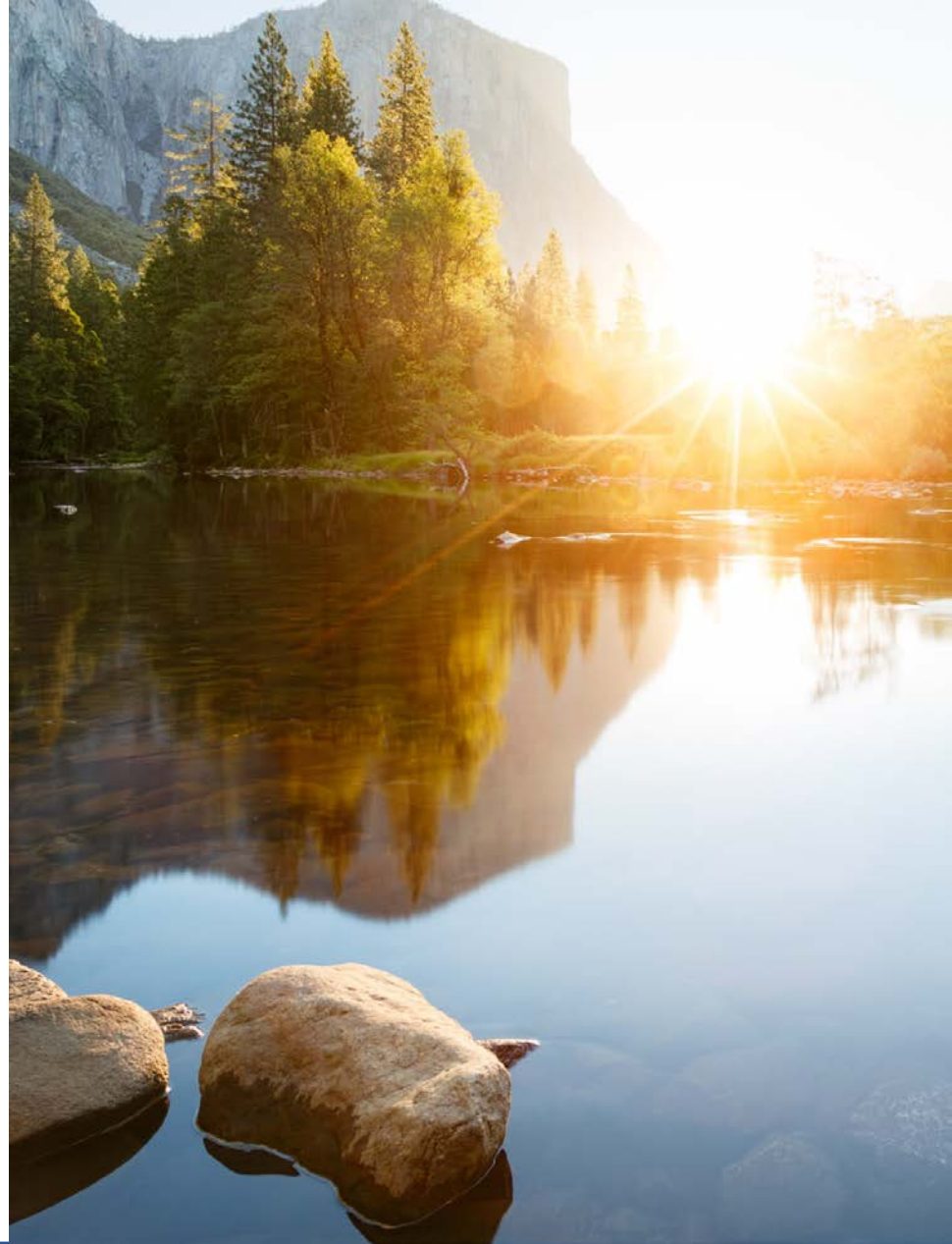
Owner

- Responsible Party
- Hires Env Consultant
- 17.56.501 & 17.56.601
 - **owners and operators must** comply with the requirements of this subchapter.



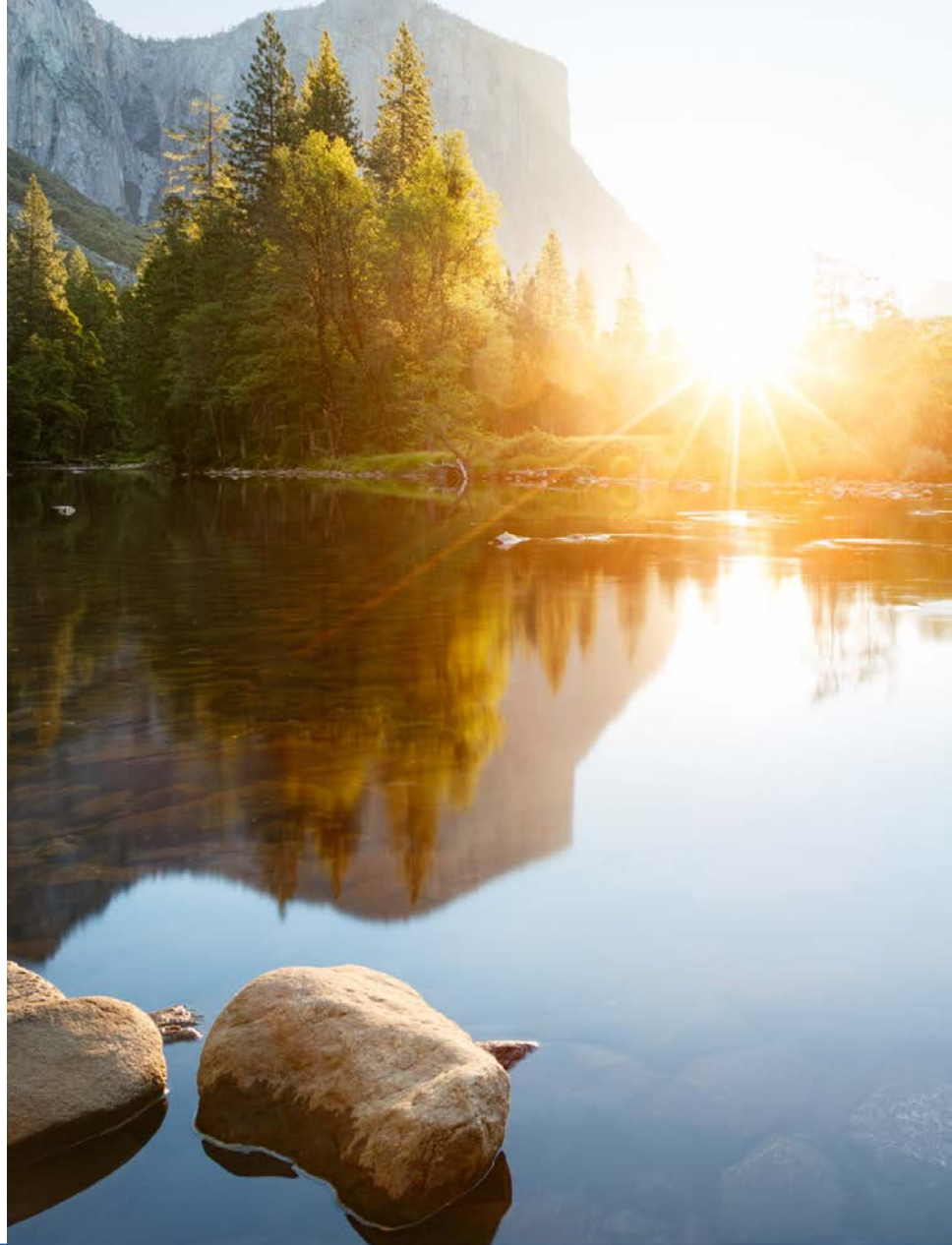
DEQ

- Regulator
- Work with Owners/Consultant's to ensure they are meeting regulatory requirements in statute(s) and rule(s)



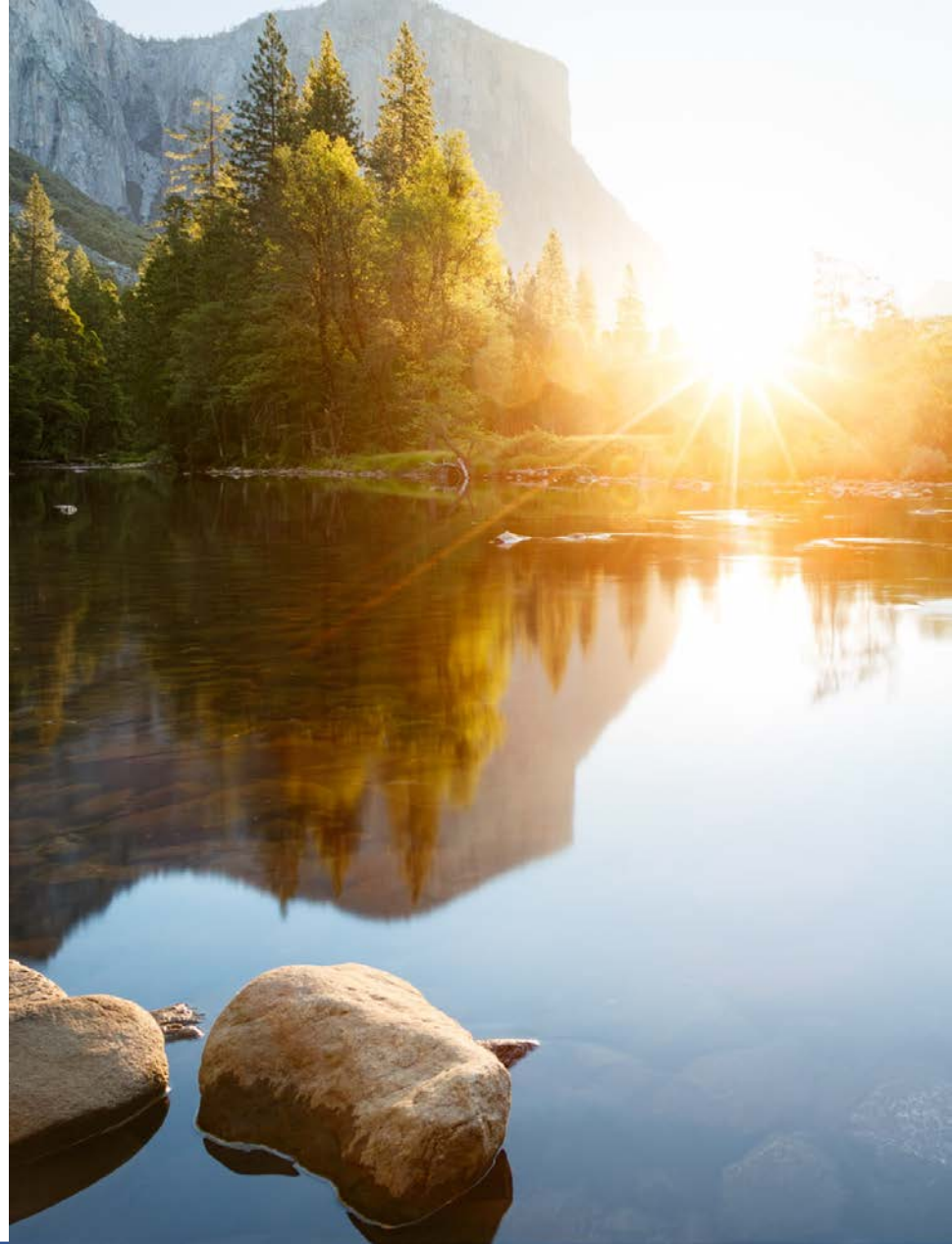
- When a petroleum release occurs from a qualified petroleum tank system it falls under the regulatory purview of the Petroleum Tank Cleanup Section. In accordance with ARM 17.56.5 and 17.56.6

- Release Reporting
- Release Confirmation
- Initial Response & Abatement
- Remedial Investigation
- Cleanup
- Compliance Monitoring
- Release Closure
 - PMZ



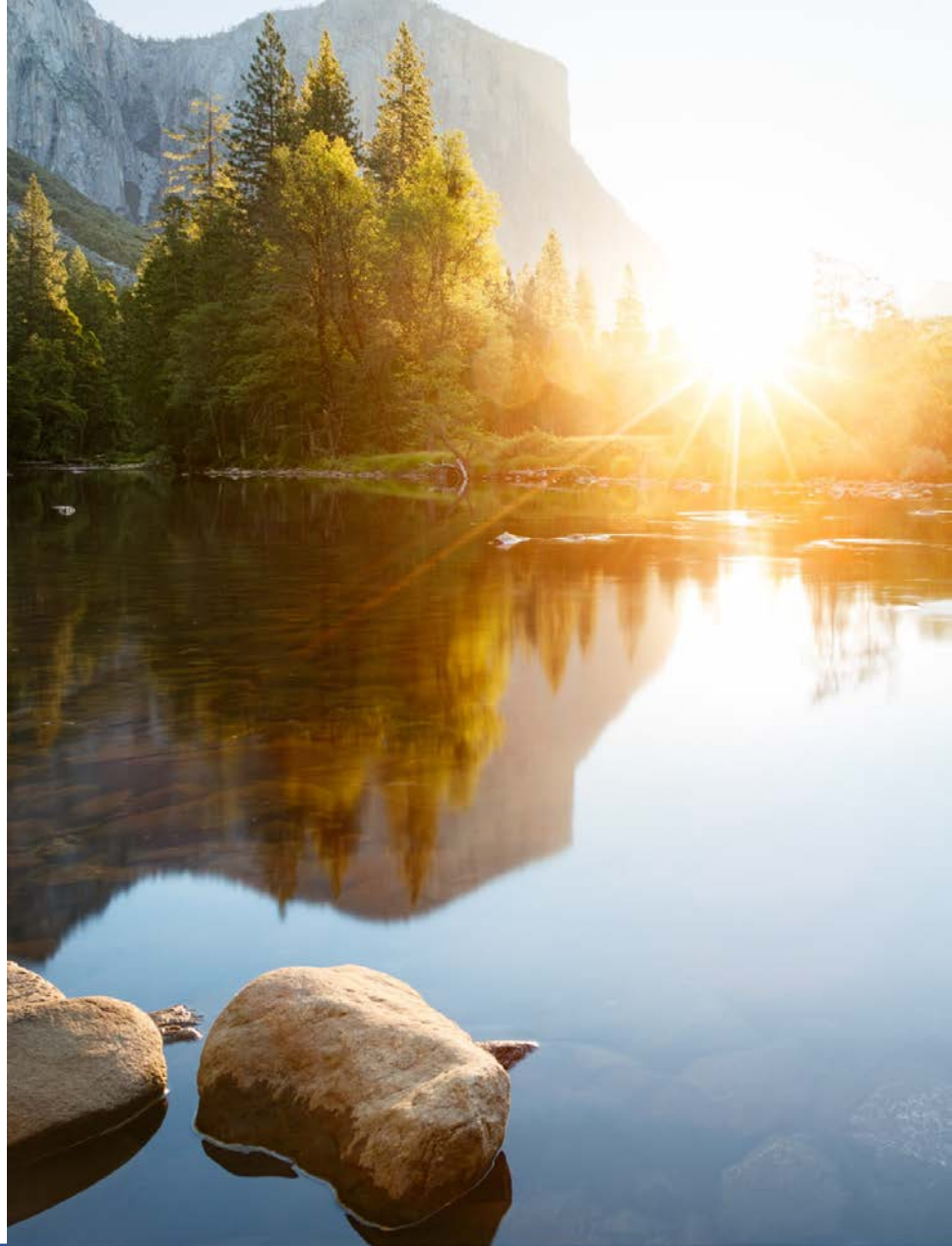
Other Sections/ Agencies

- Is the facility in compliance with UST section. “Release Prevention”
- If on Indian Lands, also must comply with EPA/Tribal requirements



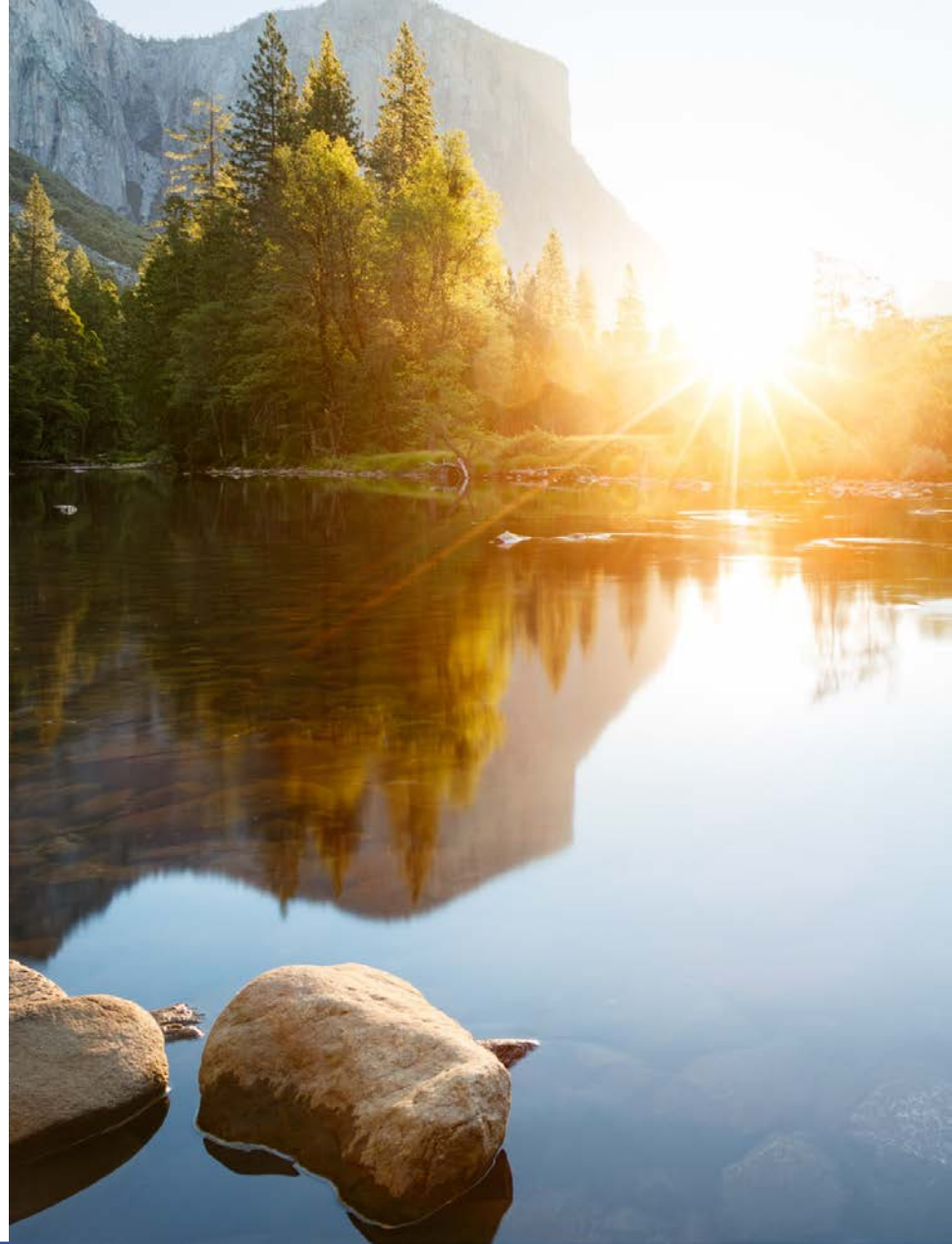
Financial Assurance

- Mechanism chosen by the Owner to pay for their petroleum release.
- PTRCF is an option



PTRCB

- An independent organization created by the Montana Legislature to administer the PTRCF.
- Only Administratively attached to DEQ

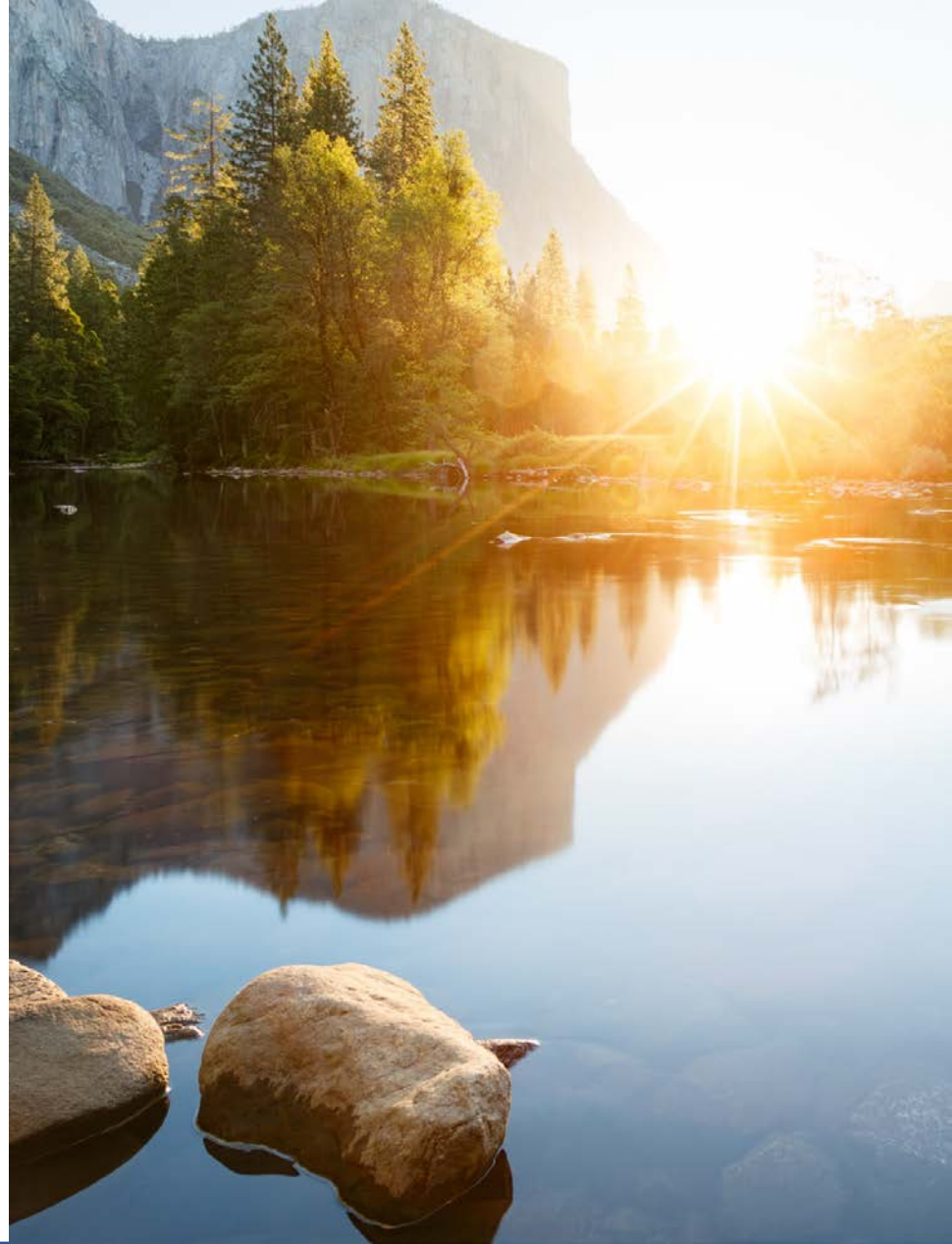


DEQ/PTRCB – where regulation overlaps

- If an owner has opted to use the PTRCF as their financial assurance, they are also subject to additional regulation. The 15-day local government comment period is one of those additional regulations and PTRCB is statutorily supported to make comments for the owner and their consultant, and in some cases DEQ, to consider.

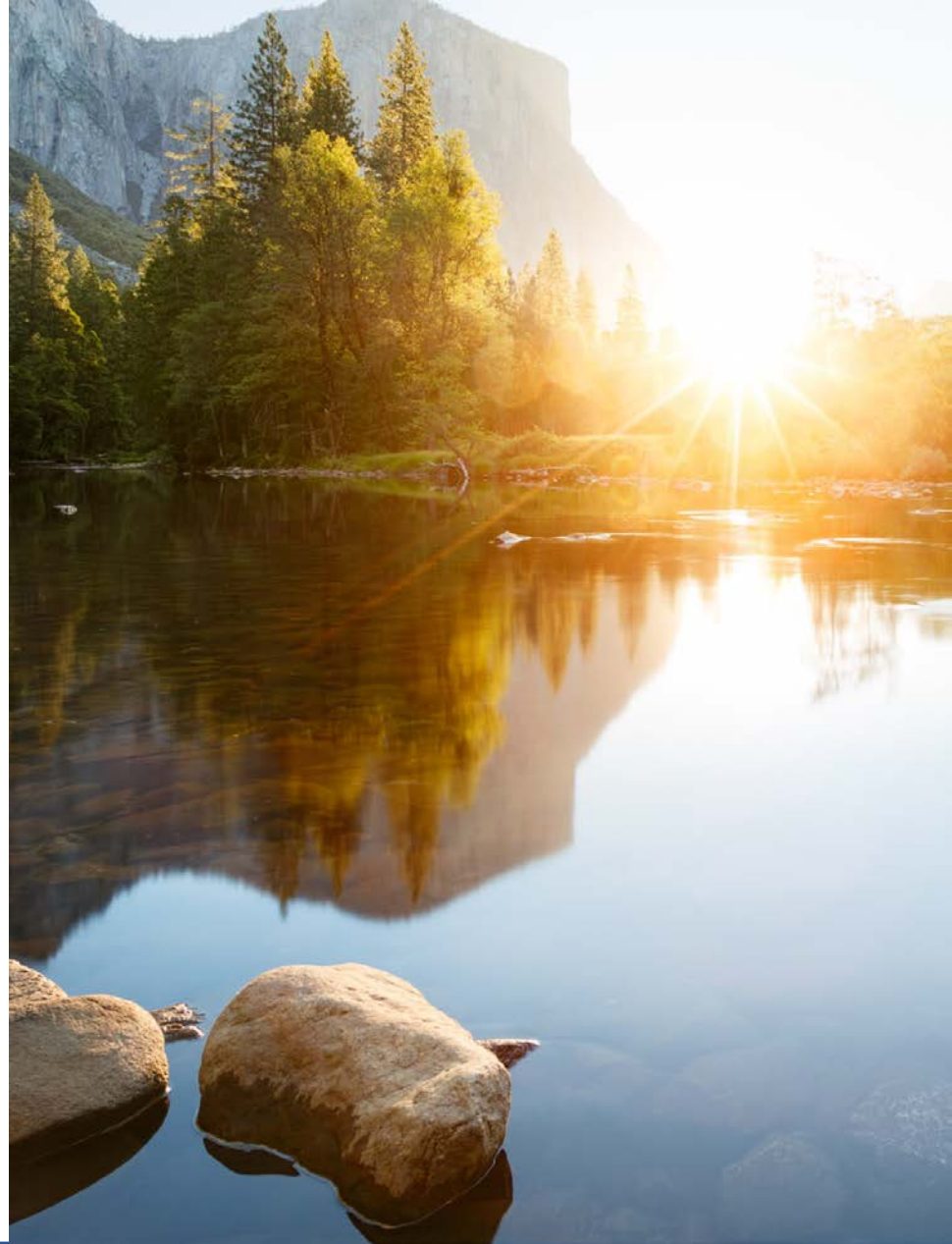


- 75.11.309 -
(e) (i) The department shall review the corrective action plan and forward a copy to a local government office, the board, and, when applicable, a tribal government office with jurisdiction over a corrective action for the release.
- DEQ does allow the owner/consultant time to respond to comments prior to DEQ approval of the work plan. If responses are not provided, DEQ will approve the work plan as is (unless we have our own comments/edits) but the owner/consultant should recognize that they may incur costs out of pocket if the fund denies them.



Misconceptions

- PTRCB is part of DEQ
- If DEQ approves work, PTRCB must pay for it.
- If PTRCB denies to pay for work in an approved corrective action plan that part can be left undone.
- Regulatory work only needs to be completed if there is funding.
- The fund “approves” work.



- Owners to begin release closure process
- Roadmap for release reporting, investigation, cleanup and closure.
- Begin with “Closure” in mind.
- RBCA Guidance

