



Draft Stakeholder Communication Plan For Underground Storage Tank Program

Public Policy Office

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Underground Storage Tank Stakeholder Communication Plan

EXECUTIVE SUMMARY/BACKGROUND

The UST permitting regulations attempt to reduce the potential for leaking of contaminants into ground water, volatilization of contaminants into the air, and the catastrophic failure of UST systems resulting in personal injury or property damage. Additionally, the rules set out recordkeeping and reporting requirements. The program has four components: ensuring proper operation and maintenance of tanks through the UST operating permit program; ensuring proper installation and modification of tanks through the installation permitting program; compliance assistance to owners and operators; and ensuring installers, removers, and inspectors are properly trained and licensed.

STAKEHOLDER INVOLVEMENT

This communication strategy is designed to meet objectives identified by DEQ and the Governor's office to develop and maintain stakeholder awareness and provide mechanisms for effective two-way communication. Generally, the Governor's office will handle communication related to large scale events that affect multiple programs, such as a flooding or fire events and DEQ will handle communication related to events specific to the underground storage tank program or day-to-day events.

GOALS

- To develop consensus among interested parties so that, while certain groups and parties may be in opposition, they will at least recognize and understand the reasoning behind difficult decisions.
- To ensure that all interested parties are involved in this process by providing meaningful opportunities for input – both internally and externally.
- To enhance and maintain agency and project credibility by communicating clearly, reasonably, and honestly about the process, the plan, and the potential impacts.

OBJECTIVES

- Work closely with stakeholders as appropriate on communication of roles and responsibilities.
- Develop a strong relationship with interested parties that we can maintain over the life of the planning process and implementation.

- Use a communication process that is fluid, flexible and allows us to adjust when necessary.

AUDIENCES

This communication plan targets key audiences. Although a multitude of groups and individuals are represented in each of the key audiences, the techniques, tools and tactics proposed to attain and retain their attention and involvement are similar for each group.

Internal -This includes DEQ employees and keeping them abreast of DEQ's role in this process.

- Water
- Solid Waste
- Remediation
- Legal
- Enforcement
- Public Relations
- Air
- Montana Environmental Policy Act (MEPA)

External – This includes, but is not limited to, environmental organizations, community groups, elected officials, industry groups, labor groups and the public.

- Facility Owners and Operators
- Petroleum Marketers
- Petroleum Tank Release Compensation Board and Staff
- Licensed Individuals in UST-related occupations
- Private citizens

MEDIA RELATIONS

Designated internal spokesperson for media contacts: Nolan Lister

KEY MESSAGES

- UST continues to explore ways to increase compliance assistance, improve business processes, and engage with the regulated community.
- Montana must enforce its rules to prevent, detect, and clean up leaks from USTs in a timely manner.
- Inspections and cleanup documentation by DEQ provide long-term data on site management needs.

TACTICS

The following tools and techniques are used in the action plan:

- ☐ Petroleum stakeholder calls, as needed
- ☐ Granicus notices for process/guidance updates
- ☐ Annual Installer/Remover Day
- ☐ Annual Consultant's Day
- ☐ MUST Newsletter (1-4 times per year)
- ☐ Designated spokesperson for media contacts: Nolan Lister
- ☐ DEQ Hosted Web Page: PTC and UST have webpages that are kept up to date
- ☐ Internal Audience Communication
- ☐ Meaningful stakeholder involvement, such as Petroleum Marketer's Convention Attendance and Presentations by DEQ.
- ☐ Public involvement in Rule processes.

ACTION PLAN

Due Date	Activity	Purpose	Who Responsible
Monthly	DEQ hosted web page	Share information with public and stakeholders	Supervisors/web editors (Kat/Mae; Tom/William)
As needed	News releases/news conferences	Emergency response, press releases,	Managers/PIOs
Varies, Annually to Quarterly	MUST newsletter quarterly	Communicate information to stakeholders on a regular basis.	Nolan/supervisors
As Needed	Stakeholder survey of ways to engage	Optional surveys: Before actions (meetings/conferences, etc.) send out a survey a month or two in advance to gauge interest, get feedback on agenda (what is your top choice or order of interest))	Nolan/supervisors
Annual	Annual stakeholder meeting	Installer/remover training and consultant's day are held annually for training/communication purposes.	Supervisors
As needed	Stakeholder Meetings	Stakeholder meetings to share out program updates to stakeholders.	Supervisors

Due Date	Activity	Purpose	Who Responsible
As needed	Streaming of meetings/online availability	Public access/information/involvement mt.laws streaming (session), meetings via teams for stakeholder meetings	
As needed	MAPA process	Rulemaking process	John/supervisors/managers
As needed	Public meetings (across the state, vulnerable communities)	Pre rulemaking engagement, engage stakeholders before the formal rulemaking process begins (MAPA) process.	John/supervisors/managers
As needed	Public comment forum (DEQ's public comment page (provide link) or newspapers)	New facility permit comment period; cleanup comment period; rulemaking	Supervisors/sections
As needed	Interested Parties outreach – Granicus lists (link to sign up page for Granicus)	Public engagement and notifications- public can sign up for areas of interest (Granicus)	all
As needed or required (Quality Assurance Plans)	Issue papers, Guidance document updates	explain section/bureau processes; issue paper/discussion may be included in newsletters or posted on websites (Monthly FAQs; session updates)	Section supervisors/managers

RESOURCES/CONTACTS

For Media or general contacts: Nolan Lister

For Rulemaking process: John Benoit

For UST section questions: Seth Hendrix

For Petroleum Tank Cleanup Section questions: Latysha Pankratz

SIGNATURE PAGE

Signatures indicate concurrence with this plan.

DEQ Director

Date

Division Administrator

Date

Public Policy Director

Date