



DIVISION OF UNDERGROUND STORAGE TANKS

Operational Compliance Inspection Quality
Assurance and Control Program

Status Update

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A Brief History

- The Division's Operational Compliance program has become more and more sophisticated over the years as the focus has moved from cleanup to prevention.
 - UST Certificate Inspections
 - 1998 System Upgrades
 - 2005 Energy Policy Act
 - 2018 UST Federal Rule Change

A Brief History (Cont.)

- The Division has developed many resources for staff over the years to increase consistency and accuracy of operational compliance inspections.
 - UST Facility Inspection Form (Paper Inspection Form)
 - UST Enforcement Policy
 - Standardized Inspection Process (SIP) and Standardized inspection Manual. (SIM)
 - Mobile Inspection Application- (MIA)

Beginnings of the QA/QC Program

- Program was developed from historic needs of stakeholders and division management to increase consistency and accuracy of operational compliance inspections.
 - Additional rules and testing now means operational compliance inspections are more complicated and sophisticated as ever before
 - MIA inspection application allows for analysis of compliance rates and violation trends
 - EPA's Compliance Performance Measures (CPMs) require reporting of additional area's vs. Previous SOC Measures.

QA/QC Manager Role

- The Operational Compliance Inspection Quality Assurance and Control Position was created in September of 2021.
 - Statewide position focused on improving inspection consistency and accuracy
 - Periodic review of database metrics and staff correspondence
 - In person field audits of staff inspection procedures
 - Development and implementation of new policy into existing processes

QA/QC Manager Role (Cont.)

- Development of annual training based upon field observations and staff input
- Review of database metrics and staff correspondence
- In person review of inspection procedures (Quality Control Inspections)
- Standardized onboarding and training of new staff promoting long-term statewide consistency and staff retention
- Development and revisions to division technical guidance and IT applications

QA/QC Program First year Accomplishments

- 32 quality control inspections (QCIs) completed with staff statewide
- Developed and implemented a five-day onboarding training for new staff August 2022
- Developed guidance for fund deductible determination inspection process
- Conducted multiple webinars for staff reviewing recent changes to enforcement policy and fund determination process

Looking Forward

- QA/QC Manager to conduct one annual quality control inspection per inspector
- Establish inspection baseline metrics
- Incorporate QA/QC elements within the Division's SIM Manual
- Establish two-way communication with stakeholders:
 - Identify violations trends to increase overall compliance
 - Obtain feedback regarding Division's Operational compliance program

Looking Forward (Cont.)

- Onboarding process will continue to include:
 - Level 1 Training,
 - Peer match
 - Training inspections with QA/QC manager
- Development and implementation of Level 2 and Level 3 training curriculum for existing staff



QUESTIONS?

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