

Can State Funds be Used for Prevention?

Facilitated by:

Marshall Mott-Smith (FL) and Michaela Brockmann (RI)

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What are Obstacles State Funds Face in Using it for Prevention Purposes?

1. Reimbursement Program - Not regulation
2. UST testing doesn't work-not reliable
3. Operators do not know how to test for leaks

4. Check annual records & PEI training free to o/o, yet people are the obstacles
5. Limited funding

6. Low number of inspectors
7. High turnover of clerks
8. O/O's using private insurance are reluctant to report
9. How do you best use funds for prevention - best bang for buck
10. Limited funds - emphasis on cleanup
11. Statute restrictions
12. Underwriting - no differentiating risk
13. Nothing bad is going to happen - the fund is going to pay for it
14. Willingness of the o/o to work with us
15. Cost - who is going to pay?
16. Desire to pull funds from cleanup
17. Need to train staff on prevention
18. Politics of money
19. Lack of enforcement support
20. Limited stick...
21. Financial risk of reporting releases - would go out of business
22. Shifting resources - need cost benefit analysis
23. No timely way of evaluating compliance
24. Lack of communication between program and Legislature. Not a big issue on the radar screen
25. Changes in ownership demographics - major oil companies divesting ownership, new, inexperienced owners are buying sites

How Can the State Fund Be Used as an Incentive or Preventive Mechanism?

1. Delivery prohibition
2. Fee discount for compliance
3. Red tag
4. Compliance audits for purpose of reimbursement
5. Regular inspections
6. Prizes for reporting
7. Lower deductible for secondary containment
8. Longer to report, higher deductible
9. Target bad actors for inspections
10. Publicize good stations, as well as bad actors. "green stations"
11. Loss prevention inspections help to find leaks - train owners, give a "green" sticker
12. Sliding deductibles for compliance and equipment
13. Training classes
14. Grant program for removal
15. Advertising compliance
16. Raise deductible - owners could build credit - good record, lower deductible
17. If reporting a small release in a timely manner, no deductible
18. Training o/o's and inspectors
19. "Moral hazards" - fine balance between carrot & stick
20. Deductible as a percentage of compliance
21. Deny coverage if not in compliance
22. Lower tank fees
23. Loans and grants for upgrades
24. State pays for online training
25. Prioritize inspections
26. Better communication
27. Town Meetings
28. Self certification
29. Regional training
30. Interest free loans to replace older leak prevention equipment
31. Tax incentives for upgrades