

June 12, 2017

Rose Marie Howell
211 Horseshoe Lake Dr.
Suite 112
Halifax, NS
B3S 0B9

Dear Rose Marie Howell:

With the goals of reducing burden to business and streamlining service delivery and effectiveness, the Nova Scotia Department of Environment is proposing to stop issuing metal registration tags as proof of petroleum storage tank registration.

The Nova Scotia *Petroleum Management Regulations* require all regulated petroleum storage tanks be registered with the Nova Scotia Department of Environment. Under these regulations, the following types of tanks are regulated:

- all underground petroleum storage tanks
- aboveground tanks having a nominal capacity of 4000L or greater
- tanks at a marina with a capacity of 230L or greater
- storage tank system in a petroleum refinery regulated under the *Environment Act*.

Currently, owners/operators of registered petroleum storage tanks are issued metal registration tags that must be attached to the tank fill pipe as proof of registration. Tank owners/operators are also issued a Certificate of Registration by the department, with updated certificates issued annually once the applicable renewal fee has been paid. The goal of this tagging system has been to ensure that petroleum deliveries are only made to registered tanks.

However, we have heard that metal registration tags are not always a reliable indicator of tank registration as they are often dislodged or broken during petroleum delivery. Therefore, the department is proposing to stop issuing metal registration tags. Instead, tank owners/operators would be permitted to use their Certificate of Registration as proof of registration. This would mean that tank owners/operators would be required to retain their Certificate of Registration onsite and make it available upon request to an inspector or any company delivering petroleum products to their tank(s).

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The elimination of metal registration tags would not change the requirement for petroleum storage tanks to be registered and there would be no amendments to current regulations associated with this change. The department believes that using the Certificate of Registration as proof of registration in place of metal registration tags offers a more reliable indicator of tank registration. Also, because nothing would need to be attached to the tank, this change would eliminate the time and effort that tank owners/operators are currently investing in installing tags.

As a key stakeholder in this industry, your feedback on this proposal is important to us. We encourage you to submit any written comments to us by July 17, 2017 to:

POLICY1@novascotia.ca with "Petroleum Storage Tank Registration Tags" in the subject line

OR

Nova Scotia Environment
c/o Gina Penny
Policy and Planning
Barrington Place
1903 Barrington Street, Suite 2085
PO Box 442
Halifax, Nova Scotia, B3J 2P8

We will consider your comments and incorporate suggestions that help us meet our objectives. If this proposed change is adopted, we will notify tank owners/operators of the date when it takes effect.

Sincerely,



Sharon Munroe
Director, Quality, Safety and Training
Nova Scotia Environment