



A CRH COMPANY

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December 20th, 2018

OCC Court Clerk
2101 N. Lincoln Blvd
Oklahoma City, OK 73105

RE: Public Comments for Cause RM NO. 201800006

Dear OCC Representative,

After reviewing the proposed rules for Cause RM RO. 201800006, APAC-Central, Inc. is submitting the attached comments. APAC-Central, Inc. appreciates the agency taking the time to review these requests. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads 'Fawn Kibria'.

Fawn Kibria, P.E.
Environmental Engineer

CC: JC Ray, APAC-Central
Jeff Sorrells, APAC-Central
Andy Peeples, APAC-Central
Michael Bailey, APAC-Central

Attachments:

1. Public Comments

FILED
DEC 27 2018

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

Attachment 1. Public Comments

165:26-1-2. Definitions

“Aboveground storage tank system” means an aboveground storage tank, the individual compartments, and any connected aboveground or underground piping, dispensers and associated equipment and fixtures or transport truck connected to the storage tank system.

Suggest removing “or transport truck connected to the storage tank system” or clarifying what a transport truck is defined as. Vehicles either fueling or offloading fuel would need to have their own means of secondary containment per OCC 165:25-2-32.

165:26-2-4. Distance to be kept around tanks

(a) (1) 50 ft (15 meters) from the nearest important building ~~on the same property~~ as defined by this Chapter;

Suggest keeping original language, “50 ft (15 meters) from the nearest important building on the same property as defined by this Chapter”.

165:26-2-5.1 General spill and overfill prevention requirements

(b) Tanks with a fill pipe must be filled through a liquid tight connection mounted inside at least a five (5) gallon spill container. ~~A spill bucket is not required if the fill pipe is located within the containment dike.~~

Suggest adding “A spill bucket is not required if the fill pipe is located within the containment dike.”. A fill port that is already located within an impervious containment dike is sufficient means for secondary containment.