

From: Ronald J. Leone [<mailto:ron@mpca.org>]

Sent: Wednesday, August 21, 2013 8:13 AM

To: Lamb, David

Cc: PSTIF Office; DNRContact, mjordan@mail.wallisco.com; Wallis, Lynn; Andreasson, Rachel; McNutt, Don

Subject: RBCA Proposed Rule: Formal Comments

Mr. Lamb: The Missouri Petroleum Marketers & Convenience Store Association (MPCA) is a 400+ member statewide trade association located in Jefferson City which represents the majority of the convenience stores, gas stations, truck stops, petroleum marketers and their suppliers located all across Missouri. Many of these companies are small, second or third generation family owned businesses. It's not an exaggeration when we say that MPCA members literally and figuratively fuel Missouri's economy.

As you know, MPCA has been actively involved with the risk-based corrective action (RBCA) issue for more than 10 years. On behalf of MPCA's 400+ members, please accept this email as our formal comments regarding the RBCA rule changes detailed on pages 1160-1163 in the 7/15/13 Missouri Register.

MPCA fully supports and incorporates herein by reference both the written comments being submitted by Mark Jordan & Donnie Greenwalt with Wallis Companies and the 8/15/13 public testimony presented by the Petroleum Storage Tank Insurance Fund (PSTIF).

MPCA believes the proposed RBCA rule changes are for the most part necessary, reasonable & measured, and we ask that you seriously consider the comments and suggestions provided by both PSTIF and Wallis Companies.

Thanks to you and your staff for all of your hard work on this very important issue.

Best, Ron

Ronald J. Leone, Esq.

Executive Director

Missouri Petroleum Marketers & Convenience Store Association (MPCA)

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