

From: Anderer, Kirsten
Sent: Thursday, April 27, 2017 10:44 AM
Subject: FW: Tukumcari, NM project

Hello Regional Folks,

Please see our response to the Permastore OIG investigation below. Please share this information with our state partners ASAP, as it could impact projects that are currently in bid phase. If you have any questions, please let me know.

Thanks,

Kiri

From: Anderer, Kirsten

Sent: Thursday, April 27, 2017 10:52 AM

To: Chandler, Susan <Chandler.Susan@epa.gov>

Cc: 'Todd Johansen' <tjohansen@nmfa.net>; Vaughan, Michael <vaughan.michael@epa.gov>; Camacho, Ruben <Camacho.Ruben@epa.gov>; 'tburt@bhinc.com' <tburt@bhinc.com>;

'markm@cityoftucumcari.com' <markm@cityoftucumcari.com>; 'dpowers@cityoftucumcari.com' <dpowers@cityoftucumcari.com>; David.Bishop@state.nm.us

Subject: Tukumcari, NM project

Importance: High

Dear Susan,

Per your request, we have completed our evaluation of the information presented to us regarding Permastore's manufacturing process for glass-fused steel lined tanks.

Based on the letters from Permastore dated December 29, 2016 and January 18, 2017, we opine that Permastore does not meet the AIS requirements due to manufacturing occurring outside of the United States. There is an exemption for coating; however, Permastore is conducting more than just coating in the United Kingdom. Specifically, step 2 (punching cut outs) and step 4 (rolling of pane) in the aforementioned letters describes processes that we consider go beyond the coating process and are considered separate manufacturing processes. Just because there is a benefit to these steps occurring immediately prior to the glass fusion preparation steps, does not mean it is part of the coating process.

Previously when asked by Permastore if their product complied with the AIS requirements, EPA responded that as long as all the other manufacturing process occurred in the United States, the product would be compliant. These additional steps that are not part of the coating process were not disclosed at that time.

If you have any further questions, please let me know.

Thank you,

Kiri

Kiri Anderer, P.E.

Environmental Engineer

Drinking Water State Revolving Fund Team

Office of Ground Water and Drinking Water

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW, Mail Code 4606M

Washington, DC 20460

(202) 564-3134