

NEW MEXICO ENVIRONMENT DEPARTMENT
Underground Storage Tank Bureau
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only addresses current points of exposure - it does not provide a mechanism to address potential future points of exposure (i.e. potential future wells). Furthermore, ASTM's RBCA does not provide a mechanism to evaluate cumulative impacts of multiple contamination sources. Cumulative impacts of many isolated sites (potentially several hundred in the Albuquerque area) may seriously diminish the available ground-water resource if these sites are not addressed and remediated fully. RBCA relies on natural attenuation processes (e.g. dilution, dispersion, adsorption, bioremediation, etc.) to remediate contamination at sites where it is technically and/or economically infeasible to do so using present remediation methods. GPPAP calls for active remediation using state-of-the-art methods and innovative funding strategies.

Although these two approaches are not necessarily mutually exclusive, the City would encourage adoption of regulations that limit the allowable area for intrinsic bioremediation and other essentially passive methods to a small area; i.e. the point of compliance with regard to meeting drinking water standards should be as close to the source of contamination as possible, and should never extend beyond the downgradient property boundary.

Decisions regarding appropriate regulatory responses and priorities should be based on site-specific contaminant concentrations, plume dimensions and rate of contaminant movement, regardless of distance to receptors and immediacy of the threat to those receptors. Delays in remediating serious contamination will only compound the long-term severity of the threat and greatly increase costs of eventual remediation.

Future uses of the ground-water resource should not be compromised by the presence of contamination in the soil or the ground water. An acceptable site assessment, risk assessment and remediation process must protect future uses of the ground water resource, particularly in the event that the City elects to enhance ground water recharge. The resulting increase in water table elevations in valley areas may re-saturate soils and mobilize residual contamination. The required level of soil remediation and the duration of required monitoring prior to and after case closure must also allow for this eventuality. Conversely, well designs, risk assessments, remediation strategies and settlement agreements should adequately consider the fact that water levels will continue to decline throughout the metropolitan area unless and until enhanced recharge strategies are implemented.

TECHNICAL CONSIDERATIONS

The Albuquerque Environmental Health Department also offers several technical concerns regarding ASTM's RBCA model:

1. The model does not include depth to ground water in calculations of rates of contaminant transport from the soil to the underlying aquifer. Vadose zone processes (physical, chemical and biological) can significantly affect the fate and transport of contaminants. Depth to ground water may warrant careful evaluation in the Albuquerque area because it ranges from a few feet in the inner valley to as much as 800 feet under the east and west mesas.

2. The model should realistically evaluate recharge processes and should take into consideration the fact that most recharge in areas outside the inner valley probably occurs in response to infrequent, high intensity storm events, as opposed to long-term average precipitation and recharge rates, while recharge within the inner valley is closely tied to the distribution and use of irrigation water.

3. Sensitivity analysis should be performed to assess which parameters are most important in determining risks within a range of physical settings typical of those that will be encountered.

4. Decisions regarding the appropriate point of exposure and point of compliance are crucial to the adequate protection of the ground-water resource, as well as protection of public health. Neither value should extend beyond the downgradient property boundary.

5. Although the state is currently evaluating the RBCA approach only for possible use in evaluating and prioritizing LUST sites, it would not be appropriate to extend the use of the RBCA model to evaluation and prioritization of other contamination problems without completely modifying the technical basis of the underlying model to fit conditions in New Mexico.

CONCLUSION

The Department and the City agree that New Mexico's approach to RBCA at UST release sites must integrate two crucial areas: New Mexico's values and laws governing present and future water use, and tools for corrective action that use limited public cleanup dollars where the risk is greatest.

If incorporated into the New Mexico UST Regulations, the RBCA process should also be tailored to be consistent with the goals and actions described in the Albuquerque/Bernalillo County Ground-Water Protection Policy and Action Plan. •

City expresses concerns about RBCA at Regs hearing

by Doug Earp, Albuquerque Environmental Health Department

As the number of remediation sites has increased and the cost of their cleanup has increased even more, the U.S. Environmental Protection Agency, the states, and industry have been for the last several years cooperating in finding a way to target the leaking tanks that pose the greatest risks to public health and the environment. That effort has resulted in the idea and development by the American Society of Testing and Materials (ASTM) of Risk-Based Corrective Action Applied at Petroleum Release Site (S 1739-95), known widely as RBCA. While the state UST Bureau, the City of Albuquerque and Bernalillo County have always worked closely together in the protection and remediation of Albuquerque's ground water, the current trend toward regulatory change with RBCA provisions has the City on record as a concerned stakeholder in the RBCA dialogue.

That concern derives from the reality of more than 200 ground water contamination cases in Albuquerque and Bernalillo County. Existing pollution has contaminated about 25 public supply wells and as many as 600 private wells. Thirty square miles of land area may overlie contaminated ground water. There are currently 155 leaking underground storage tank sites in the area, 87 that have contaminated ground water and 68 with soil contamination only.

Clearly, the City of Albuquerque has a keen interest in effective protection of the water resource of the area, including potential modifications to, and effective enforcement of, the New Mexico Underground Storage Tank Regulations. At this summer's public meeting regarding changes to the UST regs, Doug Earp spoke on behalf of Albuquerque's Environmental Health Department. The following is taken from his comments.

The New Mexico Environment Department has involved stakeholders on the front end of RBCA policy discussions. In the months since the City released its public statement, a productive dialogue has continued among stakeholders, including the City and the Department, over the form of New Mexico's approach to risk based corrective action at petroleum release sites. In July, three work groups were formed; the City is participating in two of those groups. Staff from the City and the UST Bureau have met and identified areas of flexibility. Tank Notes will continue to feature other issues concerning RBCA.

—Kathy Grassel, UNM Institute of Public Law,
and Anna Richards, NMED UST Bureau

BACKGROUND

Ground water is the sole source of drinking water for residents of the metropolitan area. The City of Albuquerque supplies water to approximately 470,000 people using a network of about 90 wells. Kirtland Air Force Base, UNM, New Mexico Utilities, Rio Rancho Utilities, Sandia Heights Water Utility and other community water supply systems operate several dozen large production wells. Additionally, there are several thousand private water supply wells, many of which are located within the Rio Grande inner valley.

The City and the County invested five years and more than \$1 million studying ways to best protect the quality of the ground-water resource. The process resulted in the development and adoption of the Albuquerque/Bernalillo County Ground-Water Protection Policy and Action Plan (GPPAP) in 1994. The goals of GPPAP are to protect the ground-water resource, find and clean up the contaminated ground water, and promote the coordinated protection and prudent use of the ground-water resource throughout the region.

Technical studies that formed the basis of GPPAP concluded that the three highest priority threats to the region's ground-water resource are underground storage tanks, hazardous materials and waste storage facilities, and on-site liquid waste disposal systems.

POLICY CONSIDERATIONS

Most of the ground water within the metropolitan area is classified as crucial. GPPAP addresses all potential sources of contamination and seeks to protect all ground water to drinking water standards and/or New Mexico Water Quality Control Commission (NMWQCC) standards, whichever is more stringent. GPPAP emphasizes the need to aggressively monitor water quality, identify parties responsible for contamination, and seek required funds and state-of-the-art technologies to remediate contamination.

The RBCA process as described in the standard written by ASTM would be a significant departure from the philosophy underlying GPPAP and current NMWQCC regulations in that it would allow soil and ground-water contamination in excess of current standards if it can be demonstrated that the associated human health risks are acceptable. ASTM's RBCA

Reclamation... naturally

by Patrick deGruyter, Geologist III, District I

Natural attenuation, biodegradation, intrinsic bioremediation - all terms for the continual, on-going, natural processes happening at virtually every site where a petroleum hydrocarbon release has occurred. Left alone, any petroleum hydrocarbon plume will eventually reach a state of dynamic equilibrium, where the rate of spread is held in check by the natural attenuation processes.

These processes are biological as well as physical and include mineralization of the petroleum hydrocarbon by indigenous bacteria as well as volatilization or vaporization, dilution, and sorption onto soil particles and the aquifer matrix. These processes work to destroy the contamination, contain or reduce its spread, or diminish the contaminant concentration. And they occur with or without the implementation of an engineered approach to cleaning up the problem.

The goal of any mechanical reclamation system is to change, that is, speed up, the rate at which these natural processes occur. That is a key concept we are beginning to grasp. The best engineered system is subject to the rate limits imposed by mother nature. The effects of these site specific natural barriers are first recognized at the point in the graph of the clean-up curve where the clean-up rate approaches asymptotic. By definition, asymptote implies an infinite period of time to achieve total removal of all contamination. As the saying goes, time is money. And the supply of money is finite.

A readily observed example of one of these natural barriers is seen at nearly every site where a soil vapor extraction system is used. Soil vapor extraction, or SVE, is a widely used technology for removing the volatile constituents of gasoline and other petroleum hydrocarbons from soils in the vadose zone. It involves application

of a vacuum to the contaminated soil and subsequent volatilization of the contaminant followed by the withdrawal and treatment, or in some cases direct discharge, of the resultant vapors. In the beginning, this process is flow-rate limited, meaning that the success of the effort is subject only to how quickly the system can move the greatest volume of vapors from the flow-responsive pore spaces. At some point, as the more volatile constituents decrease, flow begins to compete with rate of volatilization. Finally, diffusion becomes the limiting natural process. At this point, and because diffusion is concentration gradient driven, the system must be pulsed, or cycled, between ever increasing periods of shutdown, and ever decreasing periods of operation.

The growing number of confirmed petroleum hydrocarbon release sites coupled with the corresponding reduction in per-site dollars available for reclamation requires adoption of a new paradigm. We must plan for and quickly recognize the onset of natural limiting factors at a clean-up site and be prepared to shift to a more cost-effective next step. We will have to accept that technology may not hold a complete solution for every site. In the past, the target has been total clean-up of the contamination with the emphasis on how fast it could be achieved. This will always be the goal. But the emerging reality is that quick, complete removal of all contamination may not be possible at all sites using current or

reasonably foreseeable future technology. The most cost-effective and technically realistic strategy at many, if not all, sites will increasingly focus on removal of the larger portion of the contaminant source and natural attenuation of the remaining contamination. Nature can present insurmountable obstacles. Ask a few petroleum reservoir engineers. They'll tell you that you can never get it all out of the ground. •

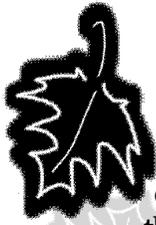


Leak o' the Week

Date	Report Person	Phone #
Nov 4-8	JaneCramer	841-9477
Nov 11-15	Kalvin Martin	841-9186
Nov 18-22	David Nye	841-9478
Nov 25-29	Norman Pricer	841-9465
Dec 2-6	Steve Jetter	841-9461
Dec 9-13	JaneCramer	841-9477
Dec 16-20	Kalvin Martin	841-9186
Dec 23-29	David Nye	841-9478

UST INSURERS

by Judy Flynn-O'Brien, UNM Institute of Public Law



Since the deadlines for meeting financial responsibility requirements have come and gone, we would like to assume that all owners or operators have the required third party coverage on their UST systems. We thought we would print an updated list of UST insurers just in case this is not a correct assumption. The list might also help tank owners and operators shopping for new insurance. (Insurers that offer UST pollution insurance but are not on the list should contact the *Tank Notes* Editor so they can be added.)

Agricultural Excess & Surplus Insurance Co. (AESIC), a surplus lines carrier within the Great American group of companies, offers either full coverage or just third party coverage. For information about the program, contact Crump Insurance Services at 800-888-7126.

The **American International Group (AIG)** has an insurance program called EnviroGuard available through member company, **Commerce & Industry**. Commerce & Industry is an admitted company whose policy forms and rates are approved by the state Insurance Department and which participates in the state insurance guaranty fund. Policies are available for either third-party-only or full coverage; the program no longer has a set minimum premium and has dropped its minimum deductible to \$5,000. Contact the Sedgwick James Co. in Pennsylvania for further information, 800-255-7112 or 717-763-7261.

CHUBB Group of Insurance Cos. targets non-marketers with its UST coverage, available through licensed CHUBB agents. Contact Mike Camfield at 908/903-2168.

The **Garage Services and Equipment Dealers Liability Association** is a risk purchasing group with a UST program underwritten by **Lloyd's of London**. (Homestead Insurance Co. is no longer participating.) Policies are available for either full coverage or just third party coverage. The minimum premium for a full coverage policy is \$1,000, plus fees. The mini-



mum deductible, or self-insured retention, is \$5,000. Inquiries can be directed to GSEDLAA at 800/845-3225 or 801/944-3218.

Lloyd's of London underwriters continue to offer a UST pollution program through The Planning Corporation, with either full or third-party-only coverage available. The minimum deductible level is generally \$25,000. For further information, contact TPC at 703/481-0200.

Tank Owners Insurance Co. of Texas, a risk retention group, continues to offer third party coverage for tanks in New Mexico to complement the state corrective action fund. The company is gradually entering the cleanup insurance market and is also working on becoming a mutual insurance company. For information about third party policies or the company's plans for the future, call TOIC at 800/336-1338 or 817/336-1336.

United Coastal Insurance Co. offers UST coverage geared toward the larger accounts, ranging from large petroleum dealers to school districts, with minimum premiums of \$20,000 per account. Call the company at 860/223-5000 for information.

Universal Underwriters makes corrective action and third party UST pollution coverage available as part of its insurance package for franchised auto, motorcycle and truck dealers, parts dealers and independent garages. Direct inquiries to the company at 800/262-3122.

Zurich-American Insurance Group offers both full and third-party-only coverage through a program handled by Pollution Liability United States (PLUS). Like the AIG program, Zurich policies are written on an admitted basis in New Mexico. The standard deductible is \$5,000 and there is no minimum premium. The program normally provides quotes within 24 hours of receipt of a completed application. Interested in working with agents, PLUS can be contacted at 800/866-4758 or 407/952-7080.

Corrosion Assessment and Cathodic Protection

By John French, Environmental Supervisor

There has been some concern and confusion about who can design and install corrosion protection (CP) system for USTs. This work must be performed by a person qualified as a "Corrosion Expert" according to 40 CFR §280.12 or the USTR §102.

The EPA Office of Underground Storage Tanks (OUST) Program defines a "Corrosion Expert" as someone who is:

- A registered professional engineer with licensing, including education/experience in corrosion control of buried metal piping systems and tanks,
- A person accredited or certified as qualified by National Association of Corrosion Engineers (NACE):
- Certified at level of Corrosion Specialist, or
- Certified at level of Cathodic Protection Specialist.

For testing of CP systems, the USTR requires a "CP Tester." The EPA OUST defines a "Cathodic

Protection Tester" as a person who is NACE certified as:

- certified at level of Senior Corrosion Technologist, or
- certified at level of Corrosion Technologist, or
- certified at level of Corrosion Technician under the direct oversight of the specialists, or
- technologists listed above.

After a CP system is installed, the USTR §501 requires that "All cathodic systems must be tested within six months of installation and at least every 3 years thereafter ..." Such testing must be performed by a CP Tester, as defined above.

The USTR §501(c) also requires that "UST systems with impressed current cathodic protection systems must also be inspected every 60 days to ensure the equipment is running properly." This inspection may be performed by a site owner/operator who logs the read-out status of the rectifier current controls into a log book every 60 days.

One more reason to upgrade now rather than later....

by Judy Flynn-O'Brien, UNM Institute of Public Law

Insurance policies offer one more reason to upgrade now rather than later. Upgrading now is "a tremendous win-win situation," according to Kathryn Martin of The Planning Corporation. "The difference in premium between a site with 20+ year old bare steel tanks and a new site could be several thousands of dollars."

Insurance agent Maggie Anderson has been selling UST pollution insurance in New Mexico since before anyone had heard of UST regulations. She agrees that there is a big difference in insurance premiums. Premiums depend on a number of factors but a new three-tank site might get third-party coverage for as low as \$750, with a \$5,000 deductible. The same site with bare steel tanks that are 20 years old or more might cost \$3,000 with a \$25,000 deductible.

Jim Titus of the Sedgwick James Co., which handles Commerce & Industry's UST insurance program, reports that the program sends information

on upgrading out with its renewal notices. Just relining can result in a 60 percent reduction in the base rate. Other companies agree that upgrading existing tanks results in lower insurance premiums. For tank owners obtaining insurance through the GSEDLAA risk purchasing group, relining can reduce rates by 25 to 35 percent. "It also makes the marginal risk acceptable," notes GSEDLAA underwriter Jack Franchow.

Making the risk acceptable to insurers can make the difference between tanks in compliance with the regulations and tanks not in compliance. The financial responsibility regulations require that owners or operators have corrective action and third party coverage on their tanks. While the state fund currently serves as an FR mechanism for corrective action, insurance is the means by which most owners and operators comply with the requirement that they demonstrate FR for third party claims.

Options for Corrosion Protection

by John French, Environmental Supervisor

To meet the December 22, 1998 nationwide requirements for corrosion protection of UST systems, you may:

1. Use tanks and piping made of noncorrodible materials, such as fiberglass, or enclosed in (jacketed with) noncorrodible materials, or
2. Use tanks and piping made of steel and coated with a corrosion-resistant coating in addition to some form of cathodic protection, or
3. Use a tank clad with a thick layer of noncorrodible material meeting the specifications of a ACT-100 tank (piping must be protected in another manner), or
4. Upgrade existing bare steel tanks by:
 - A. Adding cathodic protection to the tank, or
 - B. Adding an interior lining to the tank, or
 - C. A combination of both tank lining and cathodic protection.

Marketers and representatives for cathodic protection and tank lining have been invited to speak at all UST conferences in the last three years. The UST Bureau encourages questions, demonstrations, and discussions of all protection methods.

While there are proponents of adding solely cathodic protection or interior lining, the EPA and the New Mexico UST Bureau recommend that a combination of both cathodic protection and interior lining be applied to most existing bare steel tank systems. This recommendation applies to situations where there are advantages to adding this double-corrosion protection.

The assessment of your UST system will provide some information about how much corrosion protection your system needs. You may consider the following advantages and disadvantages of the two methods as you evaluate your UST system:

1. Double protection is more costly, but the USTs receive much more protection because both internal and external corrosion are controlled.
2. Adding only cathodic protection to marginal tanks (as assessed) has some risk that holes may already be present. External cathodic protection does not stop internal corrosion.
3. Tanks that are upgraded solely with tank lining require an internal inspection within ten years and every five years thereafter to assess the soundness of the lining.
4. When both tank lining and cathodic protection are applied to your tanks, the UST system is not required to have periodic inspections of the interior lining.
5. When used alone, tank lining does not stop external corrosion of the steel shell. Eventually the steel will not be strong enough to support the interior lining.
6. Whether your UST is singly protected by a cathodic system or doubly protected, the cathodic protection system must still be periodically tested and inspected, and records must still be kept.

Be sure to discuss the above issues with your service providers before making your upgrade modifications.



Note from the Inspector

Most tank gauging sticks come from the manufacturer with a plastic button on the end to help prevent the stick from splitting or wearing down on the end. If the button is missing, the tank measurements will be off at least 3/8". If you are doing monthly inventory control and reconciliation or using statistical inventory reconciliation (SIR) for your leak detection method, a short stick will consistently give you bad information -- and your leak detection method may not be as accurate as it should be. Please check those gauging sticks and replace the button if it is missing.
[Reprinted from UST News.]

Release Detection For Piping of Satellite Dispensers

by John Cochran, Environmental Scientist, District 1

Why does the Bureau regulate piping on satellite dispensers? Some people believe that our release-detection regulations belong in outer space, but when it comes to satellite fueling lines, the regulations are based firmly on this planet.

Satellite fueling is a method of simultaneously fueling tanks on both sides of a vehicle, usually a large truck. Tandem dispensers are located on each side of the fueling bay, which allows both saddle tanks to be fueled simultaneously. The majority of satellite fueling systems are located at truck stops.

In satellite systems, there is a pressurized product line that runs between the master and satellite dispensers. Because this line is under pressure, it must be equipped with an automatic line leak detector and must also have either an annual line tightness test or be monitored monthly using an approved method.

The line leak detector located on the submersible pump will not detect a leak in the satellite line because the leak detector will only “see” a leak as far as the solenoid valve in the master dispenser. If a

leak developed in the satellite line, it would go undetected.

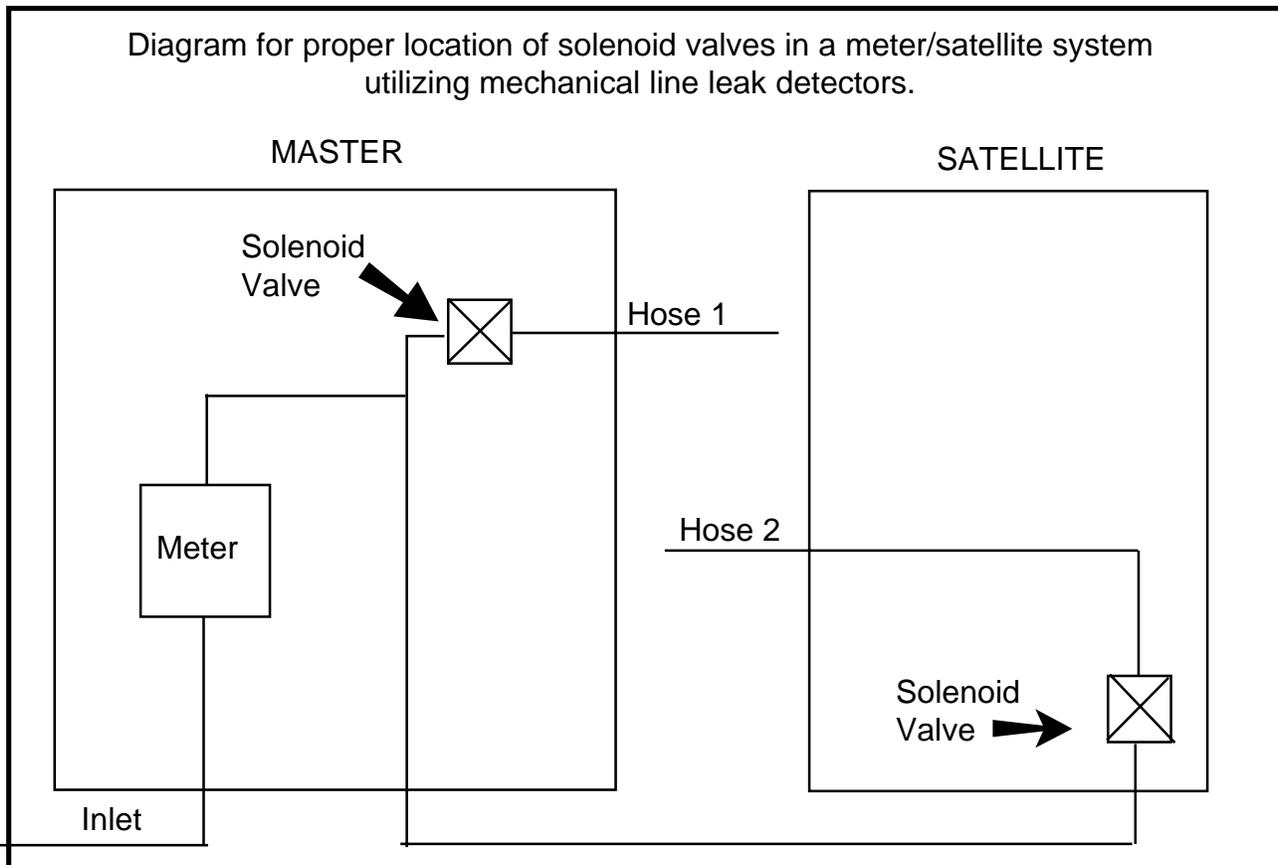
How, then, can a line leak detector be installed so that it will see both the master and satellite lines?

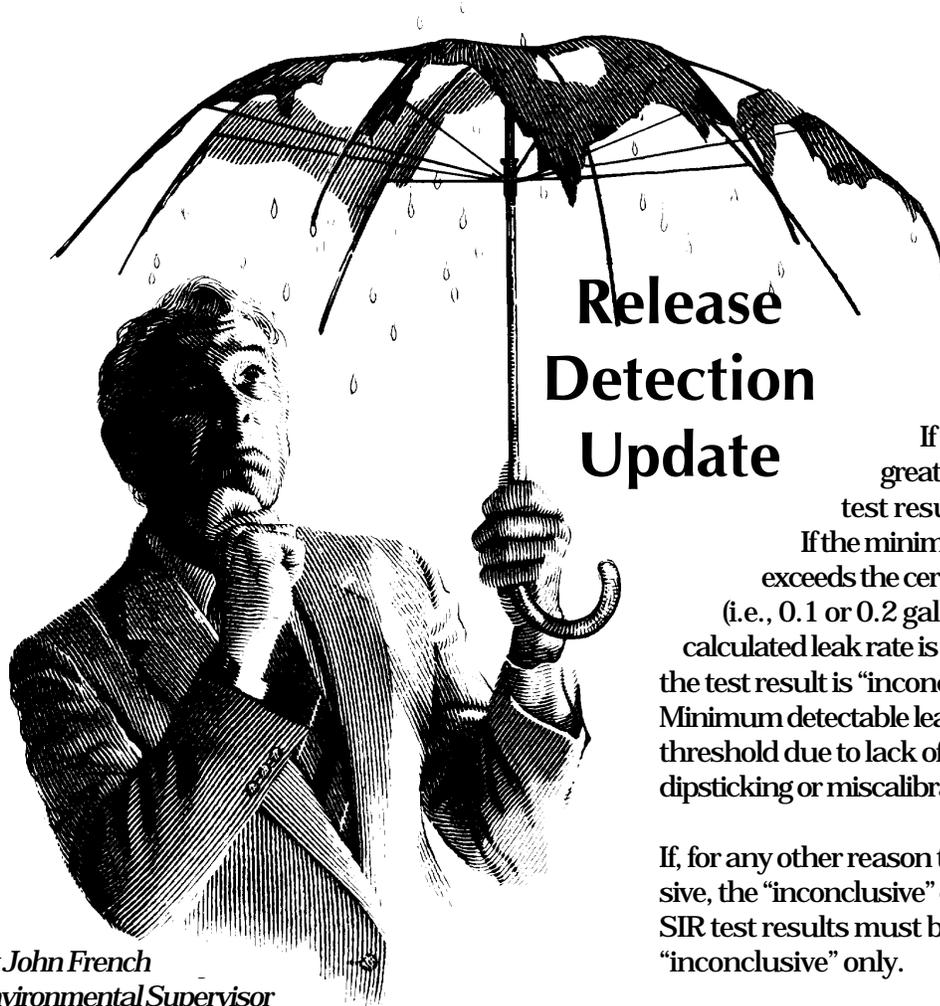
According to Red Jacket, a single mechanical line leak detector installed at the submersible pump can be utilized to provide leak detection in a master/satellite piping system by following these guidelines:

- Any solenoid valve that interrupts the flow to the underground satellite line must be removed.
- Separate solenoid valves may need to be installed in each dispenser of the piping system and wired according to state and local codes. The figure below shows where the solenoid valves should be located.

If your facility does not have Red Jacket line leak detectors, contact your local distributor or contact the manufacturer.

Contact your local Prevention/Inspection inspector with any questions concerning satellite piping release detection.





Release Detection Update

by John French
Environmental Supervisor

To promote standardized reporting of Statistical Inventory Reconciliation (SIR) results and correct interpretation of SIR results, the New Mexico Environment Department developed a form that SIR providers and tank owner/operators must use to comply with the reporting requirements of the New Mexico Underground Storage Tank Regulations (USTR). Effective January 1, 1997 all SIR test results must be reported on this form.

SIR providers give the monthly report to owner/operators, who must in turn give the information to the Underground Storage Tank Bureau upon request. The report must specify the SIR provider and version number.

SIR test results must report: 1) leak threshold; 2) minimum detectable leak rate; and 3) calculated leak rate for each tank every month. The test results must be reported as follows:

If the calculated leak rate is less than the leak threshold and the minimum detectable leak rate is less than or equal to the certified performance standard (i.e., 0.1 or 0.2 gallons per hour), the test result is "pass."

If the calculated leak rate is greater than the leak threshold, the test result is "fail."

If the minimum detectable leak rate exceeds the certified performance standard (i.e., 0.1 or 0.2 gallons per hour) and the calculated leak rate is less than the leak threshold, the test result is "inconclusive." Minimum detectable leak rates might exceed the threshold due to lack of reliable data (i.e., inaccurate dipsticking or miscalibrated meters).

If, for any other reason the test result is not conclusive, the "inconclusive" column must be marked. SIR test results must be reported as "pass," "fail," or "inconclusive" only.

Within 24 hours of receipt of a SIR report showing a failed test, the tank owner/operator must investigate the suspected release pursuant to Part VII of the NM USTR.

A conclusive result of "pass" or "fail" is required to meet the monthly release detection requirements. An inconclusive result in a 12-month period requires an alternate method of release detection for that period, such as a tank and line tightness test.

The tank owner/operator will be out of compliance with monitoring requirements if the form is not completed properly. It is the owner/operator's responsibility to choose a SIR provider whose reports meet these requirements.

If you have any questions regarding this article or to obtain copies of the form, please call Ruben Baca in Santa Fe at (505) 827-0188. The form also can be obtained at your local NMED Field Office.

Note From The Chief

We're Changing

To divert more of the Bureau's financial resources to cleaning up underground storage tanks, we're changing the way Tank Notes is produced. Beginning with the next issue, Tank Notes will no longer be published in conjunction with the Institute of Public Law. Instead, all writing and review will be done within the Environment Department. The goal of this move is to produce an equally good product for a lower price, allowing us to spend more of our budget fulfilling the Bureau's primary mission.

The NMED and the USTB wish to thank Kathleen Grassel and Judy Flynn-O'Brien from the Institute of Public Law for their tenure as producers of Tank Notes. This newsletter is one of the state government's premier publications, and they leave behind a long tradition of excellence.

I also wish to thank Dr. John French from the Albuquerque office, who has been the USTB editor for the last four years. In order to centralize production in Santa Fe, Nathan Wade, NMED Communications Director, will be the new editor. If you have ideas about how Tank Notes can serve you better, now is a great time to suggest them. Nathan's number is (505) 827-2855.

*J. David Duran
UST Bureau Chief*

USTB Internal Changes

Remember the old saying that the only thing that is constant is change? The UST Bureau is experiencing this phenomenon, even as we go to press.

David Duran has been appointed Bureau Chief. Duran has many years of experience as a manager in both the Air Quality and Solid Waste Bureaus, and the UST Bureau has already benefited from Mr. Duran's engineering expertise.

Jerry Schoeppner and Ruben Baca are Acting Program Managers of the Remedial Action and Prevention and Inspection Sections, respectively. The search for permanent managers continues.

Anna Richards is now in charge of a new section which has responsibility for planning and regulation development. Rose Barela has joined the Bureau as Administrative Secretary to the Prevention/Inspection Program. Steve Reuter was recently hired as a Geologist.

The following staff has recently left the Bureau:

Name	New Employer
Carmen Baca	NMED Air Quality Bureau
Dana Bahar	NMED Ground Water Bureau
Gregg Crandall	Private sector
chris holmes	NMED Superfund Program
Ray Montes	NMED Ground Water Bureau
Jack Ford	Energy, Minerals and Natural Resources Dept.
Tony Moreland	NMED Administrative Services Division
Shelda Sutton-Mendoza	Private Consulting
Roseanne Thompson	New Mexico State University

The Bureau's Financial Management Section has not been spared from changes. Gale Hill has accepted a position in the Human Services Department. Martin Rinaldi is currently serving as Acting Manager until a new permanent manager can be found. In addition, Bridget Spedalieri will be leaving the section, having accepted a position with the State Highway and Transportation Department.

The Department would like to thank these people for their many years of collective service and wish each well in their new endeavors. The Department is actively recruiting to fill these important vacancies and we will report on our progress in the next issue of *Tank Notes*.

TANK NOTES

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This newsletter is for the UST owner/operator population and is provided as a general information guide only. It is not intended to replace, interpret or modify manufacturers' protocols, or the rules, regulations or requirements of local, state or federal government, nor is it intended as legal or official advice. The opinions expressed in articles written by NMED staff and others are those of the authors and do not necessarily reflect those of NMED.

We welcome your comments and suggestions. Send address changes and correspondence to: New Mexico Environment Department, Underground Storage Tank Bureau, Harold Runnels Building, 1190 St. Francis Drive, P.O. Box 26110, Santa Fe, New Mexico 87502.

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TANK NOTES

STATE OF
NEW MEXICO
ENVIRONMENT
DEPARTMENT



... A Newsletter from
the Underground
Storage Tank Bureau

PUBLISHED BY THE NEW MEXICO ENVIRONMENT DEPARTMENT

VOL. 9, NO. 3

FALL 1996

UST/Marketers' Conference Big Success

by Ruben Baca, Acting Program Manager, Prevention and Inspection Section

The annual New Mexico Petroleum Marketers Association Conference was held in Ruidoso September 8-10. Their board meeting was held on Monday morning, September 9, and a new president was elected--Benny Hodges from Belen, New Mexico. The Trade Show kicked off at 9:00 a.m.

At the Monday luncheon, Lt. Governor Walter Bradley gave the keynote speech. The annual banquet was held that evening with outgoing president Charlie Hooker introducing the new president.

In conjunction with the annual NM Petroleum Marketers Association Conference, the 1996 Underground Storage Tank (UST) Conference kicked off at 1:30 on Tuesday, September 10 with a welcome from Secretary Mark Weidler, whose speech addressed "Moving Into the 21st Century."

Many seminars were conducted including options for upgrades, remediation by natural attenuation, ASTM standards, release detection, how to survive a compliance inspection, reimbursement, and new regulatory initiatives.

There were approximately 350 attendees at both conferences and there was a lot of good interfacing, communication and suggestions. Continuing Education credits will be awarded to eligible attendees.

The UST Bureau wishes to thank all of the speakers who participated in the conference without whom it would not have been such a success. Next year's conference is tentatively scheduled to coincide with the NMPMA conference in Ruidoso again.

Everyone who attended this year knows, "DON'T WAIT UNTIL 1998."

Overfill protection a must for overall pollution prevention

by Mark Weidler, NMED Secretary

Those of you who attended the joint Environment Department UST/Marketers' Conference in early September heard my challenge to emphasize pollution-prevention efforts. All of the December 22, 1998 upgrade requirements are aimed at eliminating releases from tanks and associated product-delivery equipment.

Those of us who work in the regulatory agencies have come to recognize that historically, a significant percentage of contamination at UST sites has originated from overfills of tanks. We cannot let this experience continue into the 21st century. The costs are too high.

The weakest link in our product-delivery system between the rack and a consumer's gas tank is the transport truck and its operator. Possession of a CDL ensures a trained driver, but not a trained fuel dispenser to USTs. This is currently an unregulated activity.

We urge the industry to step to the plate and set standards of training and performance to ensure that overfill protection and containment are not defeated by untrained or uncaring drivers. The high cost of cleaning up after overfills is identical to the high cost of cleaning up releases from tank and piping failures.

We challenge your industry to step forward and voluntarily address this issue in New Mexico.