

TANK NOTES

STATE OF
NEW MEXICO
ENVIRONMENT
DEPARTMENT



... A Newsletter from
the Underground
Storage Tank Bureau

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SPRING 1998

Tank Owners, Contractors and Manufacturers Share Strategies for the 1998 Upgrade Deadline

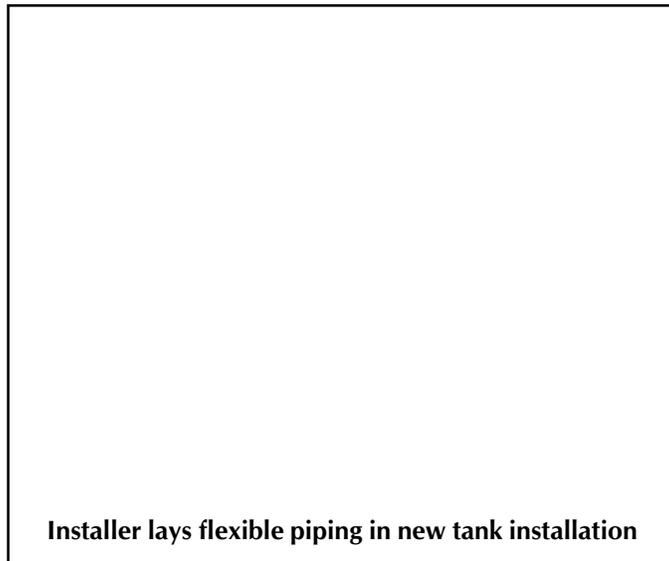
by John Cochran, Prevention/Inspection Section, USTB

How does the regulated community view the 1998 upgrade program for underground storage tanks? We asked several contractors, tank owners, and equipment manufacturers that question. Here are their answers.

We first spoke with Sid Jenkins, Branch Manager for D & H Pump Service, and Steve Turner, Division Manager for Eaton Sales & Service, to get the installation contractor's point of view.

Both Sid and Steve said that their firms are busy responding to phone calls, doing paperwork, and preparing bids for new systems and upgrades. "Every week gets busier," says Sid. Currently, both firms can fit work into their schedule, but some weeks are already beginning to fill. What if an owner waits until late summer or fall to schedule an upgrade? Both companies will try to work them in, but it will be difficult. "Some doors may be closed by then," says Steve. Whether you are planning on upgrading, replacing, or removing your tanks this year, please contact your contractor as soon as possible.

Contractors are not yet experiencing delays due to a shortage of equipment from suppliers, but orders are coming in faster each week, according to manufacturers.



Installer lays flexible piping in new tank installation

Neither D & H Pump Service nor Eaton Sales & Service plans on hiring additional staff to meet the last-minute demand. Steve Turner says, "People are in a comfort state now, but the sooner they talk to a contractor and come forward the better off they will be." His advice is don't wait until later in the year when contractor availability may be a problem.

Rising prices may be a problem also. When contractors have more work

than they can handle, they may bid high, expecting, even hoping, not to get the job. But if all the certified installers employ that strategy as December approaches, the winning bids could become uncomfortably high.

We spoke with four tank owners regarding their view of the upgrade deadline: Gary Steele, President of Rio Grande Oil, a petroleum marketer; Lora Davis, Environmental Manager for Ever-Ready Oil, a petroleum jobber; Jerry Soos, owner of Holiday Park Conoco; and Felix Rabadi, President of Rabadi Oil Inc. Gary's and Lora's companies each own a number of facilities, while Jerry and Felix own "mom and pop" operations.

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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.

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All four owners feel that the upgrade requirements are necessary to protect the environment. "It is important to protect the water in this area," says Felix. Spill and overflow prevention were considered the most important upgrades, with cathodic protection a distant second. Lora and Jerry feel that cathodic protection is a "harder sell" requirement than the other two. Lora has seen a number of tanks removed after 15 to 20 years in the ground, displaying little or no corrosion. Jerry believes that soils in the state should first have been tested for corrosiveness, and cathodic protection only be required in areas having corrosive soils. Jerry thinks that "cathodic protection should not have been a blanket policy." [Ed. note: Cathodic protection is required by EPA.]

All four agreed that owners have been given adequate time to upgrade their facilities. As Gary says, "Ten years is an appropriate amount of time for the amount of work that needed to be done." When asked if the December 22, 1998, deadline should be extended, everyone except Felix answered, "Absolutely not!" They prefer to see the same rules apply to all owners, whether they upgraded eight years ago or waited until 1998. On the other hand, Felix feels that small owners should be given an extension so they can obtain financing and complete their upgrades, and he wishes the state could have created a mechanism such as a low-interest loan from the Bureau's Corrective Action Fund. He believes that an extension is needed to keep small owners in business. Gary wishes that New Mexico could have worked with financial institutions to put together a low-cost lending program to fund upgrades.

How do the owners decide what facilities to upgrade and how to pay for the upgrades? For Gary and Lora, the answer was a question of economics: what is the volume of gas sold at the facility, and will it pay for the upgrade? If the answer to the second part is yes, the site receives a first-class upgrade. If not, then the company must ask if the facility has a long-term financial plan that will keep the site open for at least five or ten years. The answer helps these owners decide whether or not to do the minimum amount of upgrading required to keep the facility open past 1998. If not, plans are made to shut down by December 22, 1998.

Although both Gary and Lora prefer to upgrade their facilities using operating capital, Ever-Ready Oil has a working line of credit they can use. Jerry and Felix used their own money. Jerry says that he would have upgraded earlier if he could have afforded it, but he first had to save enough money.

We also spoke with Tim Kreider, the general manager of K & S Service Center, a "mom and pop" facility. Tim feels that the 1998 upgrade requirements are justified and he does not support an extension of the deadline. Nevertheless, after examining all of the possibilities available to him, Tim has decided to remove his underground storage tank for kerosene because of the cost of meeting the upgrade requirements. He plans to install an aboveground storage tank.

All owners believe that the upgrades are a good idea and will put everyone on a level playing field. As Jerry says, "Everyone should have to bear the same burden." Gary thinks those who won't meet the deadline will have made a conscious choice not to meet it.

Gary thinks it is important for owners to know what's in the UST Bureau facility files about the construction details of the UST systems at their facilities. For example, if you have new fiberglass lines and the state database shows you have steel lines, you do not actually need corrosion protection for lines; but the state would assume you do need it. So be sure the state has the latest information about your USTs. Gary also thinks that the bureau should make a priority of checking the upgrade status of all the facilities in the state. [Ed. note: In fact, in March the Bureau sent certified letters to owners of facilities where state records indicate that all UST systems are not yet upgraded asking how they intended to meet the December 1998 deadline. An accurate response to that letter will help ensure that the bureau does have correct information about your facility.]

How are the equipment manufacturers handling the approaching upgrade deadline? Ray Hodges, the Rocky Mountain Regional Manager for Red Jacket Petroleum Equipment, says that Red Jacket has anticipated the demand for both pumps and leak detection equipment by adding another shift at their production plant. He does not expect any equipment shortages but is concerned that there will not be enough certified installers to meet the last-minute demand.

What can we conclude about the upcoming deadline from this series of interviews? First of all, don't count on last-minute scheduling for an upgrade or installation. The schedules are filling up fast. Second, don't be surprised if the low bid is higher than you expected. Third, ten years was sufficient time to upgrade, and the EPA is not intending to extend the deadline. Finally, ensure that the records on file with the UST Bureau for your facilities are correct. Your site may already meet the upgrade requirements but the bureau may not know it. Respond to the bureau's questionnaire to confirm the details of your system and to tell the state your plans for dealing with the December 22, 1998 upgrade deadline.

Tank registrations to expire December 22 if not in compliance

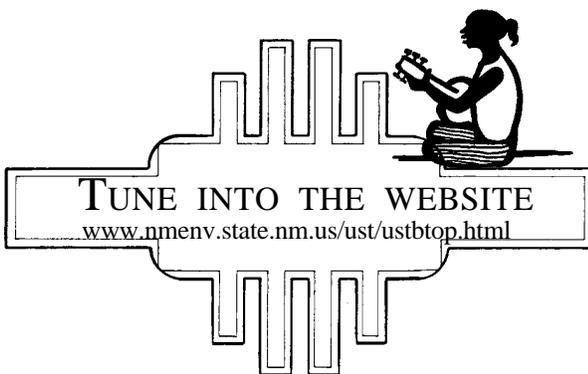
by J. David Duran, UST Bureau Chief

If your tanks are not in compliance with the December 22, 1998, standards by the deadline, your registration certificate for that facility will expire on that date. To avoid this, demonstrate to the UST Bureau that you have achieved compliance at all your facility's UST systems. Do this as soon as the systems are upgraded or replaced. All tank owners and operators have

been notified of this change in registration with the annual billing sent out in May 1998. In order to ensure that registration of your tanks continues after the December 1998 deadline, please contact your area inspector with the Prevention /Inspection Program to confirm you have achieved compliance.

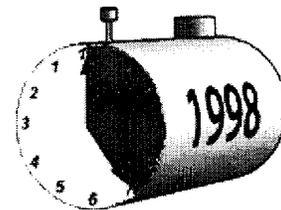
What's new at the UST Bureau website

Provided by Jenny Smith, Database Administrator



- Results of State Lead Site Monitoring Well Sampling
See <http://www.nmenv.state.nm.us/ust/sltests.html>
- Standardized Format for Quarterly Monitoring Report
See <http://www.nmenv.state.nm.us/ust/quartermon.html>
- Winter 1998 Tank Notes, Postscript Format
See <http://www.nmenv.state.nm.us/ust/tanknote.html>
- January 1998 UST Committee Meeting Minutes
See <http://www.nmenv.state.nm.us/ust/ustcmin.html>

MAY 22 -
JUNE 21,
1998



THE END IS NEAR.
COUNTING DOWN
TO DECEMBER 98

Improvement made to Corrective Action Fund tracking process

by Jim Najima, Manager,
Financial Management Program, USTB

In an effort to accurately post claims and invoices to the proper project and to expedite the review process, effective April 15, 1998, a unique work plan identification number and a unique site identification number are being supplied on all work plan approval letters. Historically, the work plan approval date, amount and facility identification number were used to track the requests for reimbursements. Through the use of a unique numeric identifier, combined with a unique site identifier, all parties involved may ensure the proper assignment of claims or invoices to the proper work plan. Work plan identification numbers will allow the remediation project manager, consultant, owner/operator and the Financial Management Program the ability to quickly and accurately communicate which phase and task is being requested for payment. Look for the Site ID # and the Work Plan ID# on your work plan approval letter, and make sure you include them in your claim or invoice to speed up the payment process.

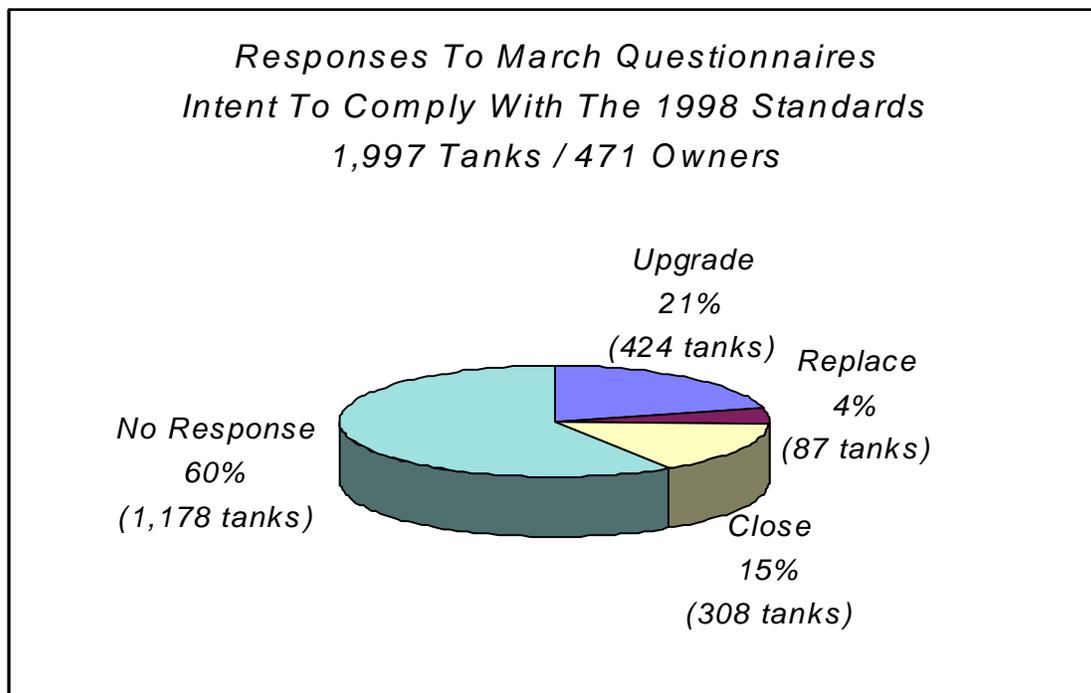
Note from the Chief

J. David Duran, UST Bureau Chief

Thanks to all the owners and operators who recently responded to a certified letter advising us of how you intend to comply with the 1998 upgrade standards. The questionnaire was sent to owners and operators identified in the Bureau's records as not yet being in compliance. Of the number responding, approximately 50% of tanks will be upgraded or replaced and 40% will be closed. The remaining 10% are already in compliance and will require verification by our field inspectors. The response was limited, as over one half of the owners and operators identified as not currently in compliance failed to respond. The pie chart below provides a summary of the responses.

On April 6, 1998, Department Secretary Mark Weidler received another letter from EPA Administrator Carol Browner indicating that EPA does not intend to extend the December 22, 1998 deadline. With approximately seven months left until December 22, 1998, we still have approximately 2,300 tanks which need to be brought into compliance. I would encourage owners and operators whose tanks are among these to upgrade, replace or close the tanks by December 22.

Tanks in use after December 22, 1998 need to be equipped with spill containment, overfill protection and corrosion protection. Please advise me or a member of the Prevention and Inspection Program if there is anything we can do to help you in your efforts.



JUNE 22 -
JULY 21

THE END IS NEAR.
COUNTING DOWN
TO DECEMBER 98

Source control and monitored natural attenuation work for forest fires and LUST sites

by Patrick DeGruyter, Team Leader, Remedial Action Program. USTB

Source control and monitored natural attenuation are technical terms for a commonly used, problem-solving strategy. These methods, taken together, are rapidly gaining favor as the most cost-effective option for cleaning up contamination at leaking underground storage tank (LUST) sites.

Consider the forest fire, a common enough occurrence in the arid Southwest. Although relatively few people ever get close enough to one to feel its intense heat or witness the flames and destruction, the effects of a forest fire are experienced by many. The airborne particulates generated by the fire can travel tens to hundreds of miles or more from the source. This smoke and ash plume obscures visibility and makes the air less breathable over an area much larger than the area consumed by the blaze. The degradation of the air can be a serious public health and aesthetic concern, and the strategy in every instance for addressing this environmental degradation is to control and ultimately extinguish the fire (the source) while the wind, rain, and gravity work to clean the smoke and ash plume. Human effort and natural processes work together to return the air quality to its pre-fire conditions.

At LUST sites, it is the actual or potential degradation of ground water that is of concern. And while it is this concern that drives the effort to clean up these sites, a simple analysis reveals that only the tiniest fraction of the contaminant mass at a typical site is actually tied up in the dissolved phase. Most of the contaminant mass is in the soil, and leaching through this mass is what contaminates the ground water. Volatilization from the mass causes toxic and explosive vapors. It becomes apparent then that the key to a successful ground water reclamation or impact prevention strategy is control of the contaminant source.

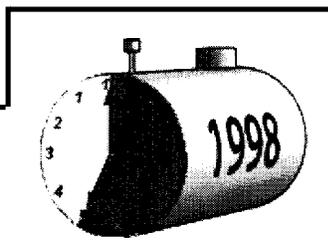
Source control is not just another name for dig-and-haul. While physical removal, including excavation of contaminated soil or removal of phase-separated hydrocarbon (PSH), may be a common approach, there are others. In-situ treatment methods also exist. Soil vapor extraction is a standard in-situ method of source control. It is frequently used in combination with air sparging. A less common approach would be containment measures directed at the source, such as physical or hydraulic control of a PSH

accumulation. The common thread to all is the focus of the remediation effort on the contaminant mass. Control the source and then let the continually occurring natural attenuation processes work to stabilize and then decrease the extent and magnitude of the ground-water contaminant plume emanating from the source area. This has been demonstrated at many LUST sites here in New Mexico.

Source control measures should be evaluated for all sites where remediation is required, but it is especially important where monitored natural attenuation (MNA) is being considered as the remediation strategy or as a component of the remediation strategy. Monitoring is required to track progress of the remediation and to identify changes in site conditions that may require a change in remediation strategy. An MNA approach must give consideration to and define a reasonable time frame for achieving site-specific remediation goals. Controlling the contaminant source directly affects the remediation time line and can therefore be used as a mitigating technique when the time frame would otherwise be unreasonable.

When evaluating the role of source control in a site remediation strategy, a number of contaminant and site-specific factors should be considered. These factors include information about the contaminant mass, site-specific hydrogeology, current and potential site use, and potential receptors. Source control may not be appropriate at some sites. At others, source control may be limited to removal of PSH. At shallow ground water sites, excavation and treatment or disposal of the contaminated soil may be the preferred source control technique. At deeper ground water sites, an in-situ source control method such as soil vapor extraction may be the most effective option.

Underground Storage Tank Bureau staff considered the role of source control during recent meetings held to formulate proposed changes to the New Mexico Underground Storage Tank Regulations. Proposed changes include provisions designed to ease approval of expedited source removal when contamination is discovered while removing underground storage tank systems. In practice, this will generally mean sites where ground water is shallow and the contaminated soil is within practicable excavation depth. At other sites, source control will be considered as part of the comprehensive site remediation plan. The goal is to control the source when it is most opportune and in a manner that is cost-effective, practical, and environmentally responsible.



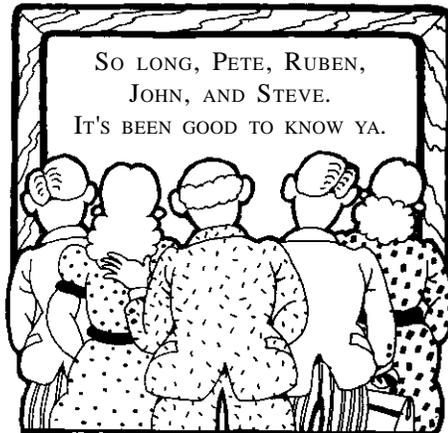
JULY 22 - AUG. 21, 1998
THE END IS NEAR.
COUNTING DOWN TO DEC 98

Leak o' the Week

Report releases to the following staff during working hours. For emergencies during evenings and week-ends, call the NMED emergency number, 827-9329.

Jun 1 - Jun 5	Rita Alexander	841-9349
Jun 8 - Jun 12	David Nye	841-9478
Jun 15 - Jun 19	Christian Carlsen	827-2914
Jun 22 - Jun 26	Lorena Goerger	827-0110
Jun 29 - July 3	Norman Pricer	841-9189
July 6 - July 10	Steve Jetter	841-9461
July 13 - July 17	Tom Leck	841-9479
July 20 - July 24	Brian Salem	827-2926
July 27 - July 31	Jane Cramer	841-9477
Aug 3 - Aug 7	Lisa Schall	827-2916
Aug 10 - Aug 14	Rita Alexander	841-9349
Aug 17 - Aug 21	David Nye	841-9478
Aug 24 - Aug 28	Christian Carlsen	827-2914
Aug 31 - Sept 4	Lorena Goerger	827-0110
Sept 7 - Sept 11	Norman Pricer	841-9189
Sept 14 - Sept 18	Steve Jetter	841-9461
Sept 21 - Sept 25	Tom Leck	841-9479
Sept 28 - Oct 2	Brian Salem	827-2926
Oct 5 - Oct 9	Jane Cramer	841-9477
Oct 12 - Oct 16	Lisa Schall	827-2916
Oct 19 - Oct 23	Rita Alexander	841-9349
Oct 26 - Oct 30	David Nye	841-9478

Bureau staff changes



Pete Maggiore, Director of Environmental Protection Division, resigned from the Department on June 15. He is now Director of the Science and Technology Division of the state's Economic Development Department.

Ruben Baca, John French, and Steve Huddleson have recently moved on to other career opportunities. Until the positions can be filled, John Cochran is serving as Acting Manager of the Prevention/Inspection Program (827-2910) and Stephen Reuter is serving as Acting Manager of the Remedial Action Program, (827-2566). All of these positions will be filled as soon as possible.

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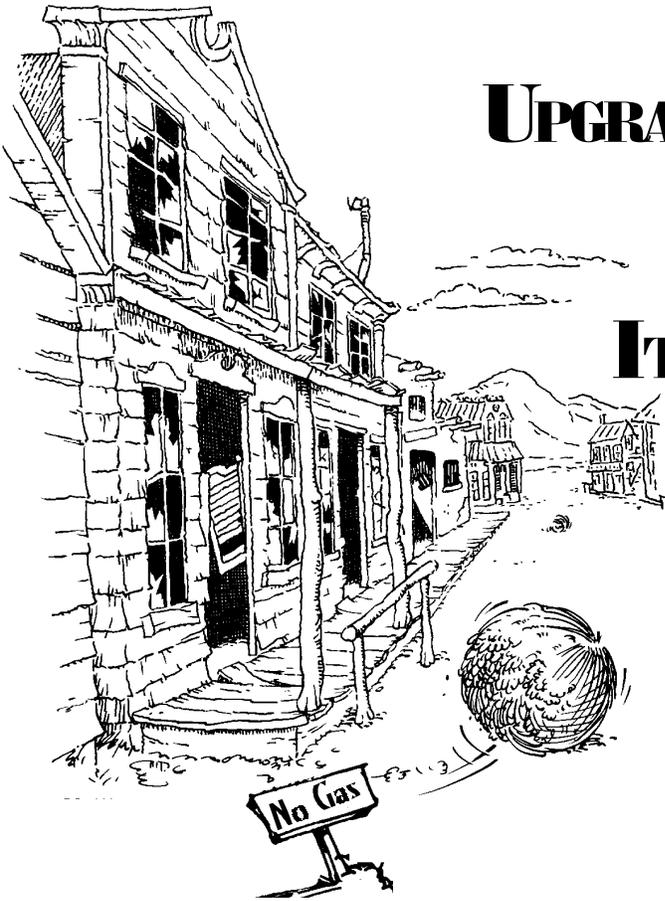
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