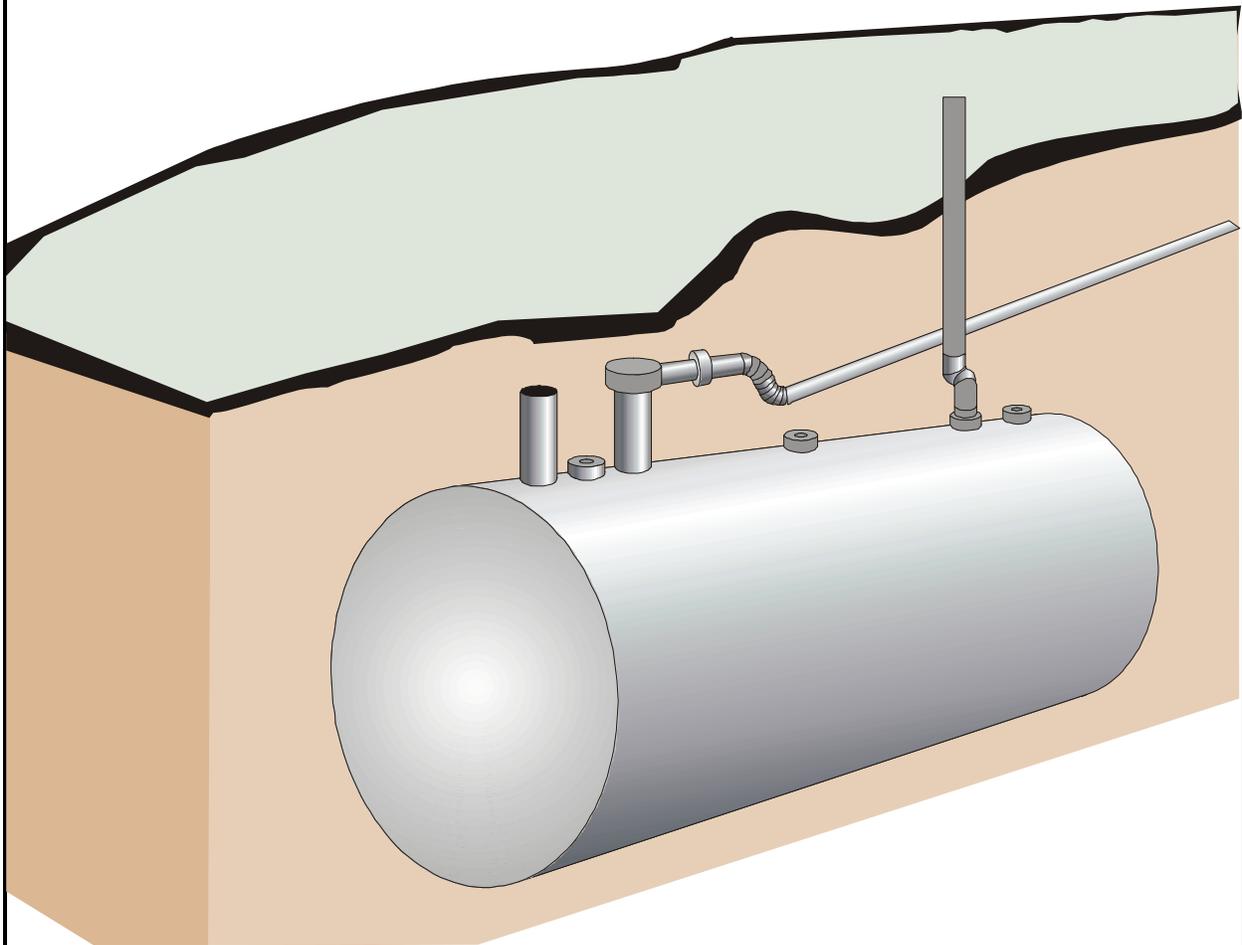




**U.S. DEPARTMENT OF ENERGY**

**Final  
Compliance Status Report  
for Existing Underground  
Storage Tanks (USTs)  
December 22, 1998**





Department of Energy  
Washington, DC 20585  
December 22, 1998

Ms. Carol Browner  
Administrator, U.S. Environmental Protection Agency  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Ms. Browner:

As requested at your November 24, 1998 meeting with Federal agencies, and in the December 2, 1998 letter from Sylvia K. Lowrance, Principal Deputy Assistant Administrator, enclosed is the "Final Compliance Status Report for Existing Underground Storage Tanks (UST)," for the Department of Energy.

Questions concerning the enclosed report may be directed to Thomas Traceski, Office of Environmental Policy and Assistance at (202) 586-2481.

Sincerely,

David Michaels, PhD, MPH  
Assistant Secretary  
Environment, Safety and Health

cc:  
C. Hooks, EPA  
M. Kenderdine, DOE

Enclosure

**FINAL  
COMPLIANCE STATUS REPORT  
FOR EXISTING UNDERGROUND STORAGE TANKS**

## **1. Executive Summary**

Ten years ago the U.S. Environmental Protection Agency (EPA), issued Underground Storage Tank (UST) Regulations (40 CFR Parts 280 and 281) in accordance with Subtitle I of the Resource Conservation and Recovery Act (RCRA). Section 280.21, "Upgrading of Existing UST Systems," states that USTs installed before December 22, 1988 (existing USTs) must be in full compliance with all regulatory requirements by December 22, 1998.

On December 2, 1998, the U.S. Department of Energy (DOE) received a correspondence from Sylvia K. Lowrance, Principal Deputy Assistant Administrator, EPA requesting that all federal agencies submit: (1) a draft status report to Craig Hooks, Director, Federal Facilities Enforcement Office, by December 10, 1998: and, (2) a final status report due to EPA Administrator Carol Browner by December 22, 1998. DOE submitted a draft status report as specified, and this "Final Compliance Status Report for Existing Underground Storage Tanks," fulfills the second part of EPA's request.

Since the enactment of Subtitle I (1984), DOE has made a substantial effort to bring over 1000 existing USTs into compliance in order to meet the December 22, 1998 deadline. Responding to a memorandum from the Under Secretary of Energy, Ernest Moniz, "Underground Storage Tank Compliance" (see Appendix A), and a survey of over 100 DOE and DOE contractor personnel, DOE facilities across the complex have indicated that existing USTs have been upgraded, replaced or closed in compliance with federal and, where applicable, more stringent state requirements. Table 1, "Summary Status Report: Existing Underground Storage Tanks at DOE Facilities," describes DOE's overall response to EPA's request. As the Table shows, *all* existing USTs at DOE facilities are compliant with the December 22, 1998 requirement. Part 5 of this report, "Compliance Status," presents an inventory of USTs at 112 DOE facilities.

## **2. Underground Storage Tank Provisions and Compliance Deadline**

According to these regulations (40 CFR 280.21), existing USTs must be in full compliance with applicable regulatory requirements by December 22, 1998. By this date, all existing USTs must meet one of the following conditions:

- ▶ be upgraded to provide proper protection against spills, overfills, and tank corrosion;
- ▶ be replaced with new USTs that meet prescribed performance standards; or
- ▶ be temporarily or permanently closed.

**Table 1.**  
**Summary Status Report:**  
**Existing Underground Storage Tanks at DOE Facilities**

EXISTING UST STATUS	I. OPERATIONS OFFICES	II. SPECIAL PURPOSE OFFICES	III. POWER MARKETING ADMINISTRATIONS	TOTALS
<b>a. As of Dec. 22, 1988</b>	983	52	124	1,159
<b>b. Permanently closed</b>	872	50	90	1,012
<b>c. Upgraded</b>	53	1	0	54
<b>d. Replaced<sup>1</sup></b>	37	1	28	66
<b>e. Temporarily closed</b>	8	0	0	8
<b>f. Met standard as of Dec. 22, 1988<sup>2</sup></b>	14	0	6	20
<b>g. Not compliant as of Dec. 22, 1998</b>	0	0	0	0

<sup>1</sup> Replaced (d) - represents existing USTs that were replaced with new USTs. This category is different from the "New" UST category in Table 2, "Inventory of USTs: List of DOE Offices, Site-Specific Contacts, and Status." The "Additional New USTs" category in Table 2 identifies new USTs installed separate from those that replaced existing USTs.

<sup>2</sup> This category includes existing USTs that were compliant as of December 22, 1988 and did not need to be upgraded, replaced, or closed.

### 3. DOE Outreach

In anticipation of this regulatory deadline, the Office of Environmental Policy and Assistance (EH), assisted DOE facilities with the proper interpretation and compliant implementation of UST requirements in a number of ways. First, EH prepared several technical documents including a comprehensive guidance entitled "Regulated Underground Storage Tanks," and five topical documents (Information Briefs). Second, in 1994 and 1995, EH developed a workshop called "Underground Storage Tank Leak Detection" that specifically discussed and emphasized the December 22, 1998 provisions. Third, EH hosted a Federal UST workgroup over a two year period where this issue was extensively discussed with participating federal facilities. Fourth, in October 1997, EH sent a notice to DOE field elements entitled "Upgrading of Existing Underground Storage Tank Systems," describing this upcoming compliance milestone. Fifth, earlier this year, EH prepared a discussion paper "1998 Compliance Deadline for Underground Storage Tank Systems," which was made available to the field on the EH web site and which was published as an article in "Synergy" and "EnviroWatch, both DOE publications. Finally, this information was made available on the EH web site at <http://tis.eh.doe.gov/oepa>, which also provides users with a link to the EPA UST page.

#### **4. Report Methodology**

Programs and operations that are part of the DOE mission are managed through a decentralized organization with: ten operation offices across the nation that oversee national laboratories, processing plants, and pilot projects; ten special purpose offices that include energy efficiency and renewable energy programs, Naval petroleum reserves, Naval reactors, strategic petroleum reserves, the Yucca Mountain Site Characterization project, and the Waste Isolation Pilot Project; and, finally five power marketing administrations such as Bonneville and Southeastern Power Administrations. Each of these offices and power administration serves as line management for environment, safety and health programs at the 112 facilities under their purview, which includes serving as owner and/or operator of USTs at their facilities.

To complete the survey and prepare this final report, UST specialists at all of these DOE offices had to be identified and contacted. EH: (1) prepared a memorandum, "Underground Storage Tank Compliance," from Under Secretary of Energy, Ernest Moniz (Appendix A), for complex-wide distribution to inform and gather information requested by EPA for the final status report, and (2) identified and notified by phone responsible UST personnel throughout the DOE complex to ascertain the current compliance status of existing USTs at DOE facilities for the final status report. Information from all of these facilities was gathered from phone conversations, fax messages, and e-mails; entered on a questionnaire (Appendix B); and reported in Table 2.

For the final status report, EH relied on telephone numbers and contacts appearing in the Office of Field Management publication titled, "Department of Energy Field Fact Book," (May 1998), as supplemented by "Energy Efficiency and Renewable Energy Functional Directory" (February 1998). Beginning on December 2, 1998, EH systematically identified and telephoned the appropriate contact at each major operations office, special purpose office, and power marketing administration. The office and site-specific information gathered from our survey can be found in the next section.

#### **5. Compliance Status**

This report indicates that DOE made a substantial effort to bring hundreds of existing USTs into compliance over the past ten years in order to meet the upcoming December 22, 1998 deadline. For this report, over 100 people were identified (specified UST contacts are listed in the table below), who provided information for this final report. In discussing the status of the existing USTs, all of these contacts indicated that, based on information available to them, their existing USTs have been upgraded, replaced, or closed and are in compliance with federal and, where applicable, more stringent state UST requirements. *All* existing USTs throughout the DOE complex will meet the December 22, 1998 requirement.

The following Table 2, "Inventory of USTs," contains information gathered from these interviews. The Table identifies the DOE facility contacted, the respective UST point-of-contact and affiliation, and compliance status of USTs at their facility. The "Status" column summarizes seven (7) questions asked by EPA with the DOE response. These questions are as follows:

- a. The total number of existing USTs in operation at this facility as of December 22, 1988?
- b. Over the past ten years, number of existing USTs permanently closed at your facility?
- c. Over the past ten years, number of existing USTs upgraded at your facility?
- d. Over the past ten years, number of existing USTs replaced with new USTs at your facility?
- e. How many existing USTs are/will be temporary closed by December 22, 1998?
- f. How many existing USTs in operation on December 22, 1998 will **not** be in compliance? Explain plans to bring this UST into compliance (including schedule and budgetary commitments).
- h. Over the past ten years, number of "new" (other than those in "d." above) USTs installed at this facility?

[Note: existing USTs that met the December 22, 1998 standards and did not require modification are identified as "g" in the status column.]

**Table 2 -- Inventory of USTs: List of DOE Offices, Site-Specific Contacts, and Status**

DOE Office	Contact	Phone/Fax/E-mail	Status
<b>I. OPERATIONS OFFICES</b>			
<p>1. Albuquerque Operations Office, NM</p> <ul style="list-style-type: none"> <li>• Carlsbad Area Office/Waste Isolation Pilot Project, NM</li> <li>• Grand Junction Project Office, CO</li> <li>• Kansas City Plant, MO</li> <li>• Los Alamos National Laboratory, NM</li> <li>• Monticello Mill Tailings Site, UT</li> <li>• Pantex Plant, TX</li> <li>• Sandia National Laboratory, NM &amp; CA                             <ul style="list-style-type: none"> <li>- Holloman Air Force Base</li> <li>- Kauai Test Facility, HI</li> <li>- Tonopah Test Range, NM</li> <li>- Kirtland Air Force Base, NM</li> </ul> </li> </ul>	<p>Skip Harrell Environmental Protection Division</p>	<p>Phone: (505) 845-4300 Fax: (505) 845-6714 E-mail: wharrell@doeal.gov</p>	<p>g. As of Dec. 22, 1988: 197 h. Permanently closed: 188 i. Upgraded: 6 j. Replaced: 2 k. Temporarily closed: 0 l. Not in compliance: 0 m. Met standard: 1 n. Additional "New" USTs: 5</p>
<p>2. Chicago Operations Office, IL</p> <ul style="list-style-type: none"> <li>• Ames Laboratory, IA</li> <li>• Argonne National Laboratory-East, IL</li> <li>• Argonne National Laboratory-West, ID</li> <li>• Brookhaven National Laboratory, NY</li> <li>• Environmental Measurements Laboratory, NY</li> <li>• Fermi National Accelerator Laboratory, IL</li> <li>• New Brunswick Laboratory, IL</li> <li>• Princeton Plasma Physics Laboratory, NJ</li> </ul>	<p>Kaushik Joshi Safety and Technical Services Division</p>	<p>Phone: (630) 252-4226 Fax: (630) 252-2835 E-mail: Kaushik.Joshi@ch.doe.gov</p>	<p>a. As of Dec. 22, 1988: 93 b. Permanently closed: 65 c. Upgraded: 7 d. Replaced: 13 e. Temporarily closed: 6 f. Not in compliance: 0 g. Met standard: 2 ----- h. Additional "New" USTs: 5</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>3. Idaho Operations Office, ID</p> <ul style="list-style-type: none"> <li>• Idaho Chemical Processing Plant, ID</li> <li>• Central Facility Area, ID</li> <li>• INEEL Research Center, ID</li> <li>• Radioactive Waste Management Complex, ID</li> <li>• Specific Manufacturing Capabilities Complex, ID</li> <li>• Test Area North, ID</li> <li>• Test Reactor Area, ID</li> <li>• Waste Reduction Operation Complex, ID</li> <li>• Idaho Falls Facility, ID</li> </ul>	<p>Bob Starck Office of Program Executions Scientific Engineering and Technical Support Division</p>	<p>Phone: (208) 526-1122 Fax: (208) 526-0553 E-mail: Starckra@id.doe.gov</p>	<p>a. As of Dec. 22, 1988: 206</p> <p>b. Permanently closed: 178</p> <p>c. Upgraded: 4</p> <p>d. Replaced: 19</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 5</p> <p>-----</p> <p>h. Additional "New" USTs: 16</p>
<p>4. Nevada Operations Office, NV</p> <ul style="list-style-type: none"> <li>• Amador Valley Operations, CA</li> <li>• Los Alamos Operations, NM</li> <li>• Nevada Test Site, NV</li> <li>• North Las Vegas Facilities, NV</li> <li>• Remote Sensing Laboratory, NM</li> <li>• Special Technologies Laboratory, CA</li> <li>• Washington Aerial Measurements, VA</li> </ul>	<p>Debra Howard Environment, Safety and Health Division</p>	<p>Phone: (702) 295-1760 Fax: (702) 295-1455 E-mail: Howard@NV.DOE.gov</p>	<p>a. As of Dec. 22, 1988: 131</p> <p>b. Permanently closed: 126</p> <p>c. Upgraded: 3</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 1</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 1</p> <p>-----</p> <p>h. Additional "New" USTs: 3</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>5. Oak Ridge Operations Office, TN</p> <ul style="list-style-type: none"> <li>• East Tennessee Technology Park, TN</li> <li>• Oak Ridge Institute for Science and Education, TN</li> <li>• Oak Ridge National Laboratory, TN</li> <li>• Paducah Gaseous Diffusion Plant, KY</li> <li>• Portsmouth Gaseous Diffusion Plant, OH</li> <li>• Weldon Spring Site, MO</li> <li>• Y-12 Plant, TN</li> <li>• Thomas Jefferson National Accelerator Facility, VA</li> </ul>	<p>Marty Atkins Operations Division</p>	<p>Phone: (423) 576-3995 Fax: (423) 574-4724 E-mail: atkinsem@oro.doe.gov</p>	<p>a. As of Dec. 22, 1988: 30</p> <p>b. Permanently closed: 22</p> <p>c. Upgraded: 5</p> <p>d. Replaced: 3</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>
<p>6. Oakland Operations Office, CA</p> <ul style="list-style-type: none"> <li>• Energy Technology Engineering Center, CA</li> <li>• Ernest Orlando Lawrence Berkeley National Laboratory, CA</li> <li>• Lawrence Livermore National Laboratory, CA</li> <li>• Stanford Linear Accelerator Center, CA</li> <li>• Laboratory for Energy-Related Health Research, CA</li> </ul>	<p>Steve Black Environment, Safety and Health</p>	<p>Phone: (510) 637-1595 Fax: (510) 637-2078 E-mail: steve.black@oak.doe.gov</p>	<p>a. As of Dec. 22, 1988: 108</p> <p>b. Permanently closed: 97</p> <p>c. Upgraded: 6</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 5</p> <p>-----</p> <p>h. Additional "New" USTs: 11</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>7. Ohio Field Office, OH</p> <ul style="list-style-type: none"> <li>• Ashtabula Environmental Management Project, OH</li> <li>• Columbus Environmental Management Project, OH</li> <li>• Fernald Environmental Management Project, OH</li> <li>• Miamisburg Environmental Management Project, OH</li> <li>• West Valley Demonstration Project, NY</li> </ul>	<p>Lydia Boada-Clista Compliance Division</p>	<p>Phone: (937) 865-4164 Fax: (937) 865-4402 E-mail: lydia.boada-clista@em.doe.gov</p>	<p>a. As of Dec. 22, 1988: 26</p> <p>b. Permanently closed: 25</p> <p>c. Upgraded: 1</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>
<p>8. Richland Operations Office, WA</p> <ul style="list-style-type: none"> <li>• Hanford Site, WA</li> <li>• Pacific Northwest National Laboratory, WA</li> </ul>	<p>Alex Teimouri Environmental Assurance, Permits and Policy Division</p>	<p>Phone: (509) 376-6222 Fax: (509) 376-0306 E-mail: Alex_E_Teimouri@rl.gov</p>	<p>a. As of Dec. 22, 1988: 66</p> <p>b. Permanently closed: 65</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 1</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 12</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
9. Rocky Flats Field Office, CO  <ul style="list-style-type: none"> <li>• Rocky Flats Environmental Technology Site, CO</li> </ul>	Norma Castaneda ER/WM Projects Group	Phone: (303) 966-4226 Fax: (303) 966-4728 E-mail: norma.castaneda@rfets.gov	a. As of Dec. 22, 1988: 24 b. Permanently closed: 24 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 0 ----- h. Additional "New" USTs: 5
10. Savannah River Operations Office, SC  <ul style="list-style-type: none"> <li>• Savannah River Ecology Laboratory, SC</li> <li>• Savannah River Site, SC</li> <li>• Savannah River Technology Center, SC</li> </ul>	David Roberts Environmental Quality and Management Division	Phone: (803) 725-3751 Fax: (803) 725-1440 E-mail: david-p.roberts@srs.gov	a. As of Dec. 22, 1988: 102 b. Permanently closed: 82 c. Upgraded: 20 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 0 ----- h. Additional "New" USTs: 0



DOE Office	Contact	Phone/Fax/E-mail	Status
3. Golden Field Office, CO  <ul style="list-style-type: none"> <li>• National Renewable Energy Laboratory, Golden, CO (NREL)</li> </ul>	Karen Harness Environment Safety and Health (ES&H)	Phone: (303) 275-4743 Fax: (303) 275-4788 E-mail: karen_harness@nrel.gov	a. As of Dec. 22, 1988: 2 b. Permanently closed: 2 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 0 ----- h. Additional "New" USTs: 0
4. Naval Petroleum Reserves in California (NPR-CA)	Jim Killen Planning and Program Analysis	Phone: (805) 282-3005 Fax: (805) 282-3072 E-mail: jkillen@nprc.doe.gov	a. As of Dec. 22, 1988: 0 b. Permanently closed: 0 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 0 ----- h. Additional "New" USTs: 0

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>5. Naval Petroleum Reserves in CO, Utah, and Wyoming (NPR-CO, UT, &amp; WY)</p> <ul style="list-style-type: none"> <li>• Naval Oil Shale Reserve No. 1, CO</li> <li>• Naval Oil Shale Reserve No. 2, UT</li> <li>• Naval Oil Shale Reserve No. 3, CO</li> <li>• Naval Petroleum Reserve No. 3, WY</li> <li>• Rocky Mountain Oil Field Testing Center</li> </ul>	<p>Lorri Jackson Environment, Safety and Health Division</p>	<p>Phone: (307) 437-9641 Fax: (307) 437-9623 E-mail: dam@caspars.net</p>	<p>a. As of Dec. 22, 1988: 3</p> <p>b. Permanently closed: 3</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>
<p>6. Office of Science and Technical Information (OSTI), TN</p>	<p>Bill Edmonds Resource Management</p>	<p>Phone: (423) 576-3382 Fax: (423) 576-2865 E-mail: Bill.Edmonds@ccmail.osti.gov</p>	<p>a. As of Dec. 22, 1988: 1</p> <p>b. Permanently closed: 0</p> <p>c. Upgraded: 1</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>7. Pittsburgh Naval Reactors Office, PA</p> <ul style="list-style-type: none"> <li>• Bettis Atomic Power Laboratory, PA</li> <li>• Naval Reactor Facility, ID</li> </ul> <p>Schenectady Naval Reactors Office, NY</p> <ul style="list-style-type: none"> <li>• Knolls Atomic Power Laboratory, NY</li> <li>• Knolls Atomic Power Laboratory, CT</li> <li>• Kesselring Site, NY</li> </ul>	<p>John McKenzie NAVSEA-08</p>	<p>Phone: (703) 602-8229 Fax: (703) 602-5324 E-mail: N/A</p>	<p>a. As of Dec. 22, 1988: 23</p> <p>b. Permanently closed: 22</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 1</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>
<p>8. Strategic Petroleum Reserve Project Management Office (SPRO)</p> <ul style="list-style-type: none"> <li>• Bayou Choctaw, LA</li> <li>• Big Hill Facility, TX</li> <li>• Bryan Mound, TX</li> <li>• Weeks Island, LA</li> <li>• West Hackberry Facility, LA</li> </ul>	<p>Daneen Farrow Environment, Safety and Health Division</p>	<p>Phone: (504) 734-4721 Fax: (504) 734-4950 E-mail: daneen.farrow@spr.gov</p>	<p>a. As of Dec. 22, 1988: 9</p> <p>b. Permanently closed: 9</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
9. Yucca Mountain Site Characterization Office (YMSCO), NV	Scott Wade Site Operations Division	Phone: (702) 794-5459 Fax: (702) 794-5467 E-mail: scott_wade@ymp.gov	a. As of Dec. 22, 1988: 0 b. Permanently closed: 0 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 0 ----- h. Additional "New" USTs: 0

DOE Office	Contact	Phone/Fax/E-mail	Status
<b>III. POWER MARKETING ADMINISTRATIONS</b>			
1. Alaska Power Administration (APA) <ul style="list-style-type: none"> <li>• Snettisham, AK</li> </ul>	Rodney Adelman Administrator	Phone: (202) 586-2008 Fax: (202) 586-9147 E-mail: rodney@wapa.gov	a. As of Dec. 22, 1988: 4 b. Permanently closed: 2 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 2 ----- h. Additional "New" USTs: 0
2. Bonneville Power Administration (BPA) <ul style="list-style-type: none"> <li>• Boise, ID</li> <li>• Burley, ID</li> <li>• Idaho Falls, ID</li> <li>• Missoula, MT</li> <li>• Portland, OR</li> <li>• Redmond, OR</li> <li>• Seattle, WA</li> <li>• Spokane, WA</li> <li>• Walla Walla, WA</li> </ul>	Larry Purchase Pollution Prevention and Abatement	Phone: (503) 230-3768 Fax: (503) 230-7591 E-mail: lkpurchase@bpa.gov	a. As of Dec. 22, 1988: 90 b. Permanently closed: 60 c. Upgraded: 0 d. Replaced: 28 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 2 ----- h. Additional "New" USTs: 0

DOE Office	Contact	Phone/Fax/E-mail	Status
<p>3. Southeastern Power Administration (SEPA)</p> <ul style="list-style-type: none"> <li>• GA-AI-SC System</li> <li>• Cumberland System, TN,KY</li> <li>• Kerr-Philpott System, VA, NC</li> <li>• Jim Woodruff System, FL, GA, AL</li> </ul>	<p>Tony Truett Power Resources</p>	<p>Phone: (706) 213-3800 Fax: (706) 213-3884 E-mail: tonyt@sepa.fed.us</p>	<p>a. As of Dec. 22, 1988: 0</p> <p>b. Permanently closed: 0</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>
<p>4. Southwestern Power Administration (SWPA)</p> <ul style="list-style-type: none"> <li>• Springfield, MO</li> <li>• Jonesboro, AR</li> <li>• Gore, OK</li> <li>• Tupelo, OK</li> <li>• Tulsa, OK</li> </ul>	<p>Bob Orr Division of Acquisition, Property, and Environment</p>	<p>Phone: (417) 891-2668 Fax: (417) 891-2693 E-mail: orr@swpa.gov</p>	<p>a. As of Dec. 22, 1988: 1</p> <p>b. Permanently closed: 1</p> <p>c. Upgraded: 0</p> <p>d. Replaced: 0</p> <p>e. Temporarily closed: 0</p> <p>f. Not in compliance: 0</p> <p>g. Met standard: 0</p> <p>-----</p> <p>h. Additional "New" USTs: 0</p>

DOE Office	Contact	Phone/Fax/E-mail	Status
5. Western Area Power Administration (WAPA) <ul style="list-style-type: none"> <li>• Billings, MT</li> <li>• Loveland, CO</li> <li>• Phoenix, AZ</li> <li>• Folsom, CA</li> <li>• Salt Lake City, UT</li> <li>• Montrose, CO</li> <li>• Bismarck, ND</li> <li>• Huron, SD</li> <li>• Watertown, SD</li> <li>• Fort Peck, MT</li> </ul>	Bill Karsell Corporate Services Office, Environment Office	Phone: (303) 275-1720 Fax: (303) 275-1727 E-mail: karsell@wapa.gov	a. As of Dec. 22, 1988: 29 b. Permanently closed: 27 c. Upgraded: 0 d. Replaced: 0 e. Temporarily closed: 0 f. Not in compliance: 0 g. Met standard: 2 ----- h. Additional "New" USTs: 3



**The Under Secretary of Energy**  
Washington, DC 20585  
December 8, 1998

MEMORANDUM FOR HEADS OF FIELD ELEMENTS

FROM: ERNEST J. MONIZ

SUBJECT: Underground Storage Tank Compliance

Recently, Administrator Carol Browner, Environmental Protection Agency (EPA), announced the Agency's enforcement strategy for the upcoming underground storage tank (UST) compliance deadline. The EPA strategy emphasizes actions EPA and States will take to implement the UST requirements that will go into effect on December 22, 1998, and stipulates additional information needed on Federal facilities compliance. By this deadline, USTs installed before December 22, 1988, that are not already protected against corrosion, spills, and overfills must be upgraded, replaced, or properly closed (either permanently or temporarily).

The UST regulations, promulgated by EPA on September 23, 1988, under the authority of Subtitle I of the Resource Conservation and Recovery Act, are aimed at preventing leaks from underground storage tanks that could contaminate groundwater and thus pose a threat to drinking water supplies. Under EPA's regulations, UST owners/operators have had 10 years to come into compliance. Over this period the Office of Environment, Safety and Health has issued to Departmental elements comprehensive guidance<sup>1</sup> on UST requirements, and memoranda describing the upcoming UST compliance deadline.<sup>2</sup>

In order for the Department to ensure that it is in compliance with the December 22, 1998, deadline and to assemble the information called for in the EPA enforcement strategy, Heads of Field Elements are directed to provide the following:

- Certification of compliance with the December 22, 1998, milestone for upgrading, replacing, or properly closing existing USTs under your purview. Alternatively, certification of temporary closure for sub-standard USTs and compliance plan with schedule and budgetary commitment to upgrade, replace, or permanently close them.
- Inventory of USTs subject to the aforementioned compliance deadline, to include the number, capacity, material stored, status as to upgraded, replaced or closed (either permanently or temporarily), and whether UST is subject to a compliance agreement with State or Federal regulators.

This information is to be submitted to the Office of Environment, Safety and Health with copies to your respective Secretarial Officers by December 15, 1998. In addition, please report by December 10, 1998, using data available as of that date, to Mr. Thomas Traceski, Office of Environment, Safety and Health, Office of Environmental Policy and Assistance, at (202) 586-2481 or FAX (202) 586-3915 on the status of compliance efforts, for the purpose of providing a brief status report requested by EPA by that date.

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<sup>1</sup> Regulated Underground Storage Tanks (USTs) Guidance, July 1992 (DOE/EH-231-004); Identifying and Classifying an UST Information Brief, February 1993 (DOE/EH-231-012a); Excluded and Deferred USTs Information Briefs, May 1993 (DOE/EH-231-12b&c); Petroleum and Hazardous Substance USTs Information Briefs, January 1994 (DOE/EH-231-12d&e).

<sup>2</sup> EH-413 Memorandum dated October 15, 1997, Subject: "Upgrading of Existing Underground Storage Tank (UST) Systems.

**QUESTIONNAIRE FOR  
EXISTING UNDERGROUND STORAGE TANKS  
(EACH FACILITY)**

**A. General Information**

- 1. Facility: \_\_\_\_\_
- 2. Contact Name: \_\_\_\_\_  
Organization: \_\_\_\_\_  
Phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail: \_\_\_\_\_

**B. Underground Storage Tank Systems at this Facility**

- 3. The total number of existing USTs at this facility as of December 22, 1988?  
(USTs for which installation began on or before December 22, 1988 are defined as "existing" under see 40 CFR 280.12)  
# \_\_\_\_\_
  - 4. Over the past ten years, number of existing USTs permanently closed at this facility?  
# \_\_\_\_\_
  - 5. Over the past ten years, number of existing USTs upgraded at this facility?  
# \_\_\_\_\_
  - 6. Over the past ten years, number of existing USTs replaced with a *new* USTs at this facility?  
# \_\_\_\_\_
  - 7. How many existing USTs are/will be temporary closed by December 22, 1998?  
(Specify if this UST will be permanently closed, upgraded or replaced w/ a *new* UST )  
# \_\_\_\_\_
  - 8. How many existing USTs in operation on December 22, 1998 will **not** be in compliance?  
Explain plans to bring this UST into compliance (including schedule and budgetary commitments).  
# \_\_\_\_\_
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9. Over the past ten years, number of "new" USTs installed at this facility?  
(*New UST means a tank system...for which installation has commenced after December 22, 1988 (see 40 CFR 280.12)*).

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***C. Headquarters Contacts***

Please fax this form to Thomas Traceski or Jerry DiCerbo, RCRA/CERCLA Division, EH-413 at (202) 586-3915. If you have any questions please contact us by:

- Calling at (202) 586-2481 or (202) 586-5047, respectively;
- Faxing messages to (202) 586-3915; or
- Communicating electronically, via Internet, to  
“[thomas.traceski@eh.doe.gov](mailto:thomas.traceski@eh.doe.gov)” or [gerald.dicerbo@eh.doe.gov](mailto:gerald.dicerbo@eh.doe.gov).

The U.S. Environmental Protection Agency (EPA) has requested a final compliance status report early next week. Therefore, your immediate attention to this matter is requested. Thank you.