

**MEMORANDUM  
STORAGE TANK PROGRAM  
WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY**

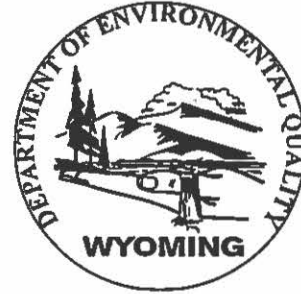
TO: Todd Parfitt, Director

THRU: Luke Esch, Administrator  
Karen Halvorsen, STP Manager *KE*

FROM: Oma Gilbreth, STP Compliance Supervisor *OG*

DATE: November 16, 2015

SUBJECT: City West  
STP Facility Number 0-004301  
NOV Docket Number 5624-15



The City of Gillette owns City West, located at 611 North Exchange Avenue, Gillette, Wyoming. The facility has two underground storage tanks (USTs). The USTs were installed on May 31, 1995, and a minimum site assessment (MSA) has not been performed. Failure to perform an MSA at sites where the tanks are between 18 and 20 years old is a violation of Wyoming Water Quality Rules and Regulations, Chapter 17.

The STP sent reminder letters to the City on November 5, 2012; October 11, 2013; and February 23, 2015, reminding the City that an MSA was due sometime between May 31, 2013, and May 31, 2015. An inspection report dated December 20, 2012, also reminded the City that the MSA was becoming due. A Letter of Violation was sent to the City on November 10, 2015. A compliance inspection was completed on November 13, 2015, and the inspector notified the shop foreman that the MSA was past due. The attached NOV and Order orders the City to complete the MSA field work by July 1, 2016. The City will have 30 days after receipt of data to submit the results to the STP.

Wyoming Water Quality Rules and Regulations Chapter 17, Section 29(a)(ii) states:

*“Unless the site is already listed as a contaminated site, all UST owners and/or operators which have not previously performed a MSA shall perform a MSA. This MSA shall be performed no sooner than eighteen (18) years, and no later than twenty (20) years, after the tanks were installed, at the owners and/or operators expense. This requirement applies to all USTs installed after September 22, 1988.”*

Because the tanks at City West were installed in May of 1995, the site is not on the contaminated site list, the City has been notified numerous times of the MSA requirement, and the City of Gillette has not performed an MSA, the STP requests that you sign the attached NOV.