

Converse County Airport Board

P.O. Box 774

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Steven D. Good - Manager

October 2, 2000.

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Wyoming Department of Environmental Quality
Chairman of the Environmental Quality Council
Room 1714, Herschler Building, 1W
122 West 25th Street
Cheyenne WY 82002

Terri A. Lorenzon, Director
Environmental Quality Council

RE: Notice of Violation, Docket Number 3221-00

Dear Sir,

In reference to your certified letter dated September 20, 2000 regarding our underground storage facility #0-000792. Converse County Airport wishes to appeal this ruling, and on their behalf I would like to give you a little background information as well as respond to the items addressed in your letter.

The DEQ letter dated February 19, 1998 states that the Converse County Airport was "in compliance with all aspects of the Wyoming Underground Storage Tank Program". Prior to the letter from the DEQ, we had solicited bids from CorrPro and CGRS to install an impressed current system in our fuel farm. However, a follow-up phone call with Mr. Dlug made on October 12, 1998 in which I was told the Converse County Airport was in compliance, we assumed no further action needed to be taken. (Copy of the DEQ letter is attached.)

Our next correspondence from the DEQ was in letter form dated March 2, 2000 from Mr. Robert Lucht. Mr. Lucht stated our facility was in violation of the Wyoming Water Quality Rules and Regulations, specifically that we must convert to a different monthly monitoring system of leak detection within a 60 day time frame, and that our method of corrosion protection did not meet with DEQ requirements. (Copy of the DEQ letter is attached.)

On March 7, 2000, we received a Notice of Inspection from Mr. Robert Lucht stating he would perform a leak detection inspection of our facility on March 21st to determine compliance with the the Wyoming Environmental Quality Act, Water Quality Rules and Regulations. During the inspection, Mr. Lucht checked our inventory records, and stated we need to proceed with the cathodic protection system we had checked into in 1997, and have our tanks tested again. I told Mr. Lucht that our airport operates on funding received from the county and at this time our budget would not handle the expense involved in the installation of an impressed current system and a new monthly monitoring system. I did state that we were preparing the budget for FY 2000/01 and the funding could be requested, although approval of our budget by the County Commissioners would not be given until July. Mr. Lucht stated we would be allowed to wait until after that time to proceed with the installation projects. (Copy of the DEQ letter is attached.)

Since the date of the inspection, Eaton Metal performed a test on the underground storage tank anodes on April 5th. The results showed the JetA tank (#3) tested at -.90 and the 100LL tank (#4) tested at -.80. Eaton stated there appeared to be a continuity problem between the two tanks and suggested we contact a corrosion engineer and recommended the company, RustNot from Idaho. Over the course of several months and numerous conversations with Mr. Bill Specklemer of RustNot, he was unable to coordinate a visit to our facility. Our next step was to contact CorrPro and West-Tech Systems from Montana to proceed with the impressed current system. We have since signed an agreement with West-Tech from Billings MT to design and install an impressed current system according to all current DEQ requirements, with work to commence October 5th and completion expected within 2 weeks of start date. (Copy of Eaton results and West-Tech contract is attached.)

We are also in the process of signing an agreement with Eaton Metal from Casper WY for the purchase of an automatic tank gauging and line monitoring system. It is the Simplicity program designed by Veeder-Root. This system will be installed according to all current DEQ requirements.

And finally, regarding the annual registrations for our facility, all registrations have been sent to your office in accordance with DEQ rules and regulations. The registration for fiscal year 2001 was delayed as we were unable to contact the firm that has done our tank tightness testing for the last several years. We contacted Ann with your Cheyenne office and Mr. Lucht and were told we could wait until the test was completed and then submit the registration or we could send it in with 'pending' written in the test date space. We completed the annual registration and sent it to the state office on October 3rd. The testing of the line leak detectors will be performed by West-Tech Systems at the time they install the impressed current system. The results will be sent to the DEQ as soon as they become available to us. (Copies of all registrations are attached.)

From the beginning, The Converse County Airport has made every effort to be in compliance with the Wyoming Department of Environmental Quality, and we are currently in the process of implementing all systems recommended by the DEQ. We are now asking by way of this written petition to appeal the Notice of Violation order and hearing.

If you need any additional information or have any questions, please feel free to contact me.

Sincerely,

Steven D. Good - Airport Manager
Converse County Airport

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