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RESPONSE TO COMMENTS
RECEIVED BEFORE FEBRUARY 22, 2008
DRAFT CHAPTER 17

Terri A. Lorenzon, Director
Environmental Quality Council

Comment 1: Comment 1 is contained in the letter from Secor International Corporation that is attached to this response. The essence of their comment is that there is no need to complete a monitor well during a Minimum Site Assessment unless the well penetrates groundwater.

Response 1: The Department accepts the comment and proposes that Chapter 17, Section 29 (c) (iv) (B) and Chapter 17, Section 29 (c) (v) (A) should be changed as follows:

Chapter 17, Section 29 (c) (iv) (B):

"For boreholes, at least one borehole shall be advanced to the ground water table or a maximum of thirty (30) feet below ground surface, whichever is first. ~~This boring shall be completed as a monitor well.~~ At least one borehole shall be completed as a monitor well whenever groundwater is encountered during the drilling. For soil excavations, the maximum excavation depth shall be fifteen (15) feet below ground surface."

Chapter 17, Section 29 (c) (v) (A): "Monitor Wells.

(A) All boreholes that penetrate the ground water table shall be completed as monitor wells or abandoned in accordance with this part and the approved work plan. ~~If ground water is not encountered, at least one (1) borehole will be advanced to a maximum depth of thirty (30) feet and completed as a monitor well.~~

Comment 2: The commenter expressed concern about the availability of tracer tests now that Praxair has stopped offering these tests. Chapter 17, Part D, Section 14 (f) (iii) should be modified to eliminate this requirement. The full text of this comment can be seen in the attached letter from CGRS.

Response 2: The department accepts the comment and proposes that Chapter 17, Section 14 (f) (iii) be changed as follows:

"(f) *Petroleum USTs with a throughput of less than 15,000 gallons per month.* Notwithstanding any other provision of this chapter, owners and/or operators of USTs with a throughput of less than 15,000 gallons per month may use inventory control as a monthly monitoring technique provided that:



October 25, 2007

Mr. Robert Lucht
Wyoming Department of Environmental Quality
122 West 25th Street
Herschler Building 4-W
Cheyenne, WY 82002

Subject: Release Detection Requirements—Tracer Tight® Testing

Dear Mr. Lucht:

I am writing to express my concern about the Tracer Tight® testing requirements listed in the Wyoming Department of Environmental Quality Water Quality Rules and Regulations, Chapter 17, Part D §14 (f) (iii).

This part addresses leak detection requirements for petroleum underground storage tanks (USTs) with a throughput of less than 15,000 gallons per month. Part D §14 (f) (iii) states "that a tracer survey is accomplished once every five years...."

My concern is that the availability of a "tracer" test has become severely limited. The only third party approved tracer type test is owned by Praxair Tracer Research. They have traditionally provided their test through an national affiliate network. It is our understanding that currently there are no Tracer affiliates operating in the Rocky Mountain region. It is also our understanding that Praxair Tracer Research has scaled back overall operations to some degree.

Therefore I urge you to reconsider the above referenced requirement. It is my opinion that verbiage should be changed to allow any type of third party approved, precision 0.1 gallon per hour test to be conducted on the fuel system every five years.

Thank you for the opportunity to express my concerns about this issue. If you have any questions or need additional information I can be reached at 800-288-2657.

Sincerely,

Tim Goodrich
CGRS, Inc.



SECOR
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INCORPORATED

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October 10, 2007

Mr. Sterling Roberts
Wyoming Department of Environmental Quality
510 Meadowview Drive
Lander, Wyoming 82520-2958

RE: Castle Rock Hospital District Minimum Site Assessment Work Plan
1445 Uinta Drive
Green River, Wyoming
Wyoming DEQ UST Facility 0-004234

Dear Mr. Roberts:

On the behalf of our client Castle Rock Hospital District, SECOR International Incorporated (SECOR) is providing this letter to obtain clarification for and a better understanding of actual requirements associated with inconsistencies between the Wyoming Department of Environmental Quality (WDEQ) Water Quality Division Storage Tank Program *Guidance Document Number 1 Minimum Site Assessments* (the Guide), and Chapter 17 of the WDEQ Water Quality Rules and Regulations (the Regulations).

On September 4, 2007, SECOR submitted a Work Plan for Minimum Site Assessment at the property listed above (the Site). Based on the preliminary WDEQ review of the Work Plan, the inconsistencies between the Guide and the Regulations were identified. The inconsistencies include but are not limited to:

- 1) The Regulations under Part F, Section 29, paragraph (c) MSA Performance and Information Requirements, subparagraph (iv) Borehole/Soil Excavation Completion Requirements (B), require the installation at least one boring into groundwater or to a maximum of thirty (30) feet below ground surface, which ever is first. Additionally, the Regulations require this boring to be completed as a monitoring well, whether groundwater is encountered to this depth or not.
- 2) The Guide does not mention the 30 foot boring requirement if groundwater above this maximum depth is not encountered. Additionally, the Guide does not mention the installation of a monitoring well if the 30 foot boring is a dry hole.

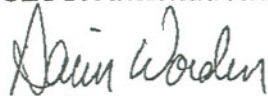
SECOR requests clarification as it applies to the Castle Rock Hospital District Work Plan. SECOR does not expect to encounter groundwater at the Site. Additionally, if impact is not encountered within three feet of the bottom of the tank or dispenser lines, SECOR does not see the utility in extending one of the borings to a 30 foot depth, or requiring the installation of a two inch diameter groundwater monitoring well into a dry hole. These considerations are based on costs and the applicability of requirements which do not appear to directly apply to the Site.

SECOR

Mr. Sterling Roberts
October 10, 2007
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Thanks ahead of time for your help in clarifying these issues. Please contact the undersigned at 801-327-7814 should you require additional information or clarification of any information contained in this document.

Sincerely,
SECOR International Incorporated



Darin Worden
Senior Hydrologist

Copies: 1 – Addressee, hardcopy via regular mail
 1 – Addressee, black and white scan pdf via email
 1 – Mr. Bryon Wall, CRHD via email