STATE COMPLIANCE REPORT<br>FOR GOVERNMENT OWNED TANKS<br>WITHIN THE STATE OF WYOMING



May 1, 2007
STORAGE TANK PROGRAM
WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID AND HAZARDOUS WASTE MANAGEMENT DIVISION

## INTRODUCTION

In August 2005, a federal law called the Underground Storage Tanks Compliance Act of 2005 was enacted. Section 1523 of that act mandates that every tank which has "not undergone an inspection since December 22, 1998" be inspected "not later than 2 years after the enactment of this subsection." Section 1523 goes on to state that after all tanks have been inspected once, every state "shall conduct on-site inspections of each underground storage tank regulated under this subtitle at least once every 3 years." Section 9011 of that act requires that every state report to the U.S. Environmental Protection Agency on every underground storage tank facility owned by the federal government, the state government or any branch of local government. This "State Compliance Report" is due "not later than 2 years after the date of enactment of this subsection," or August 8,2007 . This report is required to list the location and owner of each underground storage tank owned by the government and not in compliance with the underground storage tank program. This report is also required to list the date of the last inspection for each government owned tank.

The State Compliance Report for Wyoming was first issued on February 17, 2006. This report is an update on that previous report.

There are 160 underground storage tank facilities owned by all levels of government within Wyoming. Of these, 56 are federally owned, 31 are state owned, and 73 are owned by various local governments.

## FEDERALLY OWNED AND OPERATED UNDERGROUND STORAGE TANKS

Of the federally owned tank facilities, 2 are owned by the Veterans Administration, 1 is owned by the Air National Guard, 28 are owned by the National Park Service and 25 are owned by the United States Air Force at Warren Air Force Base.

Of the 56 facilities owned by the federal government, 55 have been inspected within the last 2 years, and 1 has not been inspected since December 22, 1998. That single facility is the Horseshoe Bend Marina, a location at a federal recreation area that has been temporarily out of use for several years. It is not being used currently because the water in the reservoir has been so low in recent years that the boat ramp does not reach the water. The National Park Service intends to operate this facility again when the water levels are higher. The Wyoming Department of Environmental Quality (WDEQ) will inspect this facility before the statutory deadline of August 8, 2007.

WDEQ inspects the removal of all underground storage tanks to verify if they leaked during their service life. Based on our inspections and a review of department files and databases, WDEQ believes that the 56 facilities owned by the federal government were in compliance with all aspects of the Underground Storage Tank Program at the date of the last inspection, with the following exceptions:

| Alfacilityl | Name | Facilly Name | Street Address | Clly | County | State | ZIP Code | State | Federalcitation |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0-001806 | Grand Teton National Park | Moose Visitor Center Fleet Fu | Maintenance Complex | Moosa | Teton | WY | 83012 | WY | 280.31 (c) |
| 0-003750 | U S National Park Service | Mammoth Fleet Fueling Facilit | Mammoth Hot Springs Bu | Yellowston | Park | WY | 82190 | WY | $28020(c)(1)$ |
| 0-005007 | US National Park Service | Lake Generator Emergency Po | Lake Govermment Area | Yellowstan | 'Park | WY | 82190 | WY | $28031(\mathrm{~b})(1)$ |

The violation at the Moose Visitor Center Fleet Fueling Facility was for failing to perform 60day checks of the rectifier on the impressed current system. Also at the Moose facility, the operator was not performing inventory control when the primary method of leak detection was automatic tank gauging. The violation found at the Mammoth Hot Springs Fleet Fueling Facility was for failing to have overfill protection on one of the tanks. Apparently someone removed the butterfly valve for maintenance and failed to re-install it. The violation at the Lake Generator was for a failing cathodic protection test. All of these violations were handled with letters of violation, and all have been corrected.

This is a compliance rate of $94.5 \%$ for all federally owned facilities in Wyoming. Since the date of the first report on government owned tanks, the United States Air Force has decommissioned the Peacekeeper Missile system under the Strategic Arms Reduction Treaty (START 2). The decommissioning of these missiles eliminated 50 federally owned underground storage tank facilities. The apparent drop in the compliance rate for federally owned facilities since the date of the first report on government owned tanks is due to this decrease in the number of federally owned facilities rather than an actual decrease in compliance. As a whole, the federal government complies with these rules at about the same rate that private owners comply.

## STATE OWNED UNDERGROUND STORAGE TANKS

The 31 state owned facilities are owned by a wide variety of agencies, and no single agency owns more than $25 \%$. Of these, 3 have not been inspected since December 22, 1998. WDEQ expects to complete inspections of every state owned facility which has not been inspected since January 1, 2002 this summer.

Based on the inspections performed to date, the 31 underground storage tank facilities owned by the State of Wyoming were in compliance with all aspects of the Underground Storage Tank Program at the date of the last inspection, with the following exceptions:

| Atrachityld | Name | Faclity Name | Streat Address | Cily | County | State | 21 PCode | Stata | Federamiation |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0001683 | Casper Communty College | Casper College Maintenance | 125 Colifege Dive | Casper | Natrona | WY | 82601 | WY | 280.43 (d) |
| 0-002274 | University of Whorning - Sefet | University Fleet Operation | 15th and Lewis | Laramie | Albary | Wr | 82071 | WY | 28020 (c)(1) |
| 0.002274 | Unwersty of Whorrung - Safet | Universty Fleet Operstion | 13th and Lewis | Laramie | Albany | Wr | 82071 | WY | 28021 (d) |
| 10.002274 | Unversty of Whorming - Safet | University Fleet Operation | 15th and Lewis | Laramie | Alcany | Wr | 82071 | WY | $280.30(a)$ |
| 10.002274 | Unversay of Whorming - Safet | Unveraty Fleet Operation | 15th and Lewis | Laramio | Afumy | WY | 82071 | Wr | 280.30(b) |
| 0-001829 | Whomurg Depariment of Tran | WY Department of Transporiat | 900 Eryan Stock Tran | Casper | Natrona | W | 82002 | W | 280.43 (d) |
| 0.001288 | Wyoming State Training Scho | Wyoming State Training Schoo | 2204 State Highway 789 | mander | Fremont | WY | 82520 | WY | $28031(\mathrm{D})(1)$ |
| p.004241 | South Lincoin Hospetal Otstrc | Souh Lincoln Medical Center | 711 Onyx | Kermmerer | Lincoin | Wr | 83101 | Wr | $280.31(0)(1)$ |

The violations listed for Casper Community College and Wyoming Department of Transportation were both for failing to do inventory control when the primary method of leak detection was automatic tank gauging. Both of these violations were handled by Letters of Violation. The violations listed for the University of Wyoming was for filling the tank through a fill pipe without a spill bucket or overfill device and for failing to report a release. A Notice of

Violation was issued to the University of Wyoming in response to the violations discovered during that inspection. The violation at the South Lincoln Hospital District was for failing to have a cathodic protection test done on time. That violation was handled by Letter of Violation. (In Wyoming, hospital districts are a function of state government.)

This is an overall compliance rate of 83.8 percent for tanks owned by the State of Wyoming. The compliance rate for state owned facilities is a little lower than the compliance rate for all facilities in Wyoming. This is probably not significant because there are only 31 facilities in this group. In very small groups, the compliance rate becomes very sensitive to small changes in the number of violations. For example, if there had been only 4 facilities in violation instead of 5, the compliance rate would have increased markedly to 87.1 percent.

## LOCAL GOVERNMENT OWNED UNDERGROUND STORGE TANKS

There are 73 underground storage tank facilities owned by local governments in Wyoming. Local government owned facilities are 20 percent owned by school districts, 36.5 percent owned by cities and towns, 12 percent owned by counties and operated only for fueling county vehicles, 11 percent owned by local hospitals, 7 percent owned by airports with the remaining 13.5 percent owned by a variety of entities such as cemetery districts, fire protection districts, etc. There are 59 different owners listed for these 73 facilities.

The State of Wyoming has inspected 69 of the local government owned tanks since June 1, 2002. There are 3 facilities that have not been inspected since before December 22, 1998. Those 3 facilities will be inspected before the statutory deadline of August 8, 2007. There is also 1 facility that was last inspected in 1999. That facility will also be inspected before August 8 , 2007.

The violations discovered at local government owned underground storage tanks during the last inspection are listed below:

| Alfacilylid | Name | Facilly Name | Streel Address | Cily | County | State | Code | State | alchation |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0.004159 | Campoell County Scrool Din | Campbell County High Setrad | 1000 Camel Drve | Gitette | Camptell | WY | 82717 | w | $28020(0)(1)$ |
| 0.001048 | Carbon Courty School Dist | Litte Snake Rwer Valley Scho | Meeker Street | Bagys | Carbon | WY | 82 | Wr | 280 43(a) |
| 0.001048 | Carbon Courty School Dist. | Litte Snake River Valley Scho | Meeker Streel | Eaggs | Carbon | W | 62321 | Wr | 260 43(d) |
| b.001365 | Cay of Cheyenne | Parks Department | 520 West Exghth Avenue | Cheyeme | Larame | W | 82001 | VY | 280 43(a) |
| b-003576 | Hot Sprngs County Cem | Hot Springs County Cemetery | 1333 Camyon Hills Road | Thermopolis | Hot Spran | WY | 82443 | WY | 280 40(a)(1) |
| p.003575 | Hot Springs Counly Cemeter | Hot Springs County Cemetery | 1333 Canyon Hills Road | Thermopots | Hot Sprin | WY | 82443 | WY | 280 40(a)(2) |
| p.003575 | Hot Springe Counly Cemeter | Hot Springs County Cemetery | 1333 Canyon Hills Road | Thermopolis | Hot Spm | WY | 82443 | W | 280 40(a)(3) |
| b-003575 | Hot Springs County Cemeter | Hot Springs County Cemetery | 1333 Canyon Hills Road | Thermopolis | Hot Span | W | 82443 | WY | 26041 (a) |
| 0,003575 | Hot Springs County Cemeter | Hot Springs County Cemelery | 1333 Canyon Hils Road | Thermopolis | Hot Sprin | WY | 82443 | WY | $29044(\mathrm{c})$ |
| b.003130 | Johnson County | Johnson Courty Airport | 158 Arpont Road | Buffalo | Johnson | WY | 82834 | WY | $28040(0)(1)$ |
| 0-0031 | Johrson County | Johnson Courty Aurport | 158 Auport Read | Butaio | Johneon | W | 82834 | WY | 28040 (b) |
| b.003 | Natrona County | Natrona County Road and Brid | 538 Southwest Wyaming | Milis | Natrona | W | 82644 | Wr | 280 43(d) |
| p.000152 | Natrona Courty School Distn | Natrona County Schools Bus | 880 Foster Road | Casper | Natrons | W | 82601 | WY | 280 43(0) |
| b.000390 | Town of Tornington | Town of Toftington - Mantent | 2926 Weat E Slre | Tommaton | Gosthen | WY | 82240 | WY | 280 44(c) |
| p.000390 | Town of Torangion | Town of Tortingion - Maintena | 2926 West E Sireet | Torrington | Goshen | w | 82240 | WY | 280.40(b) |
| p-000390 | Town of Torrington | Town of Tomngion . Maintera | 2926 West E Street | Tomington | Goshen | WY | 82240 | WY | 28041 (a) |
| 0-000395 | Town of Torrington | Town of Tornington - Munce | East 2oth Avenue | Torrington | Gowhen | W | 82240 | WY | 280 40(b) |
| 6-000395 | Town of Torington | Town of Torrington - Muncipe | 2000 East 20 th Averu | Toranglon | Goshen | WY | 82240 | wr | $28044(\mathrm{c})$ |
| p.003380 | Town of Wryer | Town of Whight | 1414 West Elkhorn | Wright | Campbell | W | 82732 | Wr | $280.20(6)(1)(4)$ |
| P-001693 | Uunta County School District | Transportation Facility | 2234 Yellow Creek Road | Evanston | Unis | WY | 82930 | wr | 28031 (c) |
| 0.000609 | Weston County whoming | Mondell Fietd | 4208 U 5 Highway 16 | Newcastie | Weston | WY | 82701 | WY | 28043 (d) |
| b-000609 | Weston County Wyorning | Mondell Freed | 4206 US Highway 16 | Newcastle | Weston | WY | 82701 | WY | 28021 (d) |
| p-004070 | Goshen County School Distr | Goshen Counly Sch | 810 West $251 n$ Streel | Tornigton | Goshen | wr | 82240 | WY | 28031 (b)(1) |
| p-004070 | Goshen County School Distri | Goshen County Schools - Torn | 810 Weat 25in Street | Torrngton | Gophen | Wr | 82240 | Wr | 28041 (a) |
| p.005004 | Campoell County Hosptal | Campben County Hosptal | 501 South Burma Aven | Glatte | Campb | WY | 82717 | Wr | 280.31 (b)(1) |

The violations discovered at the Town of Torrington facilities were for failing to maintain sump sensors in operable condition when they are used as the only line leak detection method. A Letter of Violation was issued and the sump sensors were immediately repaired. The violation at Goshen County School District \#1 was for failing to test the steel lines when the cathodic protection test on the steel tank was completed. The violation at the Natrona County Road and Bridge facility was for failing to do inventory control when automatic tank gauging was the primary method of leak detection. The violation at the Natrona County School District was for no passing results on the automatic tank gauging system for 5 months in 2005. The violation at the Little Snake River Valley School was for failing to do leak detection on a tank which is already equipped with an automatic tank gauge. At this location, the school district was not doing anything, no records were being kept and the automatic tank gauge had not made a test in over a year. A follow-up inspection is being scheduled to determine if leak detection is being done now. The violation at the Campbell County School District was for a possible hole in the spill bucket. This was resolved when the school district cleaned out the spill bucket and tested it with water for 24 hours proving that it did not leak. The violation at the Campbell County Hospital was for having more than 3 years between the last 2 cathodic protection tests. The violation at the Parks Department of the City of Cheyenne was for failing to perform inventory control on a tank when automatic tank gauging was the primary leak detection method. The violation at the Town of Wright was for not having a proper fitting on the fill tube when a butterfly valve was used for overfill protection.

This is a compliance rate of $80.2 \%$ for all facilities owned by local governments. Again, the compliance rate for local governments is lower than the compliance rate for the state overall. In this case, the problem appears to be that individual entities have not been fully educated in the requirements. Most of these facilities are the only facility owned by the entity and they have not been a priority.

## APPENDIX A

## LIST OF GOVERNMENT OWNED TANKS STATE OF WYOMING

The list starting on the next page is color coded based on the date of the last inspection. Those facilities shown in RED type on a white background have not been inspected since before December 22, 1998. Those facilities shown in BLUE type have been inspected since January 1, 2002, and those shown in GREEN type were inspected last between December 22, 1998, and January 1, 2002.





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90 CES/CEV LC 300 Vesle Drive Cheyenne


Yellowstone Natl Park Sheridan



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| Wyoming Retirement Center | 890 Highway 20 South | Basin |
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| Wyoming Department of Transportatic | 5300 Bishop Boulevard | Cheyenne |
| Wyoming State Hospital | P. O. Box 177 L : 831 Highway | ton |
| State of Wyoming - Honor Farm | 40 Honor Farm Road | Riverton |
| State of Wyoming | 723 West 19th Street | Cheyenne |
| State of Wyoming / A\&I Facilities | 801 West 20th Street | Cheyenne |
| State of Wyoming / A\&I Facilities Ma | 801 West 20th Street | Cheyenne |
| Wyoming Pioneer Home | 141 Pioneer Home Drive | Thermopolis |
| Casper Community College | 125 College Drive | Casper |
| Wyoming Department of Homeland S | 150 North Nichols | Casper |
| Adjutant General | 5500 Bishop Blvd. | Cheyenne |
| Wyoming Department of Transportatic | 5300 Bishop Boulevard | Cheyenne |
| Teton County Hospital District | dba St. John's Hospital [L625 | Jackson | Wyoming Department of Transportatic 5300 Bishop Boulevard Cheyenne Cheyenne Cheyenne Wyoming Office of Homeland Security 122 West 25th Street[..Herschle Cheyenne WYARNG 5500 Bishop Blvd. Cheyenne Veterans Home of Wyoming 700 Veterans Lane Johnson County Hospital District Wyoming Department of Transportatic 5300 Bishop Boulevard Wyoming Department of Transportatic 5300 Bishop Boulevard State of Wyoming Boy's School 1550 Highway 20 South Buffalo

Cheyenne
Laramie
Cheyenne Worland Wyoming State Penitentiary P. O. Box 400 r. South Higley B Rawlins Wyoming State Penitentiary P.O. Box 400 Г. $\quad$ South Higley B Rawlins Wyoming Department of Transportatic 5300 Bishop Boulevard Cheyenne Riverton Laramie


[^0]:    FEDERALLY OWNED UNDERGROUND STORAGE TANK FACILITIES (Continued)
    

