## <u>Agenda Item:</u> 11-20 <u>Petition to Amend Underground Storage Tanks Secondary Containment Rules</u>

## **Explanation:**

The Steel Tank Institute Steel Plate Fabricators Association (STI) filed a petition to request the amendment of Underground Storage Tank (UST) secondary containment standards contained in 15A NCAC 02N .0903(a).

15A NCAC 02N .0903(a) currently states: "Tanks must be protected from external corrosion in accordance with 40 CFR 280.20 (a)(1), (3), or (5)."

The petition seeks to change 15A NCAC 02N .0903(a) to read: "Tanks must be protected from external corrosion in accordance with 40 CFR 280.20 (a)(1), (2), (3), or (5)."

The rules as currently written only allow new or replacement double-walled USTs to be installed that are constructed of materials that will protect the exterior of the tank from corrosion. These include double-walled steel tanks that are constructed of two walls of steel with a thick fiberglass coating on the outside wall, double-walled tanks that are constructed of an inner wall of steel and an outer wall of fiberglass or plastic (known as jacketed tanks) and double-walled tanks that are constructed of two walls of fiberglass.

The petition seeks to allow double-walled steel tanks to be installed that do not have a thick protective fiberglass or plastic coating on the outer steel wall. These tanks are protected from corrosion by using cathodic protection systems (sacrificial anodes attached to the tanks or impressed current systems) that must be tested and maintained over time to ensure that the tanks are continuously protected.

## **Recommendation:**

Division of Waste Management staff recommend that the Environmental Management Commission deny the petition.