

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 8, 2010

Mr. Carl E. Edlund, Division Director
Multimedia Planning and Permitting Division
USEPA Region 6
1445 Ross Avenue Suite 1200
Mail Code: 6PD
Dallas, Texas 75202-2733

RE: UST Compliance Act
Periodic Inspection Requirement

Dear Mr. Edlund:

This letter is Louisiana's official response to the Environmental Protection Agency (EPA) regarding the Underground Storage Tank (UST) periodic inspection requirements of the UST Compliance Act. The UST Compliance Act requires that all underground storage tanks identified in the Act as requiring inspections are inspected at least once every three years to determine compliance with 40 CFR Part 280 and state-specific regulations (LAC 33:XI) by August 8, 2010. The Louisiana Department of Environmental Quality (LDEQ) has been working with the support of EPA to meet this requirement. I am pleased to report that as of August 8, 2010, LDEQ has met the three year inspection requirement cycle by inspecting all underground storage tanks at least once since August 8, 2007. We appreciate the support and funding that EPA Region 6 has provided to assist us in meeting this requirement.

We are underway with conducting inspections in order to meet the next three year inspection cycle as required by the UST Compliance Act. If you have any questions or if this letter does not satisfy the requirements of the final UST Compliance Act periodic inspection requirement guidance provided by EPA, please contact me at (225) 219-3390 or via email tim.knight@la.gov.

Mr. Carl E. Edlund
Page 2

We look forward to working with you as we continue to implement these important Energy Act requirements.

Sincerely,



Tim B. Knight, Administrator

tk

c: Peggy M. Hatch, LDEQ
Paul Miller, LDEQ-OEC
Cheryl S. Nolan, LDEQ-OES
Steve Vargo, USEPA-Region 6
Willie Kelley, USEPA-Region 6

Certification Form

State: Louisiana

Grant Requirement (check the appropriate box for meeting or developing the requirement)

Requirement	Met	Developing Requirement
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Secondary Containment or Financial Responsibility (after 2/8/07)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Delivery Prohibition (after 8/8/07)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2-Year Inspections (after 8/8/07)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
State Compliance Report to EPA (after 8/8/07)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Record (after 9/30/07)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Operator Training (after 8/8/09)		<input type="checkbox"/>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3-year Inspections (after 8/8/10)		<input type="checkbox"/>

Certification (check the appropriate certification box)

All grant requirements checked above have been met

I hereby certify that I meet all grant requirements checked as being met above in accordance with the grant guidelines published by EPA.

Some grant requirements checked above have been met

I hereby certify that I meet the requirements checked as being met above in accordance with the grant guidelines published by EPA. In addition, I also certify that I am developing the requirements checked as being developed above in accordance with grant guidelines published by EPA. A detailed description of our current and planned activities and the date by which we will meet the requirement(s) are described below.

All grant requirements checked above are under development

I hereby certify that I am developing the requirements checked as being developed above. The requirements being developed are in accordance with grant guidelines published by EPA. A detailed description of our current and planned activities and the date by which we will meet the requirement(s) are described below.

Description of Requirements Being Developed

Current activities:

LDEQ collected UST release source and cause information for the period of 10/1/07 to 9/30/08, and posted the first Public Record Report on LDEQ's public website on 12/23/08. The second Public Record Report for the period of 10/1/08 to 9/30/09 was posted on LDEQ's public website on 12/28/09.

Secondary Containment regulations became final on 10/21/08, requiring all UST systems installed after 12/20/08 to be secondarily contained with interstitial monitoring.

Emergency power generator regulations became final on 8/20/09, requiring emergency power generator USTs to be secondarily contained if installed after 12/20/08, and to have interstitial monitoring if installed after 8/20/09.

LDEQ's "Training Requirements for Underground Storage Tank System Operators" regulations (LAC 33:XI.Chapter 6) became final on February 20, 2010. These regulations require all UST operators to receive state-specific operator training by August 8, 2012. Louisiana conducted four UST Operator Training seminars as of August 8, 2010, that resulted in the certification of 204 Class A and B UST Operators that are responsible for 752 UST facilities.

LDEQ has completed the 3-year inspection requirement on August 8, 2010. All UST facilities were inspected as of August 8, 2007, and have been re-inspected by August 8, 2010.

Planned activities:

LDEQ is currently using LDEQ-USTD staff and LDEQ contractors to meet the next 3 year inspection cycle requirement.

Six UST Operator Training seminars are scheduled in Louisiana in 2010, and 16 to 24 seminars will be scheduled in 2011. LDEQ is on schedule to have all UST operators trained by August 8, 2012.

Certification

I certify that the information provided above is true and accurate to the best of my knowledge.

Tim B Knight
Name

Tim B Knight
Signature

8/8/10
Date