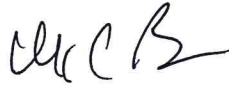




State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

MEMORANDUM

To: Underground Storage Tank Owners and Interested Parties
From: Chuck Carr Brown, Ph.D., Secretary 
Date: July 6, 2017
RE: Allowing Failed Underground Storage Tanks to Remain in Temporary Closure under Certain Conditions

Underground storage tank owners, operators, certified workers, and response action contractors have requested that Louisiana Department of Environmental Quality (LDEQ) Underground Storage Tank Division (UST Division) allow failed tanks to be placed into temporary closure whenever the failed tank is in the same tank hold as active tanks, instead of requiring them to be either repaired, replaced, upgraded, or permanently closed.

LDEQ has evaluated the information relative to this request and has determined that failed tanks could remain in temporary closure under the following conditions:

- Failed tanks must be in the same tank hold as active tanks.
- Site check and/or corrective action as described in LAC 33:XI.711.A.2 and/or LAC 33:XI.715.C.1.e must be conducted.
- All product has been removed from the tank as required by LAC 33:XI.715.C.1.a and the tank has been cleaned of any residual product and bottom sludge.
- The tank fill port is padlocked as required by LAC 33:XI.903.B.2.
- All product piping has been disconnected from the tank and capped.
- There is a report or memo by LDEQ in the facility's file in EDMS stating that the tank cannot be used again unless it is repaired.
- The tank is prohibited from delivery (red tagged) by LDEQ until it is repaired, replaced, or permanently closed.

This decision is based on the fact that there will be no adverse impacts to human health and the environment. Additionally, this option would eliminate the potential damage to adjacent

operating tanks in the same tank hold resulting from tank removal, and thereby minimizing the financial impact on small business owners.

Attached please find the basis of decision for allowing failed tanks to remain in temporary closure under certain conditions. Please contact Samuel Broussard of my staff at 337-262-5744 if you have any questions.