

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

August 8, 2007

Mr. Stephen Johnson, Administrator
Attn: State Government UST Compliance Report Submittal
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, MC 0001
Washington, D.C. 20460-0001

Dear Mr. Johnson:

Enclosed is a copy of the Missouri State Compliance Report on Government Owned Underground Storage Tanks (USTs). Subsection (b) of Section 1526 of the Energy Policy Act amends Subtitle I of the Solid Waste Disposal Act by requiring states that receive Subtitle I funding to report on the compliance status of their government owned and/or operated USTs.

The report lists two government owned facilities, one federal and one local, as out of compliance with federal and state UST law and regulations. The department is working with the owners/operators to return the facilities to compliance.

As you are aware, the Missouri Department of Natural Resources has not conducted compliance inspections for approximately the last two years. A new contract inspection process should be implemented soon to inspect all tank facilities, including government owned facilities, to ensure compliance is maintained.

If you have any questions in this matter, please contact me at (573) 526-2058, or Ms. Kathy Flippin, Chief, of the Hazardous Waste Compliance/Enforcement Section at (573) 751-1718. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

Original signed by Ken Koon

Ken Koon, Chief
Tanks Section

KK:ls

Enclosure

c: Ms. Carol Eighmey, Petroleum Storage Tank Insurance Fund
Ms. Kathy Flippin, Hazardous Waste Program
Mr. Bob Geller, Hazardous Waste Program
Mr. Dan Schuette, Hazardous Waste Program

**Appendix A -
State Compliance Report on
Government Underground Storage Tanks (USTs)**

Noncompliant Federal-Government USTs									
UST ID #	Owner Name	Facility Address	City	County	State	Zip Code	Violation Citation (Federal or State with Program Approval)	Date of Last On-Site Inspection	Action(s) to Ensure Compliance
2387	US Army Corps of Engineers	16311 County Road DD	Smithville	Clay	MO	64089	10 CSR 20-10.043 (Release Detection) 10 CSR 20-10.31 (Corrosion Protection)	3/30/2005	Telephone call and letter to owner requested properly performed release detection method and cathodic protection (CP) system test reports. Facility contact indicated CP test report will be provided as soon as available from the consultant. DNR will require facility to meet minimum ATG test requirements or use alternative method (for examples, either install CSLD or use SIR).

Noncompliant Local-Government USTs									
UST ID #	Owner Name	Facility Address	City	County	State	Zip Code	Violation Citation (Federal or State with Program Approval)	Date of Last On-Site Inspection	Action(s) to Ensure Compliance
20164	St. Louis Public Schools	3416 Cook Avenue	St. Louis	St. Louis City	MO	63106	10 CSR 20-10.021(2) (Tank Upgrade Requirements)	3/1/2004	Facility contact informed the department that the steel tank has interior lining. He is attempting to get documentation from the contractor to demonstrate the tank meets the 1998 Upgrades. No documentation has been received at this time. If documentation is not received, permanent closure will be required.