

HB

220

HB 220

HB 220, Underground Storage Tanks

Binkley's office is doing a one page sheet that lists the main provisions of the bill.

Basically, the 1 million cleanup fund with a \$25,000 deductible; Grants for retrofitting, up to 60%, maximum of \$60,000 per facility and Creates a Board.

Everyone is in, the little guys, the big guys, and the municipalities.

Controversy:

The board is the controversial part, actually, as it does not give DEC the sole responsibility of determining "how clean is clean". Owners have to have a plan, if there is a dispute between the owner and the agency, ie, in the case of an impasse, the board decides. While agencies have representation on the board they fear it is stacked towards the private sector and don't like it. DEC is telling the Gov to veto it, and of course, the green machine is encouraging it, too, but the jury is still out and I strongly suspect you will support this provision.

General fund appropriation.

nancy

For 7 floor packet

★ Fairbanks North Star Borough

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P.O. Box 1267

Fairbanks, Alaska 99707

907-452-4761

April 26, 1990

Linda Anderson
FNSB Legislative Lobbyist
130 Seward St., No. 304
Juneau, AK 99801

Dear Linda:

In response to your telephone inquiry yesterday, I am forwarding the material we spoke briefly about.

The 2 page table (FNSB NON-EXEMPT UNDERGROUND STORAGE TANKS) is a list of all FNSB tanks that I believe are not exempt from the requirements of the new EPA regulations. There are 51 tanks listed in this table; the number that I gave you on the phone yesterday (48) is based on the assumed completion of several projects scheduled for this (1990) summer construction season:

1. Barnette Elementary School (see note 6a) -
 - a. existing condition: boilers (for bldg. heat) & emergency generator share common UST; therefore, tank is NON-EXEMPT
 - b. after upgrade: fuel supply to be separated; existing tank becomes EXEMPT; new tank for emerg. gen. will not be underground (therefore, also EXEMPT).
2. Nordale Elementary School (see notes 6b & 7) -
 - a. existing condition: separate UST's for heat & emergency generator; emerg. gen. tank is NON-EXEMPT; heat tank is EXEMPT--but appears in table because...
 - b. upgrade project: emerg. gen. will be tied to heating fuel tank--this tank becomes NON-EXEMPT; exist. emerg. gen. tank to be removed (making this NON-EXEMPT tank a "non-problem").
3. Denali Elementary School (see note 7) -
 - a. existing condition: separate UST's for heat & emergency generator; emerg. gen. tank is NON-EXEMPT; heat tank is EXEMPT
 - b. upgrade condition: heating fuel tank to remain separate (and EXEMPT, therefore not included in the table; new tank for emerg. gen. will not be underground (therefore, also EXEMPT).

The net affect of the above will be to reduce the total number of NON-EXEMPT tanks listed in the table by 3, from 51 to 48.

It should also be noted that there are 2 "heat only" UST's on the list (serving portable classrooms at Badger & North Pole elementary schools). Such tanks are normally EXEMPT; they appear on the list because they are temporarily out of service ("portables" not in use this school yr.) and are subject to the temporary "closure" requirements of the EPA regulations. If these tanks are put in service, as they may be next school year, they become EXEMPT--so perhaps a more accurate (future) total no. of FNSB NON-EXEMPT UST's is 46.

The other material included is just some basic background/summary info. from the EPA.

Please let me know if I can be of further assistance.

Sincerely,



George S. Ferree, Energy Program Manager
Facilities Management Division

ATTACHMENTS

cc: Joe Notkin, Manager, Facilities Management Division
Project File

UST/LTR0426a.DOC

FNSB NON-EXEMPT UNDERGROUND STORAGE TANKS (1)

N ?	CONTENTS	SIZE (Gal.)	CURRENT USE	YEAR INSTALLED	LEAK DETECTION (2)		CORROSION PROTECTION (3)		SPILL/OVERFILL PREVENTION		TANK CLOSURE REQ'D. ?			NOTES
					REQ'D.?	BY	REQ'D.?	BY	REQ'D.?	BY	TYPE		BY	
											PERM.	TEMP.		
TIES	Regular gasoline	1,500	Vehicle/equip. motor fuel	1982	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Unleaded gasoline	1,500	Vehicle/equip. motor fuel	1982	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Diesel	300	Vehicle/equip. motor fuel	1980	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Diesel	300	Vehicle/equip. motor fuel	1980	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Unknown	Unknown	Abandoned in place	1970-73(?)	N	N/A	N	N/A	N	N/A	Y		ASAP	8
	Unleaded gasoline	5,000	Vehicle/equip. motor fuel	1981	Y	Dec-93	Y	Dec-98	Y	Dec-98				
Area Area	Diesel	10,000	Vehicle/equip. motor fuel	1981	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Regular gasoline	1,000	Vehicle/equip. motor fuel	1984	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Unleaded gasoline	500	Vehicle/equip. motor fuel	1984	Y	Dec-93	Y	Dec-98	Y	Dec-98				9
e)	Regular gasoline	500	*Zemboni* motor fuel	1983	Y	Dec-93	Y	Dec-98	Y	Dec-98				
	Regular gasoline	1,000	Vehicle/equip. motor fuel	1982	Y	Dec-93	Y	Dec-98	Y	Dec-98				
ent: Plant ent: Plant:	Diesel	500	Abandoned in place	1967(?)	N	N/A	N	N/A	N	N/A	Y		ASAP	10
	Unknown	Unknown	Abandoned in place	Unknown	N	N/A	N	N/A	N	N/A	Y		ASAP	11
	Unknown	Unknown	Abandoned in place	Unknown	N	N/A	N	N/A	N	N/A	Y		ASAP	11
IONS	Station #4	Gasoline	500	Vehicle/equip. motor fuel	1990	Y	At installation	Y	At installation	Y	At installation			
	in	Diesel	500	Vehicle/equip. motor fuel	1986	Y	Dec-93	Y	Dec-98	Y	Dec-98			
	#1	Regular gasoline	1,000	Vehicle/equip. motor fuel	1984	Y	Dec-93	Y	Dec-98	Y	Dec-98			
	#1	Unleaded gasoline	1,000	Vehicle/equip. motor fuel	1988	Y	Dec-93	Y	Dec-98	Y	Dec-98			
	#1	Diesel	1,000	Vehicle/equip. motor fuel	1984	Y	Dec-93	Y	Dec-98	Y	Dec-98			
		Regular gasoline	1,000	Vehicle/equip. motor fuel	1982	Y	Dec-93	Y	Dec-98	Y	Dec-98			
		Unleaded gasoline	1,000	Vehicle/equip. motor fuel	1982	Y	Dec-93	Y	Dec-98	Y	Dec-98			
	Diesel	10,000	Abandoned in place	1985	N	N/A	N	N/A	N	N/A	Y		ASAP	13

NOTES: 1 For purposes of this table (FNSB compliance w/ EPA regulations), NON-EXEMPT underground storage tanks (UST's) are defined as those with petroleum contents OTHER than heating fuel stored for CURRENT consumptive use, as HEATING fuel ONLY, on the immediate premises; multiple use tanks are classified according to the most restrictive use that applies.

2 See table at right for phase-in schedule for leak detection requirements.

3 Corrosion protection deadline for all EXISTING UST's is 12/22/98, same requirements also apply to all underground piping associated with affected UST's. Emergency generator fuel tanks are exempt from corrosion protection & spill/overflow prevention requirements (but not from leak detection requirements).

4 Emergency generator at Main Administration Building is out of service until further notice.

5 Heating fuel tank for portable classroom(s): CURRENTLY NOT IN USE (89-90 school year); EPA requires at least temporary closure.

6 Multiple use* tanks for space/heating AND emergency generator fuel storage (see Note 1):

a. Common heat/emerg. gen. fuel supply @ Barnard Elem. School to be decommissioned during summer 1990 electrical upgrade project. New emerg. gen. fuel tank to be above grade, inside bldg. (EXEMPT)

b. New emerg. gen. @ Montvale Elem. School to be connected to this existing heating fuel (gen's) UST during summer 1990 electrical upgrade project; tank will then be NON-EXEMPT.

Existing emerg. gen. tanks @ Donald S. Harbale elementary schools are scheduled to be removed as part of summer 1990 electrical upgrade project.

EPA requires permanent tank closure (including site assessment) within 12 months after tank taken out of service.

* Tank is located beneath the air-cooled condenser unit outside northwest corner of building believed to be an old (abandoned) vehicle/equip. motor fuel tank.

* Is only partially buried—but enough in quality as an UNDERGROUND tank according to EPA regulations (10% or more of volume below ground).

* Heating fuel tank adjacent to Cabin 20 (site of boiler for abandoned "district heat" system).

* Surveyed to FNSB by City of Fairburn in 1987; nothing known beyond existence of tanks.

* Summer 1990 installation (partial).

* Tank was formerly used to store heating fuel for boiler, no longer in use. Tank was only used for several months.

(2) Leak detection phase-in schedule for EXISTING* UST's:

Year installed	Required by
pre-1965 or 7	Dec-89
1965-69	Dec-90
1970-74	Dec-91
1975-79	Dec-92
1980-88	Dec-93

* EXISTING UST's are defined as those installed and in use before December 22, 1988.

FNSB NON-EXEMPT UNDERGROUND STORAGE TANKS (1)

LOCATION (FACILITY)	CONTENTS	SIZE (Gal.)	CURRENT USE	YEAR INSTALLED	LEAK DETECTION (2)		CORROSION PROTECTION (3)		SPILL/OVERFILL PREVENTION		TANK CLOSURE REQ'D. ?			NOTES
					REQ'D.?	BY	REQ'D.?	BY	REQ'D.?	BY	TYPE		BY	
											PERM.	TEMP.		
SCHOOL DISTRICT														
School District Physical Plant	Regular gasoline	1,500	Vehicle/equip. motor fuel	1977	Y	Dec-92	Y	Dec-99	Y	Dec-98				
School District Physical Plant	Unleaded gasoline	1,500	Vehicle/equip. motor fuel	1977	Y	Dec-92	Y	Dec-98	Y	Dec-98				
School District Physical Plant	Diesel	1,500	Vehicle/equip. motor fuel	1885	Y	Dec-93	Y	Dec-98	Y	Dec-98				
Main Administration Building	Regular gasoline	500	Emergency generator fuel	1970 (?)	N	N/A	Y	Dec-98	Y	Dec-98		Y	ASAP	4
Badger Elementary School	Diesel	2,500	Heat; temp. out of service	1986	N	N/A	N	N/A	N	N/A		Y	ASAP	5
Badger Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98				6
Barnette Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6(a)
Denali Elementary School	Regular gasoline	500	Emergency generator fuel	N/A	N	N/A	Y	N/A	N	N/A	Y		1991	7
Howard Luke (Alt.) Jr./Sr. High School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Hunter Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Hutchinson Career Center	Diesel	500	Emergency generator fuel	1973	N	N/A	Y	Dec-98	Y	Dec-98				6
Joy Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Lathrop High School	Diesel	1,000	Emergency generator fuel	1975	N	N/A	Y	Dec-98	Y	Dec-98				
Nordale Elementary School	Regular gasoline	500	Emergency generator fuel	N/A	N	N/A	N	N/A	N	N/A	Y		1991	7
Nordale Elementary School	Diesel	3,000	Heat & emerg. generator fuel	1984	N	N/A	Y	Dec-98	Y	Dec-98				6(b)
North Pole Elementary School	Diesel	500	Emergency generator fuel	1975	N	N/A	Y	Dec-98	Y	Dec-98				
North Pole Elementary School	Diesel	1,000	Heat; temp. out of service	1985	N	N/A	N	N/A	N	N/A		Y	ASAP	5
North Pole High School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
North Pole Middle School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Pearl Creek Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Salcha Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Tanana Jr. High School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Brown Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Two Rivers Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
New University Park Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
Old University Park Elementary School	Regular gasoline	500	Emergency generator fuel	1970 (?)	N	N/A	Y	Dec-98	Y	Dec-98				
Wetzel Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6
West Valley High School	Diesel	1,500	Emergency generator fuel	1989	N	N/A	Y	At installation	Y	At installation				
Woodriver Elementary School	Diesel		Heat & emerg. generator fuel		N	N/A	Y	Dec-98	Y	Dec-98		Y		6

FNSB 2011 FIFTH 115 BUREAU

IMPACT STATEMENT REGARDING
SENATE COMMITTEE SUBSTITUTE FOR
HOUSE BILL 220 (FINANCE)

As originally proposed, HB220 had provisions for financial assistance, namely grant money up to a maximum of \$60,000 per site to assist the tank owner upgrade his system to meet the new EPA regulations.

Also, under the original bill, an eye was cast to offering a means by which the cost of the newly required liability insurance coverage would be available and affordable to the tank owner.

Unfortunately, the Senate CS for HB220 does none of this. The Senate CS does offer an important mechanism for cleaning up contamination, which is certainly in the tank owners best interest, and in the State of Alaska's best interest.

But, beyond important clean up assistance, Senate CS for HB220 only offers negative economic assistance. As incredible as it sounds, the only financial assistance remaining in the proposal is up to a maximum of \$60,000 for "systems closure".

In other words, this new draft will only assist the tank owner to go out of business and refuses to address the needs of the business person who wishes to stay in business but does not have the financial resources to do so.

Remember most of the usual retail gas stations around the State were never designed to support the kind of financial burden these new EPA regulations mandate, and will certainly go out of business without assistance. There are new financial requirements "layered on" an existing industry which in most cases operates without the necessary gross margin to adapt.

Only the large companies, i.e., retail outlets owned by nation-wide oil companies, can afford to meet the new EPA standards, and have the assets to self insure. This alone should shed a little light as to where the rush to eliminate financial assistance for the smaller business person is coming from.

IMPACT STATEMENT
SCSHB220 (FINANCE)
Page 2

In Fairbanks alone I can name for you the businesses that will be forced to close their doors to gas retail. And the impact of the proposed negative legislation can fairly easily be measured in lost jobs, and in lost tax base. It is depressing to observe the negative economic impact this proposed legislation will have in the Fairbank's area alone. A sample of those Fairbank's businesses severely impacted is: Anders Cache, Valley Center, Curry's Corner, Goldstream General Store, Valley View Center, Fox General Store, Moose Creek General Store, Arctic Acres, Just-a-Store, Gold Hill Gas and Grocery, Salcha Store, Chatanika Lodge, Fairbanks Gas and Go, Kobuk Fuel and Feed.

Each of these businesses probably support a payroll of four full-time employees, and each pays property taxes of approximately \$5-6,000 a year. So, it is fairly easy to carry the "negative impact" out to its' logical consequences on a state-wide basis of hundreds of lost jobs of thousands of dollars lost in property tax payments to local governments.

These independents build the economic base for Fairbanks and other communities around Alaska (Central, Manley, Cantwell, etc.) because they were willing to work on small margins. The large oil company owned retail outlets will not move into these rural areas because they cannot operate on these small returns.

Grants for upgrading existing systems in these small businesses must be returned to HB220. We must include a mechanism for "positive" economic development, not just "negative" economic development. Also, a mechanism to offset the high cost of insurance must be included. Both of these allowances could be short lived, "sun setting" in 1994, but would afford a means by which those existing retailers really needing assistance could survive these next three to four years.

Let the small retailer purchase the low end coverage of the liability insurance requirements. For example, require the retailer to purchase the first \$300,000 worth of liability (this is where almost all the exposure will be -- remember, we will be insuring "clean" sites) and use the reserves of the State of Alaska to underwrite or "guarantee" the upper limits of \$700,000 to satisfy the requirements of the EPA.

IMPACT STATEMENT
SCSHB220 (FINANCE)
Page Three

Only by building the positive support back into this legislation can be small "Mom and Pop" retail business survive. Senate CS for HB220 must re-instate grants for systems upgrade and a mechanism for offsetting the high cost of insurance.

Both these support mechanisms can be tied to a 1994 lapse schedule. By that time, all existing businesses should have received upgrade assistance and by that time the State of Alaska will have been able to demonstrate to the insurance industry that we are operating clean, safe sites. In that manner, competition for writing coverage should develop which would enable rates to come down to where small retailers can afford to purchase the full \$1,000,000 liability coverage without assistance.

It would probably be prudent to set qualification standards for upgrade and insurance assistance on a sliding scale (total dollars sold or gross annual revenues) so that those small businesses needing it most received assistance.

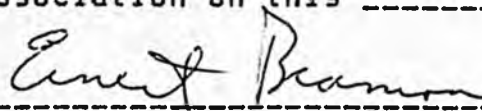
A handwritten signature in cursive script, appearing to read "Ed Anderson", is located in the lower right quadrant of the page.

WHEREAS, when all of the small petroleum operators are gone,
petroleum products will be from the wellhead to the consumer
therefore, no competition. With no competition, prices
will skyrocket, and

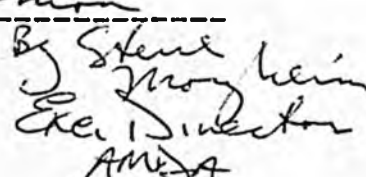
WHEREAS, No provisions have been made in the state to
handle and store hazardous waste.

NOWHEREFORE be it resolved that the Alaskan Marine Dealers
Association strongly supports the enactment and funding of
Substituted House Bill 220.

PASSED AND APPROVED, by the Alaskan Marine Dealers
Association on this 10th day of January, 1990.



President
ERNEST BRANNON

By 
Exec. Director
AMDA



Dollars and Sense

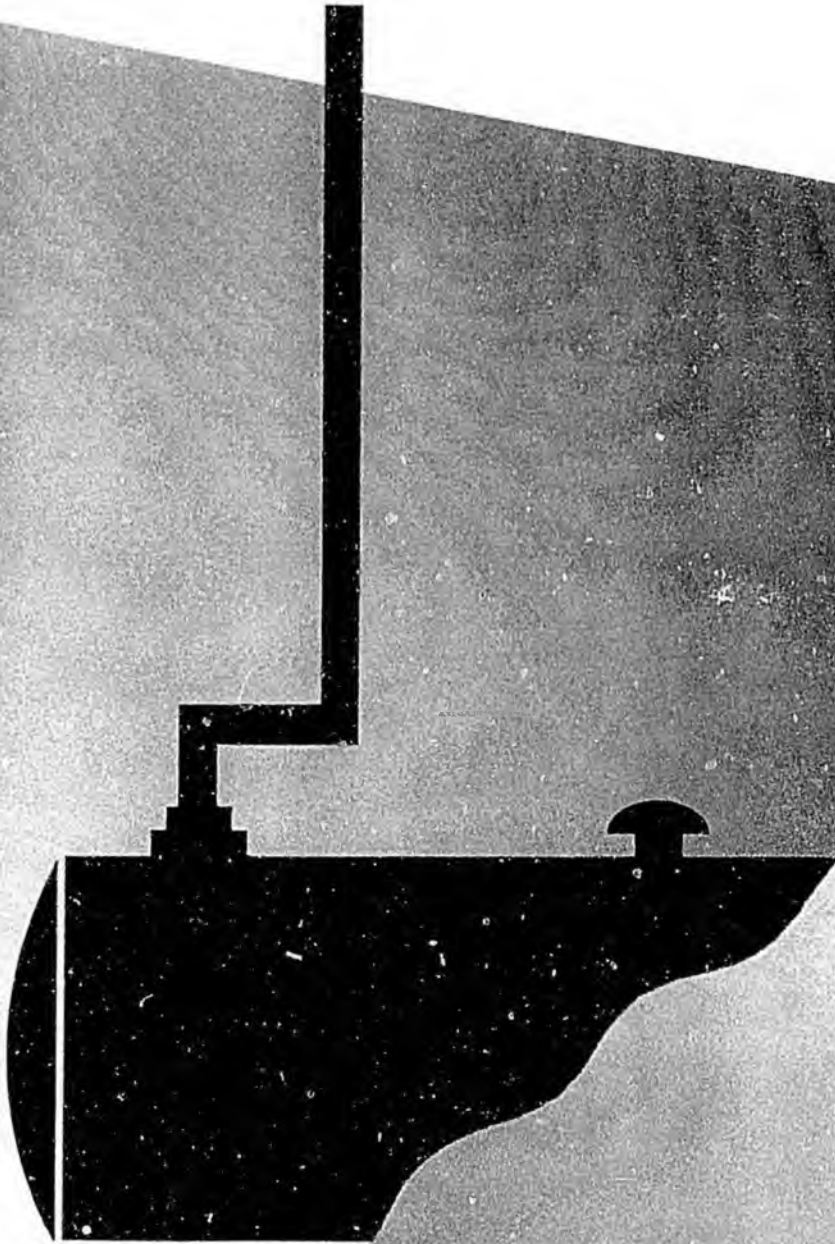


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DOLLARS AND SENSE

**A Summary of the Financial Responsibility Regulations
for Underground Storage Tank Systems**

**U.S. Environmental Protection Agency
Office of Underground Storage Tanks**

December 1988

WHAT ARE THESE REGULATIONS ALL ABOUT?

The U.S. Environmental Protection Agency (EPA) has published final regulations concerning financial responsibilities if you own or operate underground storage tank systems containing petroleum. (EPA plans to develop similar regulations for tanks containing hazardous substances in the future.) Although the full regulations appear in the Federal Register (October 26, 1988), this brochure provides a brief summary and answers some important questions about your financial responsibilities.

Why Has EPA Written These New Regulations?

Several million underground storage tank systems (USTs) in the United States contain petroleum. Tens of thousands of these USTs, including their piping, are currently leaking. Many more are expected to leak in the future. Leaking USTs can cause fires or explosions that threaten human safety. In addition, leaking USTs can contaminate nearby ground water. Because many of us depend on ground water for the water we drink, Federal legislation seeks to safeguard our nation's ground-water resources.

Congress responded in 1984 to the problem of leaking USTs by adding Subtitle I to the Resource Conservation and Recovery Act. Subtitle I requires EPA to develop regulations to protect human health and the environment from leaking USTs and specifically mandates requirements for financial responsibility.

What Is "Financial Responsibility" And Why Is It Necessary For You?

Financial responsibility means that if you own or operate an UST, you must ensure, either through insurance or other means explained below, that there will be money to help pay for the costs of third-party liability and corrective action caused by a leak from your tank. These costs could include cleaning up leaked petroleum, correcting environmental damage, supplying drinking water, and compensating people for personal injury or property damage. Financial responsibility also protects you. If your UST leaks, you may be faced with high cleanup costs or with lawsuits brought by third parties. Having financial responsibility means that money will be available to meet these costs.



What Kinds Of Tanks Are Covered By The Rule?

Financial responsibility must be shown for all USTs containing petroleum products. USTs are defined by law to be tank systems with at least 10 percent of their volume below the surface of the ground. The term "tank systems" also includes the piping connected to the tank.

What Kinds Of Tanks Are Not Covered?

Some tank systems have been exempted or deferred from the financial responsibility rule:

- ◆ USTs containing hazardous wastes already regulated under RCRA.
- ◆ UST systems containing electrical equipment and hydraulic lifts.
- ◆ Wastewater treatment USTs that are regulated by the Clean Water Act.
- ◆ USTs with a capacity of less than 110 gallons, and tanks holding a minimal concentration of regulated substances.
- ◆ USTs that serve as emergency back up, hold regulated substances for only a short time, and are expeditiously emptied after use.
- ◆ Field-constructed tanks.
- ◆ USTs containing radioactive materials and USTs used as backup diesel tanks at nuclear facilities.
- ◆ Airport hydrant fueling systems.
- ◆ Farm or residential tanks with capacity of 1,100 gallons or less storing motor fuel which is not for resale.
- ◆ Tanks for storing heating oil which is used on-site.
- ◆ Septic tanks.
- ◆ Certain pipeline systems, such as those regulated under the Natural Gas Pipeline Safety Act of 1968.
- ◆ Surface impoundments, pits, ponds, or lagoons.
- ◆ Storm or waste water collection systems.
- ◆ Flow-through process tanks.
- ◆ Liquid trap and other lines used in oil or gas production.
- ◆ Storage tanks on or above the floor of an underground area, such as a basement or tunnel.

WHO IS AFFECTED BY THESE REGULATIONS?

Do You Have To Show Financial Responsibility?

Either the owner or the operator of the tank must show financial responsibility, but not both if the owner and operator are different individuals or firms. It is the responsibility of the owner and operator to decide which of them will show financial responsibility.

Federal and State governments and their agencies that own USTs are not required to document financial responsibility. Local governments, however, must comply with the new rule.

If you owned or operated a tank that was properly closed before the date for compliance that applies to you, then the financial responsibility requirements will not apply to your closed tank.

What Do You Have To Do?

The new financial responsibility regulations require you to show that you have one of the following:

- ◆ at least \$1 million to cover the costs of a leak or spill from your underground storage tank if you are a **PETROLEUM MARKETER** (page 43334 of the Federal Register of October 26, 1988); or
- ◆ at least \$500,000 if you are **NOT A MARKETER** (page 43330 of the Federal Register of October 26, 1988).

You may show that you have this coverage by using insurance or any of the other methods of coverage explained in this brochure. The amount of financial responsibility that you must show does not limit your total liability for damages caused by a leak from your tank system.

When Must You Comply With The Financial Responsibility Requirements?

The rule takes effect 90 days after its publication in the Federal Register (i.e., January 24, 1989). The date when you will have to show financial responsibility, however, depends on the compliance category that you fall into, as shown below:

- ◆ If you fall into one of the following groups, you must show financial responsibility on the same day that the rule becomes effective on January 24, 1989: 1) petroleum marketing firms that own 1,000 or more USTs; and 2) any other UST owners that report a tangible net worth of \$20 million or more to the SEC, Dun and Bradstreet, the Energy Information Administration, or the Rural Electrification Administration.
- ◆ If you are a petroleum marketing firm that owns 100 to 999 USTs, you must show financial responsibility by October 26, 1989.
- ◆ If you are a petroleum marketing firm that owns 13 to 99 USTs at more than one site, you must show financial responsibility by April 26, 1990.
- ◆ If you fall into one of the following groups, you must show financial responsibility by October 26, 1990: 1) petroleum marketing firms owning 1 to 12 USTs or those having fewer than 100 USTs at one site; 2) all other UST owners with a tangible net worth of less than \$20 million; and 3) local governments.

What Happens If You Install A New UST Before Your Scheduled Compliance Date?

The regulations require that you show financial responsibility for a new UST when you notify EPA that you have installed the tank. If you install a new UST before the date when you must first show financial responsibility as described above, then you must only show financial responsibility for the new tank by that compliance date. You may ignore the line on the new tank notification form concerning financial responsibility.

What Amount Of Money Are You Responsible For?

The amount of money for which you must show financial responsibility depends on the type of business you operate, the amount of throughput of your tank, and the number of tanks you have:

- ◆ If your tank is used in petroleum production, refining or marketing (for example, service stations and truck stops), then you must be able to show that you have \$1 million of "per occurrence" coverage. "Per occurrence" means the amount of money that must be available to pay the costs of one occurrence.
- ◆ You must also have coverage for an annual aggregate amount. The annual aggregate amount is the total amount of financial responsibility that you must have to cover all leaks that might occur in one year. The amount of aggregate coverage that you must have depends on the number of tanks that you own or operate. The annual aggregate limits are:
 - 1 to 100 tanks, \$1 million annual aggregate; or
 - 101 or more tanks, \$2 million annual aggregate.

For example, if you own or operate three service stations with a total of 18 tanks, then you must have financial responsibility in the amount of \$1 million per occurrence and \$1 million annual aggregate. If you own or operate 50 service stations with a total of 200 tanks, you must have financial responsibility in the amount of \$1 million per occurrence and \$2 million annual aggregate.

- ◆ If your tanks are located at a facility not engaged in petroleum production, refining or marketing, and your facility has a monthly throughput of more than 10,000 gallons, then you must show that you have \$1 million of "per occurrence" coverage. If the facility has a monthly throughput of 10,000 gallons or less, then you must show that you \$500,000 of "per occurrence" coverage and \$1 million or \$2 million of annual aggregate coverage depending on the number of tanks you own or operate, as discussed above.

For example, if you are an automobile dealer with four small tanks with a total monthly throughput of 10,000 gallons, then you would only need to have financial responsibility in the amount of \$500,000 per occurrence and \$1 million annual aggregate. If you have 30 dealerships with a total of 110 tanks, you would need to have financial responsibility in the amount of \$500,000 per occurrence, but you would need \$2 million annual aggregate.

The chart on page 5 displays these financial responsibility requirements.



HOW DO YOU COMPLY WITH THE FINANCIAL RESPONSIBILITY REQUIREMENTS?

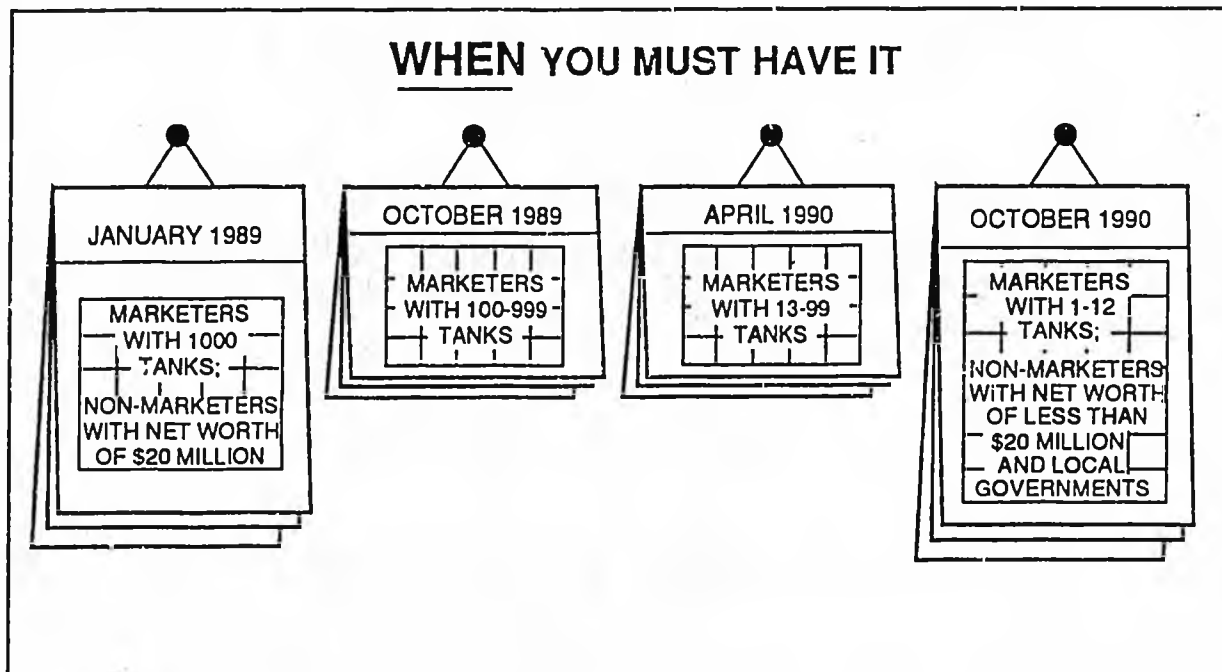
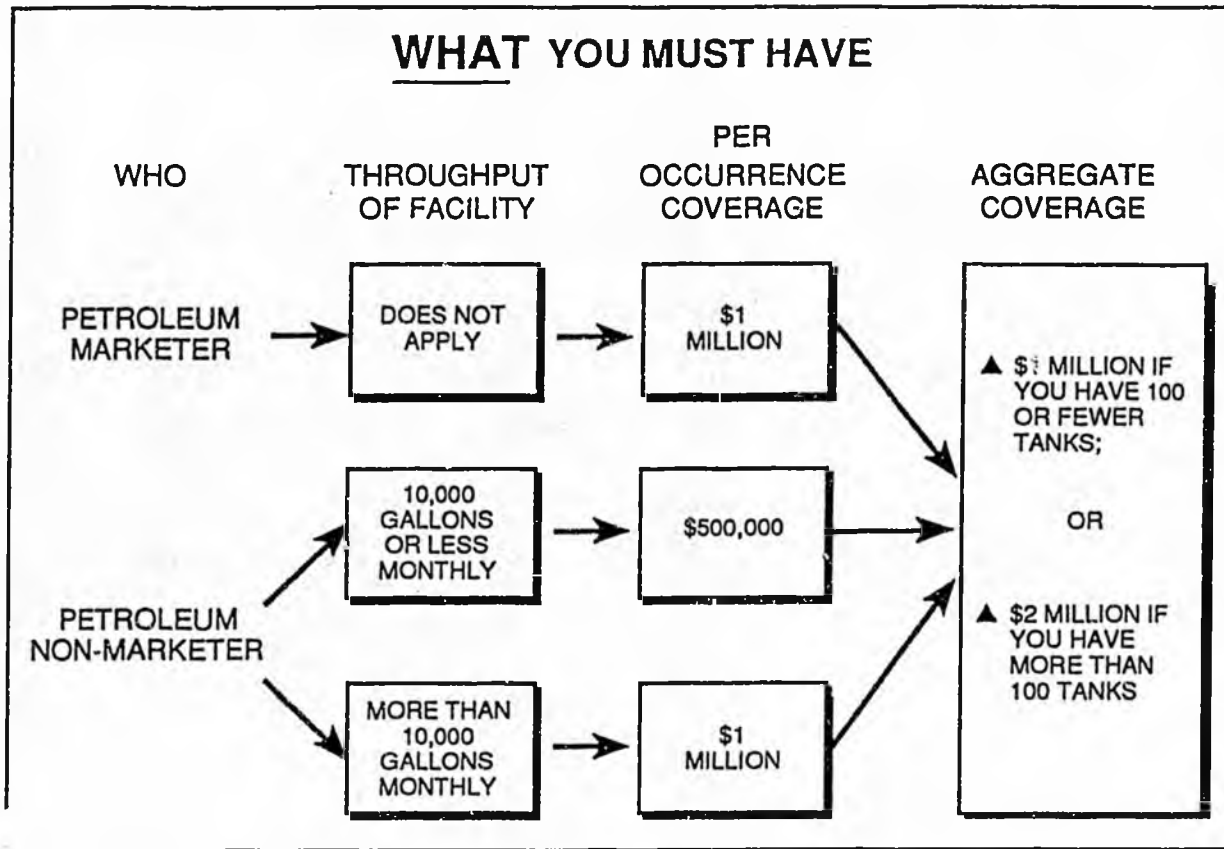
How Can You Show Financial Responsibility For Your USTs?

You can demonstrate financial responsibility for your USTs in several ways:

- ◆ Show that your firm can meet the costs of potential releases. If your firm has a tangible net worth of at least \$10 million, you can prove your financial responsibility by passing one of these two financial tests described on page 15.
- ◆ Show that someone else is responsible for cleanup and damage costs. You may arrange to have someone else be responsible for paying the costs of leaks from your USTs. This may be done in a number of ways (all are described in detail in the rule):
 1. Obtain insurance coverage from an insurer or a risk retention group (page 8); or
 2. Obtain a guarantee for the amount you are responsible for from a corporate parent, grandparent, sibling, or from another firm with whom you have a substantial business relationship. The provider of the guarantee has to pass one of the financial tests described on page 15; or
 3. Obtain a surety bond for the amount you are responsible for; or
 4. Obtain a letter of credit for the amount you are responsible for.
- ◆ Use State funds. If your State has established a State fund that will pay for the cleanup costs of a leak from your tank systems, then you may not need additional coverage to show you can pay for the same costs (page 7). You need to check to see if the State fund covers your tanks. You may also still need to show financial responsibility for the costs of compensating those injured by leaks, unless the State fund would also pay for those costs.
- ◆ Use State approved methods. You may also use any method of coverage approved by your State.
- ◆ Set up a trust fund. You may set up a fully-funded trust fund to cover your financial responsibility requirement.



IMPORTANT REQUIREMENTS AND MINIMUM DEADLINES FOR YOUR FINANCIAL RESPONSIBILITY



Can You Use A Combination Of Methods To Show Financial Responsibility?

You may also use a combination of methods to show financial responsibility. The methods you choose must cover all the costs that you are responsible for (both third-party liability and corrective action) and add up to the amount of coverage you are required to show. If the methods you choose cover different costs (for example, the insurance policy covers damages to other people and property and the guarantee covers cleanup costs), then each method must provide the total amount of responsibility that you must demonstrate.

What About State Funds?

Some States have established programs to pay for cleanup costs from petroleum leaks. These State funds often may be used by owners and operators of USTs to demonstrate financial responsibility. In most States, however, funds will pay only part of cleanup costs. In addition, few States will pay for third-party damages caused by petroleum leaks.

You should contact your State environmental agency to determine if the State has a fund that you may use to show financial responsibility. Find out what the State will pay for and what amount of financial responsibility you must obtain. In several States, for example, you must demonstrate financial responsibility for the first \$100,000 of cleanup costs before the State will demonstrate financial responsibility for the remaining costs. Most State funds will not pay more than \$1 million per occurrence.

If you don't know how to reach your State Coordinator, call EPA's Hotline for the phone number of your State Coordinator (1-800-424-9346)

What Happens If Your Coverage Is Cancelled?

If your method of financial responsibility is cancelled, you must find another mechanism to replace it within 60 days after you receive the notice of cancellation. If you cannot get another mechanism in that time, then you must notify the implementing Agency or the State.

Your coverage or insurance contract must specify that the provider of coverage or insurance may only cancel your coverage by sending you a notice by certified mail. For guarantees, surety bonds, or letters of credit, cancellation can only occur 120 days after you receive the notice. Insurance policy coverage can be cancelled 60 days after you receive the notice.

Can You Get Private Insurance Coverage For Your USTs?

Private insurance coverage for USTs is still limited, but there are several major insurers who offer policies. Insurers are often selective in the tanks they will cover. If you want to purchase insurance, you may be required to meet certain conditions for coverage. For example, your insurer may ask you to test your tank for tightness, or he may require certain improvements in your tank system, such as liners, cathodic corrosion protection, and leak detection. Some insurers simply will not provide coverage for certain types of tanks, like tanks that are more than 20 years old.

You may also be able to get insurance coverage through a risk retention group. A risk retention group is an insurance company formed by businesses or individuals with similar risks to provide insurance coverage for those risks. To join a risk retention group, you will probably be asked to make a one-time payment -- called a capital contribution -- and thereafter pay annual premiums as with any other insurance policy.

If you are interested in purchasing insurance through either a private insurer or a risk retention group to show financial responsibility for your USTs, you should contact your insurance agent. You may want to take with you the sample Endorsement or Certificate of Insurance that appear on pages 11 and 12. These documents are examples of policies that meet EPA financial responsibility requirements. If you belong to a trade association, it may also be able to provide you with information about insurers and risk retention groups that cover USTs.



WHAT RECORDS MUST YOU KEEP OR FILE WITH THE IMPLEMENTING AGENCY?

You must keep records of the type of coverage you have at your tank site or your place of business. In addition, you must maintain a certification of financial responsibility (see page 10). You must keep both of these records until your tanks are properly closed.

You only need to report and/or file copies of these records with EPA in the following cases:

- ◆ You install a new tank system.
- ◆ You have confirmed that a tank system is leaking.

- ◆ You receive notice that a method of coverage you have will be cancelled or will not provide sufficient coverage, and you are unable to get other coverage.
- ◆ EPA or a State agency requests your records.



SAMPLES OF FINANCIAL RESPONSIBILITY FORMS

CERTIFICATION OF FINANCIAL RESPONSIBILITY

[Owner or operator] hereby certifies that it is in compliance with the requirements of Subpart H of 40 CFR Part 280.

The financial assurance mechanism[s] used to demonstrate financial responsibility under Subpart H of 40 CFR Part 280 is [are] as follows:

[For each mechanism, list the type of mechanism, name of issuer, mechanism number (if applicable), amount of coverage, effective period of coverage and whether the mechanism covers "taking corrective action" and/or "compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "non-sudden accidental releases" or "accidental releases."]

[Signature of owner or operator]

[Name of owner or operator]

[Title]

[Date]

[Signature of witness or notary]

[Name of witness or notary]

[Date]

The owner or operator must update this certification whenever the financial insurance mechanism(s) used to demonstrate financial responsibility change(s).

ENDORSEMENT

Name: _____ [name of each covered location]

Address: _____ [address of each covered location]

Policy Number: _____

Period of Coverage: _____ [current policy period]

Name of [Insurer or Risk Retention Group]: _____

Address of [Insurer or Risk Retention Group]: _____

Name of Insured: _____

Address of Insured: _____

Endorsement:

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following underground storage tanks:

[List the number of tanks at each facility and the name(s) and address(es) of the facility(ies) where the tanks are located. If more than one instrument is used to assure different tanks at any one facility, for each tank covered by this instrument, list the tank identification number provided in the notification submitted pursuant to 40 CFR 280.22, or the corresponding state requirement, and the name and address of the facility.]

for [insert: "taking corrective action" and/or "compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "nonsudden accidental releases" or "accidental releases"; if coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location] arising from operating the underground storage tank(s) identified above.

The limits of liability are [insert the dollar amount of the "each occurrence" and "annual aggregate" limits of the Insurer's or Group's liability; if the amount of coverage is different for different types of coverage or for different underground storage tanks or locations, indicate the amount of coverage for each type of coverage and/or for each underground storage tank or location], exclusive of legal defense costs. This coverage is provided under [policy number]. The effective date of said policy is [date].

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

a. Bankruptcy or insolvency of the insured shall not relieve the ["Insurer" or "Group"] of its obligations under the policy to which this

endorsement is attached.

b. The ["Insurer" or "Group"] is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the insured for any such payment made by the ["Insurer" or "Group"]. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95-280.102.

c. Whenever requested by [a Director of an implementing agency], the ["Insurer" or "Group"] agrees to furnish to [the Director] a signed duplicate original of the policy and all endorsements.

d. Cancellation or any other termination of the insurance by the ["Insurer" or "Group"] will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received.

[Insert for claims-made policies:

e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the ["Insurer" or "Group"], within six months of the effective date of the cancellation or termination of the policy].

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97(b)(1) and that the ["Insurer" or "Group"] is ["licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer in one or more states".]

[Signature of authorized representative of Insurer or Risk Retention Group]

[Name of person signing]

[Title of person signing], Authorized

CERTIFICATE OF INSURANCE

Name: _____ [name of each covered location]

Address: _____ [address of each covered location]

Policy Number: _____

Endorsement (if applicable): _____

Period of Coverage: _____ [current policy period]

Name of [Insurer or Risk Retention Group]: _____

Address of [Insurer or Risk Retention Group]: _____

Name of Insured: _____

Address of Insured: _____

Certification:

1. [Name of Insurer or Risk Retention Group], [the "Insurer" or "Group"], as identified above, hereby certifies that it has issued liability insurance covering the following underground storage tank(s):

[List the number of tanks at each facility and the name(s) and address(es) of the facility(ies) where the tanks are located. If more than one instrument is used to assure different tanks at any one facility, for each tank covered by this instrument, list the tank identification number provided in the notification submitted pursuant to 40 CFR 280.22, or the corresponding state requirement, and the name and address of the facility.]

for [insert: "taking corrective action" and/or "compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "nonsudden accidental releases" or "accidental releases"; if coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location] arising from operating the underground storage tank(s) identified above.

The limits of liability are [insert the dollar amount of the "each occurrence" and "annual aggregate" limits of the Insurer's or Group's liability; if the amount of coverage is different for different types of coverage or for different underground storage tanks or locations, indicate the amount of coverage for each type of coverage and/or for each underground storage tank or location], exclusive of legal defense costs. This coverage is provided under [policy number]. The effective date of said policy is [date].

2. The ["Insurer" or "Group"] further certifies the following with respect to the insurance described in Paragraph 1:

a. Bankruptcy or insolvency of the insured shall not relieve the ["Insurer" or "Group"] of its obligations under the policy to which this certificate applies.

b. The ["Insurer" or "Group"] is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third-party, with a right of reimbursement by the insured for any such payment made by the ["Insurer" or "Group"]. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95-280.102.

c. Whenever requested by [a Director of an Implementing agency], the ["Insurer" or "Group"] agrees to furnish to [the Director] a signed duplicate original of the policy and all endorsements.

d. Cancellation or any other termination of the insurance by the ["Insurer" or "Group"] will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured.

[Insert for claims-made policies:

e. The insurance covers claims for any occurrence that commenced during the term of the policy that is discovered and reported to the ["Insurer" or "Group"] within six months of the effective date of the cancellation or other termination of the policy.]

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97(b)(2) and that the ["Insurer" or "Group"] is ["licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer in one or more states".]

[Signature of authorized representative of Insurer]

[Type name]

[Title], Authorized Representative of [name of Insurer or Risk Retention Group]

[Address of Representative]

AUDIOVISUALS, BROCHURES, AND HANDBOOKS ON USTs

Audiovisual Programs...

Installation

"Doing It Right"

Installation for the crews who do it

Order from:

American Petroleum Institute
1220 L Street, N.W.
Washington, DC 20005
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Petroleum Equipment Institute
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Tulsa, OK 74101
\$16.00 prepaid

"Recommended Practices on Tank Installation"

Companion booklet

Available from both API and PEI
\$10.00 prepaid

"A Question of When: Tank Installation for Inspectors"

"In Your Own Backyard"

Shorter version of inspector video for tank
owners

Order both from:

National Fire Protection Association
Attn: Jim Smalley
Batterymarch Park
Quincy, MA 02269
\$22.85 each prepaid

Tank Program Management

"Managing Underground Storage Tanks"

185-Slide Presentation Action Plan

Order from:

National Audiovisual Center
Customer Services Section/WD
8700 Edgeworth Drive
Capitol Heights, MD 20743-3701
(301) 763-1891
\$120.00 prepaid

Closure

"Tank Closure Without Tears: An Inspector's Safety Guide"

Order from:

New England Interstate Water
Pollution Control Commission
Attn: VIDEOS
85 Merrimac Street
Boston, MA 02114
\$20.00 prepaid

Companion booklet

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To borrow:

New England Regional Wastewater Institute
2 Fort Road
South Portland, ME 04106
Video and booklet
\$5.00 prepaid

"What Do We Have Here?: A Guide to Site Assessment at Closure"

Order from:

New England Interstate Water
Pollution Control Commission
Attn: VIDEOS
85 Merrimac Street
Boston, MA 02114
\$40.00 prepaid

Companion booklet

\$5.00 prepaid

Brochures...

Technical Requirements

"Musts for USTs" -- A Summary of the Regulations for Underground Storage Tank Systems
Stock No. 055-000-00294-1
\$2.50

Financial Responsibility

"Dollars and Sense" -- A Summary of the Financial Responsibility Regulations for Underground Storage Tank Systems
Stock No. 055-000-00293-2
\$1.25

Order both from:
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Washington, DC 20402
(202) 783-3238

Leak Detection

"Leak Lookout" -- Using External Leak Detectors to Prevent Petroleum Contamination from Underground Storage Tanks

Emergency Response

"Oh No!" -- Petroleum Leaks and Spills: What Do You Do?

Order both from:
U.S. Environmental Protection Agency
Office of Underground Storage Tanks
P.O. Box 6044
Rockville, MD 20850
Free

Handbooks...

Technology

"Cleanup of Releases from Petroleum USTs: Selected Technologies"
Stock No. 055-000-00272-0
\$7.50

"Petroleum Tank Releases Under Control: A Compendium of Current Practices for State UST Inspectors"
Stock No. 055-000-00295-9
\$8.50

"Processes Affecting Subsurface Transport of Leaking Underground Tank Fluids"
Stock No. 055-000-00269-0
\$3.25

"Survey of Vendors of External Petroleum Leak Monitoring Devices for Use with USTs"
Stock No. 055-000-00277-1
\$4.25

Order from:
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U.S. Government Printing Office
Washington, DC 20402
(202) 783-3238

FINANCIAL TEST OPTIONS

Test I

- a. Your firm must have a tangible net worth of at least \$10 million; and
- b. Your firm must have a tangible net worth of at least 10 times the amount of aggregate coverage that you are required to demonstrate plus any other liability coverage for which your firm is using the test to demonstrate financial responsibility to EPA; and
- c. Your firm must file the firm's annual financial statements with the Securities and Exchange Commission (SEC), or annually report the firm's tangible net worth to Dun and Bradstreet and receive a rating of 4A or 5A. Utilities may file financial statements with the Energy Information Administration, or the Rural Electrification Administration instead of the SEC; and
- d. Your firm must have audited financial statements that do not include an adverse auditor's opinion or disclaimer of opinion.

Test II

- a. Your firm must have a tangible net worth of at least \$10 million; and
- b. Your firm must have a tangible net worth of at least 6 times the amount of aggregate coverage that you are required to demonstrate; and
- c. Have U.S. assets that are at least 90 percent of total assets or at least 6 times the required aggregate amount; and
- d. Have net working capital at least 6 times the required aggregate amount, or a bond rating of AAA, AA, A, or BBB from Standard and Poor's, or Aaa, Aa, A, or Baa from Moody's; and
- e. Your firm must have audited financial statements that do not include an adverse auditor's opinion or disclaimer of opinion.

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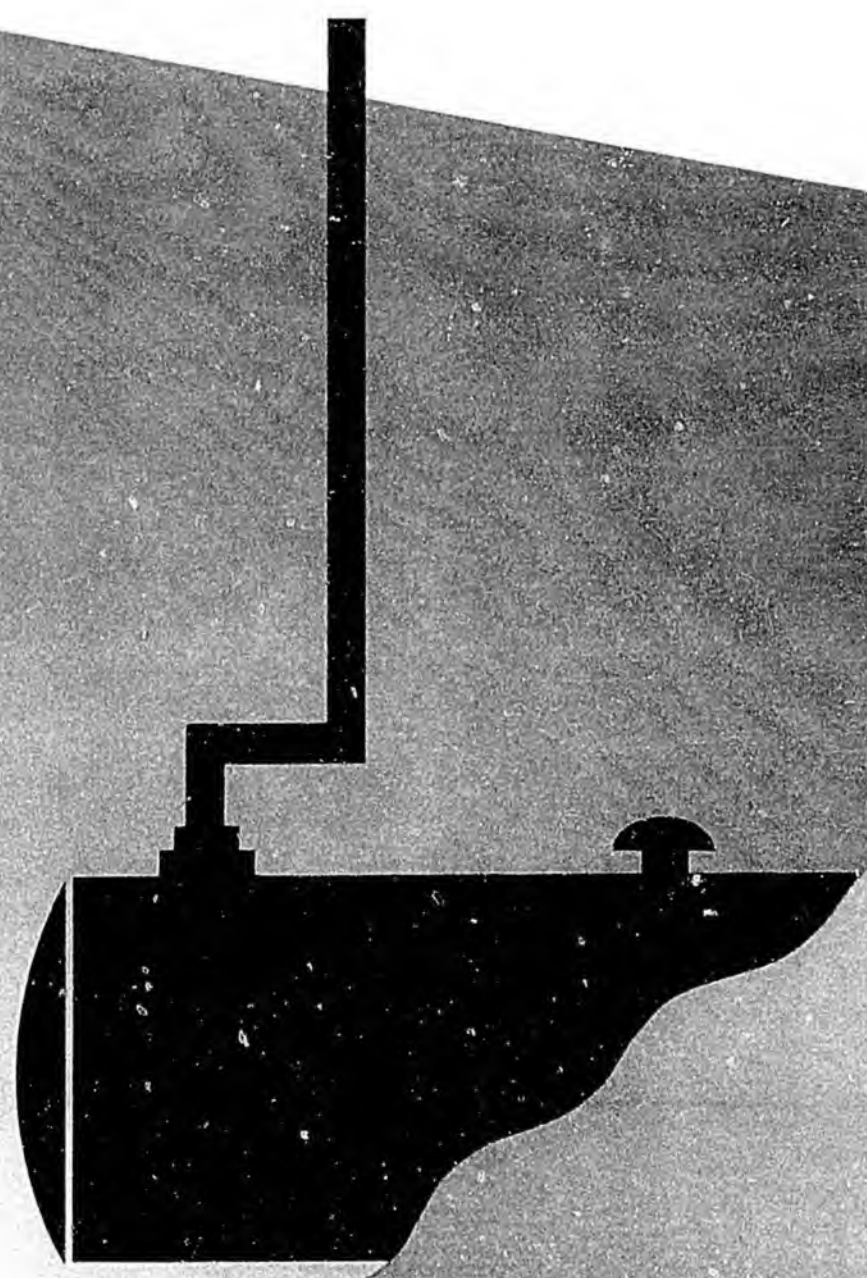
United States
Environmental Protection
Agency

Office of
Underground Storage Tanks
Washington, D.C. 20460

EPA/530/UST-88/008
September 1988



Musts for USTs



Musts for USTs

**A Summary of the New
Regulations for Underground
Storage Tank Systems**

**U.S. Environmental Protection Agency
Office of Underground Storage Tanks**

September 1988

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*The financial responsibility requirements are not summarized in this booklet. A complete explanation of your financial responsibility requirements will appear in the Federal Register and in an EPA brochure later in 1988.

WHAT ARE THESE REGULATIONS ABOUT?

The U.S. Environmental Protection Agency (EPA) has written regulations for many of the nation's underground storage tank systems. This booklet briefly describes the new technical requirements for these systems, which include tanks and piping. You can find the complete regulations in the Federal Register. Properly managed, underground storage tank systems -- often called USTs -- will not threaten our health or our environment.

Why Has EPA Written These New Regulations?

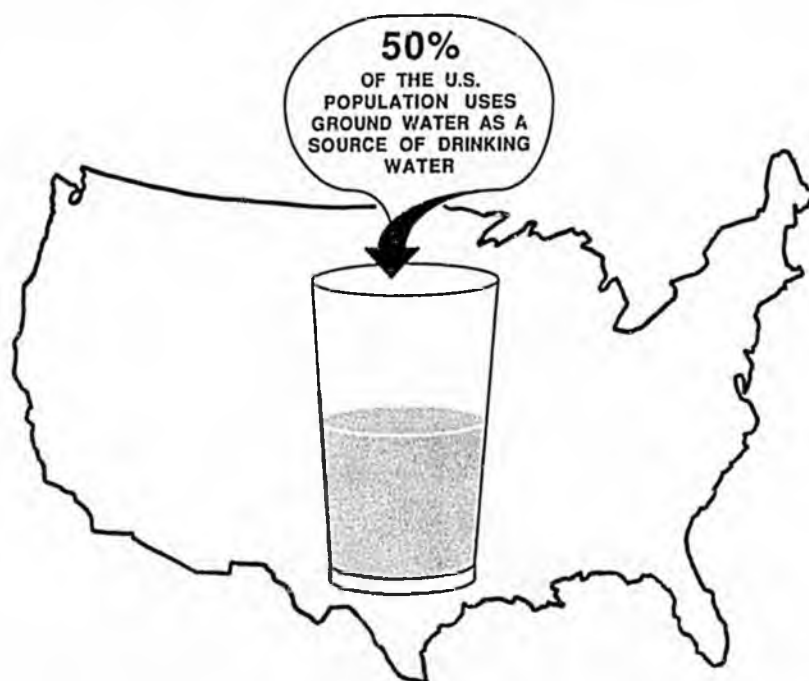
Several million underground storage tank systems in the United States contain petroleum or hazardous chemicals. Tens of thousands of these USTs, including their piping, are currently leaking. Many more are expected to leak in the future. Leaking USTs can cause fires or explosions that threaten human safety. In addition, leaking USTs can contaminate nearby ground water. Because many of us depend on ground water for the water we drink, Federal legislation seeks to safeguard our nation's ground-water resources.

Congress responded in 1984 to the problem of leaking USTs by adding Subtitle I to the Resource Conservation and Recovery Act (RCRA). Subtitle I requires EPA to develop regulations to protect human health and the environment from leaking USTs.

What Are The Goals Of The UST Regulations?

EPA has developed the UST regulations to make sure the following goals are reached:

- ◆ To prevent leaks and spills.
- ◆ To find leaks and spills.
- ◆ To correct the problems created by leaks and spills.
- ◆ To make sure that owners and operators of USTs can pay for correcting the problems created if their USTs leak.
- ◆ To make sure each State has a regulatory program for USTs that is as strict as or stricter than the Federal regulations.



WHY WORRY ABOUT LEAKS AND SPILLS?

◆ *Because your tank or its piping may leak.* As many as 25 percent of all underground storage tanks (USTs) may now be leaking. Many more will leak in the near future, possibly including yours. Your tank or its piping might be leaking right now. If a tank system is past its prime (over 10 years old), especially if it's not protected against corrosion, the potential for leaking increases dramatically. Newer tank systems (especially the piping) can also leak, and spills can happen anytime. Don't let your profits drain away.



◆ *Because it's in your best interest.* Leaking UST sites can be very costly to clean up. Imagine how much money you'd lose if your tank could not be used for weeks during lengthy cleanups or if local residents sued you for property damages. The costs can run into the thousands, perhaps as much as \$100,000 and more. Detect and clean up spills or leaks -- before they hurt you financially.

◆ *Because it's the law.* But it's the law for good reason. Much of our country depends on ground water for drinking water, and leaked or spilled petroleum can contaminate this vital resource. Explosions are another potential hazard. Many State and local governments, therefore, already require specific steps to prevent, detect, or clean up leaks and spills. Others will soon have similar requirements. Check with your local and State governments to learn what requirements apply to you.

◆ *Because it's for the good of the community and the environment.* Leaks and spills can have serious consequences. Petroleum can contaminate soil, drinking water supplies, and air. Petroleum and its resulting vapors can also accumulate in nearby confined spaces, such as septic tanks, sewers, and the basements of homes. These vapors are poisonous and can cause a fire or explosion.

How Will These Regulations Affect You?

The regulations describe the steps you -- the tank owner or operator -- need to take to help protect our health and environment. These steps will also help you avoid the high cost of cleaning up the environment and defending yourself in legal actions that can result if your tank or its piping leaks.

You should note the following major points of the UST regulations:

- ◆ If you install an UST after December 1988, it must meet the requirements for new USTs concerning correct installation, spill and overfill prevention, corrosion protection, and leak detection (see pages 7-11).
- ◆ If you have an UST that was installed before December 1988, it must meet two major requirements --
 - 1) Requirements for corrosion protection and spill and overfill prevention (see page 13).
 - 2) Leak detection requirements (see pages 14-15).
- ◆ You must take corrective action in response to leaks (see pages 19-20).
- ◆ You must follow closure requirements for tanks you temporarily or permanently close (see pages 23-24).
- ◆ You are financially responsible for the cost of cleaning up a leak and compensating other people for bodily injury and property damage caused by your leaking UST.

Although these points are discussed in the following sections, additional information appears in the "Technical Questions & Answers" section starting on page 31.

What's Your "Financial Responsibility" For Petroleum Leaks?

A complete explanation of your financial responsibility requirements will appear in the Federal Register and in an EPA brochure later in 1988.

In general, owners or operators of petroleum USTs must be able to demonstrate their ability to pay for damage that could be caused if their tanks leaked. These payments would need to cover the costs of cleaning up a site (see page 20) and compensating other people for bodily injury and property damage.

Who Is "The Regulatory Authority"?

This booklet describes EPA's basic requirements for USTs, but your State or local regulatory authority may have requirements that are somewhat different or more strict. You will need to identify your regulatory authority and its specific requirements for your USTs. If you are not sure who your regulatory authority is, call your local fire marshal for help.

What's An "UST"?

An UST is any tank, including underground piping connected to the tank, that has at least 10 percent of its volume underground. The regulations apply only to USTs storing either petroleum or certain hazardous chemicals.

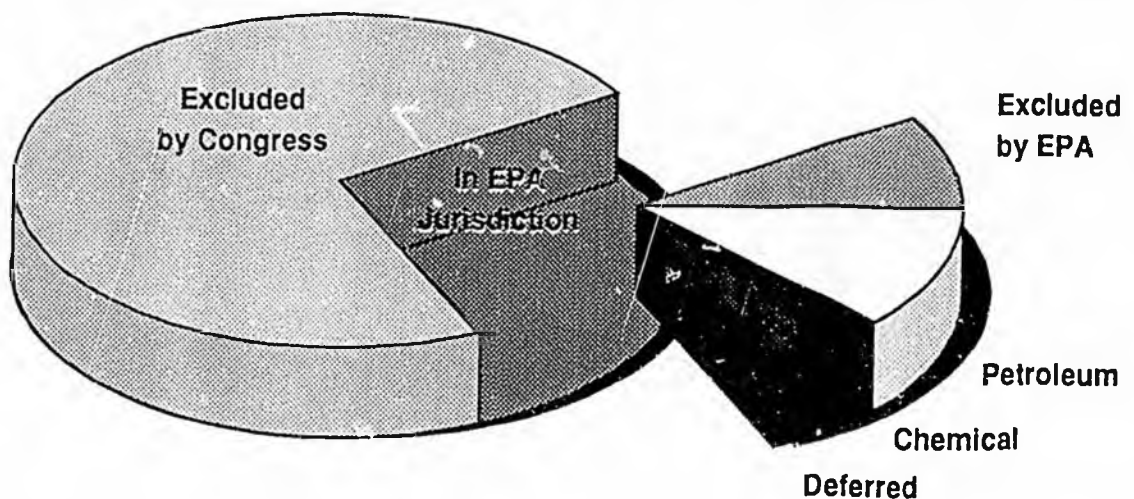
The "For Chemical USTs Only" section starting on page 27 identifies hazardous chemicals and special requirements for chemical USTs. Generally, the requirements for both petroleum and chemical USTs are very similar.

Some kinds of tanks are not covered by these regulations:

- ◆ Farm and residential tanks holding 1,100 gallons or less of motor fuel used for noncommercial purposes.
- ◆ Tanks storing heating oil used on the premises where it is stored.
- ◆ Tanks on or above the floor of underground areas, such as basements or tunnels.

- ◆ Septic tanks and systems for collecting storm water and wastewater.
- ◆ Flow-through process tanks.
- ◆ Tanks holding 110 gallons or less.
- ◆ Emergency spill and overfill tanks.

Other storage areas that might be considered "tanks" are also excluded, such as surface impoundments and pits. Some "tanks," such as field-constructed tanks, have been deferred from most of the regulations. The regulations published in the **Federal Register** fully identify various tank types and which requirements apply to them.



WHY DO USTs CAUSE PROBLEMS?

No Corrosion Protection

Most of the UST systems already in the ground have tanks and piping made of bare steel. When unprotected steel is buried in the ground, it can be eaten away by corrosion. The UST regulations require corrosion protection for all USTs. The "Technical Questions & Answers" section explains how corrosion works and ways to defeat it (see pages 31 and 32).

Spills and Overfills

In addition to leaks from tanks and piping, spills and overfills cause many UST releases. When more petroleum is delivered into the tank than it can hold, an overfill happens. When the delivery truck's hose is disconnected incorrectly, a spill results. The "Technical Questions & Answers" section identifies ways to combat spills and overfills (see page 33).

Installation Mistakes

Tanks and piping also leak if they are not put in the ground properly. For example, if poorly selected or compacted backfill material is used when covering the UST, or if pipe fittings are inadequately attached to the UST, then leaking can result. You can avoid mistakes made during installation by using an installer who carefully follows approved installation procedures. The "Technical Questions & Answers" section identifies approved installation procedures (see page 33).

Piping Failures

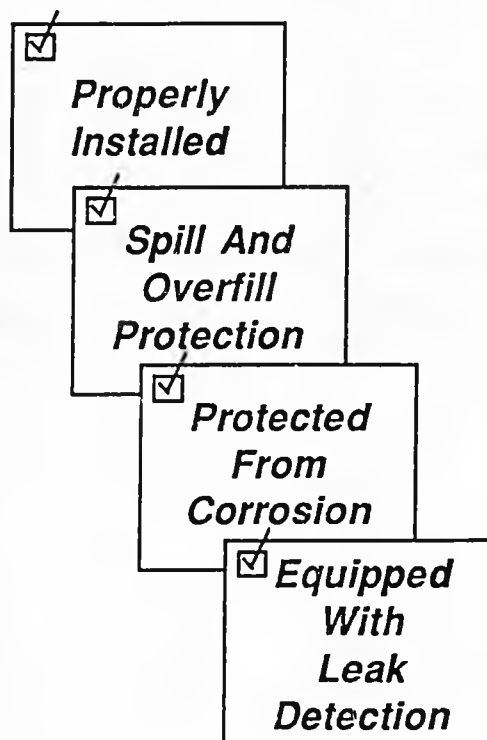
EPA studies show that most leaks result from piping failure. Piping is smaller and less sturdy than tanks. It is assembled in the field with numerous connections and usually installed near the ground's surface. As a result, piping suffers much more than tanks from the effects of installation mistakes, excessive surface loads, the stress of underground movement, and corrosion. Using a skilled installer is even more critical to the proper installation of piping. It is important to remember that the regulations apply to the entire UST system -- both tanks and piping.

WHAT DO NEW PETROLEUM USTs NEED?

You must meet four requirements when you install a new UST system:

- ◆ You must certify that the tank and piping are installed properly according to industry codes.
- ◆ You must equip the UST with devices that prevent spills and overfills. Also, you must follow correct tank filling practices.
- ◆ You must protect the tank and piping from corrosion.
- ◆ You must equip both the tank and piping with leak detection.

The following sections provide basic information on these requirements. Also, see the "Technical Questions & Answers" section starting on page 31 for more information.



REMEMBER...

New UST systems are those that are installed after December 1988.

Those USTs installed between May 1985 and December 1988 must meet two minimum requirements:

- ◆ The UST must prevent releases due to corrosion or structural failure.
- ◆ The stored contents must be compatible with the tank's interior wall.

After December 1988, these older USTs must meet the requirements for existing USTs (see pages 13-17).

Installing UST Systems The Right Way

First, install USTs correctly by using qualified installers who follow industry codes. Faulty installation is a significant cause of UST failures, particularly piping failures. (See pages 33, 37 and 39 for information on correct installation practices and industry codes.) You must also make sure that the contents you store are compatible with the UST system.

Second, you will also need to certify on a notification form (see page 25) that you have used a qualified installer who can assure you that your UST has been installed correctly.

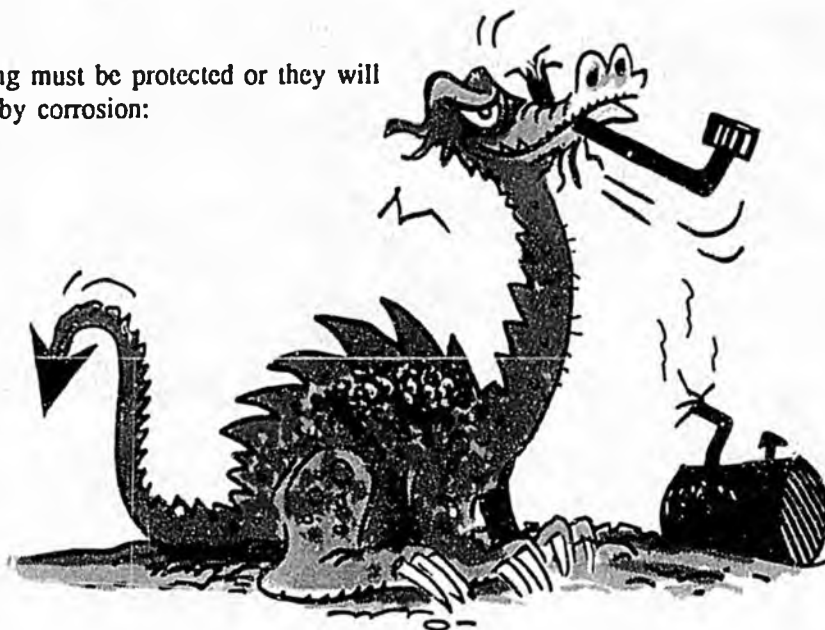
Preventing Spills And Overfills

Because human error causes most spills and overfills, these mistakes can be avoided by following the correct tank filling practices required by the UST regulations. If you and your distributor follow these practices, nearly all spills and overfills can be prevented from happening. Also, the UST regulations require the use of mechanical devices, such as spill catchment basins and overfill alarms, to prevent these releases from harming the environment. (Correct tank filling practices and preventive devices are identified on page 33.)

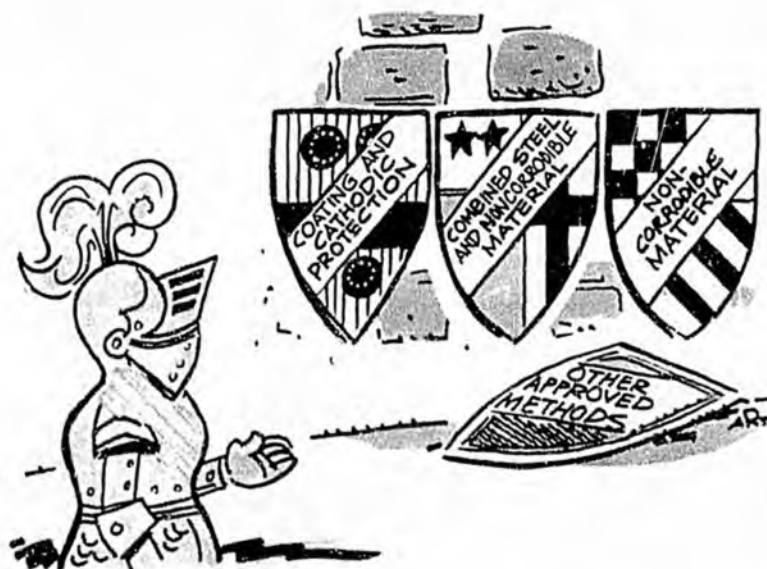


Protecting Tanks And Piping From Corrosion

Tanks and piping must be protected or they will be eaten away by corrosion:



- ◆ Steel tanks and piping can be coated with a corrosion-resistant coating and “cathodically” protected. (Cathodic protection uses either sacrificial anodes or impressed current, methods described on page 31.)
- ◆ Tanks and piping can be protected by other methods approved by the regulatory authority.
- ◆ Tanks and piping can be made totally of a noncorrodible material, such as fiberglass-reinforced plastic. (Metal piping connected to noncorrodible tanks still requires corrosion protection.)
- ◆ Steel tanks (but not piping) can be protected using a method in which a thick layer of noncorrodible material is bonded to the tank.



Detecting Leaks From Tanks

You must check your tanks at least once a month to see if they are leaking.

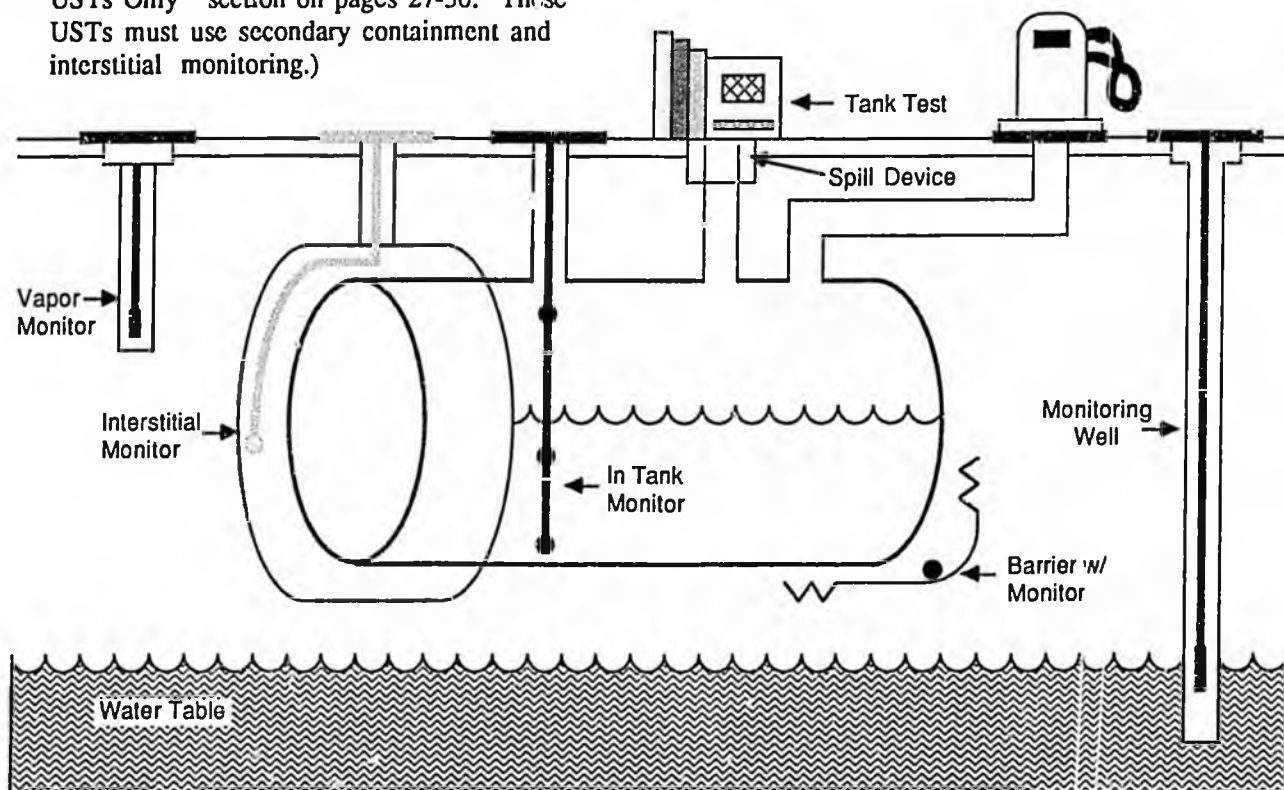
You must use one (or a combination) of the following monthly monitoring methods:

- ◆ Automatic tank gauging.
- ◆ Monitoring for vapors in the soil.
- ◆ Interstitial monitoring.
- ◆ Monitoring for liquids on the ground water.
- ◆ Other approved methods.

For Young Tanks... An Alternate Leak Detection Method

You have one additional leak detection choice, but only for 10 years after you install your UST. Instead of using one of the monthly monitoring methods noted above, you can check for leaks by combining monthly inventory control with tank tightness testing every 5 years. After 10 years, you must use one of the monthly monitoring methods listed above.

Information on these leak detection methods appears in the "Technical Questions & Answers" section on pages 34-35. (Special requirements for USTs containing hazardous chemicals are described in the "For Chemical USTs Only" section on pages 27-30. These USTs must use secondary containment and interstitial monitoring.)



Detecting Leaks From Piping

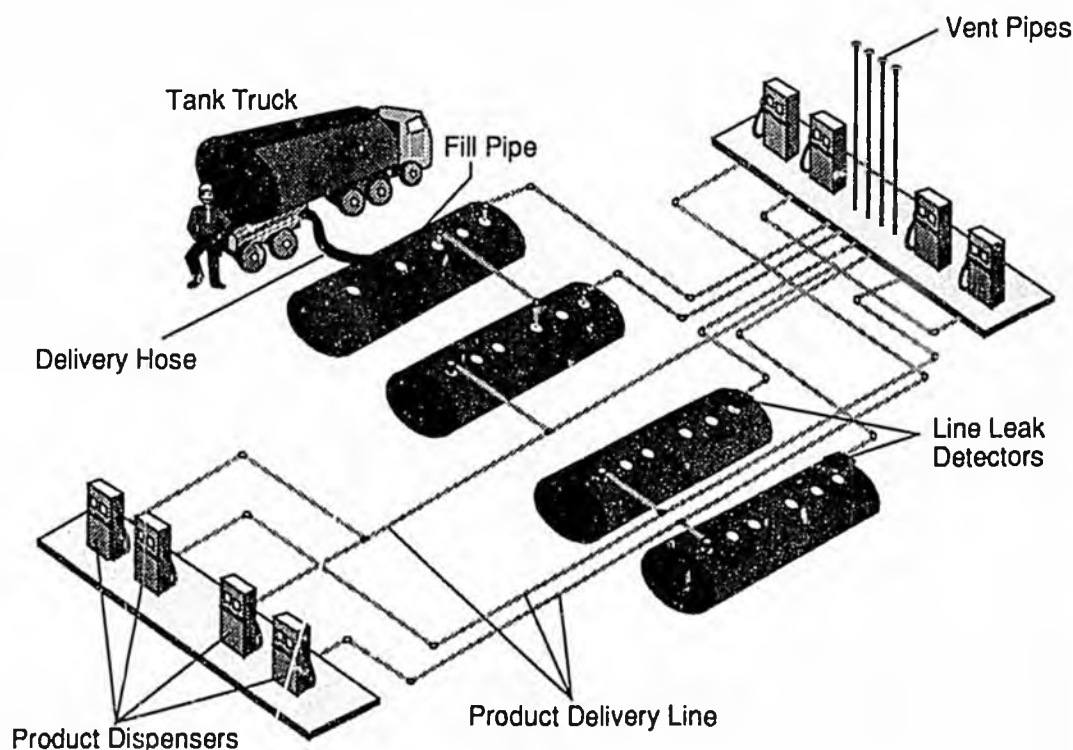
Because most leaks come from piping, your piping must have leak detection.

If your piping is pressurized, you must meet the following requirements:

- ◆ The piping must have devices to automatically shut off or restrict flow or have an alarm that indicates a leak.
- ◆ You must either conduct an **annual** tightness test of the piping or use one of the following monthly methods noted above for tanks: vapor monitoring, ground-water monitoring, interstitial monitoring, or other approved monthly methods.

If your UST has suction piping, your leak detection requirements will depend on which type of suction piping you have:

- ◆ The most commonly used suction piping requires either monthly monitoring (using one of the four monthly methods noted above for use on pressurized piping) or tightness testing of the piping every 3 years.
- ◆ Another kind of suction piping is safer and does not require leak detection. This safer method has two main characteristics:
 - Below-grade piping is sloped so that the piping's contents will drain back into the storage tank if the suction is released.
 - Only one check valve is included in each suction line and is located directly below the suction pump.



A Typical Tank Facility

WHAT ABOUT EXISTING PETROLEUM USTs?

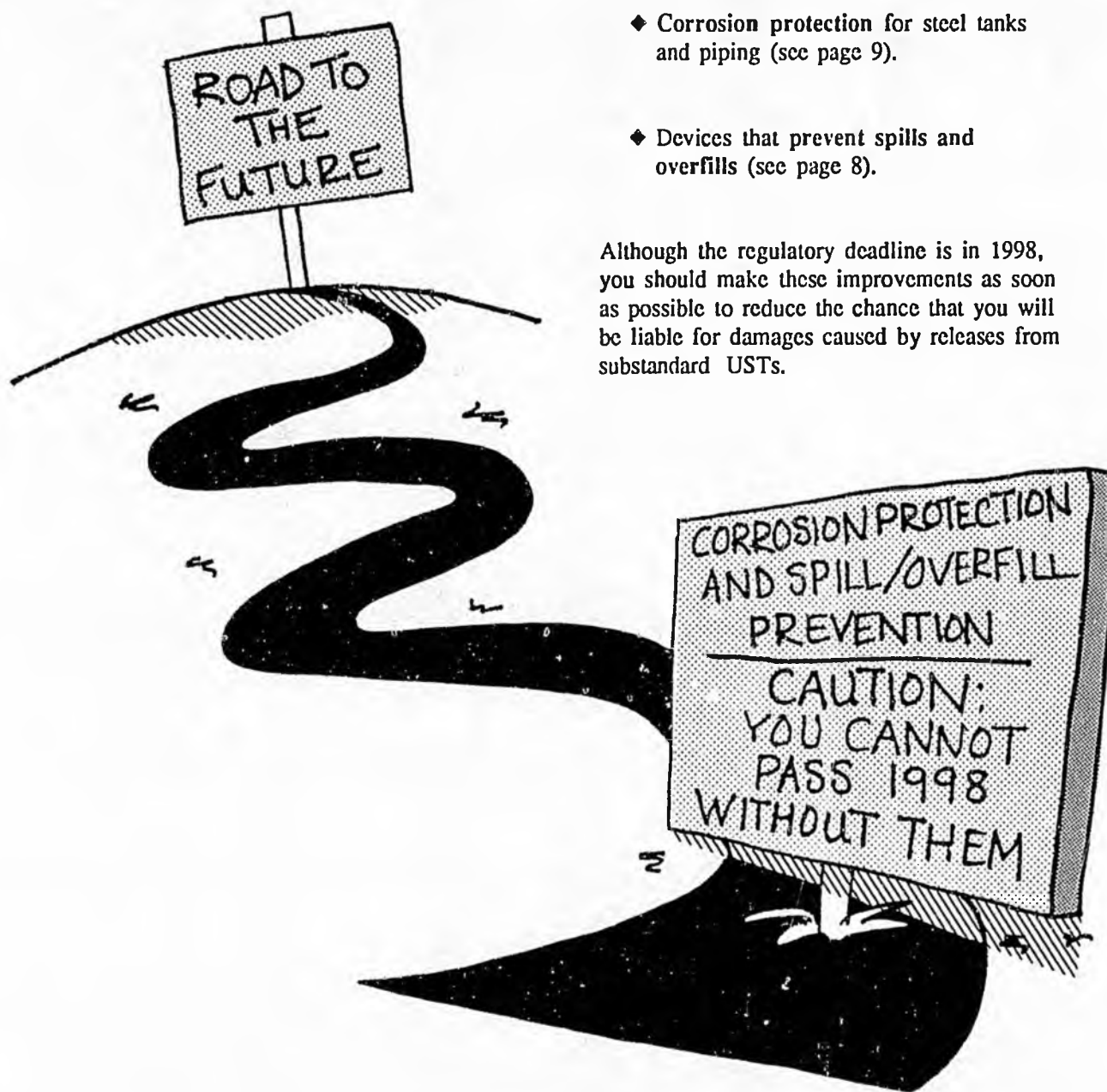
Existing UST systems are those installed before December 1988. In addition to immediately starting tank filling procedures that will prevent spills and overfills, you will need to meet the following requirements for corrosion protection, spill and overfill prevention, and leak detection. (The chart on pages 16-17 displays these requirements and when you must meet them.)

Deadline For Corrosion Protection And For Devices To Prevent Spills And Overfills

By December 1998 (10 years after the UST regulations become effective), USTs that were installed before December 1988 must have:

- ◆ Corrosion protection for steel tanks and piping (see page 9).
- ◆ Devices that prevent spills and overfills (see page 8).

Although the regulatory deadline is in 1998, you should make these improvements as soon as possible to reduce the chance that you will be liable for damages caused by releases from substandard USTs.



Deadlines And Choices For Leak Detection

Deadlines...

Leak detection requirements are being phased in for existing USTs depending on their age:

If the tank was installed...	It must have leak detection by December of...
before 1965 or unknown	1989
1965-1969	1990
1970-1974	1991
1975-1979	1992
1980-Dec.1988	1993

This schedule will make sure that the older USTs, which are more likely to leak, have leak detection first.

Choices For Existing Tanks...

You have three basic choices for making sure your tanks are checked at least monthly to see if they are leaking:

- ◆ You can use any of the monthly monitoring methods listed for new tanks on page 10.
- ◆ If your UST has corrosion protection or internal tank lining and devices that prevent spills and overfills, you can combine monthly inventory control with tank tightness testing every 5 years. This choice, however, can only be used for 10 years after adding corrosion protection or internally lining the tank (or until December 1998, whichever date is later). After 10 years, you must use one of the monthly monitoring methods on page 10.
- ◆ If your UST does not have corrosion protection or internal tank lining and devices that prevent spills and overfills, you can combine monthly inventory control with *annual* tank tightness testing. Please note, however, that this method is allowed only until December 1998. After that, your UST -- now equipped with corrosion protection or an internal tank lining, and devices that prevent spills and overfills -- must use one of the first two leak detection choices noted above.

Some Choices May Be Better...

You have a leak detection advantage if your UST has been "upgraded" with corrosion protection and devices to prevent spills and overfills. For 10 years after "upgrading," you can use a leak detection method that will be less costly and easier to apply than most other leak detection methods. This method requires you to conduct monthly inventory control and to have tank tightness tests performed every 5 years (see page 14). By contrast, USTs that have not been "upgraded" must have tank tightness tests every year.

Choices For Existing Piping...

You have two basic choices of leak detection for piping depending on the type of piping you use:

- ◆ By December 1990, existing pressurized piping must meet the leak detection requirements for new pressurized piping (see page 11).
- ◆ Existing suction piping must meet the requirements for new suction piping (see page 11) at the same time the tank meets the leak detection schedule given above.

REMEMBER...

No matter which leak detection methods you use for tanks and piping, they must be working by the deadlines described above. If not, you must close your UST or replace it with a new UST.

The chart on pages 16-17 displays all these leak detection requirements and the ones for corrosion protection and spill and overfill prevention.



WHAT DO YOU HAVE TO DO? Minimum Requirements

You must have Leak Detection, Corrosion Protection, and Spill/Overfill Prevention.

For WHEN you have to add these to your tank system, see the chart on the right. →

LEAK DETECTION	
NEW TANKS <i>2 Choices</i>	<ul style="list-style-type: none"> ● Monthly Monitoring* ● Monthly Inventory Control and Tank Tightness Testing Every 5 Years (You can only use this choice for 10 years after installation.)
EXISTING TANKS <i>3 Choices</i> <i>The chart at the bottom of the next page displays these choices.</i>	<ul style="list-style-type: none"> ● Monthly Monitoring* ● Monthly Inventory Control and Annual Tank Tightness Testing (This choice can only be used until December 1998.) ● Monthly Inventory Control and Tank Tightness Testing Every 5 Years (This choice can only be used for 10 years after adding corrosion protection and spill/overfill prevention or until December 1998, whichever date is later.)
NEW & EXISTING PRESSURIZED PIPING <i>Choice of one from each set</i>	<ul style="list-style-type: none"> ● Automatic Flow Restrictor ● Automatic Shutoff Device -and- ● Continuous Alarm System ● Annual Line Testing ● Monthly Monitoring* (except automatic tank gauging)
NEW & EXISTING SUCTION PIPING <i>3 Choices</i>	<ul style="list-style-type: none"> ● Monthly Monitoring* (except automatic tank gauging) ● Line Testing Every 3 Years ● No Requirements (if the system has the characteristics described on page 11)
CORROSION PROTECTION	
NEW TANKS <i>3 Choices</i>	<ul style="list-style-type: none"> ● Coated and Cathodically Protected Steel ● Fiberglass ● Steel Tank clad with Fiberglass
EXISTING TANKS <i>4 Choices</i>	<ul style="list-style-type: none"> ● Same Options as for New Tanks ● Add Cathodic Protection System ● Interior Lining ● Interior Lining and Cathodic Protection
NEW PIPING <i>2 Choices</i>	<ul style="list-style-type: none"> ● Coated and Cathodically Protected Steel ● Fiberglass
EXISTING PIPING <i>2 Choices</i>	<ul style="list-style-type: none"> ● Same Options as for New Piping ● Cathodically Protected Steel
SPILL / OVERFILL PREVENTION	
ALL TANKS	<ul style="list-style-type: none"> ● Catchment Basins -and- ● Automatic Shutoff Devices -or- ● Overfill Alarms -or- ● Ball Float Valves
<p>* Monthly Monitoring includes: Automatic Tank Gauging Ground-Water Monitoring Vapor Monitoring Other Approved Methods Interstitial Monitoring</p>	

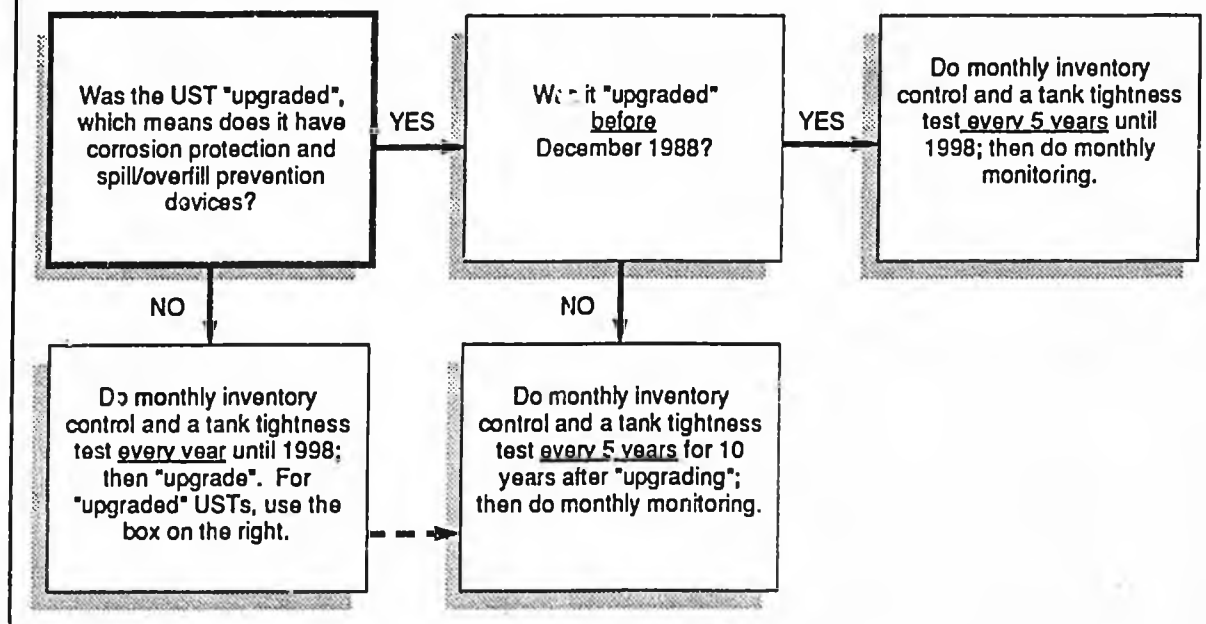
WHEN DO YOU HAVE TO ACT? Important Deadlines

← For WHAT you have to do, see the chart on the left.

TYPE OF TANK & PIPING	LEAK DETECTION	CORROSION PROTECTION	SPILL / OVERFILL PREVENTION
New Tanks and Piping*	At installation	At installation	At installation
Existing Tanks** Installed: Before 1965 or unknown 1965 - 1969 1970 - 1974 1975 - 1979 1980 - December 1988	By No Later Than: December 1989 December 1990 December 1991 December 1992 December 1993	} December 1998	} December 1998
Existing Piping** Pressurized Suction	December 1990 Same as existing tanks	December 1998 December 1998	Does not apply Does not apply
<p>* New tanks and piping are those installed after December 1988</p> <p>** Existing tanks and piping are those installed before December 1988</p>			

IF YOU CHOOSE TANK TIGHTNESS TESTING AT EXISTING USTs ...

If you don't use monthly monitoring at existing USTs, you must use a combination of periodic tank tightness tests and monthly inventory control. This combined method can only be used for a few years, as the chart below displays.



HOW DO YOU CORRECT PROBLEMS CAUSED BY LEAKS?

What Do You Do When You Suspect Your Petroleum UST Is Leaking?

Various warning signals indicate that your UST may be leaking and creating problems for the environment and your business. You can avoid most of these problems by paying careful attention to these warning signals and by taking the appropriate actions.

Warnings From Equipment

You should suspect a leak when you discover the following warning signals from equipment:

- ◆ Unusual operating conditions (such as erratic behavior of the dispensing pump).
- ◆ Results from leak detection monitoring and testing that indicate a leak.

You need to confirm quickly whether these suspected leaks are real. What at first appears to be a leak may be the result of faulty equipment that is part of your UST system or its leak detection. Double check this equipment carefully for failures. You may simply need to repair or replace equipment that is not working.

If repair or replacement of faulty equipment does not solve the problem, then you must report this finding to the regulatory authority and conduct tightness tests of the entire UST system. If these tests indicate a leak, you need to report to

the regulatory authority and follow the actions for a confirmed leak (see page 20).

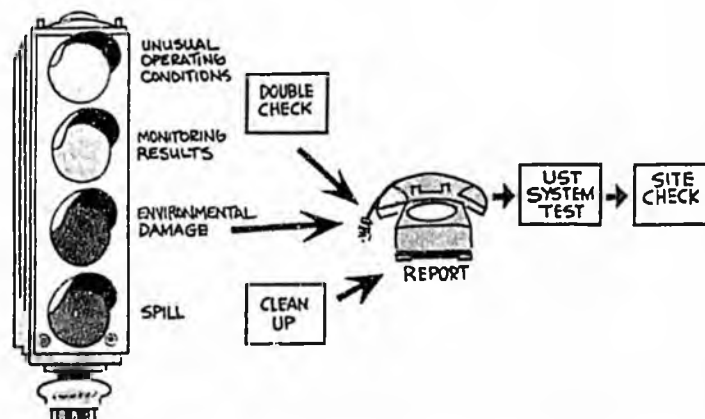
Warnings In The Environment

You should also suspect a leak if evidence of leaked petroleum appears at or near your site. For example, neighbors might tell you they have smelled petroleum vapors in their basements or tasted petroleum in their drinking water. You might even discover evidence of environmental damage as you investigate the suspected equipment failures discussed above.

Whenever evidence of environmental damage is discovered, you must take the following actions:

- ◆ Report this discovery immediately to the regulatory authority.
- ◆ Conduct tightness tests of the entire UST system.
- ◆ Investigate the UST site for additional information on the extent and nature of the environmental damage.

The results of these system tests and site checks will help answer the crucial question: "Is my UST leaking?" If the answer is yes, then you will need to follow the actions for responding to confirmed leaks (see page 20).



What Do You Do When Your Petroleum UST Leaks?

Your response to confirmed leaks and spills (including overfills) comes in two stages: short-term and long-term.

Short-Term Actions

- ◆ Take immediate action to stop and contain the leak or spill.



- ◆ Tell the regulatory authority within 24 hours that there is a leak or spill. However, petroleum spills and overfills of less than 25 gallons do not have to be reported if you immediately contain and clean up these releases.
- ◆ Make sure the leak or spill poses no immediate hazard to human health and safety by removing explosive vapors and fire hazards. Your fire department should be able to help or advise you with this task. You must also make sure you handle contaminated soil properly so that it poses no hazard (for example, from vapors or direct contact).

- ◆ Find out how far the petroleum has moved and begin to recover the leaked petroleum (such as product floating on the water table).
- ◆ Report your progress and any information you have collected to the regulatory authority no later than 20 days after you have confirmed a leak or spill.
- ◆ Investigate to determine if the leak has damaged or might damage the environment. You must report to the regulatory authority what you have learned from a full investigation of your site within 45 days of confirming a leak or spill. At the same time, you must also submit a report explaining how you plan to remove the leaked petroleum, if you have found contaminated ground water. Additional site studies may be required if necessary.

These actions are fully explained in the UST regulations and in a brochure (see page 38).

Some leaks and spills will require additional, long-term attention to correct the problem.

Long-Term Actions

Based on the information you have provided, the regulatory authority will decide if you must take further action at your site. You may need to take two more actions:

- ◆ Develop and submit a Corrective Action Plan that shows how you will meet requirements established for your site by the regulatory authority.
- ◆ Make sure you meet the requirements approved by the regulatory authority for your site.

Can Leaking Tanks Be Repaired?

You can repair a leaking tank if the person who does the repair carefully follows standard industry codes that establish the correct way to conduct repairs. (See page 39 for repair codes.)

Within 30 days of the repair, you must prove that the tank repair has worked by doing one of the following:

- ◆ Having the tank inspected internally or tightness tested following standard industry codes.
- ◆ Using one of the monthly leak detection monitoring methods (except for the method combining inventory control and tank tightness testing).
- ◆ Using other methods approved by the regulatory authority.

Within 6 months of repair, USTs with cathodic protection must be tested to show that the cathodic protection is working properly.

You must keep records for each repair as long as you keep the UST in service.

Can Leaking Piping Be Repaired?

Damaged metal piping cannot be repaired and must be replaced. Loose fittings can simply be tightened, however, if that solves the problem.



Piping made of fiberglass-reinforced plastic, however, can be repaired, but only in accordance with the manufacturer's instructions or national codes of practice. Within 30 days of the repair, piping must be tested in the same ways noted above for testing tank repairs (except for internal inspection).

HOW DO YOU CLOSE USTs?

You can close your UST permanently or temporarily.

Closing Permanently

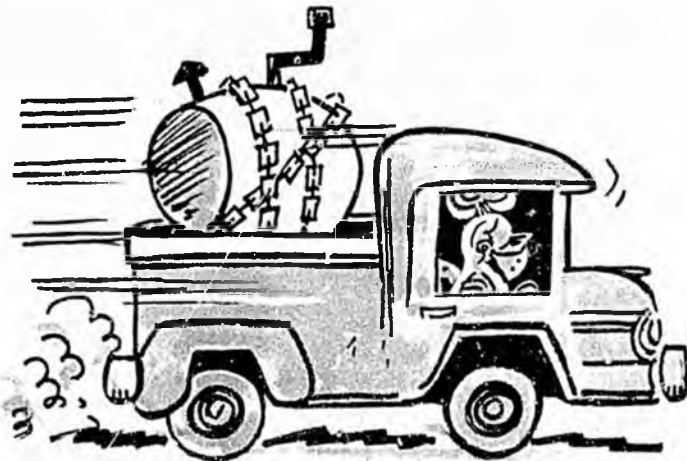
If your tank is not protected from corrosion and it remains closed for more than 12 months or you decide to close it permanently, you must follow requirements for permanent closure:

- ◆ You must notify the regulatory authority 30 days before you close your UST.
- ◆ You must determine if leaks from your tank have damaged the surrounding environment. If there is damage, then you will have to take the corrective actions described on page 20.
- ◆ You can either remove the UST from the ground or leave it in the ground. In both cases, the tank must be emptied and cleaned by removing all liquids, dangerous vapor levels, and accumulated sludge. These potentially very hazardous actions need to be carried out carefully by following standard safety practices. (See pages 37 and 39 for sources of information on good closure practices.) If you leave the UST in the ground, you must also fill it with a harmless, chemically inactive solid, like sand. The regulatory authority will help you decide how best to close your UST so that it meets all local requirements for closure.

Three Exceptions To Permanent Closure

The requirements for permanent closure may not apply to your UST if it meets one of the following conditions:

- ◆ If your UST meets the requirements for a new or upgraded UST, then it can remain "temporarily" closed indefinitely as long as it meets the requirements below for a temporarily closed UST.
- ◆ The regulatory authority can grant an extension beyond the 12-month limit on temporary closure for USTs unprotected from corrosion.
- ◆ You can change the contents of your UST to an unregulated substance, such as water. Before you make this change, you must notify the regulatory authority, clean and empty the UST, and determine if any damage to the environment was caused while the UST held regulated substances. If there is damage, then you must take the corrective actions described on page 20.



Closing Temporarily

Tanks not used for 3 to 12 months must follow requirements for temporary closure:

- ◆ If your UST has corrosion protection and leak detection, you must continue to operate these protective systems. If a leak is found, you will have to respond just as you would for a leak from an active UST, as described on page 20. (If your UST is empty, however, you do not need to maintain leak detection.)
- ◆ You must cap all lines, except the vent-line, attached to your UST.



WHAT ABOUT REPORTING AND RECORDKEEPING?

What Do You Need To Report?

In general, you will only need to report to the regulatory authority at the beginning and end of your UST system's operating life:

- ◆ When you install an UST, you have to fill out a notification form available from your State. This form provides information about your UST, including a certification of correct installation. (You should have already used this form to identify your existing USTs. If you haven't done that yet, be sure you do so now.)
- ◆ You must report suspected releases to the regulatory authority (see page 19).
- ◆ You must report confirmed releases to your regulatory authority. You must also report follow-up actions you plan or have taken to correct the damage caused by your UST (see page 20).
- ◆ You must notify the regulatory authority 30 days before you permanently close your UST (see page 23).

You need to check with your regulatory authority about the particular reporting requirements in your area, including any additional or more stringent requirements than those noted above.

REPORTING

INSTALLATION



SUSPECTED
RELEASE



CORRECTIVE
ACTION



CLOSURE



What Records Must You Keep?

You will have to keep records that can be provided to an inspector during an on-site visit that prove your facility meets certain requirements. These records must be kept long enough to show your facility's recent compliance status in four major areas:

- ◆ You will have to keep records of leak detection performance and upkeep:
 - The last year's monitoring results, and the most recent tightness test.
 - Copies of performance claims provided by leak detection manufacturers.
 - Records of recent maintenance, repair, and calibration of leak detection equipment installed on-site.

- ◆ You will have to keep records showing that the last two inspections of your corrosion protection system were carried out by properly trained professionals.

- ◆ You must keep records showing that a repaired or upgraded UST system was properly repaired or upgraded.

- ◆ For at least 3 years after closing an UST, you must keep records of the site assessment results required for permanent closure. (These results show what impact your UST has had on the surrounding area.)

You should check with your regulatory authority about the particular recordkeeping requirements in your area. Generally, you should follow this useful rule of thumb for recordkeeping: When in doubt, keep it.



FOR CHEMICAL USTs ONLY

What Chemicals Are Included In The UST Regulations?

Several hundred chemicals were designated as "hazardous" in Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, better known as CERCLA or "Superfund."

The UST regulations apply to the same hazardous chemicals identified by CERCLA, except for those listed as hazardous wastes. These hazardous wastes are already regulated under Subtitle C of the Resource Conservation and Recovery Act and are not covered by the UST regulations. (See 40 CFR Parts 260-270 for the hazardous waste regulations.)

Information on the CERCLA hazardous chemicals is available from EPA through the RCRA/CERCLA Hotline at 1-(800)-424-9346 or (202) 382-3000.

The following pages describe requirements for USTs that contain hazardous chemicals -- more simply referred to as chemical USTs.

REMEMBER...

New UST systems are those that are installed after December 1988.

Those USTs installed between May 1985 and December 1988 must meet two minimum requirements:

- ◆ The UST must prevent releases due to corrosion or structural failure.
- ◆ The stored contents must be compatible with the tank's interior wall.

After December 1988, these older USTs must meet the requirements for existing chemical USTs (see page 29).

HAZARDOUS SUBSTANCE LIST (Partial Listing Only)

HAZARDOUS SUBSTANCE	CASRN*
Acenaphthene	83329
Acenaphthylene	208968
Acetaldehyde	75070
Acetaldehyde, chloro-	107200
Acetaldehyde, trichloro-	75876
Chromic sulfate	10101538
Chromium	7440473
CHROMIUM AND COMPOUNDS	--
Chromous chloride	10049055
Chrysene	218019
Cobaltous bromide	7789437
Cobaltous formate	544183
Cobaltous sulfamate	14017415
Copper	7440508
Copper cyanide	544923
Famphur	52857
Ferric ammonium citrate	1185575
Ferric ammonium oxalate	2944674
Ferric chloride	7705080
Ferric dextran	9004664
Ferric fluoride	7783508
Ferric nitrate	10421484
Ferric sulfate	10028225
Keithane	115322
Kepon	143500
Lasiocarpine	303344
LEAD AND COMPOUNDS	--
Lead	7439921
Lead acetate	301042
Lead arsenate	7784409
Lead chloride	7758954
Lead fluoborate	13814965
Lead iodide	10101630
Zinc nitrate	7779886
Zinc phenosulfonate	127882
Zinc phosphide	1314847
Zinc silicofluoride	16871719
Zinc sulfate	7733020
Zirconium nitrate	13746899
Zirconium sulfate	14644612
Zirconium tetrachloride	10026116

*Chemical Abstracts Service Registry Number

What Requirements Apply To New Chemical USTs?

New chemical USTs have to meet the same requirements described earlier for new petroleum USTs concerning correct installation, corrosion protection, spill and overflow prevention, corrective action, and closure.

However, they must have secondary containment and interstitial monitoring as described below.

Secondary Containment

All new chemical USTs must have "secondary containment." A single-walled tank is the first or "primary" containment. Using only primary containment, a leak can escape into the environment. But by enclosing an UST within a second wall, leaks can be contained and detected quickly before harming the environment.

There are several ways to construct secondary containment:

- ◆ Placing one tank inside another tank or one pipe inside another pipe (making them double-walled systems).
- ◆ Placing the UST system inside a concrete vault.
- ◆ Lining the excavation zone around the UST system with a liner that cannot be penetrated by the chemical.

Interstitial Monitoring

The chemical UST must have a leak detection system that can indicate the presence of a leak in the confined space between the first and the second wall. Several devices are available to monitor this confined "interstitial" space. ("Interstitial" simply means "between the walls.") The UST regulations describe these various methods and the requirements for their proper use.

You can apply for an exception, called a variance, from the requirement for secondary containment and interstitial monitoring. Getting a variance will require a lot of work. You will have to convince your regulatory authority that your alternative leak detection method will work effectively by providing detailed studies of your site, proposed leak detection method, and available methods for corrective action. Also, some States may not allow variances.

What About Existing Chemical USTs?

Existing UST systems are those installed before December 1988. In addition to immediately starting tank filling procedures that prevent spills and overfills, you will need to meet the following requirements for existing USTs.

Protection From Corrosion And Prevention Of Spills And Overfills

By December 1998 (10 years after the UST regulations become effective), you must improve your USTs installed before December 1988:

- ◆ By adding corrosion protection to steel tanks and piping.
- ◆ By using devices that prevent spills and overfills.

Although the regulatory deadline is in 1998, you should make these improvements as soon as you can to reduce the chance that you will be liable for damages caused by your sub-standard UST.

Leak Detection

Leak detection requirements are being phased in for existing USTs depending on their age:

If the tank was installed...	It must have leak detection by December of...
before 1965 or unknown	1989
1965-1969	1990
1970-1974	1991
1975-1979	1992
1980-Dec.1988	1993

This schedule will make sure that the older USTs, which are more likely to leak, have leak detection first.

There is a special deadline for pressurized piping in December 1990. At that time, existing pressurized piping must meet the requirements for new pressurized piping (described on page 11).

Choosing Leak Detection Methods For Existing Chemical USTs

You can meet the leak detection requirements in one of the following three ways:

- ◆ After December 1998, your UST must meet the same requirements for secondary containment and interstitial monitoring that apply to new chemical USTs.
- ◆ After December 1988, a variance can be granted if you meet the same requirements described above for getting a variance for a new chemical UST.
- ◆ Until December 1998, you can use any of the leak detection methods, other than interstitial monitoring, described on page 14 but only if the method you choose can effectively detect releases of the hazardous chemical stored in the UST. (Variances are not required in these cases before December 1998.)

After December 1998, you must either use secondary containment and interstitial monitoring or get a variance.

NOTE..

No matter which leak detection methods you use for tanks and piping, they must be working by the deadlines described above. If not, you must close your UST or replace it with a new UST.

What Do You Do If You Have A Hazardous Chemical Leak Or Spill?

You must follow the same short-term and long-term actions described earlier for petroleum leaks and spills -- except for two modified short-term actions.

First, you must immediately report hazardous chemical spills or overfills that meet or exceed their "reportable quantities" to the National Response Center at 1-(800)-424-8802 or (202) 267-2675.

Second, you must also report hazardous chemical spills or overfills that meet or exceed their "reportable quantities" to the regulatory authority within 24 hours. However, if these spills or overfills are smaller than their "reportable quantities" and are immediately contained and cleaned up, they do not need to be reported.

You can get information on the "reportable quantities" by calling the RCRA/CERCLA Hotline 1-(800)-424-9346 or (202) 382-3000.

TECHNICAL QUESTIONS & ANSWERS

Q. How does "corrosion" cause USTs to leak? How can USTs be protected from corrosion?

A. Unprotected steel USTs are frequently damaged by corrosion. When this happens, the metal UST system and its underground surroundings act like a battery. Part of the UST can become negatively charged and another part positively charged. Moisture in the soil provides the connecting link that finally turns these UST "batteries" on. Then, the negatively charged part of the UST system -- where the current exits from the tank or its piping -- begins to deteriorate. As electric current passes through this part, the hard metal begins to turn into soft ore, holes form, and leaks begin.

Steel tanks and piping can be protected by coating them with a corrosion-resistant coating and by using "cathodic" protection. Cathodic protection reverses the electric current that causes corrosion and comes in two forms:

- ◆ "Sacrificial anodes" can be attached to the UST. Sacrificial anodes are pieces of metal more electrically active than the steel UST. Because these anodes are more active, the electric current will exit from them rather than the UST. Thus, the UST is the "cathode" and is protected from corrosion while the attached "anode" is sacrificed.
- ◆ An "impressed current" protection system introduces an electric current into the ground through a series of anodes that are not attached to the UST. Because the electric current flowing from these anodes to the tank system is greater than the corrosive current attempting to flow from it, the UST is protected from corrosion.

In addition, steel USTs can also be protected from corrosion if they are bonded to a thick layer of noncorrodible material, such as fiberglass-reinforced plastic. Cathodic protection is not needed with this method of corrosion protection. Also, the corrosion problem can be totally avoided by using tanks and piping made completely of noncorrodible material, such as fiberglass.

For more information on how corrosion works and how USTs can be protected from corrosion, contact the National Association of Corrosion Engineers or other corrosion professionals. See page 39 for industry codes on corrosion protection.

Q. How can existing USTs (those installed before December 1988) be "upgraded" to meet the corrosion protection requirements by December 1998?

A. When you add corrosion protection to existing UST systems, you have several choices. Your first choice is to meet the corrosion protection requirements for new tanks and piping (see page 9). Your other choices, described below, depend on whether you are protecting the tank or the piping.

Protecting Tanks

You have three choices for "upgrading" your tank for corrosion protection:

- ◆ The interior of a tank can be lined according to industry codes (see page 39 for codes). Tanks using only an interior lining for corrosion protection must pass an inspection in 10 years and reinspections every 5 years after that to ensure that the lining and tank are structurally sound.
- ◆ Tanks using only cathodic protection must meet the general requirements for cathodic protection and satisfy one of the methods below to make sure that the tank is structurally sound:
 - If the tank is less than 10 years old, you can use one of the monthly leak detection monitoring methods noted on page 10.
 - If the tank is less than 10 years old, you can have two tank tightness tests conducted. The first test must take place before you install cathodic protection, and the second test must take place between 3 and 6 months later.
 - If the tank is 10 years old or more, it must be internally inspected and assessed to make sure that the tank is structurally sound and free of corrosion holes before a cathodic protection system is installed.

- ◆ You can combine tank interior lining with cathodic protection. If you use this combined method, you are not required to have the interior lining periodically inspected.

Protecting Piping

Unless the existing piping is made of noncorrodible material, it must meet the requirements for cathodic protection of new metal piping, except that the existing piping does not need to be coated with a corrosion-resistant coating (see page 9).

Q. What are "installation mistakes" and how can they be avoided?

A. Improper installation is a significant cause of fiberglass-reinforced plastic (FRP) and steel UST failures, particularly piping failures. Proper installation is crucial to ensure the structural integrity of both the tank and its piping. Installation includes excavation, tank system siting, burial depth, tank system assembly, backfilling of the tank system, and surface grading. Many mistakes can be made during installation. For example, mishandling of the tank during installation can cause structural failure of FRP tanks or damage to steel tank coatings and cathodic protection. Improper layout of piping runs, incomplete tightening of joints, inadequate cover pad construction, and construction accidents can lead to failure of delivery piping.

Installation problems result from careless installation practices that do not follow recognized industry codes and procedures. If owners and operators make sure that their installers carefully follow the correct installation procedures called for by industry codes, the number of installation mistakes will be significantly reduced. See page 39 for industry codes on installation. See page 37 for sources of information on installation.

Q. What are spills and overfills? How can they be stopped?

A. Many of the leaks at UST systems are actually the result of spills and overfills (which are two separate problems). In fact, these releases are at least twice as numerous as tank or piping releases. Spills most often occur at the fill pipe opening when the delivery truck's hose is disconnected, usually releasing only a few gallons. Repeated releases of even small volumes, however, can create real environmental problems. Overfills occur less frequently but usually release much larger volumes. When a tank is overfilled, large volumes can be released through untight fittings on the top of the tank or the vent pipe. The tightness of these fittings normally would not be a problem as long as the tank was not filled beyond its capacity.

There are three keys to solving the problems of spills and overfills. **First**, you must make sure that the volume available in the tank is greater than the volume of product to be transferred to the tank before the transfer is made.

Second, you have to make sure that the transfer operation is watched constantly to prevent overfilling and spilling. See page 39 for appropriate industry codes.

Third, you must use equipment that can prevent or severely limit spills and overfills (see below for when you have to do this). Spill prevention devices, such as spill catchment basins or dry disconnect couplings, are readily available. Overfill prevention devices automatically shut off flow when the tank is nearly full. Other overfill devices either restrict flow or trigger an alarm when the tank is nearly full.

Your new UST system must be equipped with both spill and overfill prevention devices when it is installed. Your existing USTs must have these devices by December 1998. The only exception to this requirement is if your UST system is filled only by separate transfers of no more than 25 gallons. In these cases, you do not have to follow the spill and overfill equipment requirements.

Q. What leak detection methods will satisfy the leak detection requirements for new or "upgraded" petroleum USTs?

A. You must provide your UST system with a method, or combination of methods, of leak detection that allows you to meet the following three basic requirements:

- ◆ You can detect a leak from any portion of the tank or its piping that routinely contains petroleum;
- ◆ Your leak detection equipment is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions; and
- ◆ Your leak detection equipment meets the performance requirements described in the Federal regulations, sections 280.43 or 280.44.

EPA is developing brochures that fully describe the various ways you can meet the leak detection requirements (see page 38). Leak detection methods are presented in the Preamble to the UST regulations (Section IV.D.) and in the rule (Subpart D, Sections 280.43 and 280.44). The descriptions below briefly identify leak detection methods for tanks and piping.

Leak Detection for Tanks

Leak detection for tanks can consist of one or a combination of the following methods:

Tank Tightness Testing Combined with Inventory Control

This method combines manual inventory control information (measured daily and compiled monthly) with tank tightness testing every 5 years. Tank tightness testing requires taking the UST out of service while changes in level or volume over time are measured. This method can be used only by new or upgraded USTs during their first 10 years of operation (or until 1998, whichever is later). After that, one of the monthly monitoring methods below must be used.

Automatic Tank Gauging Systems

This method uses automated processes to monitor product level and inventory control.

Monitoring for Vapors in the Soil

This method samples vapors in the soil gas surrounding the UST. Leaked petroleum produces vapors that can be detected in the soil gas. The regulations describe several requirements for using this leak detection method. For example, this method requires using porous soils in the backfill and locating the monitoring devices in these porous soils near the UST system.

Monitoring for Liquids on the Ground Water

This method monitors the ground water table near an UST for the presence of released free product on the water table. Monitoring wells near the UST are checked frequently to see if petroleum can be detected. The regulations allow manual and automatic methods for detecting petroleum in the monitoring wells. The regulations also describe several requirements for the use of this method. For example, this method cannot be used if the water table is more than 20 feet below the surface of the ground.

Interstitial Monitoring

This method detects leaks in the space between the UST and a second barrier or wall. The regulations describe several general performance requirements for the application of interstitial monitoring with double-walled USTs, USTs fitted with internal liners, and USTs using partial interception barriers located below the UST.

Other Methods Approved by the Regulatory Authority

If other methods can be shown to work as effectively as the methods described above for leak detection, then these alternative methods can be approved by the regulatory authority.

One Additional Method with Restricted Use

Manual tank gauging can be used as the sole method of leak detection, but only with tanks that are 550 gallons or less. This method involves taking two stick measurements at least 36 hours apart when the tank is not open for use. Also, manual tank gauging can be used in place of manual inventory control in tanks ranging in size from 551 to 2,000 gallons. In these cases, however, manual tank gauging must be combined with tank tightness testing.

Leak Detection for Piping

If you have pressurized piping, you need to do two things:

- ◆ Install an automatic line leak detector, and
- ◆ Either conduct an annual line tightness test,

Or conduct monthly leak detection monitoring using one of the following methods noted above for tanks: vapor monitoring, ground-water monitoring, interstitial monitoring, or other approved monthly methods.

If you have suction piping, you need to do one of two things:

- ◆ Either conduct line tightness tests every 3 years,

Or conduct monthly leak detection monitoring as described above for pressurized piping.

You do not need to have leak detection if your suction piping meets some basic design requirements:

- ◆ Below-grade piping is sloped so that the piping's contents will drain back into the storage tank if the suction is released.
- ◆ Only one check valve is included in each suction line and is located directly below the suction pump.

AUDIOVISUALS, BROCHURES, AND HANDBOOKS ON USTs

Audiovisual Programs...

Installation

"Doing It Right" -- Installation for the crews who do it

Order from:
American Petroleum Institute
1220 L Street, N.W.
Washington, DC 20005
or
Petroleum Equipment Institute
Box 2380
Tulsa, OK 74101
\$16.00 prepaid

"Recommended Practices on Tank Installation" -- Companion booklet

Available from both API and PEI
\$10.00 prepaid

"A Question of When: Tank Installation for Inspectors"

Order from:
National Fire Protection Association
Attn: Jim Smalley
Batterymarch Park
Quincy, MA 02269
\$22.85 each prepaid

"In Your Own Backyard" -- Shorter version of inspector video for tank owners

Closure

"Tank Closure Without Tears: An Inspector's Safety Guide"

Order from:
New England Interstate Water
Pollution Control Commission
Attn: VIDEOS
85 Merrimac Street
Boston, MA 02114
\$20.00 prepaid

Companion booklet
\$5.00 prepaid

To borrow:
New England Regional Wastewater Institute
2 Fort Road
South Portland, ME 04106
Video and booklet
\$5.00 prepaid

Closure (cont.)

"What Do We Have Here?: A Guide to Site Assessment at Closure"

Order from:
New England Interstate Water
Pollution Control Commission
Attn: VIDEOS
85 Merrimac Street
Boston, MA 02114
\$40.00 prepaid

Companion booklet
\$5.00 prepaid

Tank Program Management

**"Managing Underground Storage Tanks" --
185-Slide Presentation Action Plan**

Order from:
National Audiovisual Center
Customer Services Section/WD
8700 Edgeworth Drive
Capitol Heights, MD 20743-3701
(301) 763-1891
\$120.00 prepaid

Brochures...

Technical Requirements

**"Musts for USTs" -- A Summary of the Regu-
lations for Underground Storage Tank Systems**
Stock No. 055-000-00294-1
\$2.50

Order from:
Superintendent of Documents
U.S. Government Printing Office
Washington, DC 20402
(202) 783-3238

Financial Responsibility

**"Dollars and Sense" -- A Summary of the Fi-
nancial Responsibility Regulations for Under-
ground Storage Tank Systems**
Stock No. 055-000-00293-2
\$1.25

Order from:
Superintendent of Documents
U.S. Government Printing Office
Washington, DC 20402
(202) 783-3238

Leak Detection

**"Leak Lookout" -- Using External Leak De-
tectors to Prevent Petroleum Contamination
from Underground Storage Tanks**
Free

Order from:
U.S. Environmental Protection Agency
Office of Underground Storage Tanks
P.O. Box 6044
Rockville, MD 20850

Emergency Response

**"Oh No!" -- Petroleum Leaks and Spills:
What Do You Do?**
Free

Order from:
U.S. Environmental Protection Agency
Office of Underground Storage Tanks
P.O. Box 6044
Rockville, MD 20850

Handbooks...***Technology*****"Cleanup of Releases from Petroleum USTs:
Selected Technologies"**

Stock No. 055-000-00272-0
\$7.50

**"Petroleum Tank Releases Under Control:
A Compendium of Current Practices for
State UST
Inspectors"**

Stock No. 055-000-00295-9
\$8.50

**"Processes Affecting Subsurface Transport
of Leaking Underground Tank Fluids"**

Stock No. 055-000-00269-0
\$3.25

**"Survey of Vendors of External Petroleum
Leak Monitoring Devices for Use with USTs"**

Stock No. 055-000-00277-1
\$4.25

Order from:

Superintendent of Documents
U.S. Government Printing Office
Washington, DC 20402
(202) 783-3238

INDUSTRY CODES AND STANDARDS*

Installation

API Publication 1615, 1987, "Installation of Underground Petroleum Storage Systems," Recommended Practice, 4th Edition

PEI RP-100-87, 1987, "Recommended Practices for Installation of Underground Liquid Storage Systems"

Tank Filling Practices

API Publication 1621, 1977, "Recommended Practice for Bulk Liquid Stock Control at Retail Outlets," 3rd Edition (A revised edition is now available.)

NFPA 385, 1985, "Standard for Tank Vehicles for Flammable and Combustible Liquids"

Closure

API Bulletin 1604, 1987, "Removal and Disposal of Used Underground Petroleum Storage Tanks," Recommended Practice, 2nd Edition

Lining

API Publication 1631, 1987, "Interior Lining of Underground Storage Tanks," Recommended Practice, 2nd Edition

NLPA Standard 631, 19--, "Spill Prevention: Minimum 10 Year Life Extension of Existing Steel Underground Storage Tanks by Lining Without the Addition of Cathodic Protection" (DRAFT)

Corrosion Protection

API Publication 1632, 1987, "Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems," Recommended Practice, 2nd Edition

NACE RP-0169-83, 1983, "Recommended Practice: Control of Corrosion on Underground or Submerged Metallic Piping Systems"

NACE RP-0285-85, 1985, "Recommended Practice: Control of External Corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems"

General (Repair, Spill and Overfill, Installation, Compatibility)

API Publication 1626, 1985, "Storing and Handling Ethanol and Gasoline-Ethanol Blends at Distribution Terminals and Service Stations," 1st Edition

API Publication 1627, 1986, "Storage and Handling of Gasoline-Methanol/Cosolvent Blends at Distribution Terminals and Service Stations"

API Recommended Practice 1635, 1987, "Management of Underground Petroleum Storage Systems at Marketing and Distribution Facilities," Recommended Practice, 3rd Edition

NFPA 30, 1987, "Flammable and Combustible Liquids Code"

NFPA 30A, 1987, "Automotive and Marine Service Station Code"

*This list includes the most relevant codes and standards for underground storage tank systems. Organizations are identified on page 41.

ORGANIZATIONS TO CONTACT FOR TANK INFORMATION

ACT -- Association for Composite Tanks
108 North State Street
Suite 720
Chicago, IL 60602
(301) 235-6000 (for information requests)

API -- American Petroleum Institute
1220 L Street, N.W.
Washington, DC 20005
(202) 682-8000

Fiberglass Petroleum Tank and
Pipe Institute
One SeaGate, Suite 1001
Toledo, OH 43604
(419) 247-5412

NACE -- National Association of Corrosion
Engineers
Box 218340
Houston, TX 77218
(713) 492-0535

NFPA -- National Fire Protection Association
Batterymarch Park
Quincy, MA 02269
(617) 770-3000

NLPA -- National Leak Prevention Association
P.O. Box 29809
Cincinnati, OH 45229
(513) 281-7693
1-(800)-543-1838

PEI -- Petroleum Equipment Institute
Box 2380
Tulsa, OK 74101
(918) 743-9941

Steel Tank Institute
P.O. Box 4020
Northbrook, IL 60065
(312) 498-1980

Wb 720

Carl F Heflinger
665 10th. Ave. #307
Fairbanks Alaska 99701
March 19, 1990

MAR 22 1990

Rep. Curt Menard
Box V.
Juneau Alaska 99811

Dear Sir/:

Regarding CS Sub for House CS Sub. for House Bill #220.
An act relating to Motor fuels Petroleum and chemical storage
tanks and and investigation, containment and cleanup of
hazardous substances.

I attended the meeting last Saturday chaired by Senator Binkley
and senator Frank. I was favorably impressed and urge passage
of the bill as written and presented to the people.

To finance the program I suggest a small tax be levied on all
petroleum products sold in the State and the money placed in a
special fund to finance this program, or levy an additional tax
on the producing oil companys that they will shift on to the
consumer.

It would save money if the dirt contaminated by hydrocarbons
could be processed here in Fairbanks.

Yours Truly

CF Heflinger
Carl Heflinger

Copies to
Binkley
Frank
Fahrenkamp
Fisher
Boucher

Kelly's Tire & Wheel

Firestone 

JAN 25 1990

269 ILLINOIS
TELEPHONE 452-2219
FAIRBANKS, ALASKA 99701

January 18, 1990

Senator Bettye Fahrenkamp
P.O. Box V
Juneau, AK 99811

Dear Senator Fahrenkamp:

I am a lifetime Alaskan and have been in business in Fairbanks for 40 years at the same location. I have five underground storage tanks that have not been in use for twelve years.

I want to establish that I support conservation and believe in measures that enhance and save our beautiful state with common sense solutions. I fear the present focus on underground storage tanks has developed into an overkill situation. It is comparable to the fiber-phobia concerning asbestos removal where negligible health hazards are blown into plague-size proportions and cost billions in private and public funds. I believe money invested in pollution prevention pays better dividends than money spent on recalling past pollution, except in extreme situations such as at Eielson Air Force Base where a 10 million gallon spill has been neglected for many years.

Water quality

I was recently informed by a Department of Environmental Conservation officer that all ground water under my property must be of drinking water quality regardless of the pollution in ground water surrounding my property. Over 35 years ago the public health department condemned all the gravel pits surrounding Fairbanks as too polluted to be used for recreational swimming. With this in mind, how can we now be expected to have drinking water in the center of town. Drinking water quality would be impossible to obtain. It is also unnecessary because no one drinks the water, everyone in the area uses the municipal water system.

Satisfactory solutions are not reached by seeking 100% perfection. I respectfully request the legislature lower the water quality requirements to an obtainable level.

Another concern that has not been addressed is, in the event that the pollution has spread under our buildings, do we then tear them down and dig there as well? The replacement value of my building, estimated by my insurance company, is \$356,000.00. Will I have to destroy it, and my business, chasing a few unreachable gallons of gasoline? Will this decision be left up to the Department of Environmental Conservation field officer alone? Will you include a provision in House Bill 220 to replace a building if it was so destroyed?

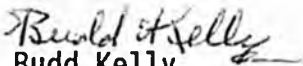
Kelly Tire and Wheel
January 18, 1990
Page 2

I respectfully request that you address the issues of water quality and under-building pollution. Please make Alaska one of the 32 states that has more lenient regulations than the Federal Environmental Protection Agency, instead of one of the 19 states that has more stringent regulations.

You are the only hope for many small, independent Alaskan businesses. The financial relief in House Bill 220 is most welcome and needed because none of us have the resources to comply with the Environmental Protection Agency regulations.

Thank you so much for your time and efforts on our behalf.

Sincerely,


Budd Kelly
(Andrew Kelly)

xc: Standing Finance Committee

AK:kk

ALASKA DEALERSHIP

Volume 3, No. 1

Newsletter of the Alaskan Marine Dealers Association February 1990



PO Box 230565
Anchorage, Alaska 99523

(907) 561-4554

BOARD OF TRUSTEES 1989 - 1990

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Steve Morgheim
Executive Director

PRESIDENT'S MESSAGE:

Dear Colleagues:

The Boat Show has come and gone, and now it's time to rig and deliver all those packages you sold. From information I've received, the Show was a big success. My own assessment is that the Sullivan Arena portion of the Show looked the best ever, and traffic was up almost 33%. As for the Northway Mall portion of the Show, traffic was down, but it was good. Sales were tougher to make this year, but we worked harder and did well. All in all, the Show gets better every year, and you are to be congratulated for this.

I hope you will remember the annual AMDA banquet. There is a lot going on that night, and it will be worthwhile for you to attend. It's different from all other banquets we have hosted.

Don't forget to complete the Economic Impact Survey. I know it is cumbersome, but it's the kind of base line information needed to promote and direct our Industry. The Industry with the best information (used properly) usually ends up with the "pudding".

(continued on page 3, Legislative Lighthouse)

Alaskan Marine Dealers Association
PO B. 230565
Anchorage, Alaska 99523

The purpose of this Association shall be to sponsor and produce boat shows; to generally promote the Alaskan boating and marine industry; to create harmonious relations between the industry and the public; to promote local, state, and national legislation beneficial to the industry and the boating public.

Address Correction Requested

Board Meeting Minutes

February 14, 1990

The meeting was called to order at 7:30pm at Elmer's Restaurant in Anchorage. Trustees in attendance were Ernest Brannon, Dave Benesch, and Dan Gibeau. John Boyt and Norm Brustad were absent with cause. Also present were Stan Thomson and Earl Baker of Alaska Yacht World, and Steve Morgheim

The agenda was adopted with one addition (a resolution supporting passage of Alaska HB 220 was formally adopted. It had been telephonically adopted by the Trustees on Jan. 10, 1990).

Minutes of the Dec. 13, 1989, were approved as presented.

Morgheim presented a financial statement for the calendar year 1989 for the AMDA general fund. It was approved as presented, and it will be forward to the AMDA accounting firm for review and submission to the IRS.

Old Business:

Morgheim presented a detailed financial summary of the just completed Boat Show. It was approved as presented.

The Board analyzed a summary of about 20 Exhibitor Questionnaires which had been returned for the Anchors Aweigh Boat Show. Additionally, it reviewed a summary of Exit Interviews taken from about 200 attendees at the Show. Feedback will be used to develop Improvement Goals for the 1991 Show.

The Board certified the results of the balloting for a seat on the Board of Trustees. The ballots were counted on Feb. 12, by Gary Marian (Marian Boat Works), Jim Minor (Boat Works of Alaska), and Steve Young (Sea Marita Boatworks). They recommend that the certification be done.

The Economic Impact Survey is in full swing. Jeff May of UAA is contacting dealers, and he reports that returns to-date are "light".

The annual meeting on March 10, was discussed. The agenda has been firmed up. Morgheim reported that membership certificates

have been "re-styled" for 1990; the award plaques for the Anchors Aweigh Boat Show have been ordered; and the video portion of the Boating Safety Public Service Annoucements (PSA's) has been edited.

The Board reviewed ideas on how to further promote the AMDA. It approved funding for 100 window decals, and requested Morgheim to investigate the costs and procedures for producing Tide Books.

New Business:

Plans for the Dimond Center "Let's Go Boating Show" were reviewed. Morgheim presented a plan to accomodate the firms which had displayed in the 1989 and which had asked to also display in 1990. Space at the Center has been reduced by 27%. The plan will spread this "loss" equally among the firms, and requires several of them to "shuffle" their locations. The Board authorized Morgheim to implement the plan based on the fact that he needs flexibility to produce the event.

Alaska Yacht World asked to display boats in the Dimond Center parking lot during the event. The Board approved this (for all firms) with these conditions: 1. the Dimond Center must approve it; 2. any boat displayed must be 25' or longer; 3. space must be paid for; 4. firms must provide their own security and insurance.

New memberships were approved: Worthington Ford and Polar Yachts as Active and Frigid North Co. and Alaska Products as Associate members.

The Board retained the services of Morgheim and requested a written contract.

The next Board meeting will be on March 10. Meeting adjourned at 9:30 pm.





Legislative Lighthouse

(Message cont. from front page)

Recently I addressed the issue of "Petroleum Underground Storage Tanks". Since, I have written letters to all of the Alaska State Senators. With that letter, I enclosed a resolution adopted by the AMDA Board of Trustees (also included in this newsletter to you.)

At least one half of the Senators has responded, all in favor of the amended HB 220. However, it appears the oil industry is putting a lot of pressure on the Senators not to fund the bill by further taxing that industry.

Just the other day, I received a second letter from Senator Binkley indicating that another round of public hearings may

be held in Anchorage and Fairbanks on the Bill. If you have a position, I urge you to attend and testify.

The Association supports a clean environment, but at the same time, it supports the need to receive convenient service from Marine and Automobile service stations. If this Bill is not passed and funded, you will see most medium and small service facilities go by the wayside. When that happens, petroleum products will go from wellhead to dispenser, all of which will be owned by the same firm. Then, watch the prices skyrocket.

Ernest Brannon
President

Announcements

The following letter was received at the AMDA office:

Dear Steve/AMDA members:

Thanks for the information when we spoke on the phone, it was most helpful.

I did 3 trips to Alaska last year just to see the terrain and speak with local marine dealers to get some feel for what we might do business in up there.

We are a large company capable of building quantities of a given style of welded aluminum boats to a very high standard. Anything from 15' to 40', jets, outboards, commercial or pleasure can be built.

Even though we can, and do, supply complete boats to the New Zealand and Australian market, we would like to possibly form a partnership with a local company to utilise local labour and parts.

Such as motors/jets and complete interiors. All our motors/jets usually come from the U.S., so it would be senseless to bring them here and then send them back.

If you could put this letter in the commercial community where it would do the most good, it would be most appreciated.

Hilton McLachlan

Pacer Marketing Ltd.
P. O. Box 1783
Rotorua, New Zealand
Fax: (073)486-867
Ph: (073) 484-966



Calendar of Events

March 10, 1990
Annual AMDA
Meeting and Banquet

March 31, 1990
Last Day
(1989 - 90) Activity Year

April 1, 1990
First Day
(1990 - 91) Activity Year

April 19 - 22, 1990
Second Annual
"Let's Go Boating Show"
Dimond Center

June 3 - 9, 1990
National Safe Boating Week

August, 1990
"First-Nighter" Sign-Up
1991 Anchors Aweigh
Boat Show

Sept. 27 - 30, 1990
IMTEC
McCormick Place
Chicago, Illinois

Association Members 1989 - 1990 Activity Year



NAME	ADDRESS	CITY	ZIP	PHONE
A-1 Enterprises	RT. 2, Box 745	Soldotna	99669	283-9228
Ace Marine Propeller Spec.	6511 Arctic Spur Road	Anchorage	99518	561-7804
Alascom, Inc.	Box 196607	Anchorage	99519	264-7394
Alaska Airboats	HCO 2 Box 7663	Palmer	99645	745-6183
Alaska Commercial Co.	624 W. Potter Road	Anchorage	99518	561-0897
Alaska Diesel Electric	Box 190208	Anchorage	99519	562-2222
Alaska Mining & Diving	3222 Commercial Dr.	Anchorage	99501	279-6113
Alaska Yacht World	311 E. 76th Ave.	Anchorage	99502	522-1360
Anchorage Cycle & Marine	3401 Minnesota Drive	Anchorage	99503	272-8343
Anchorage Yacht & Marine	2457 Arctic Blvd #201	Anchorage	99503	279-8484
Ann T. Steck /Allstate	6901 Debarr Road #203	Anchorage	99504	333-4411
ATEC	Box 846	Kenai	99611	262-7100
B & J Commercial Co.	3605 Arctic, #1530	Anchorage	99503	277-9576
Boat Top's By Kevin Arseneau	HC 79, Box 4475	Eagle River	99567	276-7974
Boat Works of Alaska	1327 E. 75th	Anchorage	99518	522-3400
Burkeshore Marina	Box 520226	Big Lake	99652	892-6300
Cal Worthington Ford	1950 Gambel	Anchorage	99501	276-5300
Compeau's Inc.	4122 Boat St.	Fairbanks	99709	479-2271
Dave's Welding & Marine	1711 E. 82nd Ave.	Anchorage	99507	344-7811
Dewey's Cook Inlet	1000 E. 76th	Anchorage	99518	344-5092
Doug's Inboard Boats	2482 E. Tudor Road	Anchorage	99507	561-6826
Fedalaska Federal Credit Union	Box 107505	Anchorage	99510	276-1011
Frigid North Company	1207 W. 36th	Anchorage	99503	561-4633
Grayling Marine Inter'l, Inc.	Box 241672	Anchorage	99524	344-5667
Gus' Electronic Marine Co.	3700 W. 61st	Anchorage	99502	243-5677
Kawasaki Sport Center	400 W. Potter	Anchorage	99518	561-1165
KEM Equipment, Co.	6131 A. St.	Anchorage	99518	562-1383
Kern's Jetboat Imp. & Prop.	3002 East Tudor Rd	Anchorage	99507	561-1405
Longs Drug	601 E. Dimond Blvd.	Anchorage	99515	349-6487
Marian Boat Works	1300 E. 68th, Ste 101	Anchorage	99518	344-0899
Midnight Sun Boat Co., Inc.	PO Box 110190	Anchorage	99511	279-3925
Nelson Marine & Equipment	1840 W. Inter'l Airport Rd	Anchorage	99502	248-2628
Nor'western Marine	1229 G St.	Anchorage	99501	274-3030
Norm's Sport And Recreation	700 Muldoon Road	Anchorage	99504	337-2744
ORCA Oceanic	8551 Arctic Blvd #A	Anchorage	99515	522-3483
Plaschem Supply & Equipment	1415 Spar Ave.	Anchorage	99501	274-5505
Precision Marine	Box 1370	Soldotna	99669	262-3232
Professional Upholstery	2351 E. 4th Ave.	Anchorage	99501	276-8677
Quality Marine, Inc.	Box 2433	Seward	99664	224-3160
Recreational Equipment (REI)	1200 W. North'n Lights Blvd	Anchorage	99503	272-4565
River & Sea Marine	Box 609	Kenai	99611	262-7402
Ron's Rent-It Center, Inc.	Box 2522	Kenai	99611	283-4232
Sailing Inc.	8118 Loganberry	Anchorage	99502	243-7649
Sailing North Enterprises	3101 Wentworth	Anchorage	99508	278-0920
Sea Marita Boatworks	2000 E. Dowling, #16	Anchorage	99507	562-1280
Seekins Marine	3689 Arctic Blvd.	Anchorage	99503	563-6011
Sailboats North (Seward Sailing)	Box 1929	Kenai	99611	283-3859
South Central Sports	1411 Lakeshore Drive	Homer	99603	235-5403
Spenard Upholstery	1107 W. 36th Ave.	Anchorage	99503	561-5463
TLS Services	7900 Upper O'Malley Road	Anchorage	99516	346-2433
VIP Distributing Co.	1220 E. 68th, #102	Anchorage	99519	349-8924
Wialaska, The Skier's Edge	405 W. 36th Ave #200	Anchorage	99503	561-4665

RESOLUTION

A resolution supporting Senate CS for CS for House Bill No.220(Finance) in the Legislature of the state of Alaska, sixteenth Legislature-Second Session. "An Act relating to motor fuels, petroleum and chemical storage tanks, and investigation, containment, and clean-up of oil and hazardous substances; and providing for an effective date."

WHEREAS, the Alaskan Marine Dealers support a clean environment, and

WHEREAS, many individuals and small businesses are not aware of the devastating effects of EPA rules governing underground storage tanks, and

WHEREAS, few, if any, small businesses can comply with EPA within their given resources, and

WHEREAS, large numbers of individuals will become unemployed if said rules are strictly applied in absence of state assistance , and

WHEREAS, most small business owners will be uprooted and unemployed with no retirement future, and

WHEREAS, many small business, by law, had to assume problems caused by previous owners or users, and

WHEREAS, only recently has the public become aware of the risks of petroleum pollutants, and


WHEREAS, enviromental cleanup is not just a petroleum distributor or dispenser's problem, it's a national problem of all the people, and

WHEREAS, when all of the small petroleum operators are gone, petroleum products will be from the wellhead to the consumer therefore, no competition. With no competition, prices will skyrocket, and

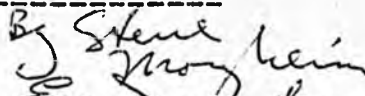
WHEREAS, No provisions have been made in the state to handle and store hazardous waste.

NOWHEREFORE be it resolved that the Alaskan Marine Dealers Association strongly supports the enactment and funding of Substituted House Bill 220.

PASSED AND APPROVED, by the Alaskan Marine Dealers Association on this 10th day of January, 1990.



President
ERNEST BRANNON

By 
Steve Mowbrin
Exec. Director
AMDA



Official Business

Alaska State Legislature

Senate

Pouch V
State Capitol
Juneau, Alaska 99811

MEMORANDUM

TO: The Conference Committee on HB 220

RE: Senate CS for HB 220 (Finance)

DATE: May 8, 1990

Attached is a second Conference Committee Report requesting an additional limited power of free conference for the Conference Committee on Senate CS for HB 220 (Finance).

In our review of the bill, we have found that a technical change made in Senate Finance to the definition of person was not picked up throughout the bill.



Official Business

Alaska State Legislature

Senate

Pouch V
State Capitol
Juneau, Alaska 99811

CONFERENCE COMMITTEE REPORT

May 8, 1990

Mr. Speaker:

The Conference Committee considering:

SENATE CS FOR CS FOR HOUSE BILL NO. 220 (FINANCE)

"An act relating to motor fuels, petroleum and chemical storage tanks, and investigation, containment, and clean up of oil and Hazardous Substances; and providing for an effective date."


respectfully requests additional limited powers of free conference on the following specific point:

1. Clarification of the definition of person.

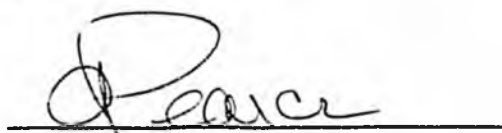
Senate Members



Senator Binkley

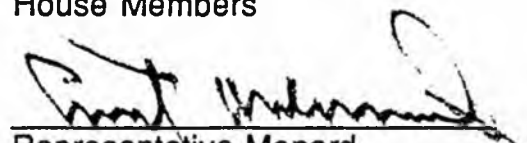


Senator Frank

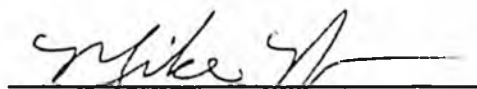


Senator Pearce

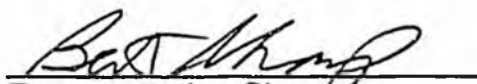
House Members



Representative Menard



Representative Navarre



Representative Sharp

hb220



JAN 23 1990

1-16-90

Dear Bettye:

We know you are looking out for the
Small Person when you support revised
HB 220.

Thomas.

Eric Brannon
President

Encl.

RESOLUTION

A resolution supporting Senate CS for CS for House Bill No.220(Finance) in the Legislature of the state of Alaska, sixteenth Legislature-Second Session. "An Act relating to motor fuels, petroleum and chemical storage tanks, and investigation, containment, and clean-up of oil and hazardous substances; and providing for an effective date."

WHEREAS, the Alaskan Marine Dealers support a clean environment, and

WHEREAS, many individuals and small businesses are not aware of the devastating effects of EPA rules governing underground storage tanks, and

WHEREAS, few, if any, small businesses can comply with EPA within their given resources, and

WHEREAS, large numbers of individuals will become unemployed if said rules are strictly applied in absence of state assistance , and

WHEREAS, most small business owners will be uprooted and unemployed with no retirement future, and

WHEREAS, many small business, by law, had to assume problems caused by previous owners or users, and

WHEREAS, only recently has the public become aware of the risks of petroleum pollutants, and

WHEREAS, enviromental cleanup is not just a petroleum distributor or dispenser's problem, it's a national problem of all the people, and

WHEREAS, when all of the small petroleum operators are gone, petroleum products will be from the wellhead to the consumer therefore, no competition. With no competition, prices will skyrocket, and

WHEREAS, No provisions have been made in the state to handle and store hazardous waste.

NOWHEREFORE be it resolved that the Alaskan Marine Dealers Association strongly supports the enactment and funding of Substituted House Bill 220.

PASSED AND APPROVED, by the Alaskan Marine Dealers Association on this 10th day of Jan., 1990.

Ernest Bronson
President

Just a reminder
that we are counting
on you to fund

HB 220.

MAR 13 1990

Ernie Brunner

OWNER OR MANAGER
NATL FUEL SAVERS OF AK
7502 O BRIEN ST
ANCHORAGE AK 99507

7540

OWNER OR MANAGER
CGG ENTS
BOX 7138
NIKISKI AK 99635

7519

OWNER OR MANAGER
JACKS SVC
BOX 587
DELTA JCT AK

OWNER OR MANAGER
NORMS AUTOMOTIVE
8021 CLEARHAVEN CIR
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
MT REDDOBT BODY SHOP
NRB 8409
NIKISKI AK 99635

7530

OWNER OR MANAGER
MR D'S BODY SHOP
MILE 1403 1/2 AK HWY
DELTA JCT AK 99737

OWNER OR MANAGER
P&D ENTERPRISES
4041 COVENTRY DR
ANCHORAGE AK 99507

7519

OWNER OR MANAGER
THERCHIK'S OIL & GAS INC
NELSON ISLAND
TOKSOOK BAY AK 99637

5540

OWNER OR MANAGER
OK FUEL CO
BOX 607
DELTA JCT AK 99737

OWNER OR MANAGER
P&P ENTS INC
8171 DIAMOND HOOK DR
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
CHINOOK SERVICE
BOX 39097
NINILCHIK AK 99639

5540

OWNER OR MANAGER
PENNINGTON ENTERPRISE
2842 FALES RD
DELTA JCT AK 99737

OWNER OR MANAGER
PRD SVC
6221 PETERSBURG ST
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
KACHEMAK BODY&PAINT
BOX 39430
NINILCHIK AK 99639

7530

OWNER OR MANAGER
QUALITY MECHANICAL
MILE 1379 AK HWY
DELTA JCT AK 99737

OWNER OR MANAGER
R & J RENTALS
4800 LORETTA LN
ANCHORAGE AK 99507

7519

OWNER OR MANAGER
LITTLE DIESEL'S SERVICE
BOX 39445
NINILCHIK AK 99639

7500

OWNER OR MANAGER
RANDY J WILLEY
BOX 19
DELTA JCT AK 99737

OWNER OR MANAGER
R B REPAIR
3824 E 67TH AVE
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
NINILCHIK VLG AUTO&BOAT
BOX 103
NINILCHIK AK 99639

7530

OWNER OR MANAGER
SILVER FOX ROADHOUSE
MI 1404 AK HWY
DELTA JCT AK 99737

OWNER OR MANAGER
RACING ENTERPRISES
1601 E 84TH CT # 106
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
SIX MILE TRADING CO
GEN DEL
NONDALTON AK 99640

5540

OWNER OR MANAGER
TRIPLE C SVC
BOX 1055
DELTA JCT AK 99737

OWNER OR MANAGER
SAWIN ENTERPRISES
3311 E 84TH #8
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
GAS&STOVE OIL
GEN DEL
NUNAPITCHUK AK 99641

5541

OWNER OR MANAGER
EAGLE AUTO SVC CTR
BOX 35
EAGLE AK 99738

OWNER OR MANAGER
SPARKLE WASH OF ANCH
3301 MAX CR #3
ANCHORAGE AK 99507

7542

OWNER OR MANAGER
TUNDRA VIDEO
BOX 14
NUNAPITCHUK AK 99641

5540

OWNER OR MANAGER
EAGLE AUTOMOTIVE SVC
BOX 35 161 TAYLOR HWY
EAGLE RIVER AK 99738

OWNER OR MANAGER
SPRUCE PK AUTO BODY INC
1657 E DOWLING RD
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
ADVANCED AUTO REPAIR
HCO4 9593
PALMER AK 99645

7530

OWNER OR MANAGER
TELEGRAPH HILL SERVIC
BOX 115
EAGLE AK 99738

OWNER OR MANAGER
TAYLORS TRANSMN SVC
6714 LAKE OTIS
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
ANALIZERS OF AK
512 DOLPHIN ST
PALMER AK 99645

7530

OWNER OR MANAGER
GWITCHYAA ZHEE CONST
BOX 57
FORT YUKON AK 99740

OWNER OR MANAGER KJ'S AUTO RESTORATIONS 3160 B EAST 46TH AVE ANCHORAGE AK 99507	7530	OWNER OR MANAGER ST SERVICES BOX 353 KODIAK AK 99615	7530	OWNER OR MANAGER GREENHOUSE SERVICE S BOX 24 CENTRAL AK 99730
OWNER OR MANAGER KNUCKP' BUSTERS INC 4222 PIPER ST #2 ANCHORAGE AK 99507	7530	OWNER OR MANAGER TOMS AUTO MACHINE BOX 971 KODIAK AK 99615	7530	OWNER OR MANAGER HILLER ENT INC BOX 37 CENTRAL AK 99730
OWNER OR MANAGER KRIZMAN AUTOMOTIVE 11701 NIX COURT #B ANCHORAGE AK 99507	7530	OWNER OR MANAGER UNITED AUTO BOX 4272 KODIAK AK 99615	7530	OWNER OR MANAGER YUKON TIRE REPAIR BOX 36 CIRCLE AK 99730
OWNER OR MANAGER KUNTZ COMMERCIAL REPAIR 5837 ROWAN ST ANCHORAGE AK 99507	7530	OWNER OR MANAGER BOBS TOWING BOX 367 MOOSE PASS AK 99631	7540	OWNER OR MANAGER YUKON GAS CACHE BOX 36 CIRCLE AK 99733
OWNER OR MANAGER LEE B ENG&MFG B.L.E.M. 6827 BUGLE CT ANCHORAGE AK 99507	7530	OWNER OR MANAGER ESTES BROS INC&ESTES E R P O BOX 326 MOOSE PASS AK 99631	5541	OWNER OR MANAGER C&M AK TIRE & RD SVC POUCH 340055 DEADHORSE AK 99734
OWNER OR MANAGER LEES AUTO 8821 TOLOFF ANCHORAGE AK 99507	7530	OWNER OR MANAGER KENS DIESEL SVC ST RT MOOSE PASS AK 99631	7530	OWNER OR MANAGER BECK ENTS BOX 11 DELTA JCT AK 99737
OWNER OR MANAGER LESLIE LORENTZEN 9100 ARLON ST ANCHORAGE AK 99507	7549	OWNER OR MANAGER MOOSE PASS GARAGE GEN DEL MOOSE PASS GAK 99631	5540	OWNER OR MANAGER CITY PARK CARWASH BOX 355 DELTA JCT AK 99737
OWNER OR MANAGER LK OTIS CAR WASH 9940 SPRING HILL DR ANCHORAGE AK 99507	7542	OWNER OR MANAGER SUMMIT LAKE LODGE MILE 45 1/2, SEWARD HIGHWAY MOOSE PASS AK 99631	5541	OWNER OR MANAGER CLEARWATER AUTO CENTE BOX 962 DELTA JCT AK 99737
OWNER OR MANAGER LLOYDS TRUCKING 8707 SWISS PL ANCHORAGE AK 99507	7539	OWNER OR MANAGER D R LAX BOX 141 NAKNEK AK 99633	7513	OWNER OR MANAGER DA VINCI AUTO BODY&GL BOX 1247 DELTA JCT AK 99737
OWNER OR MANAGER M&L AUTOBODY SHOP 5422 B WINDFLOWER ST ANCHORAGE AK 99507	7532	OWNER OR MANAGER NAKNEK ENGINE SALES AND SERVICE BOX 107 NAKNEK AK 99633	7540	OWNER OR MANAGER DARRYL'S MISLC SVCS BOX 494 DELTA JCT AK 99737
OWNER OR MANAGER MOBILE GLASS OF AK 8440 POSALIND ANCHORAGE AK 99507	7540	OWNER OR MANAGER PENINSULA AUTOMOTIVE PO BOX 6 NAKNEK AK 99633	5540	OWNER OR MANAGER DELTA JCT TOWING SVC BOX 989 DELTA JCT AK 99737
OWNER OR MANAGER MUDDERS & WHEEL DR SVC 4310 ABBOTT RD ANCHORAGE AK 99507	7530	OWNER OR MANAGER RAY&RAYS AUTOMOTIVE SVCS BOX 133 NAKNEK AK 99633	7530	OWNER OR MANAGER J D ENTS BOX 1058 DELTA JCT AK 99737

OWNER OR MANAGER FALCON TIRE & EQUIP 1900 E 53RD ANCHORAGE AK 99507	7530	OWNER OR MANAGER KIMBALL'S GARAGE BOX 3292 KODIAK AK 99615	7530	OWNER OR MANAGER JULIES & CHUCKS TRU BOX 418 BARROW AK 9972
OWNER OR MANAGER G&L AUTO REPAIR 1851 53RD #5 ANCHORAGE AK 99507	7530	OWNER OR MANAGER KODIAK TOWING 2597 MILL BAY RD KODIAK AK 99615	7549	OWNER OR MANAGER MIDNIGHT SUN AUTO R BOX 3056 BARROW AK 9972
OWNER OR MANAGER GABRIEL'S BODY SHOP 1601 E 84TH CT ANCHORAGE AK 99507	7530	OWNER OR MANAGER KODIAK TOWING/ U HAUL 2597 MILL BAY RD KODIAK AK 99615	7540	OWNER OR MANAGER MIDNIGHT SUN TOWING BOX 1355 BARROW AK 9972
OWNER OR MANAGER GREGS AUTO REPAIR 9511 CARLSON RD ANCHORAGE AK 99507	7530	OWNER OR MANAGER LAKINGS AUTO BODY BOX 4115 KODIAK AK 99615	7530	OWNER OR MANAGER N SLOPE WELDNG&GEN BOX 425 BARROW AK 9972
OWNER OR MANAGER HILL R V RNTL 8200 NADINE ST ANCHORAGE AK 99507	7512	OWNER OR MANAGER LOUS AUTO REPAIR BOX 3625 KODIAK AK 99615	7530	OWNER OR MANAGER WHALERS MARINA BOX 1140 BARROW AK 9972
OWNER OR MANAGER HLK CO 7206 ZURICH ANCHORAGE AK 99507	7530	OWNER OR MANAGER MANN SERVICE CENTER, INC. PO BOX 788 KODIAK AK 99615	5540	OWNER OR MANAGER GOODHAND TIRE & AUT BOX 89 ESTER AK 9972
OWNER OR MANAGER IKE'S BODY SHOP 7100 KOVEY AVE ANCHORAGE AK 99507	7530	OWNER OR MANAGER MARINE DIESEL&ELEC RPR BX 2486 KODIAK AK 99615	7539	OWNER OR MANAGER MOOSE CRK GARAGE&MBR BOX 125 ESTER AK 9972
OWNER OR MANAGER IMAGE AUTO BODY 8821 TOLOFF STREET ANCHORAGE AK 99507	7530	OWNER OR MANAGER MJS SVCS BOX 1421 KODIAK AK 99615	7513	OWNER OR MANAGER CANTWELL CHEVRON BOX 66 CANTWELL AK 9972
OWNER OR MANAGER IMAGE AUTOBODY 8821 TOLOFF ANCHORAGE AK 99507	7530	OWNER OR MANAGER PAT CO TRANSMISSION&AUTO BOX 1671 KODIAK AK 99615	7530	OWNER OR MANAGER CORN BREAD P. O. BOX 70 CANTWELL AK 9972
OWNER OR MANAGER JOHNSON SVCS 6828 STELLA PL ANCHORAGE AK 99507	7530	OWNER OR MANAGER PERFORMANCE UNLTD BOX 2559 KODIAK AK 99615	7530	OWNER OR MANAGER IGLOO LODGE INC BX 70 CANTWELL AK 9972
OWNER OR MANAGER K&D AUTO REPAIR SHOP 6051 BURLWOOD ANCHORAGE AK 99507	7530	OWNER OR MANAGER RENT A HEAP BOX 1221 KODIAK AK 99615	7512	OWNER OR MANAGER TSESYU SERVICE STAT: BOX 26 CANTWELL AK 9972
OWNER OR MANAGER KIMS TUDOR UNION SVC 2715 E TUDOR RD ANCHORAGE AK 99507	5540	OWNER OR MANAGER SHADES OF COMPETITION 720 WEST 58TH AVE UNIT C ANCHORAGE AK 99615	7549	OWNER OR MANAGER BROWNS DIESEL SERVIC BOX 30192 CENTRAL AK 9973

OWNER OR MANAGER BEETLE SHOP 6220 MACKAY ANCHORAGE AK 99507	7530	OWNER OR MANAGER BODY DOCTORS 1950 MILL BAY RD KODIAK AK 99615	7530	OWNER OR MANAGER MC ENTERPRISES BOX 140083 SALCHA AK 99714
OWNER OR MANAGER BRANDYS AUTO APPRAISAL 4601 PAVALOF ST ANCHORAGE AK 99507	7540	OWNER OR MANAGER BRECHAN ENTS INC BOX 1275 KODIAK AK 99615	7530	OWNER OR MANAGER SALCHA ENTERPRISES 7371 RICHARDSON HWY SALCHA AK 99714
OWNER OR MANAGER BROWN BEAR BODY & PAINT 7140 LAKE OTIS PKWY ANCHORAGE AK 99507	7530	OWNER OR MANAGER BUGGY BANYA 2705 MILL BAY RD KODIAK AK 99615	7542	OWNER OR MANAGER SALCHA STORE&SVC 7666 RICHARDSON HWY SALCHA AK 99714
OWNER OR MANAGER BROWN BEAR BODY&PAINT 8911 TOLOFF ST ANCHORAGE AK 99507	7530	OWNER OR MANAGER C & S AUTO 8880 PANAMARIOFF KODIAK AK 99615	7530	OWNER OR MANAGER TANANAN SVCS CTR BOX 74 SALCHA AK 99714
OWNER OR MANAGER C&K EQUIP REPR 8120 LK OTIS PKWY ANCHORAGE AK 99507	7530	OWNER OR MANAGER C&S AUTO 8880 PANAMARIOFF KODIAK AK 99615	7530	OWNER OR MANAGER TRYPHS TEXACO 10475 RICHARDSON HWY SALCHA AK 99714
OWNER OR MANAGER CAL NORTH MOTOR SPORTS 8757 PLUTO DR ANCHORAGE AK 99507	7540	OWNER OR MANAGER COVEYS PIT STOP BOX 2365 KODIAK AK 99615	5540	OWNER OR MANAGER YATES DUDLEY M&SI 5875 RICHARDSON HWY SALCHA AK 99714
OWNER OR MANAGER COLORITE CUSTOM BODY&PAI 6614 LK OTIS PKWY ANCHORAGE AK 99507	7530	OWNER OR MANAGER D&L AUTOMOTIVE BOX 3054 KODIAK AK 99615	7530	OWNER OR MANAGER B & J'S BOX 21045 ANAKTUVUKPASAK 9972
OWNER OR MANAGER CONST EQUIP FLD SVC CO 7101 BURLWOOD DR ANCHORAGE AK 99507	7500	OWNER OR MANAGER HERTZ CAR & TRUCK RENTAL BOX 148 KODIAK INTERNATIONAL AIRP KODIAK AK 99615	7512	OWNER OR MANAGER STEWART ENTS 1248 HEATH AVE FAIRBANKS AK 9972
OWNER OR MANAGER D. M. M. & L. ENTERPRISES 3707 COVENTRY DRIVE ANCHORAGE AK 99507	7530	OWNER OR MANAGER ISLAND AUTO CENTER 1321 MILL BAY RD KODIAK AK 99615	7530	OWNER OR MANAGER ARCTIC AUTOMOTIVE BOX 959 BARROW AK 9972
OWNER OR MANAGER DOUGS IMPORTS 7079 STELLA PL ANCHORAGE AK 99507	7530	OWNER OR MANAGER ISLAND UNION SVCS INC 202 REZANOF KODIAK AK 99615	5540	OWNER OR MANAGER BEARTOOTH EQUIP CNSI BOX 1014 BARROW AK 9972
OWNER OR MANAGER EDS BODY SHOP 1900 CONGRESS CIR # 4 ANCHORAGE AK 99507	7512	OWNER OR MANAGER JOHNS AUTO BODY 1417 MILL BAY RD KODIAK AK 99615	7530	OWNER OR MANAGER BROWER BODY SHOP BOX 864 BARROW AK 9972
OWNER OR MANAGER EXECUTIVE OIL CHANGE CO 7041 MIRANDA ANCHORAGE AK 99507	7530	OWNER OR MANAGER KEN'S AUTO REPAIR BOX 2937 KODIAK AK 99615	7530	OWNER OR MANAGER JACKSON RENTAL PO BX 105 BARROW AK 9972

OWNER OR MANAGER A-1 AUTO SERVICE CENTER 9100 LAKE OTIS PARKWAY ANCHORAGE AK 99507	7530	OWNER OR MANAGER RODGERS & SONS TESORO BOX 1237 KENAI AK 99611	5540	OWNER OR MANAGER K SNOW LEASING 910 SENATE LOOP FAIRBANKS AK 99712
OWNER OR MANAGER AAA AK 3561 E TUDOR RD #8 ANCHORAGE AK 99507	7540	OWNER OR MANAGER SCHILLING & SONS PTR 47 SPUR VIEW DR KENAI AK 99611	5540	OWNER OR MANAGER M&R ENTS 475 PANORAMA DR FAIRBANKS AK 99712
OWNER OR MANAGER AATCO TRANSMISSION 6614 LAKE OTIS PKWY ANCHORAGE AK 99507	7530	OWNER OR MANAGER SEE-A-SIGHT BOX 1391 KENAI AK 99611	7513	OWNER OR MANAGER METTS RENTALS 300 HOWLAND RD #9 FAIRBANKS AK 99712
OWNER OR MANAGER ABC AUTO RECYCLING 5705 OLD SEWARD HWY ANCHORAGE AK 99507	7538	OWNER OR MANAGER STEVE'S CHEVRON SERVICE RT 1 BOX 1095 KENAI AK 99611	5540	OWNER OR MANAGER PETERMANS AUTO SERVICE 2465 OLD STEESE HWY FAIRBANKS AK 99712
OWNER OR MANAGER ACE AUTO BODY SHOP 1840 E DOWLING ANCHORAGE AK 99507	7530	OWNER OR MANAGER SUNSHINE AUTO REPAIR BOX 85 KENAI AK 99611	7530	OWNER OR MANAGER ROLLING HILLS EQUIP RN' 2071 CHENA HOTSPPRINGS I FAIRBANKS AK 99712
OWNER OR MANAGER AL'S CARBUREATOR & ELEC 8800 BOLOVIN ANCHORAGE AK 99507	7530	OWNER OR MANAGER T&D AUTOMATIC TRANSMISSO 14063 KENAI SPUR HWY KENAI AK 99611	7530	OWNER OR MANAGER SANDERSON AUTO BODY LTI 2057 KAYLEE LN FAIRBANKS AK 99712
OWNER OR MANAGER ALSAKA CORVETTE ENT 9499 BRAYTON #13 ANCHORAGE AK 99507	7530	OWNER OR MANAGER YUKON LEASING BOX 582 KENAI AK 99611	7513	OWNER OR MANAGER STERLING SVCS 1231 GULL RD FAIRBANKS AK 99712
OWNER OR MANAGER ANCH BODY & FRAME 8240 HARTZELL UNIT # 1 ANCHORAGE AK 99507	7530	OWNER OR MANAGER SPARKYS BOX 28 KING COVE AK 99612	7530	OWNER OR MANAGER STEVENS ENTERPRIZE 110 AMAYUN LN FAIRBANKS AK 99712
OWNER OR MANAGER ANDERSON EQUIP REPAIR 2390 WALDRON ANCHORAGE AK 99507	7530	OWNER OR MANAGER SPARKYS AUTO REPAIR BOX 253 KING COVE AK 99612	7530	OWNER OR MANAGER SUPERIOR AUTOMOTIVE SVC 4189 CHSR FAIRBANKS AK 99712
OWNER OR MANAGER ARCTIC SUN COACHWORKS 650 W 59TH SUITE A ANCHORAGE AK 99507	7530	OWNER OR MANAGER KING SALMON GAS CO-OP BOX 2 KING SALMON AK 99613	5540	OWNER OR MANAGER T-C AUTO REPAIR 313 CHENA HOT SPS. RD. FAIRBANKS AK 99712
OWNER OR MANAGER AUTO TRENDS 1840 CONGRESS # 4 ANCHORAGE AK 99507	7530	OWNER OR MANAGER TIBBETTS AIRMOTIVE BOX 332 KING SALMON AK 99613	7580	OWNER OR MANAGER WELTOWN INDEPENDANT GARAG 6810 STEESE HWY. FAIRBANKS, AK 99712
OWNER OR MANAGER BEARDSLEY AUTO 5923 ROWAN ST ANCHORAGE AK 99507	7530	OWNER OR MANAGER KASHATOK MARINA GEN DEL KIPNUK AK 99614	5540	OWNER OR MANAGER CLYDE EQUIPMENT REPAIR 6714 CANADAY ROAD SALCHA AK 99714

OWNER OR MANAGER
ALEX'S PAINT & BODY
214 MULDOON RD
ANCHORAGE AK 99506

7530

OWNER OR MANAGER
RAPID CAR WASH INC
BX 2551
KENAI AK 99611

7542

OWNER OR MANAGER
DC ENTERPRISES
2641 N STEESE
FAIRBANKS AK 99712

OWNER OR MANAGER
HERBIES AUTO BODY
BOX 811 EAFB
ANCHORAGE AK 99506

7530

OWNER OR MANAGER
RECTOR G AUTOMOTIVE&PRTS
RT 1 BOX 94
KENAI AK 99611

7530

OWNER OR MANAGER
EL CHEEPO MOTORHOME RENT
669 ADVENTURE RD.
FAIRBANKS AK 99712

OWNER OR MANAGER
A MOBILE MECHANIC
2601 GUAM ST #21B
ANCHORAGE AK 99507

7530

OWNER OR MANAGER
RM MCNAIR
BOX 1984
KENAI AK 99611

7530

OWNER OR MANAGER
GRABBERS PERFORMANCE
6881 ALTAIR LANE
FAIRBANKS AK 99712

OWNER OR MANAGER
A-ALASKA TIRE CENTER
8800 GOLOVIN
ANCHORAGE, AK 99507

7530

OWNER OR MANAGER
ROBBIE'S REPAIR SERVICES
BOX 3747
KENAI AK 99611

7530

OWNER OR MANAGER
HERNING ENTS
428 RHONDA ST
FAIRBANKS AK 99712

R&R AUTOMOTIVE SPECIALTY
1039 MULDOON RD.
ANCHORAGE AK 99504

JACKSON'S SALES & SERVICES
BOX 618
KENAI AK 99611

MCDONALD TOWING
P. O. BOX 10221
FAIRBANKS AK 997

OWNER OR MANAGER 7530
REPAIRS UNLTD
3404 LEE ST
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
JOHNSON'S SAAB SERVICE
BOX 2777
KENAI AK 99611

OWNER OR MANAGER
OBSOLETE MOTORS
BOX 10310
FAIRBANKS AK 997

OWNER OR MANAGER 5540
ROGERS MULDOON TEXACO
601 MULDOON RD
ANCHORAGE AK 99504

OWNER OR MANAGER 7514
JON-BON CORPORATION
PO BOX 527
KENAI AK 99611

OWNER OR MANAGER
P&R DIVERSIFIED LS
BOX 10029
FAIRBANKS AK 997

OWNER OR MANAGER 7549
ROLAND H. GOFF
705 MULDOON #92
ANCHORAGE AK 99504

OWNER OR MANAGER 7512
JOVA ENTS/HERTZ
BOX 554
KENAI AK 99611

OWNER OR MANAGER
SS EXPRESS FABRICA
PO BOX 10730
FAIRBANKS AK 997

OWNER OR MANAGER 7513
RWR TRUCKING
328 BONIFACE 2766
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
K BEACH AUTO BODY
BOX 3772
KENAI AK 99611

OWNER OR MANAGER
B&J TRUCK & AUTO R
BOX 58212
FAIRBANKS AK 997

OWNER OR MANAGER 7530
S&L AUTO SERVICES
4950 TAKU DR.
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
K-BEACH PARTS & MACHINE
BOX 1510
KENAI AK 99611

OWNER OR MANAGER
K & A ENTERPRIZES
P. O. BOX 58153
FAIRBANKS AK 997

OWNER OR MANAGER 7549
SHAWN K. FOLEY
7744 BOUNDARY
ANCHORAGE AK 99504

OWNER OR MANAGER 7534
KASILOF MOBILE TIRE
PO BOX 4647
KENAI AK 99611

OWNER OR MANAGER
NORTH POLE RADIATOR
BOX 58683
FAIRBANKS AK 997

OWNER OR MANAGER 7530
STEVE'S WHEELER
6311 DEBARR RD #294
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
KENAI SPOT SHOP
BOX 3236
KENAI AK 99611

OWNER OR MANAGER
OLSEN TRUCK&TRLR F
BOX 58420
FAIRBANKS AK 997

OWNER OR MANAGER 7530
STOUT&STOUT AUTOMOTIVE
8310 PECK # 3
ANCHORAGE AK 99504

OWNER OR MANAGER 5540
KENAI TEXACO
11120 KENAI SPOUR HWY
KENAI AK 99611

OWNER OR MANAGER
TANANA TRACTOR
BOX 58096
FAIRBANKS AK 997

OWNER OR MANAGER 7542
SUPERIOR CAR WASH
8200 E 2ND AVE
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
MECHANIC SHOP, THE
P. O. BOX 826
KENAI AK 99611

OWNER OR MANAGER
A&L PRECISION 4 WH
762 QUASAR DR
FAIRBANKS AK 997

OWNER OR MANAGER 7530
T&R EXPEDITING
7800 DEBARR #506
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
NATE'S FST FWD MOBL REPR
BOX 4904
KENAI AK 99611

OWNER OR MANAGER
BUTLER, DENNIS
732 OLD STEESE N #
FAIRBANKS AK 997

OWNER OR MANAGER 7530
WARDROPE'S AUTO REPAIR
6153 E 12TH
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
ONE EYE'S JACK'S REPAIR
202 EVERGREEN
KENAI AK 99611

OWNER OR MANAGER
C&D ENTS
470 MCKINLEY VIEW I
FAIRBANKS AK 997

OWNER OR MANAGER 7530
CRAIG'S AUTOMOTIVE REPAIR
5320 8TH ST.
FT RICHARDSOAK 99505

OWNER OR MANAGER 7530
R & M ENGINE REBUILD
RT 1 BOX 126
KENAI AK 99611

OWNER OR MANAGER
CARTWRIGHT AD TRUCK
1992 STEESE HWY
FAIRBANKS AK 997

OWNER OR MANAGER 7530
J & J AUTOMOTIVE
632 IRWIN APT C
ANCHORAGE AK 99505

OWNER OR MANAGER 7542
R&K INDUSTRIAL ENTERPRIS
BOX 361
KENAI AK 99611

OWNER OR MANAGER
D & L AUTOMOTIVE
1351 LITTLE FOX TR.
FAIRBANKS AK 997

OWNER OR MANAGER 7530
MARV'S PLACE
6811 E 11TH AVE
ANCHORAGE AK 99504

OWNER OR MANAGER 5540
DANIELS LK FLOAT PLANE
HCO1 BOX 936
KENAI AK 99611

OWNER OR MANAGER
KINION TRUCKING
2825 PERKS HWY
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
MOONEY EDWARD C
6711 FOOTHILLS DR
ANCHORAGE AK 99504

OWNER OR MANAGER 7513
DOYLES FUEL SERVICE
BOX 582
KENAI AK 99611

OWNER OR MANAGER
M&B REPAIR INC
3650 WORRELL
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
NORTHLAND TRUCK & TRACTOR
8750 PIONEER DR
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
EAGLE AUTO SERVICE
10819 SPUR HWY STE 431
KENAI AK 99611

OWNER OR MANAGER
MCCORMICK ENTERPRIZES
2205 RAVENWOOD AVE
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
NW AUTO BODY&PNT
341 BONIFACE PKWY
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
EASY'S REPAIR
BOX 1553
KENAI AK 99611

OWNER OR MANAGER
NUCKOLS MIKE LEASING
1406 BIRCHWOOD DR
FAIRBANKS AK 99709

OWNER OR MANAGER 7519
PEREZ, SUE
3212 LEE
ANCHORAGE AK 99504

OWNER OR MANAGER 7540
EXPRESS LUBE
BOX 992
KENAI AK 99611

OWNER OR MANAGER
S & W RADIATOR
1625 COLLEGE RD
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
PIONEER AUTOBODY&PAINT
4235 MCLEAN # 7
ANCHORAGE AK 99504

OWNER OR MANAGER 7512
EZ OZY AUTO RENTAL
BOX 1080
KENAI AK 99611

OWNER OR MANAGER
SHEPHERD ENTS
506 SPRUCEWOOD
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
Q&B WHLSE AUTO REBLDRS
4602 MT VIEW RD
ANCHORAGE AK 99504

OWNER OR MANAGER 7521
FRED BRAUN'S RV PARK
PO BOX 340
KENAI AK 99611

OWNER OR MANAGER
WBN REPAIR
2541 GOLDHILL RD
FAIRBANKS AK 99709

OWNER OR MANAGER 7530
QUARTER MILE
1001 BONIFACE 1C
ANCHORAGE AK 99504

OWNER OR MANAGER 5540
G & M CHEVRON
11152 SPUR HWY.
KENAI AK 99611

OWNER OR MANAGER
A-1 RECOVERY
BOX 10265
FAIRBANKS AK 99710

OWNER OR MANAGER 7519
R R RV
6033 GLENKERRY DR
ANCHORAGE AK 99504

OWNER OR MANAGER 7519
G&E REC
3740 WILDROSE ST
KENAI AK 99611

OWNER OR MANAGER
BRAD'S AUTO BODY AND
P. O. BOX 10007
FAIRBANKS AK 99710

OWNER OR MANAGER 7530
R&B ENTERPRISES
3900 RESURRECTION DRIVE
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
GARYS AUTO ELECTRIC
BOX 4001
KENAI AK 99611

OWNER OR MANAGER
LORD SERVICES
P. O. BOX 10338
FAIRBANKS AK 99710

OWNER OR MANAGER 7530
R&R AUTOMOTIVE SPECIALTI
1039 MULDOON RD.
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
JACKSON'S SALES & SERVICES
BOX 618
KENAI AK 99611

OWNER OR MANAGER
MCDONALD TOWING
P. O. BOX 10221
FAIRBANKS AK 99710

OWNER OR MANAGER 7530
REPAIRS UNLTD
3404 LEE ST
ANCHORAGE AK 99504

OWNER OR MANAGER 7530
JOHNSON'S SAAB SERVICE
BOX 2777
KENAI AK 99611

OWNER OR MANAGER
OBSOLETE MOTORS
BOX 10310
FAIRBANKS AK 99710

OWNER OR MANAGER 5540
ROGERS MULDOON TEXACO
601 MULDOON RD
ANCHORAGE AK 99504

OWNER OR MANAGER 7514
JON-BON CORPORATION
PO BOX 527
KENAI AK 99611

OWNER OR MANAGER
PCR DIVERSIFIED LSG I
BOX 10029
FAIRBANKS AK 99710

OWNER OR MANAGER 7549
ROLAND H. GOFF
705 MULDOON #92
ANCHORAGE AK 99504

OWNER OR MANAGER 7512
JOVA ENTS/HERTZ
BOX 554
KENAI AK 99611

OWNER OR MANAGER
SS EXPRESS FABRICATIO
PO BOX 10730
FAIRBANKS AK 99710

OWNER OR MANAGER GARRETT'S TESORO # 3 317 MULDOON RD ANCHORAGE AK 99504	5541	OWNER OR MANAGER ICD GARAGE BX 115 KASILOF AK 99610	7530	OWNER OR MANAGER S&M ENGR BOX 82302 COLLEGE AK 9970
OWNER OR MANAGER GOLD DUST RACING 7610 MARYLAND AVE ANCHORAGE AK 99504	7530	OWNER OR MANAGER MC MOORE ENTERPRISES RT 2 BOX 705 KASILOF AK 99610	7530	OWNER OR MANAGER TRYPH'S ROAD HOUSE PO BOX 83963 FAIRBANKS AK 9970
OWNER OR MANAGER GRATELAND TEXACO 495 TAKU DR ANCHORAGE AK 99504	5540	OWNER OR MANAGER A & V MUFFLER 11474 SPUR HWY KENAI AK 99611	7530	OWNER OR MANAGER WET WILLY'S CAR WAS BOX 80047 FAIRBANKS AK 9970
OWNER OR MANAGER INDIAN HILLS CHEVRON INC 6470 DEBARR RD ANCHORAGE AK 99504	5541	OWNER OR MANAGER A&V MUFFLER 11474 SPUR HWY KENAI AK 99611	7530	OWNER OR MANAGER AK JACK SNOWMOBILE 1124 DOLPHIN WAY FAIRBANKS AK 9970
OWNER OR MANAGER JED AUTOMOTIVE ENTS 716 TOWNE CT ANCHORAGE AK 99504	7530	OWNER OR MANAGER A-1 AUTO RENTAL BOX 527 KENAI AK 99611	7512	OWNER OR MANAGER ALASKA NORTHSTAR EN 4732 AMHERST STREET ANCHORAGE AK 9970
OWNER OR MANAGER J&L AUTOMOTIVE PAINT & B 618 KIM PL. ANCHORAGE AK 99504	7530	OWNER OR MANAGER AJ'S AUTO BODY BOX 2857 KENAI AK 99611	7530	OWNER OR MANAGER ALASKA PRECISION SA 4388 YORK AVE FAIRBANKS AK 9970
OWNER OR MANAGER JOHN&JEFF'S AUTO REBUILD 8240 E 19TH CIR ANCHORAGE AK 99504	7530	OWNER OR MANAGER ALL AMERICAN RESTORATION BOX 1369 KENAI AK 99611	7530	OWNER OR MANAGER BARNES GARAGE 1840 MARIKA RD FAIRBANKS AK 9970
OWNER OR MANAGER JOHN'S AUTO SALES& PARTS 328 BONIFACE PKWY #2050 ANCHORAGE AK 99504	7530	OWNER OR MANAGER AUTO DOCTOR THE BOX 1132 KENAI AK 99611	7530	OWNER OR MANAGER CHAPPLE CO 5926 AIRPORT RD FAIRBANKS AK 9970
OWNER OR MANAGER KEEP IT CLEAN 253 TURPIN ST # 1 ANCHORAGE AK 99504	7542	OWNER OR MANAGER BACKYARD BODYWORKS BOX 4836 KENAI AK 99611	7530	OWNER OR MANAGER D&M REPAIR 3050 VAN HORN RD FAIRBANKS AK 9970
OWNER OR MANAGER LUISS TOWING 7800 DEHART # 93 ANCHORAGE AK 99504	7540	OWNER OR MANAGER BIG DIPPER CAR WASH RT 1 BOX 1225 KENAI AK 99611	7542	OWNER OR MANAGER DIETRICH AUTO REPAIR 1995 REDBERRY DR SF FAIRBANKS AK 9970
OWNER OR MANAGER LUNDYS QUALITY AUTOBODY 2400 BRITTANY CIR ANCHORAGE AK 99504	7530	OWNER OR MANAGER BILLS AUTOMOTIVE BOX 4257 KENAI AK 99611	7530	OWNER OR MANAGER FREDAUTOBODY&TRUCK 1092 DOLPHIN WAY FAIRBANKS AK 9970
OWNER OR MANAGER LUTHER ENTS 2938 DONNINGTON DR ANCHORAGE AK 99504	7530	OWNER OR MANAGER BRUCE'S AUTO REPAIR RT1 BOX 160-2 KENAI AK 99611	7530	OWNER OR MANAGER G & G AUTO SERVICES 947 CHENGPOMP RD #6 FAIRBANKS AK 9970
OWNER OR MANAGER M & M AUTO REPAIR 8330 LITTLE DIPPER AVE ANCHORAGE AK 99504	7530	OWNER OR MANAGER CAR MAINTENANCE 507 OVERLAND AVE KENAI AK 99611	7530	OWNER OR MANAGER GOLDSTREAM ENT 1812 WOODBINE DR FAIRBANKS AK 9970
OWNER OR MANAGER MACHUGH TRUCK REPAIR 8520 LITTLE DIPPER ANCHORAGE AK 99504	7530	OWNER OR MANAGER COOK INLET MECH BOX 1355 KENAI AK 99611	7530	OWNER OR MANAGER GOLDSTREAM R & R 1841 SLOWPOKE LN FAIRBANKS AK 9970

OWNER OR MANAGER CHIPS ENTS 7150 E 4TH ANCHORAGE AK 99504	7530	OWNER OR MANAGER LEWIS, CHARLES R. P. O. BOX 854 HOMER AK 99603	7530	OWNER OR MANAGER FOX FUEL BOX 92951 FAIRBANKS AK 997
OWNER OR MANAGER CHUCKS HIGH PERFORMANCE 7010 METEOR CT ANCHORAGE AK 99504	7530	OWNER OR MANAGER MACKINTOSH ENTERPRISE P. O. BOX 419 HOMER AK 99603	7542	OWNER OR MANAGER FRONT END SHOP INC BOX 82506 FAIRBANKS AK 997
OWNER OR MANAGER COLLISION SPECIALIST 1730 MULDOON CIR #3 ANCHORAGE AK 99504	7530	OWNER OR MANAGER MICKEY FINN ENTERPRISES 361 STERLING HWY HOMER AK 99603	5540	OWNER OR MANAGER HELGERSON REPAIR BOX 83250 FAIRBANKS AK 997
OWNER OR MANAGER DAVID DREWS 6636 EAST 16TH ANCHORAGE AK 99504	7530	OWNER OR MANAGER MIDNIGHT AUTO REPAIR BOX 2010 HOMER AK 99603	7530	OWNER OR MANAGER INDUSTRIAL ENTS BOX 81082 COLLEGE AK 997
OWNER OR MANAGER DONS REPAIR 6811 E 11TH AVE ANCHORAGE AK 99504	7500	OWNER OR MANAGER P&M ENTS&AIRPT TEXACO 1495 OCEAN DR HOMER AK 99603	5540	OWNER OR MANAGER INTERIOR TOWING&S BOX 84157 FAIRBANKS AK 997
OWNER OR MANAGER DR. DONS PAINT & BODY 503 MARLOWE ST. ANCHORAGE AK 99504	7530	OWNER OR MANAGER PORT GRAHAM CORP GEN DEL PORT GRAHAM AK 99603	5540	OWNER OR MANAGER J P&S DIESEL REPA BOX 84715 FAIRBANKS AK 997
OWNER OR MANAGER E-2 SMOG CHECK 5611 WHISPERING SPRUCE ANCHORAGE AK 99504	7540	OWNER OR MANAGER QUICKY MART 1242 OCEAN DRIVE HOMER AK 99603	5541	OWNER OR MANAGER MJI LEASING PO BX 82030 FAIRBANKS AK 997
OWNER OR MANAGER EASTSIDE AUTOMOTIVE CNTR 5705 DEBARR AVE ANCHORAGE AK 99504	5540	OWNER OR MANAGER SHOP THE PO BOX 1776 HOMER AK 99603	7530	OWNER OR MANAGER NN TRUCK REPAIR&M BOX 84874 FAIRBANKS AK 997
OWNER OR MANAGER ELMENDORF CAR WASH 328 BONIFACE #2517 ANCHORAGE AK 99504	7542	OWNER OR MANAGER SUNNY CHEVRON SVC INC BOX 863 HOMER AK 99603	5540	OWNER OR MANAGER R & D ENTERPRISES P. O. BOX 84184 FAIRBANKS, AK 997
OWNER OR MANAGER FRONTIER ENTS INC 2900 BONIFACE PK #526 ANCHORAGE AK 99504	7513	OWNER OR MANAGER JOHNSONS SVCS BOX 61 ILIAMNA AK 99606	7530	OWNER OR MANAGER R&D AUTO BOX 82570 FAIRBANKS AK 997
OWNER OR MANAGER GARRETT'S TESORO # 3 317 MULDOON RD ANCHORAGE AK 99504	5541	OWNER OR MANAGER I&D GARAGE BX 115 KASILOF AK 99610	7530	OWNER OR MANAGER S&M ENGR BOX 82302 COLLEGE AK 997
OWNER OR MANAGER GOLD DUST RACING 7610 MARYLAND AVE ANCHORAGE AK 99504	7530	OWNER OR MANAGER MC MOORE ENTERPRISES RT 2 BOX 705 KASILOF AK 99610	7530	OWNER OR MANAGER TRYPH'S ROAD HOUSE PO BOX 83963 FAIRBANKS AK 997
OWNER OR MANAGER GRATELAND TEXACO 495 TAKU DR ANCHORAGE AK 99504	5540	OWNER OR MANAGER A & V MUFFLER 11474 SPUR HWY KENAI AK 99611	7530	OWNER OR MANAGER WET WILLY'S CAR WA BOX 80047 FAIRBANKS AK 997
OWNER OR MANAGER INDIAN HILLS CHEVRON INC 6470 DEBARR RD ANCHORAGE AK 99504	5541	OWNER OR MANAGER A&V MUFFLER 11474 SPUR HWY KENAI AK 99611	7530	OWNER OR MANAGER AK JACK SNOWMOBILE 1124 DOLPHIN WAY FAIRBANKS AK 997

OWNER OR MANAGER AAA AUTO BODY AND MECHANICAL 341 BONIFACE PARKWAY ANCHORAGE AK 99504		OWNER OR MANAGER ANCHOR RIVER COLLISION BOX 2942 HOMER AK 99603		OWNER OR MANAGER ROADRUNNER TOWING PO BOX 73720 FAIRBANKS AK 99707
OWNER OR MANAGER AERO REPAIR 6331 E 6TH AVE ANCHORAGE AK 99504	7530	OWNER OR MANAGER AUTO CLINIC, INC. 2489 KACHEMAK DR HOMER AK 99603	7530	OWNER OR MANAGER ROADWAY WRECKER BOX 74284 FAIRBANKS AK 99707
OWNER OR MANAGER AK DOLPHIN AUTO DETAILIN 7800 DEBARR 280 ANCHORAGE AK 99504	7532	OWNER OR MANAGER BILLS MOBILE GLASS BOX 2444 HOMER AK 99603	7530	OWNER OR MANAGER RUNAHUCK RACING BOX 73625 FAIRBANKS AK 99707
OWNER OR MANAGER AK GEAR&AAA TRANSMISSION 345 BONIFACE PKWY ANCHORAGE AK 99504	7530	OWNER OR MANAGER BLUFF POINT MARINE SVCS BOX 1965 HOMER AK 99603	7530	OWNER OR MANAGER SSS AUTOMOTIVE SVCS BOX 2125 FAIRBANKS AK 99707
OWNER OR MANAGER AK PANDRAMA RV RNTLS INC 8215 E 2ND AVENUE ANCHORAGE AK 99504	7512	OWNER OR MANAGER FOUR BY FOUR AUTOMOTIVE BOX 257 HOMER AK 99603	7530	OWNER OR MANAGER TPANSALASKA TRK & EC BOX 791 FAIRBANKS AK 99707
OWNER OR MANAGER ALASKA CUSTOM REFINISHING 214 MULDOON RD ANCHORAGE AK 99504	7530	OWNER OR MANAGER GATEWAY LIQUOR & FOODMRT BOX 944 SEWARD AK 99603	5540	OWNER OR MANAGER TRIPLE SSS REPAIR SF BOX 74664 FAIRBANKS AK 99707
OWNER OR MANAGER AREA AUTO- VW CONNECTION 328 BONIFACE ANCHORAGE AK 99504	7530	OWNER OR MANAGER GLACIER VIEW GARAGE 519 KLONDIKE HOMER AK 99603	7530	OWNER OR MANAGER WOLVERINE SERVICES BOX 871 FAIRBANKS AK 99707
OWNER OR MANAGER B AUTO BODY 2900 BONIFACE #286 ANCHORAGE AK 99504	7530	OWNER OR MANAGER HERTZ CAR RENTAL BOX 520 HOMER AK 99603	7512	OWNER OR MANAGER WYMANS MOBIL WRENCH BOX 72932 FAIRBANKS AK 99707
OWNER OR MANAGER BENNETT'S AUTO 338 BONIFACE # 2118 ANCHORAGE AK 99504	7530	OWNER OR MANAGER HIGHLAND AUTO BODY&GLASS BOX 2338 HOMER AK 99603	7530	OWNER OR MANAGER 2ND EDITION UPHLSTR PO BOX 73904 FAIRBANKS AK 99707
OWNER OR MANAGER BONIFACE CHEVRON 2801 BONIFACE PKWY ANCHORAGE AK 99504	5540	OWNER OR MANAGER HOMER AUTO AND TRUCK REPAIR BOX 150 HOMER AK 99603	7530	OWNER OR MANAGER AK EQUIP REPAIR BOX 83745 FAIRBANKS AK 99707
OWNER OR MANAGER BONIFACE TEXACO 5700 DEBARR RD ANCHORAGE AK 99504	5540	OWNER OR MANAGER HOMER PIONEER CAR WASH BOX 1287 HOMER AK 99603	7542	OWNER OR MANAGER CONRAD'S CAR CARE BOX 81874 COLLEGE AK 99707
OWNER OR MANAGER C&E AUTO 6811 MINK ANCHORAGE AK 99504	7530	OWNER OR MANAGER HOMER RENTAL CTR 59655 E RD HOMER AK 99603	5540	OWNER OR MANAGER O 9 TRACTOR CO BOX 82877 COLLEGE AK 99707
OWNER OR MANAGER CAPITAL EQUIPT CO 7800 DEBARR RD # 441 ANCHORAGE AK 99504	7530	OWNER OR MANAGER KX-3 AUTO REPAIR BOX 1805 HOMER AK 99603	7530	OWNER OR MANAGER DAVE SEARS SVC CO BOX 82171 FAIRBANKS AK 99707
OWNER OR MANAGER CHIPMAN ENTS 8100 EAST 4TH AVE ANCHORAGE AK 99504	7540	OWNER OR MANAGER LEES ENTS BOX 2582 HOMER AK 99603	7530	OWNER OR MANAGER DETROIT HOT SPRINGS BOX 81344 FAIRBANKS AK 99707

OWNER OR MANAGER TRAVEL SYSTEMS LTD 1407 WEST 31ST AVE ANCHORAGE AK 99503	7512	OWNER OR MANAGER KNOBELS AUTO SVC BOX 84 GLENNALLEN AK 99588	5540	OWNER OR MANAGER MISS SALES, REPAIR, HT BOX 1778 FAIRBANKS AK 9970
OWNER OR MANAGER TRIM LINE OF ANCHORAGE 3605 ARCTIC #2065 ANCHORAGE AK 99503	7540	OWNER OR MANAGER WEARES BODY SHOP BOX 356 GLENNALLEN AK 99588	7500	OWNER OR MANAGER NORTH FORK STORE & I BOX 849 FAIRBANKS AK 9970
OWNER OR MANAGER TUNDRA EXPEDITING CO 3605 ARCTIC BLVD #1035 ANCHORAGE AK 99503	7513	OWNER OR MANAGER HEE YEA LINGDE FUEL CO GEN DEL GRAYLING AK 99590	5540	OWNER OR MANAGER NORTHERN LIGHTS AUT BOX 75066 FAIRBANKS AK 9970
OWNER OR MANAGER U HAUL OF ALASKA, INC. 4751 OLD SEWARD HWY. ANCHORAGE AK 99503	7519	OWNER OR MANAGER HOLY CROSS OIL CO BOX 53 HOLY CROSS AK 99602	5541	OWNER OR MANAGER PATRICK'S TOWING & SA BOX 2121 FAIRBANKS AK 9970
OWNER OR MANAGER WILDWOOD ENTS 3605 ARCTIC BLVD # 516 ANCHORAGE AK 99503	7590	OWNER OR MANAGER AIRPORT TEXACO SHOP 1495 OCEAN DRIVE HOMER AK 99603	7530	OWNER OR MANAGER PERRY AUTOMOTIVE EN BOX 544 FAIRBANKS AK 9970
OWNER OR MANAGER Y&B TEXACO 3304 SPENARD ANCHORAGE AK 99503	5540	OWNER OR MANAGER ALLEN'S TRUCK LEASING GENERAL DEL HOMER AK 99603	7530	OWNER OR MANAGER PRO AUTO & TRUCK REP BOX 74471 FAIRBANKS AK 9970
OWNER OR MANAGER 5TH WHEEL PILOT CAR SVC INC 2607 ARCTIC BLVD ANCHORAGE AK 99503	7540	OWNER OR MANAGER ALPHA / OMEGA ENTERPRISE 1495 OCEAN DRIVE HOMER AK 99603	7513	OWNER OR MANAGER QWIK CHANGE BOX 72953 FAIRBANKS AK 9970
OWNER OR MANAGER AAA AUTO BODY AND MECHANICAL 341 BONIFACE PARKWAY ANCHORAGE AK 99504	7530	OWNER OR MANAGER ANCHOR RIVER COLLISION BOX 2942 HOMER AK 99603	7530	OWNER OR MANAGER ROADRUNNER TOWING PO BOX 73720 FAIRBANKS AK 9970
OWNER OR MANAGER AERO REPAIR 6331 E 6TH AVE ANCHORAGE AK 99504	7530	OWNER OR MANAGER AUTO CLINIC, INC. 2489 KACHEMAK DR HOMER AK 99603	7530	OWNER OR MANAGER ROADWAY WRECKER BOX 74284 FAIRBANKS AK 9970
OWNER OR MANAGER AK DOLPHIN AUTO DETAILIN 7800 DEBARR 280 ANCHORAGE AK 99504	7532	OWNER OR MANAGER BILLS MOBILE GLASS BOX 2444 HOMER AK 99603	7530	OWNER OR MANAGER RUNAMUCK RACING BOX 73625 FAIRBANKS AK 9970
OWNER OR MANAGER AK GEAR & TRANSMISSION 345 BONIFACE PKWY ANCHORAGE AK 99504	7530	OWNER OR MANAGER BLUFF POINT MARINE SVCS BOX 1965 HOMER AK 99603	7530	OWNER OR MANAGER SSS AUTOMOTIVE SVCS BOX 2125 FAIRBANKS AK 9970
OWNER OR MANAGER AK PANDRAMA RV RNTLS INC 8215 E 2ND AVENUE ANCHORAGE AK 99504	7512	OWNER OR MANAGER FOUR BY FOUR AUTOMOTIVE BOX 257 HOMER AK 99603	7530	OWNER OR MANAGER TRANSALASKA TRK & I BOX 791 FAIRBANKS AK 9970
OWNER OR MANAGER ALASKA CUSTOM REFINISHING 214 MULDOON RD ANCHORAGE AK 99504	7530	OWNER OR MANAGER GATEWAY LIQUOR & FOODMRT BOX 944 SEWARD AK 99603	5540	OWNER OR MANAGER TRIPLE SSS REPAIR BOX 74664 FAIRBANKS AK 9970
OWNER OR MANAGER AREA AUTO- VW CONNECTION 328 BONIFACE ANCHORAGE AK 99504	7530	OWNER OR MANAGER GLACIER VIEW GARAGE 519 KLONDIKE HOMER AK 99603	7530	OWNER OR MANAGER WOLVERINE SERVICES BOX 871 FAIRBANKS AK 9970