



DEPARTMENT OF THE AIR FORCE
90TH MISSILE WING (AFGSC)

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SEP 18 2012

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FILED

Sep 20, 2012

Ms. Karen Halvorson
Storage Tank Program Manager
122 W. 25th Street, 4W
Cheyenne, WY 82002

Jim Ruby, Executive Secretary
Environmental Quality Council

Dear Ms. Halvorson

This letter is intended to convey comments regarding proposed rule changes that will be considered by the Environmental Quality Council for adoption on 5 October 2012; specifically, Wyoming Water Quality Rules and Regulations (WWQRR), Chapter 17 – Storage Tanks. No specific response is being requested at this time, these comments are being sent to document F. E. Warren Air Force Base's (FEW) view with regard to specific aspects of these proposed rule changes.

WWQRR Chapter 17, Part L, Section 46 (d) currently requires each Underground Storage Tank (UST) under the control of FEW to be inspected monthly by a certified class A or B operator. The inspection and certification requirement puts an undo financial and manpower burden on UST owners/operators with multiple generator facilities in remote locations. The nature and security of these systems makes them difficult if not impossible to access during inclement weather. These USTs pose less risk for contamination than fueling facilities because they are associated with "emergency" or "stand-by" generators, requiring infrequent refueling (averaging 5 years between refueling events for FEW).

We appreciate the opportunity to participate in this rule making process and look forward to working with your department in the future. If you have any questions or concerns, please feel free to contact Mr. Shain Wright at (307) 773-4357 or e-mail shain.wright@us.af.mil.

Sincerely

Shain L. Wright
Base Storage Tank Program Manager