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Title: Use of American Society for Testing Materials Emergency Standard 40 (ASTM ES40)

Identification Number: WASTE-0041-NPD (formerly OER-0009-NPD)

Date Originally Adopted: May 1, 1997

Dates Revised: December 15, 1997

Other Policies Repealed or Amended: None

Brief Description of Subject Matter: Clarifies IDEM's policy regarding use of alternative, non-invasive methods to assess the suitability of underground storage tanks for upgrading with cathodic protection.

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Use of American Society for Testing Materials Emergency Standard 40 (ASTM ES40)

The purpose of this document is to clarify IDEM's policy with respect to the use of alternative, non-invasive methods to assess the suitability of underground storage tanks for upgrading with cathodic protection.

1. IDEM will continue to accept the expired ASTM ES 40 methods until USEPA provides additional guidance on the use of the various methods specified. This is consistent with the advice given to the states in the March 6, 1997 letter from USEPA.
2. The Underground Storage Tank (UST) section will review specific technologies for alternative methods as described in ASTM ES40 and maintain a list of such procedures allowed for use in the state of Indiana. It is important to note that

while we will review alternative technologies, we will not certify nor endorse them.

Companies wishing to have their particular methods reviewed by the UST section for the purpose of being included on a list of reviewed methods, or owner/operators wishing to obtain a copy of the list should contact: Skip Powers, UST Section, P.O. Box 6015, Indianapolis, IN 46206-6015, (317) 308-3039.

Staff will review the proposals, then consult with other state/federal agencies for any information they may have about the practical use of that method.

UST owners wishing to use an alternative method as specified in ES 40 need to be extremely careful as some methods have not had much practical use. They should realize that as the December 1998 upgrade deadline looms, contractors may offer services in which they have not become proficient in order to meet the increased demand for cathodic protection upgrades. EPA estimates that a great number of UST owners wishing to upgrade with cathodic protection are going to be independent single site enterprises, with limited access to information about upgrade technology.

EXPIRES