

UST SECTION
June 10, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Piazza, President
Southern Cathodic Protection
1100 Johnson Ferry Rd., Suite 108
Atlanta, GA 30342

RE: Withdrawal of State's Approval for use of Statistical Corrosion Probability Analysis
as an Alternative Integrity Assessment Method for Underground Storage Tanks

Dear Mr. Piazza:

This is to notify you that the North Carolina Department of Environment and Natural Resources (NCDENR), UST Section has withdrawn its approval of Statistical Corrosion Probability Analysis (SCP) for use as an alternative method for assessing the structural integrity of unlined steel tanks prior to upgrading with corrosion protection. In October 1997, pursuant to federal regulation 40 CFR 280.21(b)(2)(iv) as incorporated by state rule 15A NCAC 2N .0302, NCDENR granted its approval of SCP as a method of determining if unlined steel USTs were suitable for upgrading with corrosion protection. As stipulated in the approval letter, the approval was valid only if certain conditions were met. Because the December 22, 1998 upgrade deadline has long since passed diminishing the need for integrity assessments of unlined steel tanks and because SCP was often not performed in accordance with the state's conditions for approval, the method is no longer valid in the state of North Carolina.

Should you have any questions, please do not hesitate to call me at (919) 733-8486.

Sincerely,



Ruth A. Strauss, Head
Permits and Inspection Branch

cc: Grover Nicholson