

## A Little Goes a Long Way in Testing for Cathodic Protection Readings

The day usually starts at 5 a.m. for Harry Little because many tanks and many miles await him.

The day may include discussions in which Harry has to convince someone that he's not a state inspector, or explanations to airport security personnel about why his luggage contains so many wires, alligator clips and devices with unusual names such as a soil resistivity meter or copper/copper sulfate reference electrode.

Or perhaps the day will include an opportunity to meet a baseball superstar.

More than anything though, Harry's day includes many hours of windshield time - finding his way from one underground storage tank location to another.

Harry is quite likely America's leading cathodic protection tester - now covering 27 states for Veri-Tank, a subsidiary of Steel Tank Association.

**TankTalk changes with the times**  
**This is the last print edition of *TankTalk*. See Page 8 to learn how you can continue to view this free newsletter online.**

Harry's territory stretches from Utah to Maine to Florida - not including every single state within that triangle - but enough to make a living.

"It's a good job if you can get assigned to enough tanks to keep you going," says Harry, who lives with his wife and daughter on a small cattle farm near New Hebron, Miss.

"Harry has been doing this for about 15 years," says Lorri Grainawi, technical director for Steel Tank Institute.

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The well-traveled Harry Little captures cathodic protection data from an underground storage tank in Macon, Ga. (Photo by Woody Marshall)

## How State Budget Woes Will Affect UST Inspection Efforts

Across the country, 2003 has become the year of massive budget shortfalls for state governments. Governors and lawmakers have clashed over ways to close canyon-sized budget gaps through cost-cutting and creative ways to bring in more income.

California, which earlier this year projected a \$35 billion budget imbalance, received the most notoriety. But the issue remains on the front burner for states with considerably smaller outlays to support public priorities.

So, to see how underground storage tank regulators are dealing with inspection requirements in an age when less cash is available to state programs, *TankTalk* contacted several UST officials.

What follows are the comments of:

\* Andrea Zajac, chief, Storage Tank Unit, Waste & Hazardous Material Division for Michigan Department of Environmental Quality

\* Kevin Henderson, administrator, Compliance & Enforcement Section, Underground Storage Tank Branch of the Mississippi Department of Environmental Quality

\* Marshall Mott-Smith, environmental administrator, Petroleum

Storage Systems, Florida Department of Environmental Protection

\* Sheldon Schall, chief, Wisconsin Department of Commerce, Retail Petroleum Services & Storage Tank Regulation Sections

Operational compliance remains at the forefront of inspection concerns. As you will see, some states have few worries about meeting their inspection obligations, while others are starting to consider budget implications.

**TankTalk:** How are budget shortfalls in your state affecting your agency's emphasis on UST inspections? Fewer inspectors? New priorities for compliance? No change at all?

**Andrea Zajac:** Michigan has an annual fee of \$100 per tank; therefore, our number of inspectors has not changed. Operational compliance is still our number one priority.

**Sheldon Schall:** The current and proposed budget reductions in Wisconsin have initiated an internal assessment of the petroleum inspection and storage tank regulatory program. Presently, we are evaluating how we can maintain overall services more efficiently by putting our time, effort and budget to the most effective use.

*(Continued on Page 3)*

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## Tank System No-Nos: Scissor-Jacks, Tires on Fire, Heat Guns and Flying Plastic Vessels

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### Worcester, United Kingdom

A retired builder died in a freak accident when a 6-foot-tall oil tank toppled over and crushed him.

George Andrews, of Pound Green, Arley, near Bewdley, was working on a central heating system outside his rural home, when the 500-gallon (1,893-liter) container fell from its two support jacks and pinned him to the ground.

"He was a very capable man, who could fix anything at all," a friend said. "The problem was he was using two scissor-jacks, like ones used to raise cars, and their base was too small for such a large tank. Anything could have sent it falling and unfortunately it landed on him."

Though the oil tank was empty at the time, the 76-year-old pensioner was unable to get himself free and was pronounced dead at the scene.  
[http://www.thisisworcester.co.uk/worcestershire/worcester/news/WEN\\_NEWS\\_LATEST8.html](http://www.thisisworcester.co.uk/worcestershire/worcester/news/WEN_NEWS_LATEST8.html)

### Lagos, Nigeria

Three construction workers died from a tank explosion in a building under reconstruction.

The workers allegedly had been told by a contractor to set fire to an underground water tank that had been held in place by iron rods. A police official said the workers had stacked tires next to the tank and set them ablaze - hoping to melt the rods and enable removal of the tank.

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'It was  
an act of  
stupidity.'

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The fire, however, led to an explosion that severely injured the workers, each of whom later died in a hospital while receiving treatment.

"It was an act of stupidity," the police official said.  
<http://www.thisdayonline.com/news/20030125news06.html>

### Doylestown, Pa.

Two fiberglass gasoline tanks exploded at a former gas station in Doylestown, Pa. that was about to reopen, injuring a worker and raising concerns about possible well-water contamination.

The explosion occurred at a station that closed in 2000 when MTBE was found in nearby wells.

Each 10,000-gallon (37,850 liters) tank was holding between 7,000 and 8,000 gallons (26,500 to 30,285 liters) of water to stabilize the tanks at the time of explosion.

The worker who was injured was using a heat gun between the tops of the tanks when the explosion occurred, sending fiberglass shards onto the roof of the gas station and into the street and neighboring yards. (Excerpted from news in the Dangerous Goods Group at yahoo.com)

### Melbourne, Australia

More than 200 workers were evacuated from a Melbourne industrial location after a tank containing about 20,000 liters (5,283 gallons) of hydrochloric acid exploded and rocketed into the air.

A man and a woman were treated at a hospital for minor injuries.

A fire brigade spokesman said the explosion launched the fiberglass tank about 20 meters (66 feet) skyward.

Officials were investigating whether the explosion stemmed from a spark, or the interaction of two chemicals. (Excerpted from news in the Dangerous Goods Group at yahoo.com)

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## Steel Tank Institute Adds New Industry Member Category

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To provide ongoing access for education, training and certification of individuals involved with tank specification, regulation or testing, Steel Tank Institute has developed the new Industry Member category.

Benefits of industry membership include:

- Assistance with renewal of STI certifications every five years, and inclusion on the Institute web site list of STI certified tank inspectors or testers.
- Advance notification of all STI training seminars, including priority enrollment. Industry members will always be accommodated even if the course has reached maximum enrollment. Discounts will be available for attendance at more than one seminar, or for multiple attendees at the same seminar (such as non-members who are co-

workers of the member).

- A newsletter with information geared specifically toward Industry Members.
- Discounts on STI specifications, and an update service to provide Industry Members with current copies of each of STI's specifications, standards and recommended practices.

Industry membership is open to individuals with professional responsibilities that could include:

- Tank design, specification or purchasing
- Tank inspection or testing
- Tank installation
- Code development or regulatory oversight for steel tanks

For more information on becoming an Industry Member, contact Anne Kiefer at (847) 438-8265 or [ankiefer@steeltank.com](mailto:ankiefer@steeltank.com).

## How State Budget Woes Will Affect UST Inspection Efforts

(Continued from Page 1)

We are evaluating our mission in terms of what we are presently doing, and how we are doing it, in relation to statutory mandates and "customer expectations." This includes the assessment of operational practices and protocols.

**Kevin Henderson:** Since our program in Mississippi does not receive any state funds, budget deficits have not directly impacted our inspection efforts as of yet. However, state budget shortfalls can indirectly impact our program since our ability to travel and to fill vacant positions may be limited due to statewide restrictions that might be imposed.

**Marshall Mott-Smith:** There has been no change at all for inspection efforts in Florida; in the new fiscal year we will have the same budget as the current year for compliance. The budget currently supports 25,000 inspections annually (which includes aboveground storage tanks). Our staff has made more than 400,000 inspections since 1982. We have 180 inspectors working for the state.

**TankTalk:** Which tank system components or functions are receiving the most scrutiny from inspectors in your state? Sumps? Piping? Leak detection systems? Others?

**Schall:** Leak detection is the most prominent element in the regulatory oversight process. Assessing the management and functionality of leak detection methods and systems will bring most other system components into the regulatory scrutiny picture as well.

**Henderson:** While I would not say that we are scrutinizing any one component or aspect of UST systems more than any other during our inspection activities, we have raised our cognizance of certain issues. In particular, we have educated ourselves with respect to the behavior and limitations of thermoplastic flexible piping as a result of incidents and observations we ourselves have made, and have become aware of, during the last year.

Part of our effort to address some of the issues surrounding the performance of flex piping involves ensuring that owner/operators understand that flex pipe systems are not designed to withstand a long-term external exposure of fuel. If the plastics that compose the outer layers of flex pipe systems are subjected to long-term fuel exposure, the fuel permeates into the material, causing change in material properties, pipe growth and potentially undesirable failures. We stress that any fuel that enters the containment sumps or secondary containment of thermoplastic flexible piping systems must be evacuated in a timely manner and in accordance with the manufacturers' requirements and recommendations.

fire that followed an overfill of some 500 gallons. This is an instructive example of how even the best equipment can be easily defeated by human error.

Lastly, while our inspectors have always performed testing of cathodic protection systems during inspections, we changed our test methodology in July 2002 to ensure that cathodic protection systems are functioning as intended.

As a result, it has become apparent that a substantial number of cathodic protection systems (both galvanic and impressed current) do not meet these more stringent testing criteria although they probably would have passed testing

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Additionally, we have made a concerted effort to ensure that UST owners/operators are providing effective overfill prevention. For instance, it is not enough to simply tell us that ball float valves are installed. Our inspectors must be able to physically verify that the devices are properly installed. If drop-tube type devices are the chosen method of overfill prevention, we check to make sure that there are no obstructions - and that devices relying on "flapper"-type floats are oriented correctly within the tank.

Of course, having the proper device is only one component of effective overfill prevention. We stress to the owner/operator the importance of the proper procedures that must be followed when receiving fuel deliveries.

Our focus on overfill prevention has been ongoing since the widely publicized 1998 accident in Biloxi, Miss. in which five people lost their lives in a

as it was traditionally conducted. We have enacted a change in test methodology. On galvanic systems, we require that the protected component "pass" both a local and a remote reference cell placement. On impressed current systems, the test must be conducted and "pass" with the current interrupted. We believe the net effect is to raise everyone's awareness of the importance of proper testing and evaluation of corrosion protection systems in the manner necessary to effectively mitigate the potential for releases from metallic UST system components.

**Mott-Smith:** We're looking at everything. We don't concentrate on any single tank system component. We are seeing a lot of problems with flexible pipe.

**Zajac:** Leaking sumps and all types of leak detection are receiving the most scrutiny in Michigan.

(Continued on Page 5)

## Quality Control Meetings Cover the Gamut -- from Manufacturing to Safety Issues

The STI Quality Control Meeting -- attendance at which is required for all STI tank-manufacturing licensees -- this year included everything from technology updates to safety procedures.

Gathered in Waukesha, Wisc., just west of Milwaukee, about 100 representatives of STI manufacturing plants and independent inspection contractors heard timely presentations on May 2 and 3 about insurance claim trends, coating failure analysis and consumable welding electrode selections. Attendees gained insights on the latest developments in both aboveground storage tank (AST) and underground storage tank (UST) technologies, including the Aquasweep oil/water separator.

Special highlights included the remarks of:

\* Wayne Doversberger of Underwriters Laboratories, who outlined the new Alternative Inspection Program to be introduced in July.

\* Phil Grimm of Modern Welding Co., who shared an overview of Modern's program for addressing quality on UL- and STI-listed tanks. Attendees received examples of how a quality-control manual is written and appropriate subject matter to cover.

\* Bryan Awtey of Highland Tank, who spoke on plant safety. His presentation walked the audience through the entire tank manufacturing process and identified important safety issues at each step.

The quality-control meeting, hosted this year by Lannon Tank, also included a tour of Lannon's plant, just north of the quality-control meeting site.

Immediately prior to the two-day quality control session was a required one-day seminar for all North American Permatank licensees. This event also was held at Lannon Tank.

The seminar included the start-to-finish jacketing demonstration of the double wall UST technology. Licensees observed the latest manufacturing procedures. Also covered were improved productivity, quality procedures, troubleshooting, materials and inspection techniques.



A tour of the facilities at Lannon Tank was a key part of the program at the STI Quality Control Meeting. (Photo by Larry O'Shea)

### Tank Tidbits: What Makes a Tank Corrosion Protected?

**Question:** Can a tank manufacturer declare a UST system to be corrosion protected to meet federal regulations, even if it is not certified by UL, STI, or a third-party (i.e. NACE) engineer?

**Answer from Paul Miller, Environmental Engineer, U.S. EPA:** From the federal perspective, I believe your answer lies directly in the regulations. A tank must meet the regulations at 280.20 (USTs where installation began after Dec. 22, 1988) or 280.21 (USTs where installation began on or before Dec. 22, 1988). I'm assuming we are talking about a new tank here, so I'm looking at 280.20 -- here the tank must be designed and constructed so it is protected from corrosion in accordance with a standard code of practice developed by a nationally recognized association or independent testing lab as specified below:

\* Tanks that are FRP, coated and cathodically protected (as specified in the regulations), or steel-FRP clad and meet a standard code of practice, are acceptable (these are listed directly in the regulations).

\* The tank could also be constructed of metal without additional corrosion protection if a corrosion expert (this term is specifically defined in the regulations) makes a determination that the site is not corrosive enough to cause the tank to have a release during its operat-

ing life and the owner keeps records demonstrating this for the tank's life.

\* The implementing agency (typically the state) can make a determination that the tank construction and corrosion protection is designed to prevent the release or threatened release of any stored regulated substance in a manner that is no less protective than the other options listed in the regulations.

Don't forget the standard code of practice language applies to all of the above cases.

If I were the manufacturer, I would ask myself the following:

\* Does my corrosion protection meet the standard code of practice language in the regulations?

\* Does my tank meet one of the corrosion protection options described in the regulations?

If the manufacturer can answer yes to both of these questions, then I believe the tank meets the corrosion protection requirements. Otherwise, it does not -- and I do not believe the maker can make his/her own determination/claim that their tank meets the corrosion part of the regulations without meeting the requirements above.

State and local requirements may be different than the federal regulations. Please check with your state/local entity for their requirements.

## How State Budget Woes Will Affect UST Inspection Efforts

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**TankTalk:** What elements of the inspection process do tank-system owners/operators in your state misunderstand most often?

**Mott-Smith:** There still is some confusion among tank owners/operators on record-keeping for automatic tank gauging systems. If the system can print daily reports, we want to see them all. We do realize that some systems can't do this.

The No. 1 violation found by inspectors is water in the sump. The No. 2 violation is not demonstrating financial responsibility. During 2002, about 61 percent of Florida's tank systems were in "complete compliance" and 85 percent were listed as in "substantial compliance." The primary difference between the categories was determined by paperwork violations.

**Zajac:** Owners/operators do not understand leak detection in all forms, especially inventory control. It is not unusual during an inspection for our inspectors to go through, step-by-step, with an owner/operator how to comply with inventory control.

**Henderson:** Probably, most misunderstood - with respect to the inspection process - would be the need for the owner/operator to provide access to those metallic components of pipe terminations at the tanks and dispensers that are buried in soil. It is necessary for our inspectors to confirm that any

**'The No. 1 violation found by inspectors is water in the sump. The No. 2 violation is not demonstrating financial responsibility.'**

metallic components of the piping system that are in contact with the soil are adequately protected from corrosion and this is often hampered since the soil is not removed from these areas.

A continuing battle that we have fought since the inception of the regula-

tory program involves the inability of some owner/operators to understand what records are necessary to demonstrate compliance during an inspection.

To combat this problem, we announce in advance that we will be conducting an inspection and provide the owner/operator with a "laundry list" of records that we need to see. However, there are invariably one or more aspects of the owners' record-keeping that are not made available during the inspection even though they may exist elsewhere.

This leads to delays and logjams in the inspection process as we attempt to work with the owner/operators in a cooperative manner without the need to pursue formal enforcement action for a simple record confirmation.

**Schall:** Leak detection and annual integrity testing are the most common management deficiencies. I do not believe that it is misunderstood as often as it is simply ignored. Since Wisconsin does not have field-citation authority, many operators wait for the inspector to "order" them to perform some leak detection tests.

## Michigan Workshops Focus on Updated Rules for Flammable/Combustible Liquids Storage

The Michigan Department of Environmental Quality (MDEQ) this fall will offer six workshops statewide on the new Storage and Handling of Flammable and Combustible Liquids (FL/CL) Rules.

The 2003 edition of the FL/CL Rules, which replaced the 1992 edition, has many changes that combine environmental protection with fire safety. The FL/CL Rules regulate the storage (tank and container) of all liquids with a flash point below 200 degrees Fahrenheit.

The FL/CL Rules Workshop highlights how to use the published additions and amendments to four adopted National Fire Protection Association (NFPA) pamphlets and the significant rule changes. Topics covered include:

- What paperwork and information is required by Hazardous Materials Storage Inspector (HMSI) during an on-site inspection
- Upgrades of internal inspection requirements for all regulated aboveground storage tanks (ASTs)
- Increased AST sizes allowed at public service stations and marinas
- Additional siting requirements for ASTs in reference to Critical Assessment Zones, and Delineated Wellhead Protection Areas

- New siting requirements for ASTs less than 1,100 gallons capacity
- Signage requirements at service stations
- Refueling of vehicles from tanker trucks
- New storage requirements for emergency generators
- New forms and how to complete them
- Use of double-walled AST systems and the related separation distances.

The workshop is designed for owners and operators who have facilities regulated by these rules, and people who store flammable or combustible liquids.

Workshop attendees will receive a FL/CL Rules workbook and have the opportunity to meet with MDEQ staff for one-on-one assistance.

Dates and locations include: Oct. 20, Marquette; Oct. 22, Gaylord; Oct. 27, Kalamazoo; Oct. 29, Flint; Oct. 30, Plymouth; and Nov. 3, Troy.

Online registration will be available after July 1 at [www.michigan.gov/deq](http://www.michigan.gov/deq) (click on "DEQ Training & Workshops" under Quick Links, then click on "Workshops"). For more on the workshops, contact the Environmental Assistance Center at 1-800-662-9278. For more on storage tank issues, contact the Storage Tank Unit at 517-335-7211.

## STI Web Site Provides Comprehensive Array of Useful Tank Information

Steel Tank Institute has added new features to its web site, designed to give tank owners, testers and regulators more information and options on both underground and aboveground storage tank systems.

By clicking on [www.steeltank.com](http://www.steeltank.com), you can find new information about tank topics such as:

- An online tour that leads facility managers through the decision-making process for selecting an oil-water separator to clean stormwater runoff at a local service station.

- Spreadsheets that help tank owners find an STI-certified aboveground tank inspector or a cathodic protection tester.

- Registration materials to help testers obtain the necessary certifications for inspection of aboveground tanks to the STI Standard SP001-03, or for testing cathodic protection systems.

- The ability to obtain STI standards electronically for regulators and tank owners needing quick access to the latest versions.

The web site also continues to offer:

- The STI Resource Library, a quick and easy way to look at back issues of Tank Talk, or to obtain articles and technical papers on tank design, installation and testing, environmental concerns and regulatory issues, as well as STI standards and recommended practices. You can purchase literature through a Publications Order Form, which can be sent via e-mail, fax or telephone.

- Spec the Right Tank, tours of various UST and AST technologies available and considerations for making a decision on the best tank for your site. (Information on the new AquaSweep™ Oil Water Separator Tour is included in Spec the Right Tank).

# SteelTank

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The STI web site offers new features that enhance its utility as a source of information for many audiences. Check it out at [www.steeltank.com](http://www.steeltank.com).

**'We want the STI web site to be as convenient and helpful as possible.'**

- A Fabricator Locator, which helps you to find STI member companies that make the type of tank system you need.

- The TankTalk page, which includes the current issue, other back issues available online and an index of article topics dating back to 1993.

- Downloading of eight individual QuickSpecs for use offline. The operation and features are the same as the live online QuickSpec, except for the ability to submit a request for quotation (RFQ). Each download is approximately 2.6 MB in size.

- A tank capacity chart - a useful tool for contractors, engineers, distribu-

tors and tank owners. This updated version of the Windows-based program allows users to generate a precise chart converting product depth into gallonage or liters. The program is a self-extracting executable.

- An online membership application.

- Links to STI members, other trade associations in affiliated industries, government agencies, and other organizations important to tank owners and operators.

"We are always looking for ways in which we can enhance the online experience," said Wayne Geyer, executive vice president of STI. "We want the STI web site to be as convenient and helpful as possible to the people around the world who regularly deal with tank systems."

Your comments on the STI web site are welcomed, especially any that indicate other features that a user might need. You can e-mail suggestions to [ankiefer@steeltank.com](mailto:ankiefer@steeltank.com) with a subject line of "STI web site improvements."

## A Little Goes a Long Way in Testing for Cathodic Protection Readings

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"I can't think of any other individual during that time who could have tested more underground steel tanks for cathodic protection," Lorri says.

Back in the late 1980s, Veri-Tank was formed to assist STI with cathodic protection testing on sti-P<sub>3</sub><sup>®</sup> tanks through the Watchdog<sup>®</sup> program.

The testing - using a voltmeter, a lead wire to contact the tank and a reference cell for placement in soil near the tank - enables verification that the corrosion protection system is working as designed.

Harry signed on at that time as a tester for Veri-Tank - and initially was responsible for Mississippi, Alabama and Florida.

In the early years, he combined his cathodic protection testing duties with tank tightness testing. After about three years, Harry decided to focus on cathodic protection monitoring.

The collection of data is at the heart of Harry's duties, and technological advances have made the task much easier in recent years. For more than a decade, Harry would have to type information - tank number, location and other vital data - into a handheld recording device.

At the end of the day, Harry would send the data via modem to Veri-Tank's computer for processing and storage. Today, data collection has been streamlined by new software and the use of a laptop computer that enables Harry to focus more on the process of getting a good reading at a tank location - and less on the spelling of roads, cities and states.

The Veri-Tank database identifies the tank and location automatically when Harry provides the sti-P<sub>3</sub><sup>®</sup> tank serial number.

On most days, Harry lays out a route that permits him to reach 10 to 12 locations. On his busiest day ever, he was able to get around a metropolitan area quickly enough to log 54 tank readings.

However, Harry's days usually are defined by extensive time on the road. Too much time behind the steering



After placing a reference cell in soil near the sump box, Harry Little double checks some data. (Photo by Woody Marshall)

wheel sometimes leaves him feeling "jumpy" and wishing for a respite back on the farm enjoying his family and tending to the cattle he raises for beef.

Then, there are days that are spiced by incidents such as the time Harry had to explain to a "tipsy" service station owner that he wasn't trying to get him in trouble with state regulators - in fact, that regulators might be slightly upset if the tank-performance data hadn't been collected and placed on file.

And there have been other memorable days, such as the one when Harry met baseball's iron man - Cal Ripken Jr. of the Baltimore Orioles - who has an sti-P<sub>3</sub><sup>®</sup> heating oil tank at his home outside of Baltimore.

"I got a chance to meet a lot of nice people, and I've been able to see a lot of territory," Harry says.

## AWWA Tackles MTBE Costs

The American Water Works Association (AWWA) has produced and distributed to TV news stations nationwide a video news release (VNR) on legislation before the U.S. Senate that could saddle local utilities and communities with paying an estimated \$29 billion in MTBE water pollution clean-up.

The full VNR can be viewed by clicking on the 'advocacy' box on the front page of AWWA's website, <http://www.awwa.org>.

A hard copy of the VNR can be obtained from Andrew Hudson at [ahudson@awwa.org](mailto:ahudson@awwa.org).

AWWA is a nonprofit scientific and educational organization dedicated to safe drinking water in North America.



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*TankTalk*

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## **An Era Ends, a New One Begins: In November, TankTalk Will be Published Exclusively Online**

Do you want to continue to receive news from TankTalk?

Readers who wish to receive timely notification of when TankTalk is posted online should send their email addresses to:

reasterling@steeltank.com

Or fax this page to STI at (847) 438-4509, and note your email address by the mailing label.

Starting in November, TankTalk, published for years as a hard copy newsletter, will begin a new life as an exclusively electronic publication.

TankTalk articles for several years have been available online through the Steel Tank Institute web site, [www.steeltank.com](http://www.steeltank.com).

However, starting this fall the newsletter will be published online with all articles, photographs and illustrations included.

Please include your name and mailing address exactly as it appears on the mailing label, including your company code, located above your name.

The change to online publishing will enable TankTalk to include more articles without space limitations, and offer more frequent updates.

By providing STI with your email address, you will be among the first to know of new developments that could affect the ways you manage your tanks -- and your business.

So, don't delay. Send us your email address today to get the latest news from TankTalk.

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