

UST SECTION  
June 10, 2004

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Joe Lahey, President  
Corrpro Companies, Inc.  
1090 Enterprise Drive  
Medina, Ohio 44256

RE: Withdrawal of State's Approval for use of Mean Time to Corrosion Failure as an  
Alternative Integrity Assessment Method for Underground Storage Tanks

Dear Mr. Lahey:

This is to notify you that the North Carolina Department of Environment and Natural Resources (NCDENR), UST Section has withdrawn its approval of Mean Time to Corrosion Failure (MTCF) for use as an alternative method for assessing the structural integrity of unlined steel tanks prior to upgrading with corrosion protection. In March and June 1994, 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 MTCF 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tanks and because MTCF was often not performed in accordance with the state's conditions for approval, the method is no longer valid in the state of North Carolina.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, Chief, UST Section