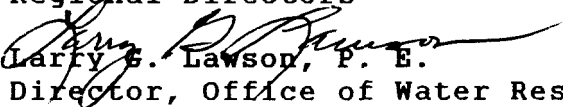


M E M O R A N D U M  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
WATER DIVISION  
OFFICE OF WATER RESOURCES MANAGEMENT

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**SUBJECT:** OWRM Guidance No. 92 - 006 Addendum No. 4  
Authorization to Issue Certifications for Tax  
Exemptions - Aboveground Storage Tanks

**TO:** Regional Directors

**FROM:**   
Larry E. Lawson, P. E.  
Director, Office of Water Resources Management

**DATE:** August 22, 1994

**COPIES:** Bob Burnley, Dave Paylor, Dave Ormes, Fred Cunningham,  
Regional Office Water Resources Managers, Regional  
Groundwater Managers

We have been receiving various questions on tax exemption certifications for aboveground storage tanks. Thus, the attached guidance has been prepared for your use in reviewing tax exemption requests. Please add the attached to the previous guidance I sent to you on this subject. If you have any questions on this specific issue please feel free to contact Dave Ormes or me.

## Aboveground Storage Tanks

For Aboveground Storage Tanks (ASTs) you should consider the following in your certification for tax exemption:

All pollution response, leak detection, inventory control, safe fill and shutdown, cathodic protection, monitor well gauging/sampling devices or equipment if required under the state AST regulations (VR 680-14-07 and VR 680-14-13) may be certified.

In order to meet the requirements of the AST regulations, an owner may install facilities, equipment or devices beyond the minimum level required by the regulations. This equipment is in conformity with the state program and also may be certified.

It is important to remember that the facility, equipment or device whether meeting the AST regulations or beyond the minimum level required by the regulations must be used for the purpose of abatement or prevention of pollution to state waters to be certified.

Some examples of AST facilities that may be certified are as follows:

1. Purchase of containment boom, pumps, sorbent materials, boats, etc.. used for the containment and cleanup of a discharge of oil.
2. Purchase of automatic sensors and supporting equipment or manual devices for the purpose of leak detection.
3. Purchase of gauging or other equipment/devices used for inventory control.
4. Purchase of alarms, shutdown controls or other associated equipment/devices used to prevent overfills at a facility.
5. Purchase of either sacrificial or impressed current equipment/devices used for cathodic protection of an AST and associated piping.
6. Purchase of equipment or devices used in monitoring well construction as well as that equipment necessary for the gauging or sampling of the monitoring well.