2015 Underground Storage Tank (UST) Regulation

Requirements & Compliance Assistance
Tools/Resources

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2015 UST Regulation Requirements

- Emergency generator tanks
  - release detection required immediately if installed after October 13, 2015
  - release detection required by October 13, 2018 for all other EGT systems

- Compatibility
  - required beginning October 13, 2015
    - Notification
    - Demonstration of compatibility
    - Recordkeeping

- Secondary containment
  - required after April 11, 2016

- Operator training
  - required beginning October 13, 2018
2015 UST Regulation Requirements

- Three year spill prevention equipment testing & containment sump testing for sumps used for piping interstitial monitoring
  - required at installation for USTs installed after October 13, 2015
  - required by October 13, 2018 for all other UST systems

- Three year overfill prevention equipment inspections
  - required at installation for USTs installed after October 13, 2015
  - required by October 13, 2018 for all other UST systems

- Annual release detection equipment testing
  - required beginning October 13, 2018
Walkthrough Inspections

• Periodic walkthrough inspections
  – Required beginning October 13, 2018
  – Every 30 Days
    • Check spill prevention equipment
    • Check release detection equipment and records
  – Annually
    • Check sumps
    • Check hand held release detection equipment
  – Keep records of the walkthrough inspection for 1 year

• Performed according to a standard code of practice developed by a nationally recognized association or independent testing laboratory.

• May use PEI RP 900
Additional Requirements

- **Flow restrictors** - flow restrictors in vent lines (ball floats) are no longer an option for overfill protection in new UST systems and when these devices need to be replaced.

- **Internally lined USTs** - if the periodic internal lining inspection shows that the lining fails and cannot be repaired according to a code of practice, then that UST system must be permanently closed.

- **Notification** – new owners must notify implementing agency within 30 days of becoming an UST owner.
Compliance Assistance Tools/Resources

- OUST’s website contains publications with compliance assistance material for Indian Country.

- Dedicated Indian Country web area: https://www.epa.gov/ust/underground-storage-tanks-usts-program-indian-country

  - For example
    - Managing Your USTs in Indian Country
    - Implementation Time Frames for 2015 Underground Storage Tank Requirements
    - Musts for USTs
    - Operating and Maintaining Underground Storage Tank Systems
    - Release Detection for Underground Storage Tanks and Piping: Straight Talk on Tanks
EPA’s Operator Training Exam and Inspector Training

- OUST provides an online exam, with printable certificate:
  - [https://www.epa.gov/ust/class-a-and-class-b-ust-operator](https://www.epa.gov/ust/class-a-and-class-b-ust-operator)
  - Demonstration available at Multi Media Meetup today at 3:30pm

- OUST provides internet-based UST inspector training to incorporate the 2015 regulations.
  - [https://www.epa.gov/ust/underground-storage-tank-ust-inspector-training](https://www.epa.gov/ust/underground-storage-tank-ust-inspector-training)
2015 UST Regulation Technical Compendium

• Provides clarification and further guidance about the 2015 UST regulation
• Approximately 50 questions & answers in these categories:
  - Applicability
  - Implementation
  - Overfill protection
  - Release detection
  - Release reporting
  - Partially excluded USTs
  - Spill buckets, under dispenser containment sumps, containment sumps
  - Secondary containment and interstitial monitoring
  - Secondary inventory reconciliation
  - Airport hydrant systems related to Department of Defense facilities

• https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulations
Examples from Technical Compendium

- Spill bucket and containment sump testing – at least once every three years to ensure equipment is liquid tight. Testing options include:
  - Manufacturer specifications; Code of practice; implementing agency determined to be no less protective of the environment.
  - Current code of practice (PE RP 1200) requires testing to 4 inches above the highest penetration - can create challenges:
    - Difficult to access the sump, requiring the dispenser removal.
    - OUST provided an example of an alternative to this, no less protective of the environment - **Low level liquid testing with automatic shutoff.**

- Can sump testing water be re-used, and what needs to be done with water once testing complete.
  - Can re-use - water not a waste until complete.
  - Once complete water is likely a hazardous waste and should contact appropriate waste water authority to dispose of properly.
Other EPA Supported Compliance Assistance

- Direct grants to tribes, tribal coalitions/consortia that support tribal compliance assistance officers and federally credentialed tribal inspectors e.g.
  - Region 5 compliance assistance grant with the Oneida Nation of Wisconsin.
  - Region 6 compliance assistance grant with ENIPC.

- Training and Compliance Assistance Conferences:
  - National Tanks Conference (September 2018)
    http://www.neiwpcc.org/tanksconference/
  - This event - Tribal Lands and Environment Forum
    http://www7.nau.edu/itep/main/Conferences/confr_tlef

- OUST and EPA regional outreach conference calls.
Additional Information

• OUST Website
  https://www.epa.gov/ust

• OUST Contact
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