

Important Dates

Date	Significance
Jul 15, 2015	Date regulation entered into Federal Register
Oct 13, 2015	Flow restrictors* cannot be used for overfill prevention
	Compatibility* must be demonstrated for all components
Apr 11, 2016	New or replaced tanks and piping require secondary containment and interstitial monitoring
	Under Dispenser Containment (UDC) required for Dispenser Systems
Oct 13, 2018	Monthly and annual inspections required.
	Deadline for performing the first test for:
	<ul style="list-style-type: none"> ◆ spill prevention equipment ◆ overfill prevention equipment ◆ containment sumps used for interstitial monitoring ◆ release detection equipment
	Test required every three years after first test
	Operator training: Classes A, B, and C UST's for Emergency Power Generators no longer deferred
	Airport Hydrant Systems and Field Constructed Tanks only partially deferred

*Please see *Other Changes* section for more information



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Overview: 2015 EPA UST Regulations



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Background

The EPA published their “*Revising Underground Storage Tank Regulations - Revisions to Existing Requirements and New Requirements for Secondary Containment and Operator Training*” final rule in the Federal Register on June 15, 2015.

According to the EPA:

“The revisions strengthen the 1988 Federal Underground Storage Tank (UST) regulations by increasing emphasis on properly operating and maintaining UST equipment. The revisions will help prevent and detect UST releases, which are a leading source of groundwater contamination. The revisions will also help ensure all USTs in the United States, including those in Indian country, meet the same minimum standards. This is the first major revision to the Federal UST Regulations since 1988.”

Secondary Containment Requirements *

- ◆ Indian Country require secondarily contained UST's — **OPW FlexWorks Double Wall Pipe**
- ◆ All new dispenser systems “require Under Dispenser Containment (UDC)”, including Kerosene dispensers — **OPW Dispenser Sumps**
- ◆ System must be monitored at least every 30 days using interstitial monitoring

Walk-through Inspections

- ◆ Every 30 days
 - ⇒ Visual check of spill prevention equipment — **OPW Multiport**
 - ⇒ Check interstice on double-walled sumps
- ◆ Records must be kept for 1 year
- ◆ PEI 900 may be used to meet this requirement

Equipment Tests

- ◆ Required every 3 years
- ◆ Records must be kept for 3 years
- ◆ Spill prevention equipment — **OPW EDGE Spill Bucket**
 - ⇒ Double-walled excluded if interstice monitored periodically
 - ⇒ Interstitial monitoring includes vacuum, pressure, and liquid monitoring
 - ⇒ Must maintain documentation “for as long as the equipment is periodically monitored”
- ◆ Overfill prevention equipment — **OPW Testable 7150 Overfill Prevention Valve**
 - ⇒ Only Inspection is required, not a “Test” which would require filling the tank
 - ⇒ Inspection should determine that device activates at appropriate level
 - ⇒ Inspection should determine that device operates properly to prevent overfill
 - ⇒ Manufacturer requirement or code of practice may be used for test
- ◆ Release Detection Equipment
 - ⇒ Annual test is required
 - ⇒ PEI RP 1200 “may be used to meet the testing requirement”
 - ⇒ Records must still be kept for 3 years
- ◆ Secondary containment is **excluded** from testing requirement
 - ⇒ Testing **is** required following a repair

Other Changes

- ◆ Vent line flow restrictors (ball float valves) not allowed for overfill prevention
 - ⇒ Existing ball float valves can remain as long as they work properly
- ◆ Definition of “regulated substance” updated to clarify that “petroleum derived from non-crude oil based product” are regulated
 - ⇒ “Motor fuel” definition includes “any fuel typically used to operate a motor engine”, including blends and biofuels
- ◆ Compatibility of equipment and components must be demonstrated for
 - ⇒ Blends over B20 (biodiesel)
 - ⇒ Blends over E10 (gasoline)
- ◆ Following repairs, repaired components must be tested

** All requirements apply to non SPA States. SPA States will be responsible for updating their individual programs.*