

National Institute of Storage Tank Management Conference

Worcester, Massachusetts

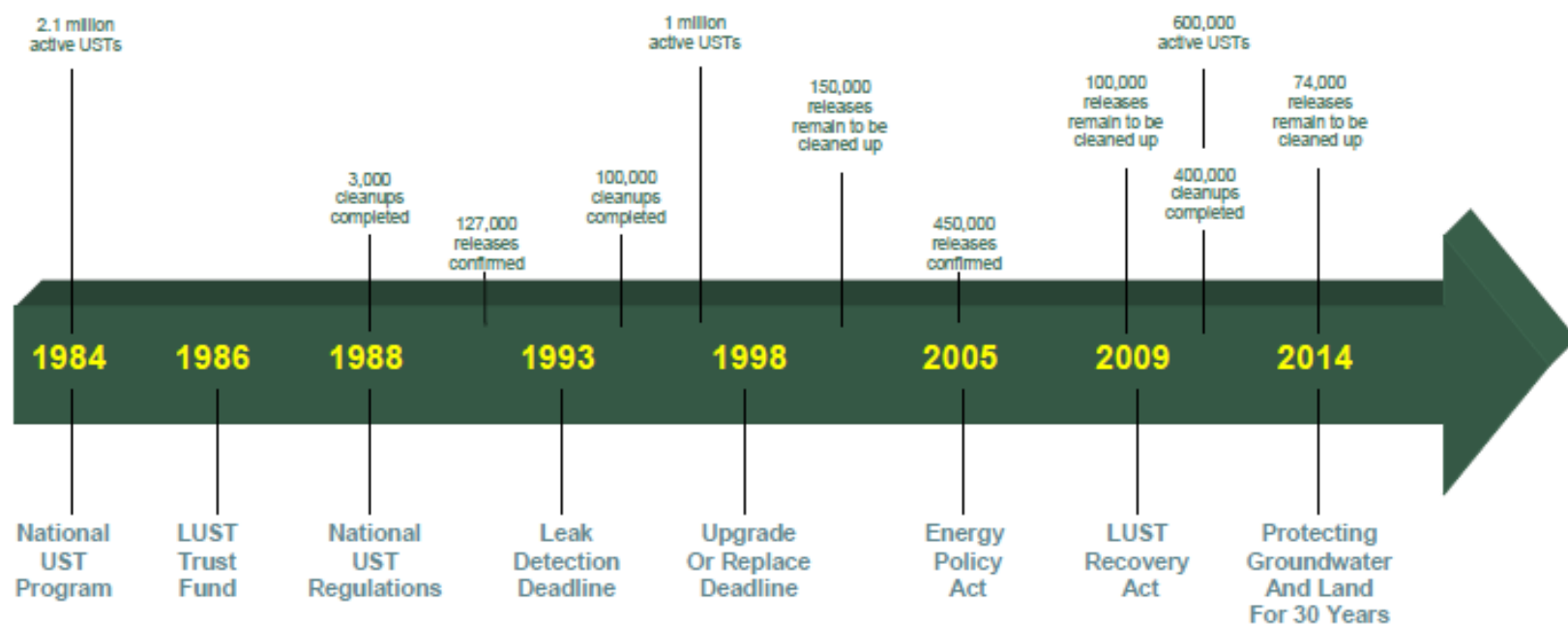
December 10, 2014

Changes to EPA UST Regulations

Stuart F. Gray

US EPA, Region 1, UST Regional Program Manager

30 Years Of The UST Program



- Why did EPA propose new UST regulations?
- How did EPA propose new regs?
- What did they propose?
- When will the new regulations be final?

Why?

- UST regulations promulgated in 1988
- Congress passed Energy Policy Act of 2005 (EPAAct)
- EPA issued guidelines, not regulations
- States have already made EPAAct related changes
- Technology and standards changed

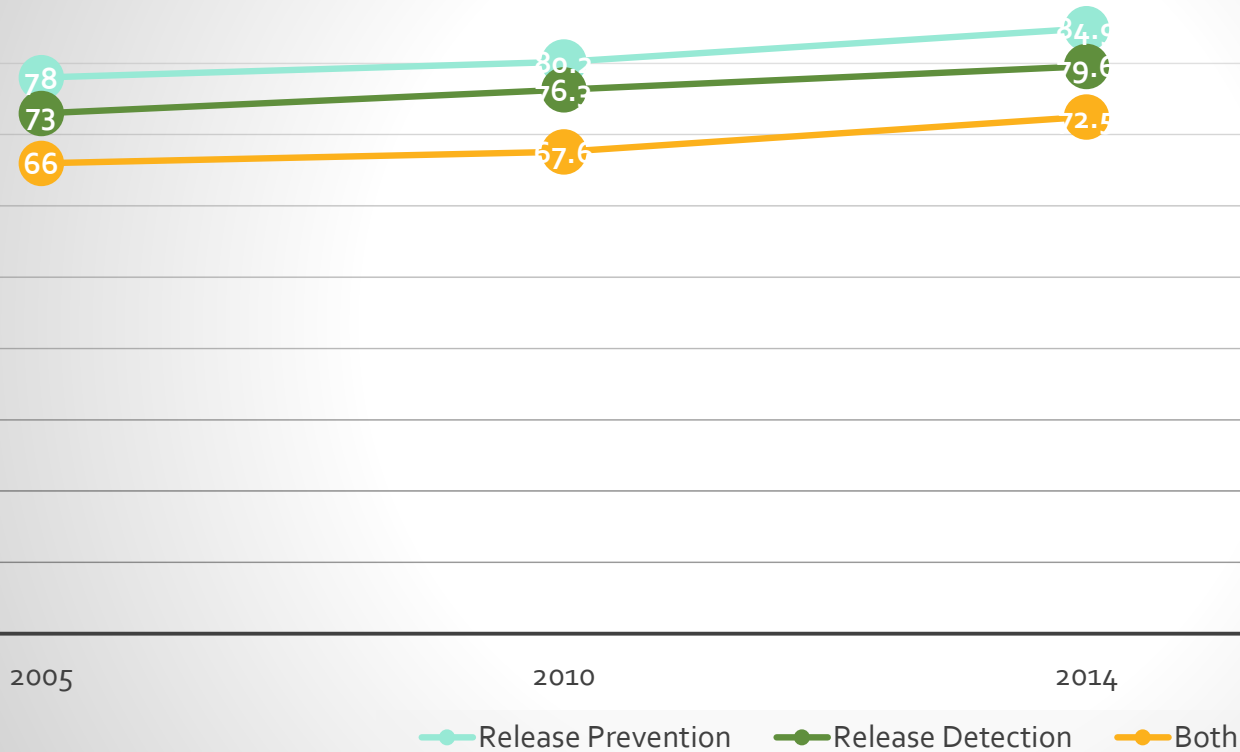


Energy Policy Act of 2005

- Delivery Prohibition
- Federal Facilities Report
- FR and Installer Certification vs secondary and under dispenser containment
- Inspecting USTs
- Operator Training
- Public Record
- Secondary Containment

Effect of EPA Act Changes on SOC?

Chart Title



How?

- EPA develops new regulation workgroup
- EPA issues Notice of Proposed Rulemaking, listed in Federal Register
- Comments received and responses prepared
- Draft Regulations revised based on comments received
- Draft regulations are circulated for comment and approval
- EPA issues Final Rule and publishes in Federal Register
- Regulations are codified when they are entered into the Code of Federal Regulations (CFR)
- UST regulations can be found under Title 40 of the CFR

What?



Proposed changes to EPA UST regulations

- Operator Training
- Secondary Containment
- Operation and Maintenance
- Deferrals
- Flow Restrictors in Vent Lines
- Interior Lining
- Notification
- Compatibility
- Repairs
- Vapor and Groundwater Monitoring
- Interstitial Monitoring Results
- Newer Technologies
- Codes of Practice
- Upgrade Requirements
- Editorial and Technical Corrections
- State Program Approval Requirements

EPA Proposed Changes

- <http://www.epa.gov/oust/fedlaws/proposedregs.html>

Operator Training

- Owners and Operators (O/O) designate at least one individual for each of three classes of operators.
- O/Os retain a list of designated operators trained at each facility and proof of training or retraining
- EPA adds definitions for Class A operator, Class B operator and Class C operator and training program.



Secondary Containment

- O/Os install secondary containment and interstitial monitoring for all (including petroleum) new and replaced tanks and piping (except safe suction piping and piping associated with field constructed tanks and airport hydrant systems). O/Os must replace the entire piping run when 50 percent or more of piping, excluding connectors, is removed and other piping installed.
- O/Os install under dispenser containment for all new dispenser systems.
- EPA adds definitions for dispenser system, replaced, secondary containment, and under-dispenser containment.

Operation and Maintenance



- Walkthrough inspections – O/Os conduct monthly walkthrough inspections
- Spill prevention equipment – test annually for liquid tightness or use a double walled spill bucket with continuous interstitial monitoring
- Overfill Prevention – test every three years

Deferrals

- Emergency Generators – requires O/Os to perform release detection
- Field Constructed Tanks – may use alternative release detection options
- Airport Hydrant Systems – may use alternative release detection systems
- Wastewater Treatment Tank Systems - limited number of active systems

Flow Restrictors in Vent Lines

- Eliminates the use of overflow prevention devices in vent lines

Other Proposed Changes

- Internal liners
- Notification
- Compatibility
- Repairs
- Vapor and GW Monitoring
- Interstitial Monitoring Results
- Newer Technologies
- Codes of Practice
- Upgrade requirements
- Editorial and Technical Corrections
- SPA requirements



When?



When?



- First quarter 2015

Stuart F. Gray

- Regional Program Manager, US EPA Region 1 UST Program
- State Program Coordinator for Massachusetts

Contact info:

Work phone: 617-918-1302

Email: gray.stuart@epa.gov