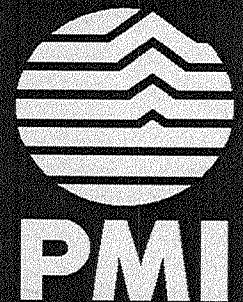




SUMMARY OF THE NEW EPA UST REGULATIONS

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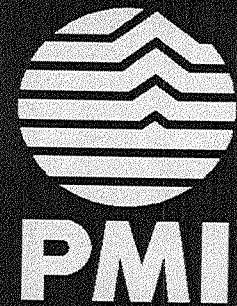
DO EPA REGULATIONS EFFECT ARKANSAS?

- EPA Regulations are not in effect in Arkansas until ADEQ adapts them
- ADEQ has approximately 3 years to accept new regulations
- ADEQ must have the State Program Approval of the regulation by the General Assembly prior to adapting the EPA regulations – January 2017



NEW EPA UST REGULATIONS

- Part of the Energy Policy Act of 2005
- Improve operation & maintenance & reduce petroleum releases
- As a condition of receiving money from the EPA
- Address UST systems that were deferred in the 1988 regulations (such as USTs serving emergency generators)
- Update the regulations to include new technologies & fuel blends



NEW EPA UST REGULATIONS (cont.)

- Provide regulation for previously unregulated areas (i.e., tribal lands)
- Issued on July 15, 2015
- Deadline - October 13, 2018



OPERATION & MAINTENANCE

- Walkthrough inspections every 30 days
- Owners must conduct UST system walkthrough inspections on spill buckets, fill caps & release detection equipment
- Once a year, they must also check the sump for damage, releases & leaks
- Implementation – within 3 years



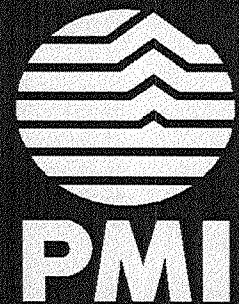
CHANGE OF OWNERSHIP NOTIFICATION

- If a tank system's ownership changes, the tank owners must notify the state regulatory authorities
- The new EPA form is entitled "Notification of Ownership Change for Underground Storage Tanks"; however, states may have their own notification forms



OPERATOR TRAINING

- Owners & operators must designate at least one individual as Class A & Class B operators, & facilities should have at least one on-site personnel trained at the Class C operator level at all times
- Class A & B operators are responsible for maintaining UST systems, while Class C operators are responsible for initially addressing emergencies presented by a spill or release from a UST system
- Owners & operators must retain a list of designated operators currently trained at each facility

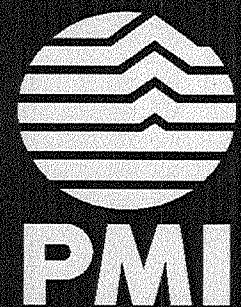


OPERATOR TRAINING (cont.)

- Must have proof of training
- Implementation – within 3 years
- Owners & operators will need to maintain a list & records for all training
- Arkansas has its own operator training program

E-15 COMPATIBILITY

- Tank owners prove that their UST system is compatible with ethanol gasoline blends greater than E-10 or diesel fuel blends greater than B-20 using one of three methods
- If you plan to place fuel blends greater than E-10 or B-20 in your UST system, you must notify your state UST program authorities 30 days ahead of time

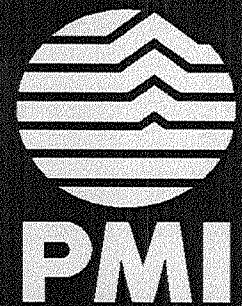


INTERNAL TANK LININGS

- If an inspector decides that a tank lining isn't performing as it should & cannot be repaired, the tank owner must permanently close the UST if it uses internal tank liners as its sole method of corrosion protection
- In addition, linings must be inspected within ten years after the initial lining & every five years after that

OVERFILL PREVENTION EQUIPMENT INSPECTIONS

- Overfill protection equipment must be tested & operationally inspected every three years
- The owner must demonstrate that the equipment operates properly & is set to activate at the appropriate level in the tank
- Owners must inspect automatic shut-off devices, flow restrictors, & alarms
- Implementation – 3 years

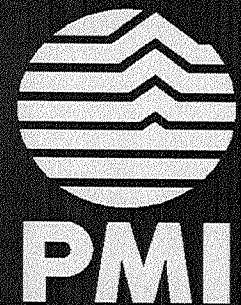


RELEASE DETECTION EQUIPMENT TESTS

- Electronic & mechanical components of release detection equipment are required to be tested annually
- Owners must complete several steps in this process, including checking ATG systems, testing alarms, inspecting probes & sensors & more
- Testing line leak detectors required

RELEASE DETECTION EQUIPMENT TESTS (cont.)

- UST systems storing fuel for Emergency Generators no longer deferred from release detection
- Owners & operators of UST systems must perform release detection



SECONDARY CONTAINMENT

- Owners & operators install secondary containment & interstitial monitoring for all new & replaced tanks & piping
- Must replace the entire piping run when 50% or more of piping is removed & other piping is installed
- Must install under dispenser containment for all new dispenser systems
- Implementation – 180 days
- Focus to protect groundwater



SPILL PREVENTION EQUIPMENT TESTS

- Spill prevention equipment must be tested at least every three years for liquid tightness
- If double-walled spill containment equipment is periodically monitored, it does not need to be tested

STATISTICAL INVENTORY RECONCILIATION

- Under the new regulations, statistical inventory reconciliation is an approved method of leak detection
- SIR methods must meet the performance standards detailed in the final rule

UNDER DISPENSER CONTAINMENT

- When the dispenser & the equipment used to connect it to the vertical riser pipe are replaced, double-walled under dispenser containment must be installed as well

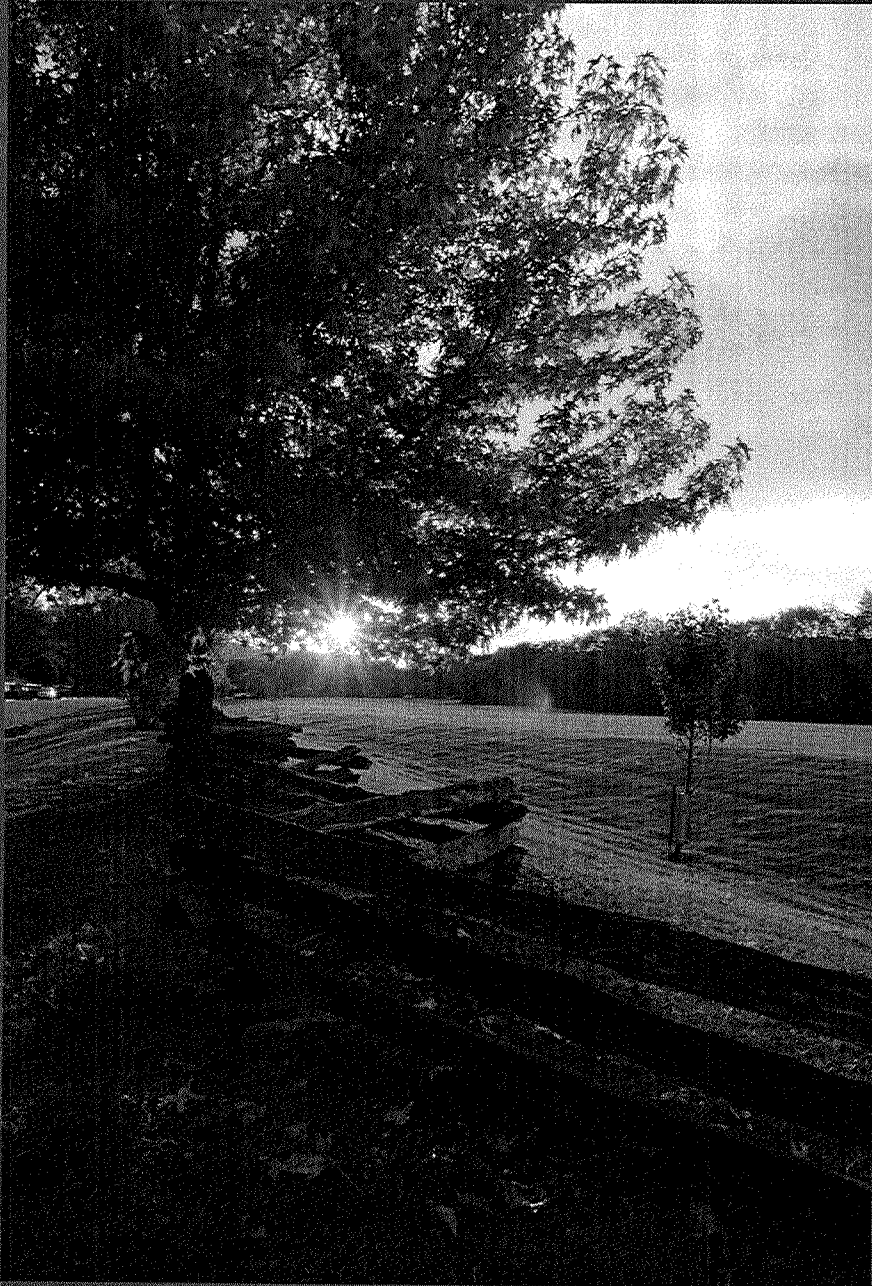
VENT LINE FLOW RESTRICTORS

- EPA eliminates flow restrictors in vent lines to meet overfill prevention
- All flow restrictors must be tested periodically to ensure they operate properly
- Existing flow restrictors can continue to be used until they require replacement
- Implementation – Immediately

FIELD CONSTRUCTED TANKS & AIRPORT HYDRANT SYSTEMS

- EPA removes deferral & modifies the requirements by regulating FCT & AHS under new subpart K
- Owners & operators may use alternative release detection options
- EPA reclassifies wastewater treatment tank systems, USTs containing radioactive materials – EPA made the decision to exclude these tanks from most UST requirements
- Owners must comply with subparts A & F





Any Questions?

