Common Compliance Violations/National Ranking Story Map: Association of State And Territorial Solid Waste Management Officials Survey Identifies Most Frequent Underground Storage Tank Regulatory Violations



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The Association of State And Territorial Solid Waste Management Officials ("ASTSWMO") published a document titled:

Common Compliance Violations (CCV) National Ranking Story Map ("Map").

ASTSWMO states that the organization's Release Prevention Task Force:

… is continuing research on commonly occurring compliance violations in States and Territories (States).

The stated intent of the Map is to provide a national perspective regarding which Underground Storage Tank ("UST") violations are discovered in greatest frequency and may require additional attention.

Bryan Paul, Arkansas Department of Energy and Environment – Division of Environmental Quality Regulated Storage Tank Inspector (District Four), is a member the Release Prevention Task Force.

USTs that are not exempt or deferred must meet certain federal and/or state design and operational standards. See 40 CFR § 280.

Arkansas was delegated the federal UST program almost 30 years ago. It adapts the federal UST rules in 8 CAR § 80-101.

The ASTSWMO Map lists the top 10 violations based on the data generated to-date as including:

1. Annual Testing
2. Spill Bucket Testing
3. Failure to Monitor Tank Every 30 Days
4. Monthly Walkthroughs
5. Containment Sump Testing

6. Failure to Monitor Piping Every 30 Days
7. Operator Training
8. Corrosion Protection
9. Registration
10. Financial Responsibility

The research generating this data was undertaken in collaboration with the United States Environmental Protection Agency Office of Underground Storage Tanks and ASTSWMO membership. The research was stated to have been conducted through a structured survey shared with all States, asking them to rank a list of 10 frequently cited violations.

As of October 2026, 40 States have responded.

A link to the Map can be found here.