Topics for 2020 UST Regulation Changes

- What is a UST?
- Who do the 2020 Regs apply to?
- A/B UST Operator Training
- Spill and Overfill Prevention
- Release Detection Requirements
- Walkthrough Inspections
- Reporting Requirements
What is a UST?

As defined by Subtitle I in 40 CFR 280:
Tank system, including its piping, that has at least 10% of its volume underground.
Get Ready!

- UST’s storing fuel for emergency power generation (Installed after Dec. 15th 2017) must begin compliance immediately.

In 2015 the EPA revised the underground storage tank (UST) regulations and established training requirements for designated Class A, Class B, and Class C operators. Operators should have been trained by October 13, 2018. These training requirements are meant to teach the responsibilities and requirements of owning a UST and what to do in the event of an emergency or spill.
Class A Operator

Class A operators make decisions regarding compliance and determine whether appropriate individuals are fulfilling the operation, maintenance, and recordkeeping requirements for UST systems.
Class B Operator

Class B operators implement applicable UST regulatory requirements on the components of either: typical UST systems or site-specific equipment used at their UST facility.
Class C operators are trained on general UST knowledge and how to take appropriate actions (including notifying appropriate authorities) in response to emergencies or alarms caused by spills or releases resulting from the operation of the UST system. Class C operator must be on duty during all hours of operation.

State Testing (TN), 3rd party Testing (Passtesting.com), 3rd party A/B Operator
Spill and Overfill Prevention Requirements

- Auto shutoff and/or overfill alarms installed
- Spill bucket testing every 3 years
- Overfill prevention equipment tested every 3 years
Release Detection Requirements For Tank

One of the following:

- **Manual Tank Gauging**- Tanks of 2000 gallons or smaller only.
- **Manual Tank Gauging plus tank tightness test**- only for 10 years after installation.
- **Monthly Monitoring**- Interstitial Monitoring, Continuous in-tank leak detection, or Automatic Tank Gauge.
Monthly Monitoring through Automatic Tank Gauge
• Must be tested annually
Release Detection For **Suction Lines**

- Safe Suction has no requirements
Anything else needs monthly monitoring or line tightness testing and possibly LLD.
Release Detection For **Pressure Lines**

- Line Leak Detection
- Monthly Monitoring or Annual Line Tightness Testing.
- Sump Testing Every 3 yrs.
- All release detection must be tested annually.
Release Detection For **Pressure Lines**
Release Detection For **Pressure Lines**

- **Mechanical** or **Electronic Line Leak Detection**
Monthly walk though inspections
- Spill prevention equipment
- Release detection equipment
Annual walk though inspections

- Annual Containment Sumps
- Hand Held Detection Equipment
Monthly Reporting

- ATG Printout
- Monthly Walkthrough Inspection

Volume and Alarm Printout

In Tank Leak Test Printout

Line Leak Test Printout
Annual Reporting

• Release Detection Testing (ATG, sensors, LLD system, etc.)
• Annual Walkthrough Inspection

3 Year Reporting

• Spill Bucket Test
• Sump Test or Inspection
• Overfill Prevention Equipment
QUESTIONS?