



**Below are the new release detection testing and/or inspection requirements taking place in 2018. The sections below briefly cover each new requirement as well as explain how testing/inspection can be accomplished.**

**Overfill Prevention Equipment Inspection**

**[OCC Rule: 165:25-2-39, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41579]**

By October 13, 2018, overfill protection equipment must be inspected for proper operation at least once every 3 years. When inspecting, owners and operators must at a minimum ensure the overfill prevention equipment is set to activate as the correct level in the tank and will activate when regulated substances reach that level. The first inspection must be conducted by October 13, 2018.

*"For overfill prevention equipment inspections, owners and operators must use manufacturer's requirements or a code of practice developed by a nationally recognized association or independent testing laboratory. Manufacturer's requirements are an option only when manufacturers have developed inspection requirements for their overfill prevention equipment that determines the device is set to activate at the appropriate level in the tank and will activate when the regulated substance reaches that level. As of this final UST regulation, EPA is aware of one code of practice that contains procedures for inspecting overfill prevention equipment: PEI RP 1200, Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities."*

**Spill Prevention Equipment Testing**

**[OCC Rule: 165:25-2-39, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41577]**

By October 13, 2018, spill prevention equipment must be tested for liquid tightness at least once every 3 years or use a double-walled spill bucket with periodic interstitial monitoring that is monitored at least every thirty (30) days. The first test must be conducted by October 13, 2018.

*"For spill prevention equipment that must be tested once every three years, this final UST regulation requires owners and operators to conduct testing using vacuum, pressure, or liquid methods. In addition, the test must be conducted in accordance with manufacturer's requirements or a code of practice developed by a nationally recognized association or independent testing laboratory. The manufacturer's requirement is an option only when the manufacturer has developed requirements for testing the tightness of their spill prevention equipment. As of the publication date of this final UST regulation, EPA is aware of one code of practice that contains procedures for testing spill prevention equipment: Petroleum Equipment Institute (PEI) Recommended Practice (RP) 1200, Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities. In addition, EPA is providing implementing agencies flexibility to allow other methods they determine to be as protective of human health and the environment as the manufacturer's requirements or a code of practice. This option allows alternatives in case codes of practice and manufacturer's requirements are not available for testing spill prevention equipment."*

### **Annual Operation & Maintenance Tests for Release Detection Equipment**

**[OCC Rule: 165:25-3-6.21, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41581]**

Beginning October 13, 2018, the electronic and mechanical components of release detection equipment must be tested for proper operation in accordance with manufacturer's instructions or use a code of practice developed by a nationally recognized association or independent testing laboratory. A test of proper operation must be performed at least annually and, at a minimum, cover the following components and criteria as applicable to the facility.

- (1.) Automatic tank gauge and other controllers: test alarm, verify system configuration, test battery backup;
- (2.) Probes and sensors: inspect for residual buildup, ensure floats move freely, ensure shaft is not damaged, ensure cables are free of kinks and breaks, test alarm operability and communication with controller;
- (3.) Automatic line leak detector: test operation to meet criteria in 40 CFR 280.44(a) by simulating a leak;
- (4.) Vacuum pumps and pressure gauges: ensure proper communication with sensors and controller (**Refer to PEI 900 Section 8 (8.5.3.4.2)**); and
- (5.) Hand-held electronic sampling equipment associated with groundwater and vapor monitoring; ensure proper operation.

Owners and operators must maintain records of the annual operation tests for 3 years. At a minimum, records must list each component tested, indicate whether each component needed to have action taken and describe any action taken to correct the issue.

*"Owners and operators must meet the release detection operation and maintenance requirements according to one of the following: Manufacturer's instructions; a code of practice developed by a nationally recognized association or independent testing laboratory; or requirements determined by the implementing agency to be no less protective of human health and the environment than the two options listed above. These requirements are consistent with options for other operation and maintenance activities in this final UST regulation. EPA reviewed PEI's final Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities (RP 1200) and is including it in this final regulation as an option for meeting the annual release detection equipment testing requirements."*

### **Containment Sump Testing**

**[OCC Rule: 165:25-3-6.25, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41580]**

By October 13, 2018, containment sumps used for interstitial monitoring of piping must be tested for liquid tightness at least once every 3 years or use double-walled containment sumps with periodic interstitial monitoring of the space between the 2 walls of the sump at least every 30 days (on installations containment sumps must be tested at installation and then every 3 years thereafter). The first test must be performed by October 13, 2018.

*"For containment sumps that require testing at least once every three years, this final UST regulation requires owners and operators conduct testing by using vacuum, pressure, or liquid methods. In addition, the test must be conducted in accordance with manufacturer's requirements or a code of practice developed by a nationally recognized association or independent testing laboratory. The manufacturer's requirement is an option only when the manufacturer has developed testing requirements for their containment sumps that ensure their containment sump is tight. As of this final UST regulation, EPA is aware of one code of practice that contains procedures for testing containment sumps: PEI RP 1200, Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities, and is adding this code of practice to the final UST regulation. In addition, EPA is providing*

*implementing agencies flexibility to allow other methods they determine to be as protective of human health and the environment as the manufacturer's requirements or a code of practice. This option allows alternatives in the event that a code of practice and manufacturer's requirements are not available for testing containment sumps."*

### **Walkthrough Inspections**

**[OCC Rule: 165:25-1-60, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41576]**

By October 13, 2018, owners and operators of UST systems must begin conducting 30-day and annual walkthrough inspections. Walkthrough records must be maintained on site for 3 years. The first walkthrough inspection must be performed by October 13, 2018.

- (1.) Every 30 days all spill prevention equipment and release detection equipment must be inspected (except spill prevention equipment at UST systems receiving deliveries at intervals greater than 30 days may be checked prior to delivery). Containment sumps and any hand-held release detection equipment, such as tank gauge sticks, must be inspected annually.
- (2.) Records should include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of any actions taken to correct issues, and delivery records if spill prevention equipment is checked less frequently. Airport hydrant systems must meet the additional walkthrough inspection requirements (see 40 CFR 280.252(c) for specifics).

*"In addition, this final UST regulation allows owners and operators to conduct operation and maintenance walkthrough inspections according to a standard code of practice developed by a nationally recognized association or independent testing laboratory or according to requirements developed by the implementing agency. The inspections must check equipment in a manner comparable to the walkthrough inspection requirements described above."*

### **Temporary Out of Use (TOU) Tanks**

**[OCC Rule: 165:25-2-133, Federal Register: Volume 80, Number 135, July 15, 2015, Pg. 41639]**

Beginning October 13, 2018, tank systems that are temporary closed for 3 months or less are not required to meet spill testing and overfill inspections, however, they are required to:

- (A) Continue to monitor for leaks by performing release detection,
- (B) Perform monthly walkthrough inspections,
- (C) Perform annual inspections and tests of release detection equipment, and
- (D) Perform 3-year containment sump testing on containment sumps used for interstitial monitoring of piping.

Beginning October 13, 2018, tank systems that are empty to less than one inch (1") of residual fluid are not required to maintain the following:

- (1.) Spill prevention testing,
- (2.) Overfill prevention inspections,
- (3.) Release detection,
- (4.) Annual release detection equipment testing and inspections,
- (5.) Monthly walkthrough inspections, and
- (6.) Three-year containment sump testing on containment sumps used for interstitial monitoring of piping.

If you have any further question regarding this matter, please contact our Compliance staff. See contact information below.

**Brock Stuber – (405) 521-6397**

**Brian McDonald – (405) 522-2989**

**Shane Clark – (405) 521-4810**