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# U.S. Environmental Protection Agency Underground Storage Tank Compendium/Correspondence: ASTM Visual Sump Pump Test Standard Addressed

04/03/2020

The Petroleum Marketers Association (“PMAA”) publication Weekly Review published a March 26th article addressing a new ASTM Standard for spill bucket and sump testing.

Spill bucket and sump testing is required by 40 C.F.R. § 280.35 of the Federal Underground Storage Tank (“UST”) regulations.

PMAA states that the United States Environmental Protection Agency Office of Underground Storage Tanks (“OUST”) has informed state UST program authorities that ASTM Standard E3255-20:

... does not meet federal regulatory requirements requiring spill prevention and sump testing be done using a liquid, pressure, or vacuum test.

The article states that the ASTM Standard uses visual testing only.

An email dated March 26th from Carolyn Hoskinson of the OUST to the “UST Community” stated that her office had received inquiries on whether the ASTM Standard meets the requirements found in 40 C.F.R. § 280.35. Her March 26th email states:

The 2015 UST regulation requires spill prevention and sump testing be done using a liquid, pressure, or vacuum test. The ASTM E3225-20 is visually based, and while a thorough visual check can always be beneficial, these procedures do not meet the requirements in 40 C.F.R. § 280.35.

She also references two new questions and answers in the UST web-based UST Technical Compendium about the 2015 UST Regulation found [here](#).

The article notes that EPA has previously approved a PMAA developed test method for sumps titled “Low Liquid Level UST Containment Sump Test.”

The PMAA article can be found [here](#).