

Repairs to Containment Sumps/Underground Storage Tanks: U.S. Environmental Protection Agency Compendium Update



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The United States Environmental Protection Agency (“EPA”) periodically updates a “Compendium” which addresses revisions to the Resource Conservation and Recovery Act, Subtitle I, Underground Storage Tank (“UST”) regulations.

EPA promulgated in 2015 the first set of significant regulation revisions to these federal UST rules since they were originally established in 1988.

The Compendium contains the federal agency’s periodic issuance of interpretations about various aspects of the 2015 revisions.

EPA addressed the question of repairs to “containment sumps.” The following question was asked:

Does the National Leak Prevention Association/Ken Wilcox Associates, Inc. (NLPA/KWA) Standard 823 *Standard for Preventive Maintenance, Repair and In-situ Construction of Petroleum Sumps* meet federal UST regulatory requirements as an acceptable code of practice for containment sump repairs?

EPA answers in the affirmative stating:

... EPA recognizes NLPA/KWA Standard 823 as a code of practice developed by a nationally recognized association that addresses the requirements identified in 40 C.F.R. § 280.33.

EPA’s response includes a recitation of the pertinent portions of § 280.33(a) and (d) and further notes:

In particular, NLPA/KWA Standard 823 sets requirements for repairing sumps to prevent releases due to structural failure or corrosion by providing:

- Minimum criteria for qualifying a containment sump for repair
- Testing and performance requirements for materials used to seal containment sumps as a preventative maintenance or repair measure
- install or replace a sump entry fitting
- fabricate a new single wall or double wall sump using the existing sump as a fabrication mold
- Minimum requirements for installer certification and training by the equipment or material manufacturer

NLPA/KWA Standard 823 provides testing procedures at the conclusion of the repair for testing the sump for liquid tightness. Owners and operators must ensure that any repairs are made following all applicable steps in the standard, including post-repair testing for liquid tightness.

A copy of this portion of the Compendium can be found [here](#).