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Underground Storage Tanks: Petroleum Marketers of America Announces U.S. Environmental Protection Agency Approval/Low Liquid Level Alternative Test Method for Sumps

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The Petroleum Marketers Association of America (“PMAA”) in a May 11th news release announced that the United States Environmental Protection Agency Office (“EPA”) of Underground Storage Tanks (“OUST”) has approved the Association’s low liquid level integrity test as an alternative method for containment sump testing.

Containment sump testing is one of the new requirements that EPA placed in the 2015 revisions to the federal underground storage tank (“UST”) regulations.

As PMAA notes, the 2015 revisions to the federal UST regulations require liquid testing every three years of all containment sumps used for interstitial monitoring of piping. The Association states that EPA’s test method requires filling sumps with water above the penetration points in the sump wall. It further concluded that the sump test method would be “prohibitively expensive for tank owners.”

As a result, PMAA’s UST Task Force developed an alternative test for containment sumps. The Association describes this alternative method as requiring:

. . . filling sumps only to the level of a liquid sensing device equipped with a positive shutdown that is mounted below penetration points in the sump wall.

This alternative test method is stated to significantly reduce reoccurring sump testing compliance costs. However, in addition, the Association states it is “equally protective of the environment as filling the sump to the top, according to the OUST.”

PMAA also announced that OUST responded to a PMAA request for clarification that:

. . . water used for spill bucket and sump testing may be reused by third party vendors at other sites in order to further reduce the cost of handling and disposal of test liquids.

Further, OUST is stated to have clarified that:

. . . if double walled pipe systems using sumps for interstitial monitoring were installed *before the date* secondary containment for piping was first required by regulation, the tank owner may instead use leak detectors and annual line tightness testing to meet leak detection requirements.

The Association states that this clarification eliminates the need to test containment sumps (because annual line tightness tests would replace interstitial monitoring as the selected method of leak detection.)

Finally, PMAA notes that OUST approved its request to allow the use of a liquid level audible alarm as a primary method of overfill protection where removing a fully functional in-tank probe to meet visual inspection requirements would destroy operability of the probe.

[A copy of the PMAA news release can be downloaded here.](#)