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# Underground Storage Tanks: Petroleum Marketers Association of America Requests that U.S. Environmental Protection Agency Delay Testing Compliance Deadline

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The Petroleum Marketers Association of America (“PMAA”) sent a December 15th letter to United States Environmental Protection Agency (“EPA”) Administrator Scott Pruitt asking that the federal underground storage tank (“UST”) testing requirements for containment sumps, spill buckets, and overfill prevention devices be delayed to October 13, 2024.

The testing requirements were included in the comprehensive revisions to the federal UST regulations promulgated in 2015. See 80 Fed. Reg. 41566 (July 15, 2015).

PMAA is a federation of 46 state and regional trade associations representing approximately 8,000 independent petroleum marketers nationwide. The organization’s members are engaged in the transport, storage and sale of petroleum products including gasoline, diesel fuels, kerosene, jet fuel, aviation gasoline, propane, racing fuel, lubricating oils, and home heating oil at both the wholesale and retail level. USTs are utilized at many of their facilities.

The Arkansas Oil Marketers Association is a member of PMAA.

The testing requirements addressed in PMAA’s comments will require operability assessment of containment sumps, spill buckets, and overfill prevention equipment. The testing of such components will be required once every three years.

The PMAA comments state:

- An extension will allow UST owners and operators time to acquire the capital needed to pay for the compliance costs associated with initial testing
- An extension will allow UST owners and operators the opportunity to extend the useful life of their existing equipment
- A lack of suitable test methods in combination with a lack of equipment designed to be tested and inspected in the required manner will take time to correct
- Equipment manufacturers need the opportunity to develop more equipment options engineered to meet the required tests
- Equipment installed in the recent past has not been required to be tested, therefore making it more difficult to comply with the newly adopted requirements

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