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Compatibility - Pipe Dope and Sealants/Underground Storage Tanks: Petroleum Marketers Association of America References New U.S. Environmental Protection Agency Guidance

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The Petroleum Marketers Association of America (“PMAA”) discussed in its October 1st weekly publication the United States Environmental Protection Agency’s (“EPA”) issuance of new guidance on underground storage tank (“UST”) pipe dope compatibility requirements.

The publication states that a:

. . . PMAA UST Task Force continues to express concerns with the EPA Office of Underground Storage Tanks (OUST) regarding E15 compatibility with pipe dope in UST systems.

These concerns are driven by the fact that the 2015 revisions to the federal UST regulations require UST owners and operators selling E15 to “first demonstrate compatibility with specific UST system components.”

PMAA states that neither the federal UST regulations nor agency guidance address whether pipe dope is included in the components requiring proof of compatibility.

PMAA references the importance of the issue because:

. . . pipe dope brand names and specifications were not included on UST installation and repair paper work until very recently. As a result, most tank owners do not know whether the pipe dope used in their UST systems is compatible with E15. Moreover, there is no practical way for them to find out. The Task Force is concerned the lack of clarity in the regulations and agency guidance regarding pipe dope compatibility increases the risk of release from systems dispensing E15, and puts state Tank Funds in financial jeopardy.

The PMAA UST Task Force asked that EPA provide both UST owners and financial responsibility providers clarity on the requirements for demonstrating pipe dope compatibility with E15.

EPA addresses three questions through the guidance it added in September to its UST Technical Compendium. The three questions include:

1. Must owners and operators demonstrate compatibility of pipe dope or sealants when storing ethanol blends greater than 10%, such as E15 or E85, or biodiesel blends greater than 20%? (Answering “No,” but pipe dope or sealants used anywhere in the UST system must be compatible with the regulated substance stored in the UST system, according to 40 C.F.R. 280.32(a)).
2. Must pipe dope used as part of an UST system be compatible? (Agency answers in part, “Yes, pipe dope used as part of an UST system must be compatible with the substance stored.”)
3. Is pipe dope typically compatible with ethanol blends greater than E10? (Agency responds, “As of 2018, pipe dope that is compatible with ethanol blends higher than E10 is available, but much of the pipe dope on the market is not.”)

A copy of the EPA guidance, which contains the full responses by the agency, can be found [here](#).