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Arkansas Department of Environmental Quality Office of Land Resources/Regulated Storage Tanks: Arkansas Oil Marketers Association Environmental Workshop Presentations

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The Arkansas Department of Environmental Quality (“ADEQ”) Office of Land Resources undertook presentations at the October 18th Arkansas Oil Marketers Association (“AOMA”) Workshop in Little Rock, Arkansas, titled:

- Compliance Violations Found During Inspections (Regulated Storage Tanks)
- New Compliance Regulations (Regulated Storage Tanks)
- Petroleum Storage Tank Trust Fund
- How to Become Eligible
- Tips on the Reimbursement Process

The Workshop is an annual event in which ADEQ personnel regularly participate.

The timing of this Workshop was particularly important since the 2015 revisions to the federal underground storage tank (“UST”) regulations are becoming effective and will impose a number of new requirements on this type of equipment. As a UST delegated state, ADEQ personnel will be the primary source of guidance and enforcement. Arguably as important is the role of agency personnel will play in administering the Arkansas Petroleum Storage Tank Trust Fund (“Trust Fund”).

The Trust Fund provides reimbursement to owners and operators of certain aboveground storage tanks and USTs in the event of a release. However, the Trust Fund has certain prerequisites for both eligibility and submission of reimbursement requests. Consequently, understanding ADEQ’s role and the necessary requirements to attain and/or maintain aboveground storage tank and UST eligibility can be a critical issue.

Examples of issues addressed during the three presentations included:

- 30-day walkthrough inspection
- Annual release detection equipment testing
- Overfill prevention equipment testing
- Spill bucket and sump testing

- Removal of regulatory deferral of release detection for emergency generator USTs
- New aboveground storage tank registration options
- 50% pipe run replacement rule
- Spill prevention
- Corrosion protection
- Release detection tanks and piping
- Line leak detector test
- Registration requirements
- New USTs prior to fuel delivery
- Change in ownership
- Number of confirmed UST releases from September 1, 2017 through September 1, 2018
- Tips for the reimbursement application process
- What to do
- What not to do
- Common unallowable costs that result in additional processing time
- Availability of reimbursement documents online
- Reimbursement application review process
- Technical review
- Financial review

ADEQ provided a map at the Workshop which identifies regulated storage tank inspector districts. The various inspectors were introduced during the Workshop.

A copy of the slides from the three presentations and the inspector district map can be found below.

[New Compliance Regulations](#)

[Petroleum Storage Tank Trust Fund](#)

[Compliance Violations Found During Inspections](#)

[RST District Map](#)