

## Repairs to UST Systems

### Repairs to Containment Sumps

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

**Answer:** Yes. EPA recognizes NLPA/KWA Standard 823 as a code of practice developed by a nationally recognized association that addresses the requirements identified in 40 CFR § 280.33: *Regulatory Requirements* (excerpt of pertinent portions of § 280.33(a) and (d))

Owners and operators of UST systems must ensure that repairs will prevent releases due to structural failure or corrosion as long as the UST system is used to store regulated substances. The repairs must meet the following requirements:

(a) Repairs to UST systems must be properly conducted in accordance with a code of practice developed by a nationally recognized association or an independent testing laboratory.

(d) Repairs to secondary containment areas of tanks and piping used for interstitial monitoring and to containment sumps used for interstitial monitoring of piping must have the secondary containment tested for tightness according to the manufacturer's instructions, a code of practice developed by a nationally recognized association or independent testing laboratory, or according to requirements established by the implementing agency within 30 days following the date of completion of the repair.

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
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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.