
501-31

Changes to Underground Storage Tank Regulation 40 CFR 280

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Background Information

- On July 15, 2015, EPA published revisions to 40 CFR 280.
- States with UST programs approved to operate in lieu of the federal program had 3 years to reapply. These States could operate under the previous regulations.
- Arkansas re-applied on October 13, 2018.
- Arkansas will require owners/operators to comply with new requirements on or before October 13, 2021.

30-DAY WALKTHROUGH INSPECTION CHECKLIST

Facility Name:	Facility ID Number:
Facility Address:	Phone Number:

Initial each column below the date of inspection to indicate that the device/system was inspected and found to be satisfactory on that date. For those items not applicable for this facility, please indicate "N/A". Keep this record for no less than one (1) year.

Date of inspection (mm/dd/yy)												
REQUIRED EVERY 30 DAYS												
Visually check spill prevention equipment for damage. Remove any liquid and/or debris.												
Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present.												
For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.												
Check for and remove obstructions in the fill pipe.												
Check the fill cap to make sure it is securely on the fill pipe.												
Ensure release detection records are reviewed and current.												
REQUIRED ANNUALLY												
For double-walled containment sumps with interstitial monitoring, check for leaks in the interstitial area.												
Visually check containment sumps for damage and leaks to the containment area or a release to the environment.												
Remove any liquid or debris from containment sumps.												
Check hand-held release detection equipment, such as groundwater bailers and tank gauge sticks, for operability and serviceability.												

Note: Spill prevention equipment at UST systems receiving deliveries at intervals greater than every 30 days may be checked prior to each delivery.

30-day Walk-throughs

- Check release detection equipment for alarms/unusual operating condition
- Check spill buckets for damage. Clean & remove liquids.
- Check fill ports & other openings to make sure caps are tight and no obstructions
- Double-wall spill prevention – check interstitial space
- Review records to make sure you are current

Annually

- Check containment sumps for leaks to containment area or environment
- Remove liquids/debris from sumps
- Double-wall containment sumps – check interstitial space
- Check gauge sticks, bailers, monitors, etc. for operability)
- Ensure availability of supplies for cleaning spills and overfills

Yearly Requirements

- ATG and other controllers
- Probes and sensors
- Automatic line leak detector
- Vacuum pumps and pressure gauges
- Hand-held electronic sampling equipment for groundwater and vapor monitoring - calibration

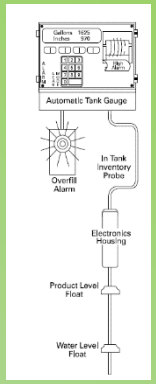
Periodic O&M – Every 3 Years

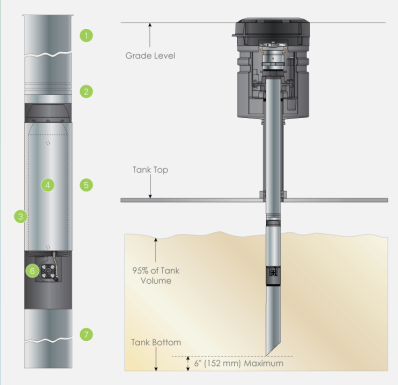
- Inspection of overfill prevention equipment
- Inspection of spill buckets & containment sumps

Every 3 Years		
		
UST spill buckets and basins need integrity testing.	*Overfill prevention devices need to be inspected.*	*Sumps used for interstitial monitoring of piping need integrity testing.*

Every 3 Years - Inspect Overfill Prevention Equipment

Overfill alarms – activate at correct level

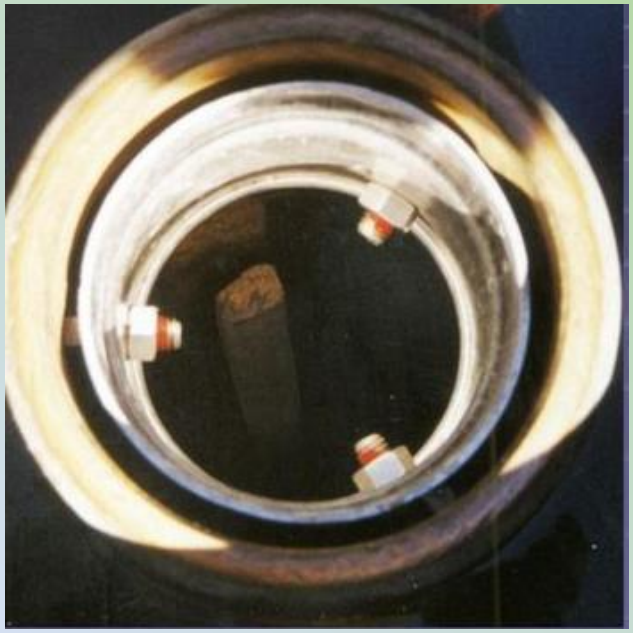




Automatic shutoff devices – shutoff at the correct level and have the correct length

Ball floats must be tested for proper operation. If determined not operational, then they have to be replaced with one of the other types of overfill prevention equipment.

Problems with Overfill Prevention Devices



Every 3 Years -Inspect Spill Prevention Equipment

- Single-walled spill buckets –tested using liquid, pressure, or vacuum method.
- Double-walled spill buckets, if monitored, don't have to be tested.

- Single-walled sumps and under dispenser containments (UDCs) installed after July 2007 have to be tested using liquid, pressure, or vacuum methods.
- Double-walled sumps and UDCs don't have to be tested if monitored.

Problems with Spill Buckets and Sumps

Who is qualified to do perform these inspections?

- 30-day Inspections – Owners, operators, employees, contractors
- Annual Inspections – *still working on guidance documents*
- 3-year Inspections – *still working on guidance documents.*

Double-wall Rule

Since 2007, Arkansas has required each new or replaced UST or piping to be secondarily contained and monitored for leaks.

- From 2007 to 2018, the requirement for secondary containment was triggered if 5 ft. of piping was replaced.

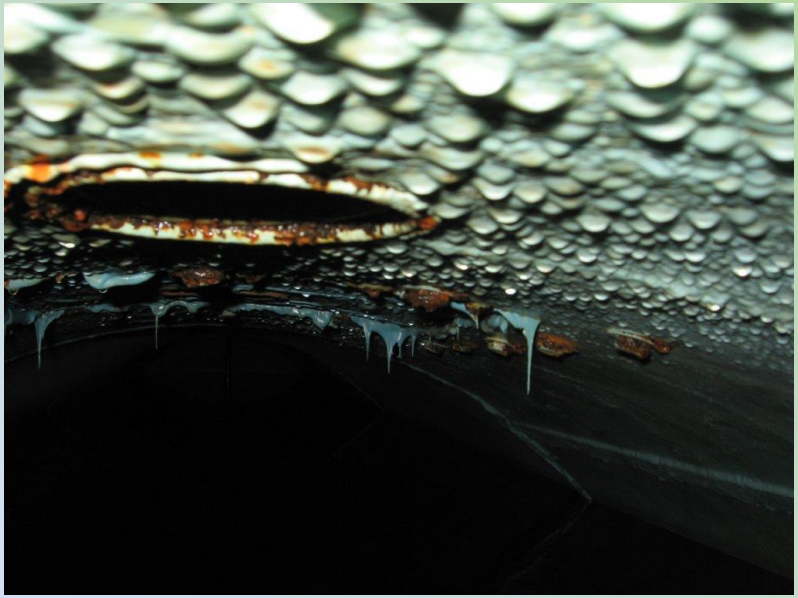
- The requirement for secondary containment of piping now is triggered when 50% or more of piping from each line is replaced.

Under Dispenser Containment

- If you replace the impact valve and dispenser, you don't need to install under-dispenser containment (UDC).

- If you replace the flex connector, impact valve, and dispenser, you need to install a sump under the dispenser.

Internal Lining



Owners and operators must permanently close tanks that use internal lining as sole method of corrosion protection if:

- The lining fails the periodic inspection and
- The lining cannot be repaired according to a code of practice

Other Requirements

Compatibility

- Owners/Operators must notify ADEQ if USTs will store regulated substances that have over 10% ethanol or over 20% biodiesel and be able to demonstrate compatibility.

Training

- Owners and Operators must designate at least one individual as an A Operator, B operator, and C operator (it can be same person).
- Class A & B have to pass an exam.
- Training records for A, B, and C.
- Retraining may be required if non-compliances.

Emergency Generators

Deferrals – Emergency Generators

- Emergency generators now must have release detection.
- They already were required to have spill prevention and corrosion protection since 1988.
- Owner/operators can choose a release detection method that only triggers an alarm and does not necessarily shut the system down. The alarm has to be transmitted to a monitoring center.

Release Detection for USTs (Every 30 days)

PRE 2007 – Release Detection for Tanks

- Automatic Tank Gauge
- Interstitial Monitoring
- Statistical Inventory Reconciliation
- Continuous In-Tank Leak Detection
- Vapor Monitoring
- Groundwater Monitoring
- Others

POST 2007

- Interstitial Monitoring - Must use interstitial monitoring as release detection of tank, piping, and components.

Piping – Line and Leak Detector Test

PRE 2007 – single-wall piping

- Automatic line leak detector –Electronic line leak detectors that will alarm only and not shut down recommended for generators.
- Have an annual line tightness test – 0.1 gph annually; 3.0 gph test every time pressurized–0.2 gph test every month or monthly monitoring of all portions of piping

POST 2007 – double-wall piping

- Interstitial Monitoring

Field-Constructed Tanks & Airport Hydrant Systems

- Notify ADEQ of their existence
- Comply with installation, operation (*release detection, spill prevention, corrosion protection, testing, etc.),* release notification, and release response.
- Exceptions on FCT and AHS over 50,000 gallons
  - Single-wall piping is accepted when installing/replacing piping.
  - Additional methods and different limits are acceptable when choosing release detection for tanks and piping.

Release Reporting – Notification Requirements

Owners/operators must report in 24 hrs. of:

1. The discovery of released regulated substances (free product or vapors in soils, basements, utilities, nearby surface water, etc.)

2. Unusual operating conditions (erratic behavior of dispensing equipment, sudden loss of product, unexplained presence of fuel or water in tanks or interstitial spaces, unless component is found defective and repaired, liquids are removed, etc.).

3. Monitoring results from a release detection method indicate a release may have occurred – failed ATG records, tripped leak detectors, interstitial monitoring alarms unless alarms were investigated and determined to be a non-release event).

Aboveground Storage Tanks

Aboveground Storage Tanks (ASTs)

- The Arkansas legislation has been amended and provisions have been put in place to eliminate fees and registration requirements for ASTs that contain petroleum products.
- The amendment also clarified provisions of the petroleum storage tank trust fund program regarding ASTs.
- Registration of ASTs is mandatory to be eligible for participation in the Trust Fund.

Questions?

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