



SIR And CITLD

Additions To The 2015 Revised Federal UST Regulation





Why Were These Methods Added To The Federal Regulation?

- Not named in the original 1988 UST regulation.
- One goal of revised regulatory package was to incorporate newer technologies.



Are These Methods Viewed Differently Under The Revised Regulation?

- How were they addressed under original 1988 federal regulation?
 - Under then § 280.43(h) Other methods.
- How are they addressed under 2015 federal regulation?
 - SIR: § 280.43(h) Statistical inventory reconciliation.
 - CITLD: § 280.43(d) Automatic tank gauging.



What Are The Performance Standards For These Methods?

SIR

- Capable of detecting leak rate of at least 0.2 gph or release of 150 gallons within 30 days;
- Report a quantitative result with a calculated leak rate;
- Use a threshold that does not exceed $\frac{1}{2}$ minimum detectable leak rate.
- What about inconclusives?





What Are The Performance Standards For These Methods?

CITLD

- Detect 0.2 gph leak rate from any portion of tank that routinely contains product;
- Operate on an uninterrupted basis or within a process allowing system to gather incremental measurements to determine leak status at least once every 30 days.
- What about inconclusives?



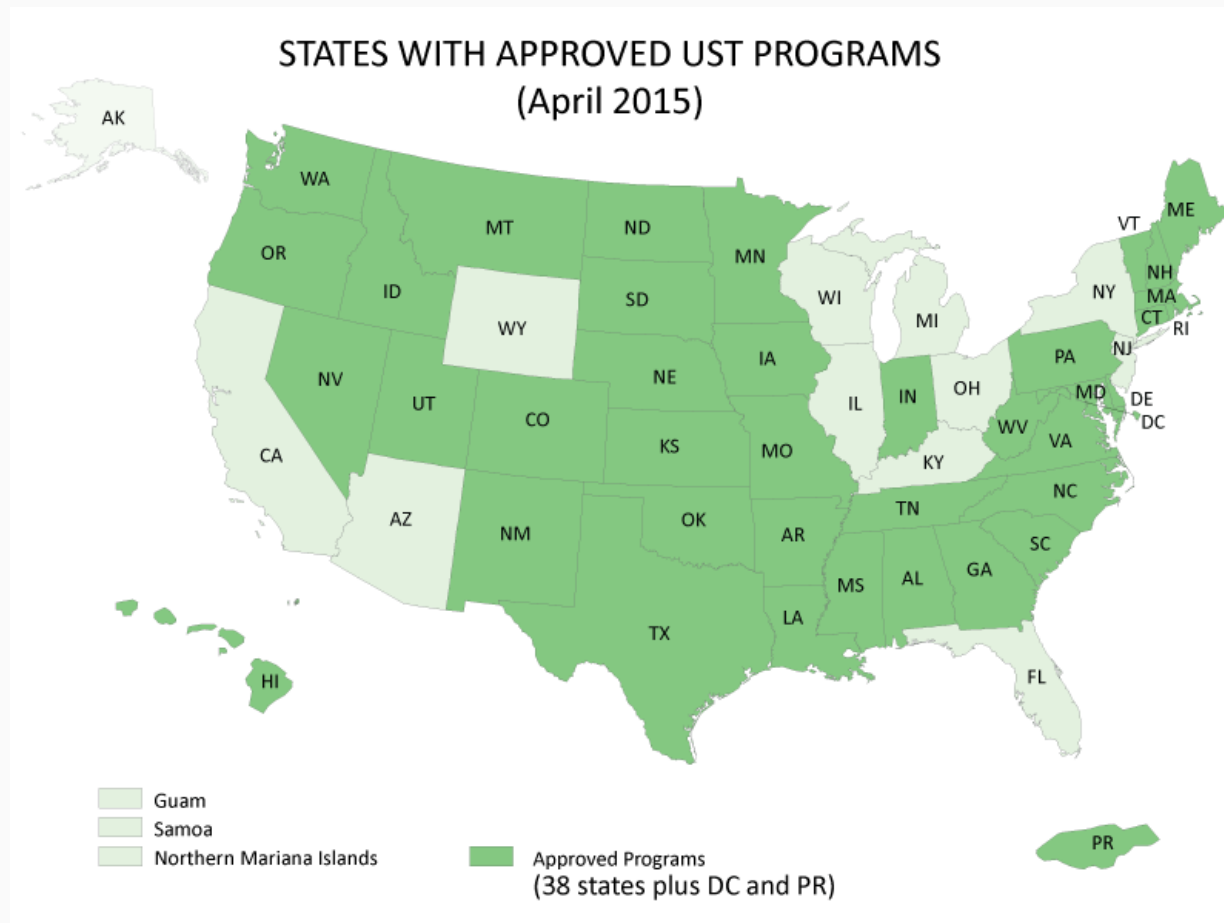


What Is The Impact Of Addition Of These Methods To State UST Programs?

- SPA versus non-SPA States.
- SPA re-authorization.



States With Approved UST Programs (SPA States)





What Is The Impact Of These Methods To Current SIR Method Users?

- *Depends on specific SIR method used.*
- *Most challenging standard to meet: 30-day monitoring requirement.*
 - *Discuss changing method or data collection procedures with current vendor .*
 - *Send data more expeditiously.*
 - *Conduct more frequent analysis.*
 - *Use vendor that currently meets 30-day requirement.*
 - *Use another type of release detection method.*



Questions And Additional Information

- Any Questions?
- For More Information
 - Contact: Tim Smith, 202- 564-0643, smith.timr@epa.gov
 - Visit the OUST website at: <http://www.epa.gov/ust>
 - Questions and Answers about the 2015 Underground Storage Tank Regulation - <https://www.epa.gov/ust/questions-and-answers-about-2015-underground-storage-tank-regulation>
 - Publications: Musts For USTs and Straight Talk On Tanks