




Fitting The Pieces Together

Maintenance

Repair

Replacement



Repairs Are Not New To UST Systems

- Although repairs are not new, the new requirements of the 2015 federal UST regulation brings into sharp focus the need for the program to have a solid handle on how maintenance, repairs, and replacement fit into the regulatory framework.



New Federal UST Requirements

- § 280.35 - **periodic testing** of spill prevention equipment and containment sumps used for interstitial monitoring of piping; **and inspection** of overfill prevention equipment
- § 280.36 - periodic (30-day and annual) **walkthrough inspections**
- § 280.40(a)(3) – annual **release detection equipment testing**



Defining Terms

- **Maintenance** means the normal operational upkeep to prevent an underground storage tank system from releasing product



Defining Terms (Continued)

- **Repair** means to **restore to proper operating condition** a tank, pipe, spill prevention equipment, overfill prevention equipment, corrosion protection equipment, release detection equipment, or other UST system component that has caused a release of product from the UST system **or** has failed to function properly. Many repairs require tightness testing within 30 days.




Defining Terms (Continued)

- **Replace** means:
 - To remove a **tank** and install another tank.
 - Or to remove 50 percent or more of **pipng** and install other piping, excluding connectors, connected to a single tank. For tanks with multiple piping runs, this definition applies independently to each piping run.




Main Drivers For Repair

- If a UST system component is **not functioning or operating properly**, it cannot fully perform its function and the associated regulatory requirement such as overfill prevention, for example, is not being met.



Repairs Allowed Are Stated in § 280.33

- 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.
- Repairs must be conducted in accordance with a national code of practice (NFPA 30, API RP 2200, etc.).



Repairs Allowed Are Stated in § 280.33 (Continued)

- Repairs to many UST system components are addressed specifically in the regulations (e.g., no repairs to metal piping that has released product)
- UST system owners and operators must maintain records (in accordance with § 280.34) of each repair as long as the UST system is used to store regulated substances.



Applying These Requirements

- How does your state define repair?
- Does your state require notification prior to certain repairs?
- Are there some repairs that should be associated with other actions (does a cracked spill bucket require an assessment as well as repair)?



Applying These Requirements (Continued)

- Now on to our feature presentations:
 - Sump entry boot and wall repairs
 - Spill bucket repairs
 - What makes a good repair?
 - Potential code of practice to systematically address repairs to UST systems