

UST Compliance

Successes and Challenges

September 2022

Preventing UST Releases

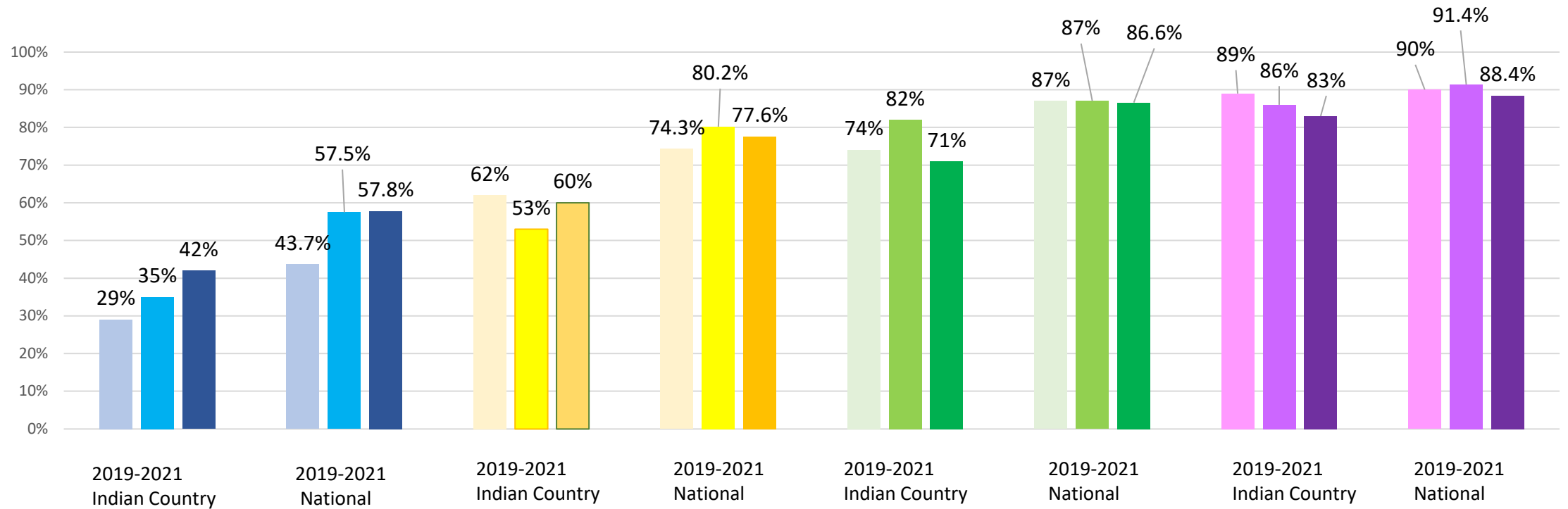
* = New Performance Measures

***Technical Compliance Rate (TCR)**

***Walk Through Requirements**

***Operator (A&B) Training Requirements**

Financial Responsibility Requirements



UST Program Challenges

(This list does not convey priority order)

- Low UST compliance and rate of cleanup
- Aging or abandoned tanks
- Equipment and supply shortages, including tanks
- Labor shortages (staff turnover, access to service providers)
- Service providers who are not knowledgeable about UST requirements that apply
- Remoteness in some areas
- Cost of business
- Natural disaster vulnerability
- Increasing number of facilities going into temporary operating status (TOU)
- Financial Responsibility: private insurance and state funds
- COVID- 19

EPA's Office of Underground Storage Tanks (OUST)

Compliance Assistance Activities

Under Development for Indian Country

1. NEIWPC Facility Compliance Tool

- Facility specific tool
- Electronic platform
- Demonstration pilot approximately Spring 2023
 - Roll-out in Indian Country
 - Will be based on 40 CFR 280
 - Will not be tailored to state regulations

EPA's Office of Underground Storage Tanks (OUST) Compliance Assistance Activities *Under Development for Indian Country*

2. EPA Smart Tools

- Electronic platform that supports inspection planning and field data collection
- Based on 40 CFR 280 and regional checklists
- Currently going through user testing and development

EPA's Office of Underground Storage Tanks (OUST) Compliance Assistance Activities *Under Development for Indian Country*

3. Operator Training

- Currently only the exam is available online
- NEIWPCC and OUST are developing an online, self-taught training for Class A and B operators
 - **Class A** operator is the person who has primary responsibility to operate and maintain the UST system according to the UST regulations. Class A operator exam tests general knowledge of the UST regulations.
 - **Class B** operator is the person who has day-to-day responsibility for implementing the UST regulations. Class B operator exam tests a more in-depth understanding of operation and maintenance aspects of UST systems.

EPA's OUST

New Compliance Assistance Materials

- **Owner and Operator Introduction: [Automated Interstitial Monitoring Systems for Underground Pressurized Piping on Emergency Power Generator \(EPG\) UST Systems \(EPA 510-K-22-001\)](#) May 2022**
 - This 22-page booklet provides owners and operators of EPG UST systems with information about using automated interstitial monitoring (AIM) systems to meet federal release detection requirements for their underground pressurized piping systems.
- **[Federal UST Requirements for Emergency Power Generator UST Systems \(EPA 510-K-22-003\)](#) May 2022**
 - This 70-page booklet summarizes the federal UST requirements for installation, reporting, spill and overfill prevention, corrosion protection, release detection, walkthrough inspections, compatibility, operator training, repairs, financial responsibility, release response, and closure that are specific to emergency power generator UST systems.