UST Program Evolution:
EPA Resources for Owners and States

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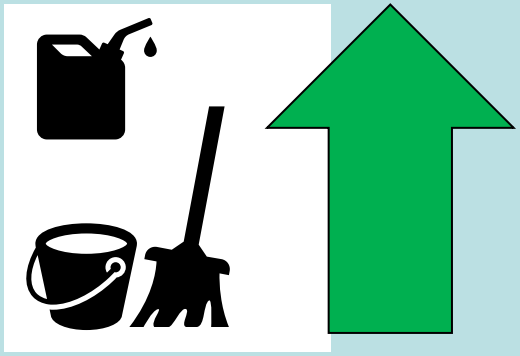
Converging Industry Trends

U$T &
LU$T

Gas Cars Around For Decades

Cleanup Cost

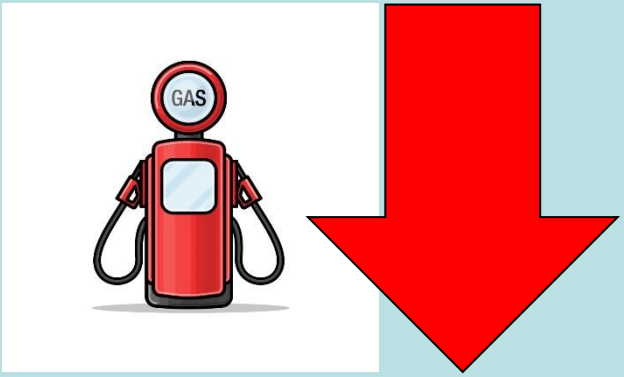


Converging Industry Trends (cont.)

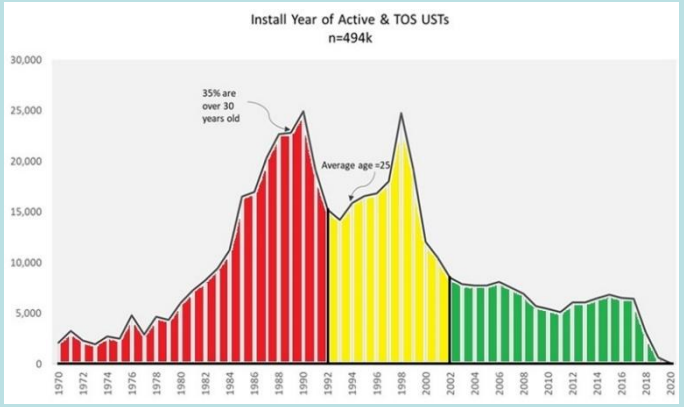
U$T & LU$T

Gas Cars Around For Decades

Increased Efficiency + EVs



Aging UST Systems



EPA Resource for States (1 of 2)

Why: ASTSWMO paper identified intersecting challenges in the coming decades & suggested a few actions where OUST could provide assistance

Sustainability of State Financial Assurance Funds for the Underground Storage Tank Programs (Feb. 24, 2023)

***UST and LUST Program Challenges in a Changing Transportation Sector*:**

- **Audience:** communicate succinctly to **non-UST experts** in positions to assist with necessary policy changes
- **Acknowledges** the convergence that will impact state UST and LUST programs & state funds are a **serious concern** for UST and LUST program sustainability and the **solvency** of state financial assurance funds.
- **Summarizes a menu of programmatic or policy changes** for states to mitigate risks

https://www.epa.gov/system/files/documents/2024-12/policy-paper-epa-oust-12.16.24.pdf

EPA Resource for States (2 of 2)

Why: ASTSWMO paper identified intersecting challenges in the coming decades & suggested a few actions where OUST could provide assistance

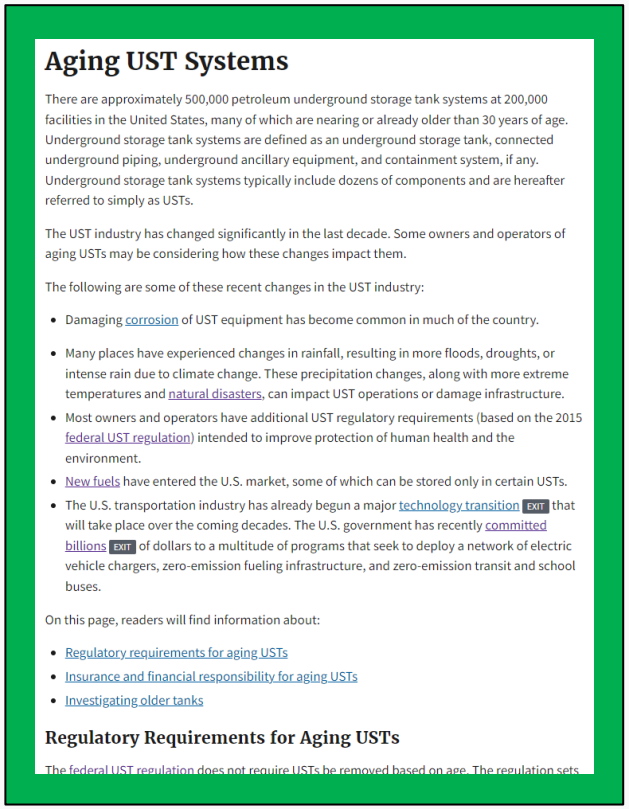
Sustainability of State Financial Assurance Funds for the Underground Storage Tank Programs (Feb. 24, 2023)

***UST Futures Forecasting Tool*:**

- **A** series of Excel spreadsheets that states can download and populate with data.
- **B** able to better estimate the number of new release discoveries, state fund and program funding, and the potential number of abandoned sites needing fuel cleanups under different scenarios.
- **"C"** and understand the potential future soundness and sustainability of their state fund for LUST cleanups.

https://www.epa.gov/ust/resources-ust-state-and-territorial-implementing-agencies

EPA's Resource for O/O



Aging UST Systems

There are approximately 500,000 petroleum underground storage tank systems at 200,000 facilities in the United States, many of which are nearing or already older than 30 years of age. Underground storage tank systems are defined as an underground storage tank, connected underground piping, underground ancillary equipment, and containment system, if any. Underground storage tank systems typically include dozens of components and are hereafter referred to simply as USTs.

The UST industry has changed significantly in the last decade. Some owners and operators of aging USTs may be considering how these changes impact them.

The following are some of these recent changes in the UST industry:

- Damaging corrosion of UST equipment has become common in much of the country.
- Many places have experienced changes in rainfall, resulting in more floods, droughts, or intense rain due to climate change. These precipitation changes, along with more extreme temperatures and natural disasters, can impact UST operations or damage infrastructure.
- Most owners and operators have additional UST regulatory requirements (based on the 2015 federal UST regulation) intended to improve protection of human health and the environment.
- New fuels have entered the U.S. market, some of which can be stored only in certain USTs.
- The U.S. transportation industry has already begun a major technology transition EXIT that will take place over the coming decades. The U.S. government has recently committed billions EXIT of dollars to a multitude of programs that seek to deploy a network of electric vehicle chargers, zero-emission fueling infrastructure, and zero-emission transit and school buses.

On this page, readers will find information about:

- Regulatory requirements for aging USTs
- Insurance and financial responsibility for aging USTs
- Investigating older tanks

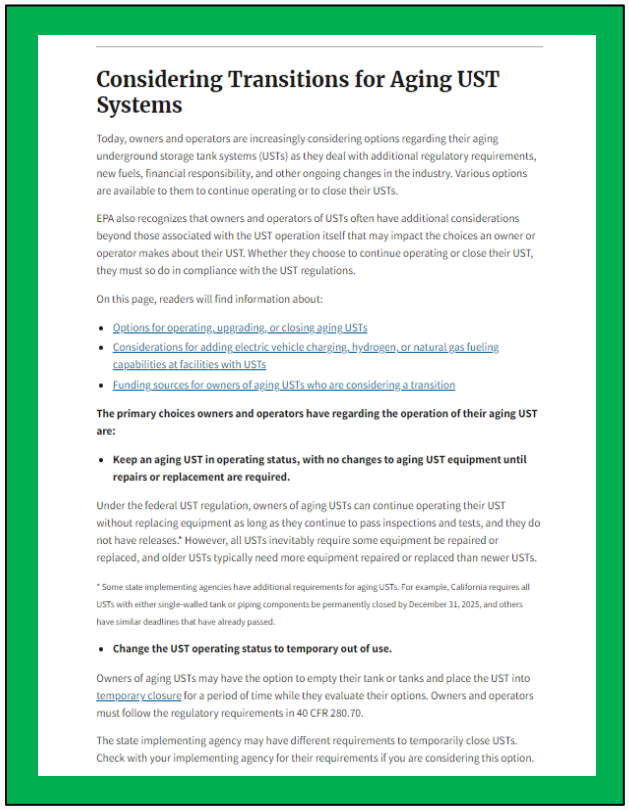
Regulatory Requirements for Aging USTs

The federal UST regulation does not require USTs be removed based on age. The regulation sets

- **Aging UST Systems webpages**
- **Two parts**
- **Part 1 Focus areas:**
  - **Significant, recent industry changes**
  - **Regulatory requirements**
  - **Insurance and financial responsibility**
  - **Investigating older tanks in UST systems**

https://www.epa.gov/ust/resources-ust-owners-and-operators#aging

EPA's Resource for O/O



Considering Transitions for Aging UST Systems

Today, owners and operators are increasingly considering options regarding their aging underground storage tank systems (USTs) as they deal with additional regulatory requirements, new fuels, financial responsibility, and other ongoing changes in the industry. Various options are available to them to continue operating or to close their USTs.

EPA also recognizes that owners and operators of USTs often have additional considerations beyond those associated with the UST operation itself that may impact the choices an owner or operator makes about their UST. Whether they choose to continue operating or close their UST, they must so do in compliance with the UST regulations.

On this page, readers will find information about:

- Options for operating, upgrading, or closing aging USTs
- Considerations for adding electric vehicle charging, hydrogen, or natural gas fueling capabilities at facilities with USTs
- Funding sources for owners of aging USTs who are considering a transition

The primary choices owners and operators have regarding the operation of their aging UST are:

- **Keep an aging UST in operating status, with no changes to aging UST equipment until repairs or replacement are required.**

Under the federal UST regulation, owners of aging USTs can continue operating their UST without replacing equipment as long as they continue to pass inspections and tests, and they do not have releases.* However, all USTs inevitably require some equipment be repaired or replaced, and older USTs typically need more equipment repaired or replaced than newer USTs.

* Some state implementing agencies have additional requirements for aging USTs. For example, California requires all USTs with either single-walled tank or piping components be permanently closed by December 31, 2025, and others have similar deadlines that have already passed.

- **Change the UST operating status to temporary out of use.**

Owners of aging USTs may have the option to empty their tank or tanks and place the UST into temporary closure for a period of time while they evaluate their options. Owners and operators must follow the regulatory requirements in 40 CFR 280.70.

The state implementing agency may have different requirements to temporarily close USTs. Check with your implementing agency for their requirements if you are considering this option.

- **Part 2 Focus areas:**
  - **Options for operating, upgrading, or closing aging UST systems.**
  - **Considerations for adding EV, H2, or natural gas fueling capabilities.**
  - **Funding sources for owners of aging USTs who are considering a transition.**

https://www.epa.gov/ust/resources-ust-owners-and-operators#transitions

Review and Questions

1. The transportation environment is changing.

2. Gas cars, USTs, and UST/LUST programs are needed for decades.

3. Every O/O and every state faces a unique situation – there's no one size fits all solution. Planning now is essential.

4. EPA has information available to assist states and O/O's to think about the future.

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