

Determining the Applicability of the UST Regulations to Field Constructed Tanks and Airport Hydrant Systems Or Lessons in How to Draw Bubbles

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What is a UST system?

UST system or Tank system means an **underground storage tank**, connected underground piping, underground ancillary equipment, and containment system, if any

Underground storage tank or UST means any **one or combination of tanks (including underground pipes** connected thereto) that is used to contain an accumulation of regulated substances, and the **volume of which** (including the volume of underground pipes connected thereto) is **10 percent or more beneath the surface of the ground.**

Criteria for Determination

- Tanks are considered a combination of tanks because they are connected by piping
- Tanks connected by piping are only considered a combination of tanks if the tanks are storing the same product.
- A tank storing an additive is not considered to be part of the combination of tanks storing the same product however the resulting mixture of product and additive can be considered the same product if the additive does not substantially change the product.



3500 Sterling Dr

Walcott, Iowa

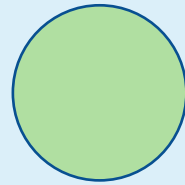


Google Street View

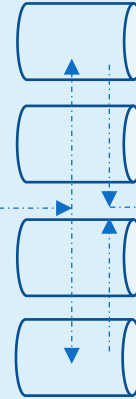
Apr 2025 [See more dates](#)



Tank 1 - 1,000,000 gal diesel AST

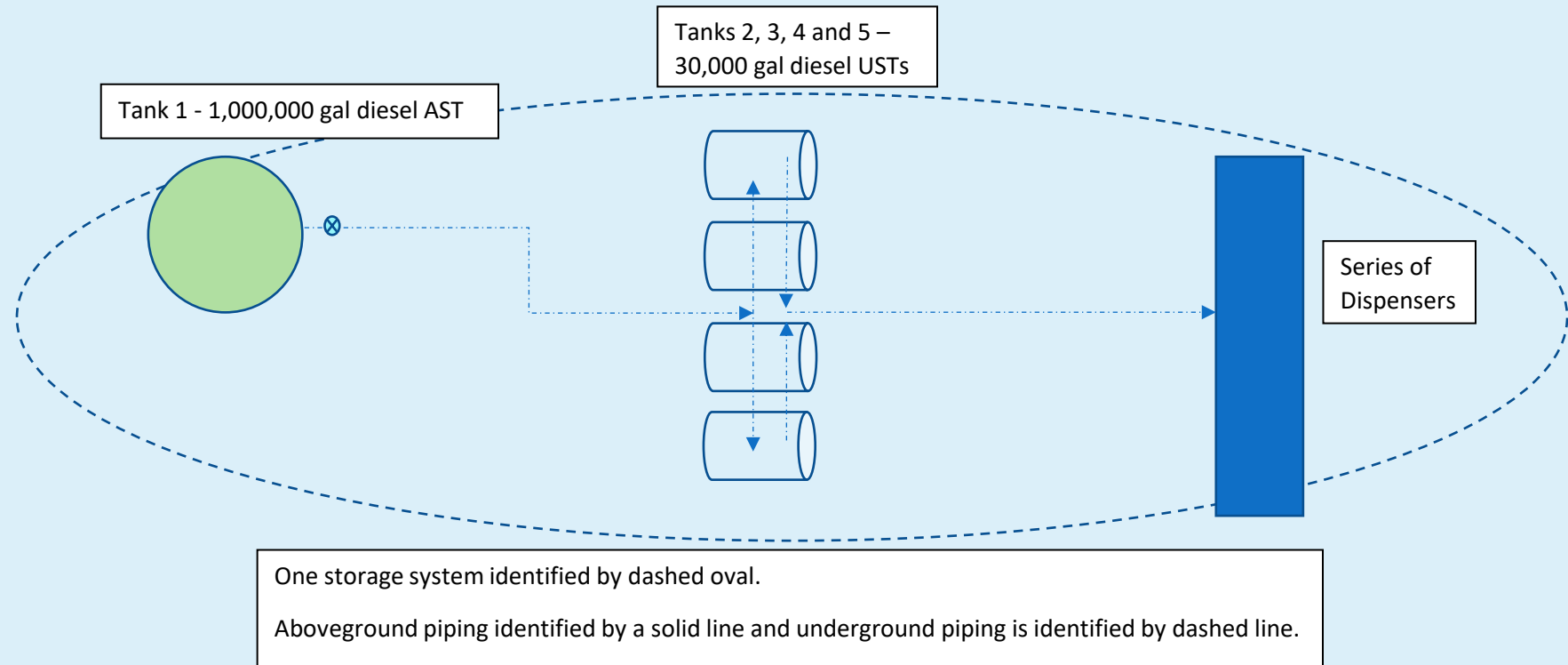


Tanks 2, 3, 4 and 5 –
30,000 gal diesel USTs

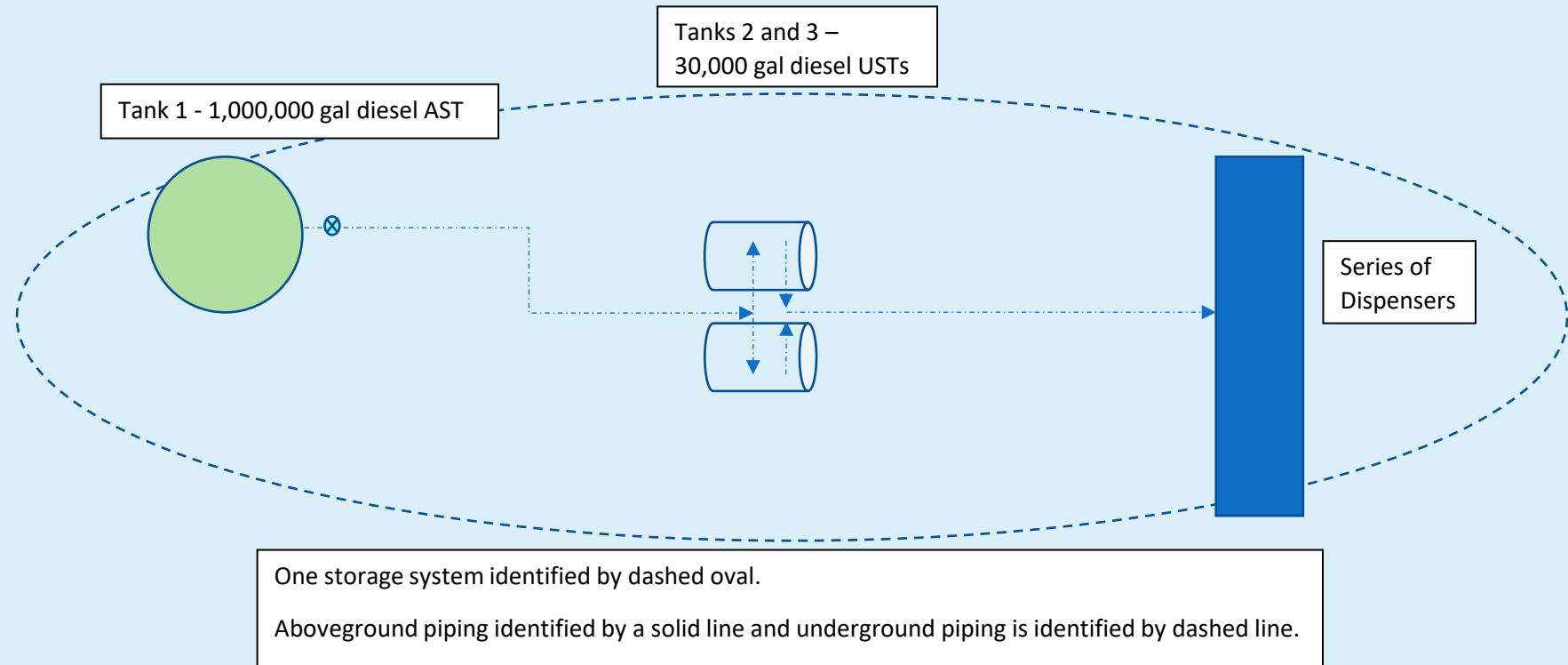


Series of
Dispensers



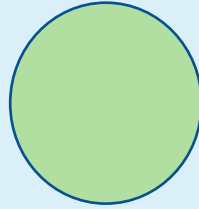


$$\frac{(120,000 \text{ gallons} + 557 \text{ gallons} + 100 \text{ gallons})}{(1,000,000 \text{ gallons} + 120,000 \text{ gallons} + 557 \text{ gallons} + 100 \text{ gallons})} = 10.7\% \text{ underground}$$



$$\frac{(60,000 \text{ gallons} + 557 \text{ gallons} + 100 \text{ gallons})}{(1,000,000 \text{ gallons} + 60,000 \text{ gallons} + 557 \text{ gallons} + 100 \text{ gallons})} = 5.7\% \text{ underground}$$

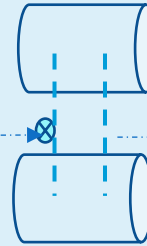
Tank 1 - 1,000,000 gal diesel AST



Tank 2 - 50,000 gal B100 AST

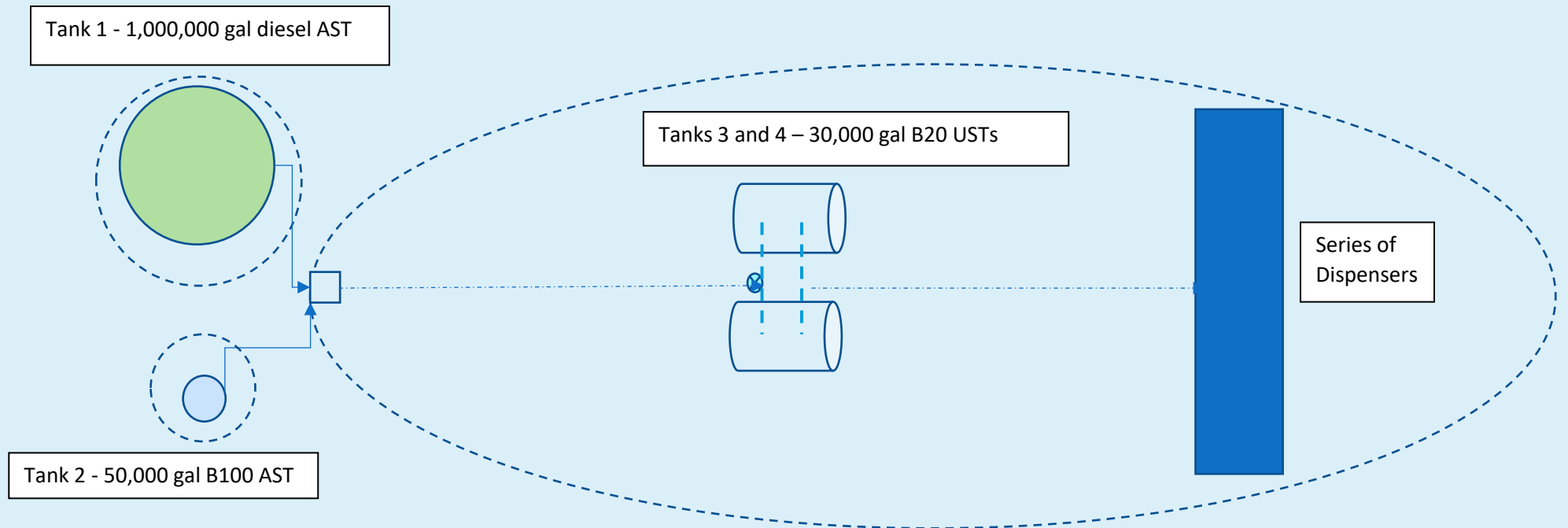


Tanks 3 and 4 - 30,000 gal B20 USTs



Series of
Dispensers





Three storage systems each identified by dashed oval.
Aboveground piping identified by a solid line and underground piping is identified by dashed line.

Questions

- Is further guidance needed on how to determine applicability (draw the bubble)?
- Is guidance needed on what requirements are applicable to the tanks (aboveground and underground) and piping?