

UNIQUE TANKS

UNIQUE PIPING



UNIQUE TANK?

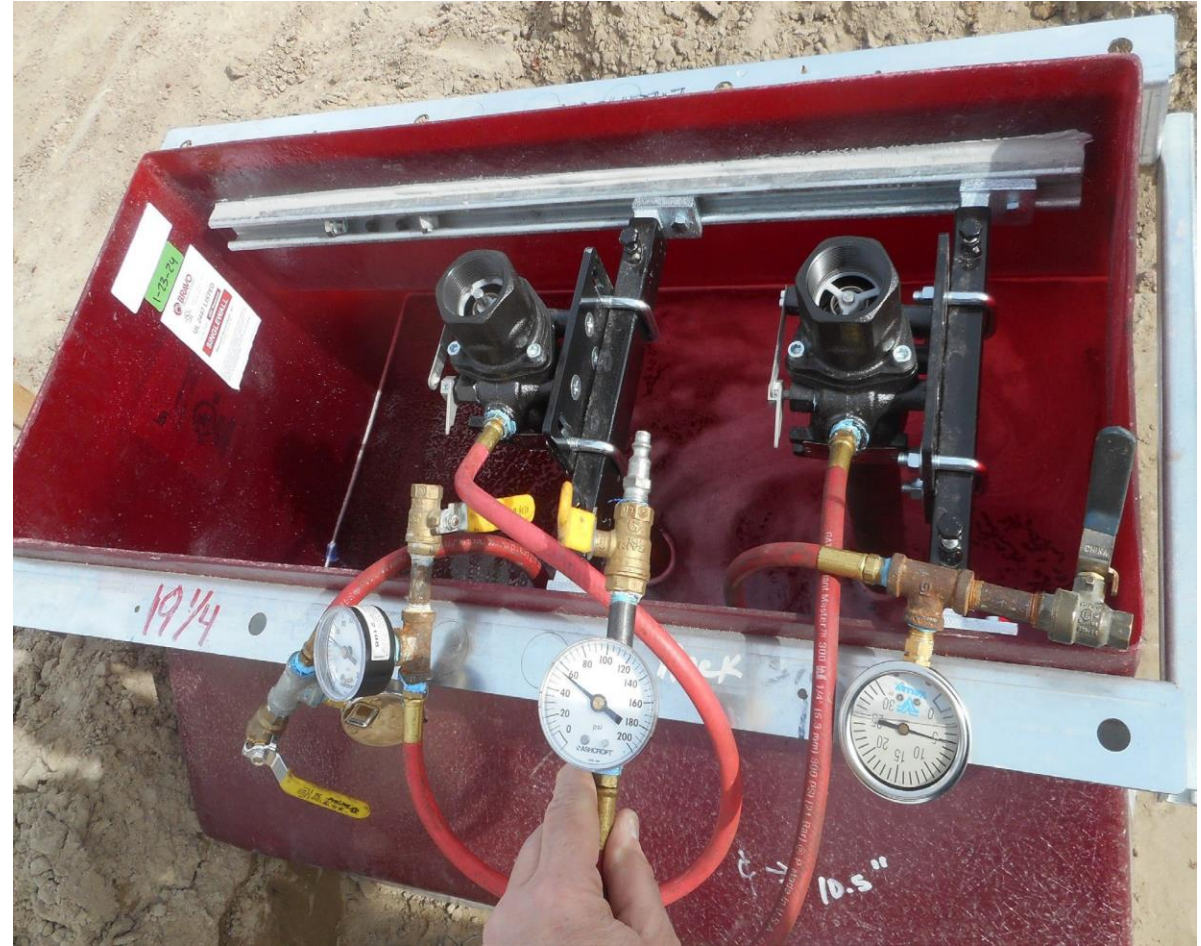


These might be
unique dispensers—

What if they
are replaced?



Determining applicability of UDC for a replaced dispenser



Under Dispenser Containment (UDC)
may be required depending on how
“new dispenser system” is defined.

IS UDC REQUIRED?

2017: BEFORE



2024: AFTER



40CFR 280.20(f)

Dispenser systems. Each underground storage tank (UST) system must be equipped with under-dispenser containment for any new dispenser system installed after April 11, 2016.

(1) A dispenser system is **considered new** when **both** the dispenser and **the equipment** needed to connect the dispenser to the underground storage tank system are installed at an UST facility. The equipment necessary to connect the dispenser to the underground storage tank system includes check valves, shear valves, unburied risers or flexible connectors, or other transitional components that are underneath the dispenser and connect the dispenser to the underground piping.

Three units combined into one...

Is this a new dispenser system
requiring UDC?

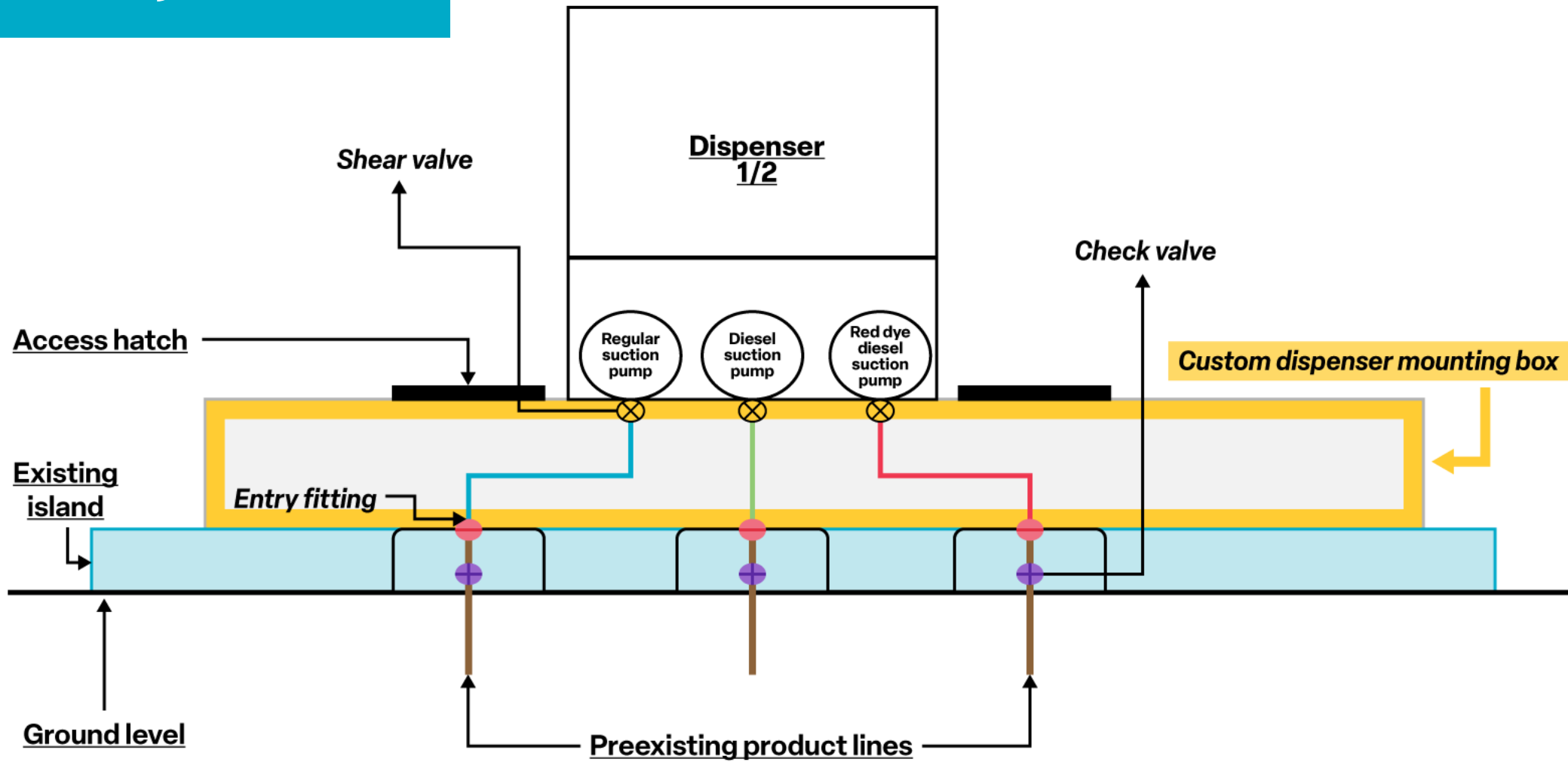
2015



2024



What do you think?



40CFR 280.20(f)

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INSTALLED
AROUND 2023

TRANSITIONAL COMPONENTS

New connecting pipe is installed inside a custom metal dispenser mount with access doors to original pipe risers and suction check valves.



What is under the box?

EPA COMPENDIUM FAQ'S

CONTAINMENT SUMP—DISPENSER REPLACEMENT AND UNDER-DISPENSER CONTAINMENT INSTALLATION REQUIREMENTS

QUESTION: Are tank owners required to install UDC if only several components of the dispenser system are replaced, but not the entire dispenser system (for example a shear valve but not flexible connectors)? Or, are tank owners required to install UDC if any single component of the dispenser system is replaced? (Added: September 2015)

EPA COMPENDIUM FAQ'S

CONTAINMENT SUMP—DISPENSER REPLACEMENT AND UNDER-DISPENSER CONTAINMENT INSTALLATION REQUIREMENTS

ANSWER: The 2015 UST regulation at 40 CFR 280.20(f) indicates that a dispenser system is considered new when both the dispenser and the equipment needed to connect the dispenser to the underground storage tank system are installed. That equipment may include check valves, shear valves, unburied risers or flexible connectors, or other transitional components that connect the dispenser to the underground piping. This means that the UDC requirement is not triggered until the dispenser and everything between the dispenser and the underground piping is installed.

NOTE: Most states have already implemented their own requirements for secondary containment and UDC. The 2015 UST regulation primarily applies to owners and operators of UST systems in Indian country.

**What was
done to avoid
installing
UDC?**

**A metal box was built to
cover pipe connections.**



Contractor believes the custom addition is not regulated since it is above grade, so no UDC is required.

This box is **custom built** to cover original pipe riser and new transition pipe.

This is the dispenser unit that can be **purchased**.



2017: FOUR DISPENSERS, FOUR PRODUCTS

Notice the spacing of the original placement.



2023: TWO DISPENSERS, FOUR PRODUCTS

Is UDC required?

YES

Pipe connecting the dispenser to the UST system was added.

NO

Only a custom mounting plate was added to secure the dispenser.



How the dispenser was installed makes the difference.

Is UDC required?

YES



A box was built to cover the pipe transition to the new dispenser.

NO



The new dispenser fit directly over original pipes.

What will you look for?

