
Fwd: The 2015 federal UST regulation and ASTM E3225-20 Standard Practice

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From: **Hoskinson, Carolyn** <Hoskinson.Carolyn@epa.gov>

Date: Thu, Mar 26, 2020 at 4:10 PM

Subject: The 2015 federal UST regulation and ASTM E3225-20 Standard Practice

To: Hoskinson, Carolyn <Hoskinson.Carolyn@epa.gov>

Dear UST Community –

Some of you may have already seen that ASTM recently published a new standard for spill bucket and sump testing <https://www.astm.org/Standards/E3225.htm>. We received several inquiries on whether this new standard meets the requirements of the federal UST regulation for spill prevention equipment or sump testing (40 CFR § 280.35). The 2015 UST regulation requires spill prevention and sump testing be done using a liquid, pressure, or vacuum test. The ASTM E3225-20 is visually based, and while a thorough visual check can always be beneficial, **these procedures do not meet the requirements in 40 CFR § 280.35.**

If owners and operators follow this standard and do not perform the correct testing requirements, they will be in violation of the regulatory requirements, and subject to appropriate enforcement. I am personally very concerned that some in our community might get confused by this. Please help us in spreading the word that these procedures do not meet the requirements in 40 CFR § 280.35.

To address this matter, we added two new questions and answers to OUST's web-based *UST Technical Compendium about the 2015 UST Regulation* at <https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulation#spillbuckets> (click on "Spill buckets, under dispenser containment sumps, containment sumps").

We appreciate the continued dedicated effort and work by state and tribal UST programs; owners and operators; and others in the UST community in meeting all regulatory compliance requirements. As always, I thank you for all that you do to help us keep our environment safe from petroleum UST releases, which are a leading source of groundwater contamination.

If you have questions about this, or feedback on what EPA can do to better assist you in achieving compliance, please contact me or Tony Raia (raia.anthony@epa.gov; 202-566-1021).

Thanks! - Carolyn

Carolyn Hoskinson, Director

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