



# Enforcement of UST Regulations

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## Coming 2018!



*December 2017*

EPA regulations put in place in 2015 will be fully enforced starting October 13, 2018. Agents must be proactive and notify their clients of this and explain to them how these regulations affect their businesses. You can reference the 40-page EPA booklet outlining the regulations by following this link. <https://www.epa.gov/ust/musts-usts>





For your convenience, I've highlighted a few key regulations below.

The following regulations will be enforced beginning October 13, 2018:

### Sump and Overfill Prevention Regulations

All tanks installed **on or before** October 13, 2015 ever receiving deliveries greater than 25 gallons

- 1.) Must begin testing spill buckets every three (3) years AND
- 2.) Must begin inspecting overfill prevention equipment every three (3) years.

All tanks installed **after** October 13, 2015 ever receiving deliveries greater than 25 gallons

- 1.) Must test spill buckets every three (3) years AND
- 2.) Must inspect overfill prevention equipment every three (3) years.



\* Spill containment and containment sump testing is not required if the containment is double-walled and uses periodic interstitial monitoring. \*

### Release Detection Regulations

- All facilities must begin **annual** Release Detection Equipment operability testing.
- Pressurized Piping installed **on or before** April 11, 2016, must begin testing containment sumps used for piping interstitial monitoring every three (3) years.
- Suction Piping Installed **on or before** April 11, 2016, must test containment sumps used for piping interstitial monitoring every three (3) years.
- Facilities using Vapor or Groundwater Monitoring must begin keeping a record of a site assessment for as long as the method is used.

### Walkthrough Inspection Regulations

- All Facilities are subject to 30-day **AND** annual walkthrough inspections.

### Compatibility

- Must maintain records demonstrating compliance with compatibility requirement for systems storing certain regulated substances (see pages 23-24 for regulated substances).

### Operator Training

- All facilities must have designated and trained Class A, B, and C operators.

### Walkthrough Inspection Regulations

- All facilities must test or inspect components within 30 days after a repair to spill or overfill prevention equipment or secondary containment areas.

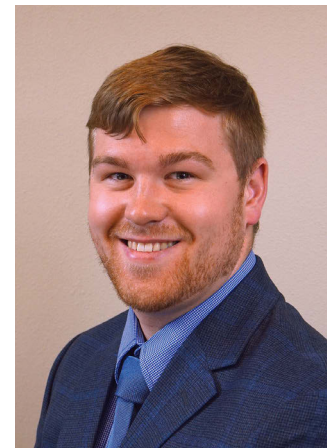


For more information, follow this link to our source material:

<https://www.epa.gov/ust/musts-usts>

### MARKET ACCESS UST/AST Carriers that ARMR has access to:

- Berkley/Nautilus
- Crum & Forster
- CHUBB
- Colony Specialty
- Freberg
- Liberty
- Great American
- Aspen
- Philadelphia



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### MINIMUM PREMIUM & TARGET MARKET

Minimum premiums start as low as \$300 for brand-new tanks. Don't think of only gas stations as potential buyers of storage tank pollution liability. Any business with a storage tank is a potential opportunity. In addition, private insurance is a great mechanism to demonstrate Financial Responsibility for tank owners.