

Compliance Options for Tank Leak Detection and Integrity Assessment

September 14, 1998

The detailed table below is intended for implementing agencies, which may share its contents with owners and operators. The table shows what types of tank leak detection methods and alternative (without human entry) integrity assessment methods meet both EPA regulations **and** the requirements of implementing agencies that have followed EPA guidance on integrity assessment. Leak detection for piping is **not** addressed. Responses in the 1st and 2nd columns do not depend on the date that an assessment was done. If any of the conditions in the first 4 columns change, then skip to the appropriate row. Remember that tanks can always use monthly leak detection monitoring under 280.43(b) through (h).

If your agency follows EPA guidance, when conditions match these,				then for compliance the tank can use:		
Was tank installed with corrosion protection or was cathodic protection added (and if so, when)?	Does piping have corrosion protection and is spill and overfill protection in place?	If upgraded, is assessment 1 of following: human-entry inspection, leak detection for tanks less than 10 years old at the time, or meeting Option A or B*?	If upgraded with cathodic protection, did assessment procedure meet former ASTM ES 40?	Alternative integrity assessment (for compliance w/ 12/22/98 upgrade req't)	For Leak Detection: Inventory Control (or, if applicable, Manual Tank Gauging) + Tightness Testing, at least	
					Annually	Every 5 Years
N	Y or N	Y or N	Not App.	Not App.	Through 12/22/98	N
Y (anytime)	N	N	N	N**	Through 12/22/98	N**
		N	Y	Y if done on or before 3/22/98; N if after	N	N
		Y	Y or N	Y	Through 12/22/98	N
Y (on or before 12/22/88)	Y	N	N	N**	Through 12/22/98	N**
		N	Y	Y if done on or before 3/22/98; N if after	N	N
		Y	Y or N	Y	-->	Thru 12/22/98
Y (after 12/22/88)	Y	N	N	N**	Through 12/22/98	N**
		N	Y	Y if done on or before 3/22/98; N if after	N	N
		Y	Y or N	Y	--->	10 yrs after tank upgraded w/ corr. prot.

* Option A or B (from EPA's 7/25/97 guidance): Option A is accordance with a current standard code of practice developed by a nationally recognized association or independent test lab. In Option B, a procedure must meet certain performance criteria in a third-party evaluation (see the "List of Integrity Assessment Evaluations," available from EPA OUST, for example procedures).

** Unless an alternative integrity assessment method was determined by implementing agency to be no less protective under 40 CFR § 280.21(b)(2)(iv), the assessment method and thus the upgrade do not meet 12/22/98 standards.