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Underground Piping and the 2014 UST Regulations...Are You Ready?

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Agenda

- **Background**
- **UST Regulations - History and Piping Implications**
- **2014 Regulations vs. Current**
- **Are You Ready?**
- **What about 2024?**
- **Summary and Questions**



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Background

■ National Oilwell Varco (NOV)

- Public company around since 1841, with focus on Oil & Gas Industry
- \$20B+ in 2012 Revenue
- Fiber Glass Systems is a \$800M division of NOV
 - Oil & Gas
 - Marine & Offshore
 - Chemical & Industrial
 - Fuel Handling

■ Fuel Handling Market

- Piping products UL Listed since 1968
- Plants in Texas and Arkansas
- Two product lines Red Thread IIA (Smith) and Dualoy (Ameron)
 - Size-over-size double containment
 - Coaxial double containment (Dualoy 3000/LCX)

■ Brief Bio



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UST Regulations – A Brief History

- **Goal of Regulations – to prevent the release of UST contents which may cause contamination of soil and water supplies.**
- **1984: Subtitle I was added to the Solid Waste Disposal Act – required EPA to protect the environment and human health from UST releases.**
- **1988: EPA finalized UST Regulations and set a deadline of December 1998 for compliance.**
- **2005: Energy Policy Act amended Subtitle I of the Solid Waste Disposal Act to include requirements for operations training, inspections, secondary containment, and financial responsibility.**
- **2014: Revision to UST Regulations – due out early 2014.**





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UST Regulations – Piping Implications

- **Underground piping associated with USTs are considered UST equipment, and thus are regulated by the EPA.**
- **Secondary containment on fuel piping systems was required by the 2005 revisions to Subtitle I.**
- **The 2014 UST Regulations will focus on proper operation and maintenance of secondary containment systems.**
 - Interstitial Integrity will be point of emphasis!



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2014 UST Piping Regulations vs. Current

- **General** – New Regs are designed to strengthen the current Regs and increase the emphasis on proper O&M of UST equipment. This includes all USTs, including those on Indian Land.
- **Secondary Containment (SC):**
 - Current – Interstitial Monitoring not always required.
 - Proposed – SC and Interstitial Monitoring for all new and replaced tanks AND piping (including petroleum), except for safe suction piping. When 50% or more of a system's piping is replaced, all of the piping must be replaced. Implementation is immediate.
 - Comments – To reduce risk, focus on piping materials a proven record of interstitial integrity testing (think California)



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2014 UST Piping Regulations vs. Current – cont.

■ **Operation & Maintenance (O&M):**

- Current – NO Interstitial Integrity Testing.
- Proposed – All systems must perform integrity testing on their interstitial area once every 3 years, or use continuous monitoring methods.
Implementation will be phased in over 3 years based on tank installation dates.
- Comments – To reduce risk, focus on piping systems with a proven record of interstitial monitoring (again....think California)



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2014 UST Piping Regulations vs. Current – cont.

■ **State Program Approval (SPA):**

- Current – Regs include criteria for states choosing to obtain SPA.
- Proposed – All SPAs must include the proposed EPA Regulation changes. States have 3 years to submit revised SPA package.
- Comments – SPA regulatory tightness varies by state. Many states have already revised, or are in the process of revising, their Regulations to meet the proposed EPA regulations.



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So What?

- **If you have not started to prepare, START NOW!**
- **Consult others who have already taken the next step....and beyond.**
- **Work with your state regulators.**
- **Be visionary! Focus not only on the 2014 Regs, but think about what may come down the road.**
- **Consider Total Cost of Ownership. Consider long term system performance and O&M costs.**
 - **What is the cost of not getting it right the first time?!**



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What about 2024?

- **2014 = periodic testing**
- **What will be required in 2024...Continuous Monitoring? What else are we to expect?**
- **Consider what your UST system will be carrying?**
 - Are the materials you select now going to cut it with tomorrow's fuels?
- **“I will be retired by then” is NOT an acceptable answer!!!**



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Thank you very much!!!



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