

SPCC - Integrity Testing

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Integrity Testing Coalition Letter

- 2006 compliance dates are fast approaching.
- Urge EPA to revise rule to allow visual only inspection for shop-built tanks that are elevated, on concrete/liners, within buildings, and portable containers.
- Alternatively, EPA should develop guidance that alleviates the need to have PE make equivalency determinations for tanks on concrete and tanks within buildings. EPA agreed to do this under the PMA settlement agreement.
- EPA should incorporate STI's "risk-based" criteria in rule revisions or guidance since STI standard may take longer than expected.
- EPA's rule revisions or guidance should specify that equivalency determinations will not be needed when the revised STI standard is used.

STI Committee

- Risk-based revisions to the SP001 Integrity Testing Standard
- Small tanks/portable containers – visual only
- Larger tanks (low risk) – visual plus some other type of external testing
- Larger tanks (higher risk) – visual, plus internal integrity testing
- Helpful checklists
- Schedule – Summer 2005 - hopefully
- EPA concerns with concrete, how will this be handled in STI standard and guidance?

| Tank size, gallons | | Tanks with secondary containment, and Release detection system or release prevention barrier or double bottom, double-wall or elevated | Tanks with secondary containment only, but without release prevention and without release detection | Tanks without secondary containment, and/or high risks |
|---|---------------|--|---|--|
| Shop built tanks | 0-1100 | O | O | O, E&L(10) |
| | 1101-5,000 | O | O, E&L(10) | O, E&L(5), I(10) or O, E(5) & L(2) |
| | 5,001-30,000 | O, E(20) | O, E(10)& I(20) or O, E(5) & L(10) | O, E&L(5), I(10) or O, E(5) & L(1) |
| | 30,001-50,000 | O, E(20) | O, E&L(5), I(15) | O, E&L(5), I(10) |
| Field erected 50,000 - 300,000 max 30 foot diameter | | O, E(5), I(20) | O, E&L(5), I(15) | O, E&L(5), I(10) |
| Portable containers | | O | O | O ** |