

UST PROGRAM'S 30<sup>TH</sup> ANNIVERSARY  
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Another advantage of getting older is having great long-term memory—just don't ask me what I did with my car keys an hour ago. For example, I can remember exactly where I was 30 years ago this month when I received word that President Reagan signed amendments to the Resource Conservation and Recovery Act (RCRA). Subtitle I of those amendments specifically provided for regulation of underground storage tank (UST) systems. The Environmental Protection Agency's Office of Underground Storage Tanks (OUST) was created the following year (1985) to carry out the Congressional mandate to develop and implement a new regulatory program for USTs. It resulted in the most comprehensive regulatory program PEI members have ever participated in.

Leaking tanks became a problem before 1984. PEI predicted in 1975 that state and federal controls related to tank and piping leaks would proliferate. At about the same time, the American Petroleum Institute's (API's) Operations and Engineering Committee recognized that UST leaks presented a growing industry problem and formed a task force to recommend procedures for detecting and dealing with them. By 1981, less than 10 percent of all USTs in the ground were protected from corrosion.

Emphasis shifted in the early 1980s from tank regulations for safety reasons (i.e., fire codes) to regulations for protecting the environment and public health. Pressure to deal with the impact of leaking USTs on groundwater mounted when *60 Minutes* aired a disturbing segment on leaking underground service station tanks. Shortly after that, Congress stepped in with the 1984 Subtitle I RCRA amendments.

There were over two million USTs in 1984. Many of them were bare steel that were corroding and leaking fuel into the ground. When President Reagan signed the law, more than 85 percent of the USTs were still made of unprotected steel. By 1988, somewhere from 10 to 48 percent of existing tanks failed a tank tightness test, depending on which study you believed. And when you consider that from 8 to 20 percent of all USTs had releases, UST regulators back then had their hands full.

The U.S. EPA's UST program has made significant contributions to the environment during the last 30 years. The program's accomplishments are real, and there is much that regulators and the regulated community can point to with pride.

Part of the reason this governmental program works so well after three decades is because Ron Brand and other founders of the UST program involved everyone in the process of protecting our environment from UST releases. States, territories, tribes, industry, owners/operators, service providers, equipment manufacturers and trade associations were called partners. PEI

and its members were treated that way back then and continue to feel that way today. This is a unique program with unique relationships that has produced quantifiable results.

I think successful managers and leaders should continuously focus on what can be, rather than what is. And I also believe that the best leaders are always focused on improving. From the equipment and contractor side of this unique partnership—and in that spirit—this is what I see still needs to be addressed to make a great UST program even greater:

- Let's figure out what is causing the metal components of our UST systems to corrode in the presence of ultra low sulfur diesel fuel.
- Let's get that last 25 percent of underground tank systems in the U.S. into compliance with release prevention and leak detection requirements. That will reduce the number of newly confirmed releases.
- Let's work together to determine why equipment is deteriorating in sumps containing ethanol and/or ethanol vapors.
- Let's find ways to clean up the releases in the backlog before state cleanup funds sunset or are diverted.
- And let's kick off an inspection and testing program that will identify equipment that no longer works as it was supposed to work.

Here's to another 30 years. Let's continue the good work