

Independent Oil Marketers Association of New England

Mass DEP UST Installation Testing Requirements

The Massachusetts Department of Environmental Protection (Mass DEP) regulates the installation of Underground Storage Tanks (UST) under 310 CMR 80. Currently there is a requirement that mandates tanks and piping to be tightness tested after being backfilled but prior to putting regulated substance into the tank. This is a new requirement that was put into place by the Mass DEP without the opportunity for public comment.

For years, the installation process has been to perform air tests on tanks and piping prior to backfilling the UST system. Once the UST system has been backfilled, a regulated substance would be put into the tank and a tightness test would be performed on the tank and piping.

The US EPA requires that the installation of USTs be conducted in accordance with a code of practice developed by a nationally recognized organization. The Petroleum Equipment Institute (PEI) and the American Petroleum Institute (API) are nationally recognized organizations that have developed standards for the installation and testing of USTs. Neither PEI or AP require tightness testing prior to introducing regulated substances into the tank. There have been no releases from newly installed USTs during the testing process in the past.

UST owners will incur additional costs and time during the installation process without any environmental benefit. This requirement should be removed from the existing UST regulations.

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