



Reminder: Groundwater Monitoring and Vapor Monitoring as Sole Methods of Tank Leak Detection will Sunset 10/13/2023

Effective since October 13, 2018, an end date has been in place for both Groundwater Monitoring and Vapor Monitoring being used as methods of tank leak detection. See 41 Ill. Adm. Code 175.630(d)(10) and (e)(11). Systems using either method as tank leak detection will need to convert to another form of tank leak detection as listed in 175.630. UST systems with only Groundwater Monitoring or Vapor Monitoring in place for tank leak detection on 10/13/2023 will be considered to be operating without approved leak detection, and shall be shut down until that is addressed, pursuant to 175.720(b).

Meanwhile, a requirement has been in effect as of 10/13/2018 to have documentation of a site assessment available for those sites using Groundwater Monitoring and Vapor Monitoring for tank leak detection. The details of this requirement are at 175.650(e)(2)(F). In addition, the already-required monthly inspection logs must continue to be maintained while the methods are still in use.

Reminder: Containment Sumps Required by 10/13/2028

There are facilities in Illinois in operation with pressurized piping without secondary containment in areas at tank tops and beneath dispensers. That means that anything, from a small steady drip to a significant release of product, will immediately enter the environment, since there is no equipment there to contain the liquids until the piping can be repaired. While this was once allowed, it is obviously an unsound practice which poses a clear risk for serious harm in the event of a large and/or prolonged leak.

Since 5/1/2003, this has not been allowed for new piping installations, or for the replacement of entire runs of piping, or when piping is broken and work is done at or below the shear valve. Piping systems still without secondary containment for piping above tanktops and beneath dispensers are "grandfathered," and will continue to be until 10/13/2028, barring any of the conditions listed above. On that date, those systems still using "direct bury" piping without secondary containment at tanktops and beneath dispensers will be cited for the violation on an NOV. The owners/operators will then have 60 days to address the noncompliant condition. Failure to do so will result in the UST system at the facility being red tagged.

There will be no extensions allowed for those who fail to meet the 10/13/2028 deadline to install secondary containment at piping areas above tanks and beneath dispensers.