

Guidance on Spill Bucket/Containment Sump Testing and Spill Reporting

The Environmental Protection Agency (EPA) requires that (1) spill catchment basins (i.e., spill buckets) and (2) containment sumps (i.e., tank-top, transition, and under-dispenser containment) used for interstitial monitoring of piping, be periodically tested to ensure that the equipment is liquid-tight. (40 CFR Part 280.35). The initial test was due by October 13, 2018.

Test Procedures

Spill Bucket Test Options

Available test procedures	Test options
PEI RP 1200 – Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment	<ul style="list-style-type: none"> • Hydrostatic testing • Vacuum testing
Spill bucket manufacturer	Model-specific options may include: <ul style="list-style-type: none"> • Hydrostatic testing • Vacuum testing • Pressure testing • Interstitial monitors for double-walled systems

Containment Sump Test Options

Available test procedures	Test options
PEI RP 1200 – Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment	<ul style="list-style-type: none"> • Hydrostatic testing
Containment sump manufacturer	Model-specific options may include: <ul style="list-style-type: none"> • Hydrostatic testing • Vacuum testing • Pressure testing • Interstitial monitors for double-walled systems
Implementing agency	<ul style="list-style-type: none"> • Low-level hydrostatic testing Note: testing procedure available on the EPA’s website at: https://www.epa.gov/ust/low-liquid-level-ust-containment-sump-testing-procedures .

Spill Reporting Requirements

Tank owners and operators are required to report spills and suspected spills in accordance with 6 NYCRR 613-2.4.

A suspected spill/leak includes (but not is limited to) unusual operating conditions such as water or petroleum in any containment device/equipment. Any test that demonstrates that the containment device/equipment (e.g., a containment sump or spill bucket) does not have integrity and therefore would allow petroleum to escape into the environment, is considered a suspected leak. Suspected spills/leaks are required to be reported to the DEC Spill Hotline within two hours of discovery unless the tank system equipment is found to be defective but not leaking and is immediately repaired or replaced.

The facility/tank owner/operator must report any test results which indicates that there has been a spill or a suspected spill to the DEC Spill Hotline. Contractors performing the test may also report the test results for the facility/tank owner/operator to the DEC Spill Hotline themselves.

Procedure for Failed Inspections/Tests

Pre-Testing Device/Equipment Inspection

Any spill bucket or containment sump that does not have integrity (based on a visual inspection prior to the test) must be reported to the Spill Hotline as a suspected spill within two hours of discovery. The test should not be performed until the spill bucket or containment sump is repaired or replaced.

Failed Test Results

Any failed test result is considered a suspected leak, which must be reported to the Spill Hotline within two hours after the test was completed.

Repairing or Replacing Devices

Spill buckets must be repaired or replaced within 30 days of failing a visual inspection or test failure.

Containment sumps must be repaired or replaced within 30 days of failing a visual inspection or test failure, unless DEC directs otherwise.

The integrity of spill buckets and containment sumps must be tested immediately upon being installed or replaced and within 30 days after being repaired.