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ASTSWMO STATEMENT ON ASTM E3225-20 AND TESTING OF SPILL PREVENTION EQUIPMENT AND CONTAINMENT SUMPS REQUIREMENTS IN 40 CFR § 280.35

In March 2020, ASTM released E3225-20, Standard Practice for Performing a Liquid Test of Spill Prevention Equipment and Containment Sumps Used for Interstitial Monitoring of Piping by Visual Examination. ASTM E3225-20 provides a practice for inspection of spill prevention equipment and containment sumps by visual examination ("naked eye") that does not use vacuum, pressure, or liquid testing.

The U.S. Environmental Protection Agency (EPA) released guidance in March 2020 to answer questions about whether ASTM E3225-20 met federal regulations that require periodic testing of spill prevention equipment and containment sumps per 40 CFR § 280.35. The U.S. EPA has determined that:

(1) owners and operators cannot use ASTM E3225-20 to meet these testing requirements; and

(2) States and Territories with state program approval (SPA) cannot allow their owners and operators to use ASTM E3225-20 to meet testing requirements for spill bucket and sumps.

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) agrees with U.S. EPA's guidance. The standard practice and procedures outlined in ASTM E3225-20 do not meet the testing requirements in 40 CFR § 280.35 and are less protective of human health and the environment than the requirements listed in 40 CFR § 280.35(a)(1)(ii).

References:

- ASTM E3225-20, Standard Practice for Performing a Liquid Test of Spill Prevention Equipment and Containment Sumps Used for Interstitial Monitoring of Piping by Visual Examination, ASTM International, West Conshohocken, PA, 2020, www.astm.org.

- Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST). 40 CFR § 280 (2019). https://www.govinfo.gov/app/details/CFR-2019-title40-vol29/CFR-2019-title40-vol29-part280

- U.S. Environmental Protection Agency. UST Technical Compendium about the 2015 UST Regulation (2020). https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulation#spillbuckets

Approved for release by the ASTSWMO Board of Directors on April 29, 2020.
Revised and Retained by the ASTSWMO Board of Directors on October 22, 2025.

Please note: Since publishing this Position Paper, ASTM has updated the Standard Practice for Performing Visual Examination of Containment Sumps (now ASTM E3225-24). The U.S. Environmental Protection Agency (U.S. EPA) has not issued guidance on this updated standard. Consistent with U.S. EPA practice, ASTSWMO will continue to cite the 2020 ASTM Standard.