

Emergency Generator Tank System Line Leak Detector Requirements California Code of Regulations, Title 23, Division 3, Chapter 16, Section 2636(f)(5)

Are automatic line leak detectors (LLDs) required on underground pressurized piping connected to emergency generators tank systems (EGTSs)?

Yes. Underground storage tanks (USTs) defined as EGTSs in Health and Safety Code, division 20, chapter 6.7, section 25281.5(c) that are connected to underground pressurized piping are required to be equipped with an LLD in accordance with California Code of Regulations, title 23, division 3, chapter 16, section 2636(f)(5). The two new LLD requirements for EGTSs are as follows:

1. Underground pressurized piping connected to an EGTS installed on or after October 1, 2018, must be equipped with an LLD at the time of installation. (§ 2636(f)(5)(B).); and
2. Underground pressurized piping connected to an EGTS installed prior to October 1, 2018, must be equipped with an LLD no later October 13, 2018. (§ 2636(f)(5)(A).)

Is an LLD always required on an EGTS?

No. An LLD is not required if the EGTS is constructed with:

1. Unburied fuel piping that is visually inspected each time the tank system is operated, but no less than monthly, and a log of the inspection results is maintained. (Health & Saf. Code, div. 20, ch. 6.7, § 25281.5(b)(3).); or
2. Piping that is not underground or pressurized. (§ 2636(f)(2).)

Are LLDs required to restrict or shut off flow of product through the piping connected to EGTSs when a leak is detected?

No. In lieu of restricting or shutting off the flow of product through the piping, the LLD may activate an audible and visual alarm when a leak is detected. (§§ 2636(f)(5)(B) & 2666(f).)

Is periodic testing required for LLDs on EGTSs?

Yes. LLDs are required to be certified for proper operation and calibrated at least once every 12 months. (§§ 2638(a) & 2666(f).)

Additional requirements for periodic testing include:

1. Owners or operators must notify their Unified Program Agency at least 48 hours prior to conducting the LLD test. (§ 2638(e).); and

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2. Certification of the LLD must be performed by a qualified UST service technician with training or certification by the manufacturer of the LLD equipment being certified or comparable training or certification if training or certification by the manufacturer of the LLD does not exist. (§§ 2638(b) & 2715(f)(2)(B) & (E).).

How is the periodic testing of the LLD documented?

The results of the certification must be recorded on the *Monitoring System Certification Form* (§ 2638(c).) The completed *Monitoring System Certification Form*, must be submitted to the UPA within 30 days of completion of the monitoring system certification. (§ 2638(d).) The submission may be submitted by hand-delivery, mail, facsimile, or other electronic methods.

If there are further questions regarding the EGTS LLD requirements please contact UST Leak Prevention Unit staff at:

https://www.waterboards.ca.gov/water_issues/programs/ust/contacts/ust_staff.shtml.

Documents with Superseded Content	
<i>Local Guidance (LG) Letter -159: Annual Underground Storage Tank Compliance Inspection Handbook</i>	May 2011
<i>Overview of UST Containment and Monitoring Requirements</i>	June 2008
<i>UST Facility Inspection Handbook</i>	August 2000
<i>UST Regulatory Compliance / Inspection Training</i>	September 2004
<i>Understanding Line Leak Detection Systems</i>	June 2008