



UST Program Update September 2022

Corrosion Protection on Metal Components

Currently the underground storage tank (UST) universe has components constructed of metal in contact with soil that had corrosion protection coatings applied by the manufacturer. Many of these coatings no longer provide corrosion protection, and therefore do not meet the corrosion protection requirements of California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), sections 2631(d), 2635(a), 2635(b), and 2636(b). Since these components are often poured into concrete or buried under other surface materials, it is difficult to determine if they are meeting the corrosion protection requirements.

During a compliance inspection, if corrosion is visible on the inside of metal components described above, such as spill containers, under dispenser containment, or jacketed single-walled steel tanks, the owner or operator must demonstrate to the satisfaction of the Unified Program Agency (UPA) that the metal components in contact with backfill materials meet the corrosion prevention requirements of UST Regulations. UST Regulations require systems to be properly protected against corrosion to prevent the possibility of release, structural weakening, and other damage. Further, UPAs shall not approve a repair to corroded components unless it can be demonstrated that the repair will prevent a release or structural failure per UST Regulations, section 2660(k).

For additional information regarding corrosion protection on metal components, contact: Mr. Austin Lemire-Baeten at (916) 327-5612, or Austin.Lemire-Baeten@waterboards.ca.gov.

Request to Submit Abstracts: 25th Annual CUPA Conference

The California CUPA Forum is requesting abstracts for the [2023 CUPA Conference](#)¹. This will be the first in-person conference in several years, and provides training related

¹ <https://calcupa.org/submit-abstracts/index.html>

to enhancing the Unified Program and improving consistency between the CUPAs and participating agencies throughout California.

The State Water Resources Control Board (State Water Board) realizes that the time required to prepare and present at the conference is a substantial commitment by both CUPA management and the individual presenting. Presenters receive International Code Council credit hours equal to the amount of time of their presentation. CUPAs that continue to meet their obligations in addition to providing presentations should be recognized for their outstanding achievements.

The California CUPA Forum has requested abstracts be submitted by September 9th, 2022. Please note that speaker biographies must be submitted prior to the abstract submittal.

For additional information regarding the 25th Annual CUPA Conference abstracts, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Equipment Testing Intervals Following Repairs

State Water Board staff have fielded questions regarding testing, certification, or inspection (testing) schedules for repaired components. Repaired UST system components are required to be tested within 30 days of repair. Tests following repair procedures do not change the original inspection frequency for that component unless all like components are fully tested after the repair is completed. For example, if one overfill prevention component was repaired and subsequently tested, this, and all other overfill prevention components in the system are still subject to the original, 36-month test interval. However, if all overfill prevention components are fully tested at the time of the repair, this essentially moves the test date forward and the next periodic test is due 36 months later in accordance with UST Regulations, section 2620(e).

For additional information regarding testing intervals following repairs, contact: Mr. Austin Lemire-Baeten at (916) 327-5612, or Austin.Lemire-Baeten@waterboards.ca.gov.

Safe Suction Piping Outreach

State Water Board staff will be reaching out to UPAs to confirm which systems in their jurisdiction properly utilize safe suction piping construction. While single-walled USTs must be permanently closed before January 1, 2026, single-walled safe suction pipe connected to secondarily contained USTs installed before July 1, 2003 does not require permanent closure. It is imperative UPAs confirm these systems' piping meets the requirements for UST Regulations, section 2636(a)(3). Safe suction piping must

operate at less than atmospheric pressure, be sloped such that all contents in the pipe drain back to the storage tank if suction is released, have no valve or pumps installed in the suction line below grade, and have an inspection method that readily demonstrates compliance with these requirements. The State Water Board will send a list to each UPA with safe suction pipe within their jurisdiction as listed in the California Environmental Reporting System (CERS). UPAs are requested to respond to the State Water Board within 90 days.

For additional information regarding safe suction piping outreach, contact:
Mr. Austin Lemire-Baeten at (916) 327-5612, or
Austin.Lemire-Baeten@waterboards.ca.gov.

USTs with No Accepted Submittals

A recent update to the CERS database in August 2022 includes a new UST Facility Search report. This report lists all sites where there has been a UST submittal or a reported inspection regardless of whether the site's UST Reporting requirement is set to Applicable or Not Applicable. However, sites without accepted submittals may get excluded from CERS reports if their data is not properly entered or managed. Sites that may have abandoned UST systems may have been reported previously and could be any of the following scenarios:

- (a) Sites where the UST reporting requirement set to "Not Applicable", there is a non-accepted UST submittal, and the submittal does not include the UST Facility Operating Permit Application type of action.
- (b) Sites where the UST Reporting requirement is set to "Not Applicable" and there is one or more reported UST inspection.
- (c) Sites where the UST Reporting requirement is set to "Applicable", but there are no UST submittals or inspections.

For example, a tank will not be included in any CERS report if the latest submittal was rejected by the UPA, no follow-up submittal is made, the UST Reporting requirement is set to Not Applicable, and CERS shows no UST inspections were reported. UPAs should check which systems in their jurisdiction do not have any accepted CERS UST submittals and require the owner or operator to submit a new submittal for acceptance.

For additional information regarding USTs with no accepted submittals, contact:
Mr. Dan Firth at Daniel.Firth@waterboards.ca.gov.

Internal Stand Alone Tank Systems

As the drive to remove and replace single-wall USTs accelerates, owners and operators are seeking out different solutions for replacing their existing systems. The State Water

Board issued a [letter in January 2015](#)² describing Internal Stand Alone Tank Systems (ISATS) and their applicability for owners of single-walled USTs. For the ISATS to be a valid method for replacing the original tank, the original UST must be permanently closed in accordance with UST Regulations, section 2672. The new system is subject to Health and Safety Code, chapter 6.7 (H&SC), section 25290.1(e) and is required to be monitored through vapor, pressure, or hydrostatic pressure methods. The ISATS qualifies as a newly constructed tank, therefore individuals installing the system must possess the appropriate licensing and certifications pursuant to UST Regulations, section 2715 and [Local Guidance letter 167-2](#)³. Post-installation enhanced leak detection testing in accordance with H&SC, section 25290.1(j) is also required before the new tank can be operational. Additional details, restrictions, and requirements for using these systems can be found in the State Water Board's letter from January 2015.

For additional information regarding the ISATS, contact:
Mr. Austin Lemire-Baeten at (916) 327-5612, or
Austin.Lemire-Baeten@waterboards.ca.gov.

² https://www.waterboards.ca.gov/ust/docs/tank_tech.pdf

³ https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg-167-2.pdf