

SOC Matrices for California Part I - Release Detection Matrix

A release detection method is present and operational. The release detection system meets minimum Federal performance standards. (See Requirements Below)

If underground storage tanks (USTs) are in temporary closure, yet still contain product, release detection requirements are being met. (See Requirements Below)

The Local Agency has been notified of suspected releases as required. (Cal. Code Regs., tit. 23, § 2650.) [40 C.F.R. § 280.40(b).]

Release detection records are available. (To be in significant operational compliance, must have records for the two most recent consecutive months and for 8 of the last 12 months.) [40 C.F.R. §§ 280.41(a), 280.45(b).]

Hazardous substance USTs are double-walled. (Cal. Code Regs., tit. 23, § 2631, subd. (a).), [40 C.F.R. § 280.42(b).]

TANK Leak Detection Methods [40 C.F.R. § 280.43.]

Interstitial Monitoring [includes traditional and vapor, pressure, and hydrostatic (VPH) systems]

Sensors are properly located to detect a release. (Cal. Code Regs., tit. 23, §§ 2630, subd. (d), 2632, subd. (c), 2641, subd. (a) OR Health & Saf. Code, § 25290.1 subd. (e)), [40 C.F.R. §§ 280.43(g)(1), 280.43(g)(2), 280.40(a)(2).] AND

Sensors are operational. (Cal. Code Regs., tit. 23, § 2638 OR Health & Saf. Code, § 25290.1 subd. (e).)

Statistical Inventory Reconciliation (SIR) [40 C.F.R. §§ 280.43(h)(1)-(2), 280.41(a).]

SIR is performed properly. (Cal. Code Regs., tit. 23, §§ 2646.1, 2643, subd. (b)(3), 2643.1.) AND

Biennial 0.1 gph tank integrity test performed properly. (Cal. Code Regs., tit. 23, § 2646.1, subd. (g).) AND

Non-passing results are reported and properly investigated. (Cal. Code Regs., tit. 23, §§ 2646.1, subd. (d), 2646.1, subd. (f), 2646.1, subd. (h).)

Automatic Tank Gauging [40 C.F.R. §§ 280.40(a)(1)-(2), 280.43(d)(1).]

0.2 gph monthly tank gauging test performed. (Cal. Code Regs., tit. 23, § 2643, subd. (b)(1).) OR

0.1 gph monthly tank gauging test AND manual inventory reconciliation properly performed. (Cal. Code Regs., tit. 23, § 2643, subd. (b)(2).)

Manual Tank Gauging (for USTs with 1,000-gallon capacity or less) [40 C.F.R. §§ 280.43(b)(1), 280.43(b)(3)-(5).]

Weekly manual tank gauging performed properly. (Cal. Code Regs., tit. 23, § 2645.) AND

If necessary, tank integrity test conducted. (Cal. Code Regs., tit. 23, § 2645, subd. (d)(3).)

Vadoze Zone (Vapor) Monitoring [40 C.F.R. §§ 280.43(e)(3), 280.43(e)(6).]

Vadoze zone monitoring system properly installed and monitored. (Cal. Code Regs., tit. 23, §§ 2647, 2649.)

Ground Water Monitoring [40 C.F.R. §§ 280.43(f)(2), 280.43(f)(7).]

Ground water monitoring system properly installed and monitored. (Cal. Code Regs., tit. 23, §§ 2648, 2649.)

Part I - Release Detection Matrix (continued)

PIPING Leak Detection Methods [280.44]

Double-Walled Pressurized Piping (includes traditional and VPH systems)

[40 C.F.R §§ 280.40(a)(2), 280.43(g)(1), 280.43(g)(2), 280.44(a).]

ALL three of the following:

Interstitial monitoring properly conducted. (Cal. Code Regs., tit. 23, § 2636, subd. (f)(1) OR Health & Saf. Code, § 25290.1 subd. (e).) AND

Line leak detector present and operational. (Cal. Code Regs., tit. 23, § 2643, subd. (c)(1).) AND

Line leak detector tested annually. (Cal. Code Regs., tit. 23, § 2641, subd. (j).)

And ONE of the following:

Line leak detector restricts or shuts off flow of product (for non emergency generator systems). (Cal. Code Regs., tit. 23, § 2636, subd. (f)(2).) OR

Line leak detector activates an audible or visual alarm and the monitoring system is checked daily (emergency generator systems only). (Cal. Code Regs., tit. 23, § 2636, subd. (f)(2).)

*Note: Federal regulations do not require lines that are interstitially monitored to also be tightness tested.

Double-Walled Suction Piping (includes traditional and VPH systems)

Interstitial Monitoring is conducted properly. (Cal. Code Regs., tit. 23, § 2636, subd. (f)(1) OR Health & Saf. Code, § 25290.1 subd. (e).) [40 C.F.R. §§ 280.40(a)(2), 280.43(g)(1), 280.43(g)(2).]

Single-Walled Pressurized Piping

BOTH of the following: [40 C.F.R. § 280.44(a).]

3.0 gph line leak detector present and operational. (Cal. Code Regs., tit. 23, § 2643, subd. (c)(1).) AND

Line leak detector tested annually. (Cal. Code Regs., tit. 23, §§ 2638, 2641, subd. (j).)

AND one of the following:

0.1 gph line integrity test performed annually. (Cal. Code Regs., tit. 23, § 2643, subd. (c)(3).) [40 C.F.R. §§ 280.40(a)(3), 280.41(b)(1)(ii).] OR

0.2 gph line integrity test performed monthly. (Cal. Code Regs., tit. 23, § 2643, subd. (c)(2).) [40 C.F.R. §§ 280.41(b)(1)(ii), 280.44(c).]

Single-Walled Suction Piping

0.1 gph line integrity test performed triennially (every 3 years). (Cal. Code Regs., tit. 23, § 2643, subd. (d).) [40 C.F.R. §§ 280.40(a)(3), 280.41(b)(2).]

Single-Walled Safe Suction Piping

Piping meets the safe suction requirements. (Cal. Code Regs., tit. 23, § 2636, subd. (a)(3)(A) – (D).) [40 C.F.R. §§ 280.41(b)(2)(i) – (v).]

Part II - Release Prevention Matrix

1. Spill container present and in good condition. (Cal. Code Regs., tit. 23, §§ 2635 subd. (b)(1), 2665.) [40 C.F.R. §§ 280.20(c)(1), 280.20(c)(1)(i), 280.21(d).]
2. The appropriate overfill prevention system is present and operational. (Cal. Code Regs., tit. 23, § 2635, subd. (b)(2), 2665.) [40 C.F.R. §§ 280.20(c)(1), 280.20(c)(1)(ii)(A), 280.20(c)(1)(ii)(B), 280.21(d).]
[Note: Overfill prevention system requirement may be waived for USTs that meet the requirements of California Code of Regulations, Title 23, section 2635(b)(3).]
3. Repaired tanks or piping are tightness tested within 30 days of the repair. (Cal. Code Regs., tit. 23, § 2661, subd. (f).) [40 C.F.R. § 280.33(d).]
4. If corrosion of steel tank or piping is discovered during an upgrade or repair, the tank and piping comply with the cathodic protection (CP) applicable design, certification, installation, inspection, and testing requirements. (Cal. Code Regs., tit. 23, § 2660, subd. (n).) [40 C.F.R. § 280.33(d).]
5. The cathodic protection system is performing adequately and provides continuous protection. (Cal. Code Regs., tit. 23, § 2635(a)(2).) [40 C.F.R. §§ 280.31(a), 280.31(b)(1).] (Note: CP is required whether tanks are in operation or in temporary closure. (Cal. Code Regs., tit. 23, § 2671, subd. (b).) [40 C.F.R. § 280.70(a).])

AND

The cathodic protection system is checked by a cathodic protection tester within 6 months of installation and at least every three years thereafter. (Cal. Code Regs., tit. 23, § 2635, subd. (a)(2)(A).) [40 C.F.R. § 280.31(b)(1).]

6. The impressed current cathodic protection system is checked every 60 days. (Cal. Code Regs., tit. 23, § 2635, subd. (a)(2)(A).) [40 C.F.R. § 280.31(c).]
7. Interior lined tanks are inspected within 10 years of lining installation and every 5 years thereafter; and the lining is compliant. (Cal. Code Regs., tit. 23, § 2663, subd. (h).) [40 C.F.R. § 280.21(b)(1)(ii).]
8. Buried metal tanks and piping (including fittings, connections, etc.) are corrosion protected. (40 C.F.R. §§ 280.20(a)-(b) [for USTs installed after 12/22/88], 280.21(a)-(c) [for USTs installed on or before 12/22/88].)
California Code of Regulations, Title 23, sections 2635(a)(2) and 2633(b) for new tanks
California Code of Regulations, Title 23, sections 2636(b) and 2663(b) for new piping
California Code of Regulations, Title 23, section 2662(c) for existing tanks
California Code of Regulations, Title 23, section 2666(b) for existing piping

Enclosure 2

>>> Liz Haven 10/02/03 04:20PM >>>

To Local Agencies: As you may know from discussions with inspector groups throughout the State earlier this year and with the CUPA Forum Board, USEPA has been working to revise the definition of Significant Operational Compliance (SOC). Per the attached email, we now have received direction from USEPA on reporting SOC, which will be on a voluntary basis for the Federal fiscal year October 1, 2003 – September 30, 2004.

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Previously, USEPA required reporting of the number of facilities inspected during the quarter that are in SOC with: (1) Leak Detection and (2) 1998 Upgrade Requirements. Please note that USEPA has now changed the names of these items to: (1) Release Detection and (2) Release Prevention. Furthermore, USEPA has provided guidance on assessment of SOC through their Release Detection and Release Prevention matrices. Please also note that USEPA has added a reporting requirement for the number of facilities inspected during the quarter that are in SOC with (3) both Release Detection and Release Prevention. USEPA has made it clear that the facility must be in compliance with all relevant SOC items to be counted as "in SOC."

Because of differences in the CA program from the Federal program, it was necessary to create a CA version. We did not receive any comments on the draft CA version that was sent out on July 25, 2003. Therefore we have finalized the CA SOC measures (attached) and are asking local agencies on behalf of USEPA to begin using the new CA SOC reporting measures on a voluntary basis. We are planning to make the necessary modifications to Report 6 as part of the CalEPA Technical Group on Instructions and Forms rulemaking in Title 27. USEPA will require the use of the measures beginning on October 1, 2004, and the Title 27 rulemaking should be completed by that time. Until the reporting becomes mandatory, please report SOC data ONLY if you use the new CA SOC reporting measures. USEPA will no longer accept data based on the old reporting guidelines. Thank you in advance for your cooperation.