
State Water Resources Control Board

August 14, 2023

To: Unified Program Agencies and Licensed Tank Testers

Repairing Single-Walled Product Piping

The State Water Resources Control Board is aware of instances where tank testers or other contractors are repairing single-walled product piping after the piping has failed testing. Beginning October 1, 2018, all buried single-walled piping, except for vent piping, vapor recovery piping, tank riser piping, and suction piping meeting the requirements of California Code of Regulations, title 23, division 3, chapter 16, (Underground Storage Tank (UST) Regulations) section 2636(a)(3), must meet the requirements of article 3 of the UST Regulations (article 3) when repaired or replaced (UST Regulations, section 2666(b)(2)). Single-walled product pipe that has been repaired on or after October 1, 2018, without upgrading with secondary containment and continuous monitoring is prohibited and must be immediately upgraded or permanently closed.

Line tightness testing on single-walled product piping includes the 0.1 gallon per hour (gph) tightness tests, enhanced leak detection (ELD) tests, and monitoring results performed by the line leak detector at 0.2 gph monthly or 0.1 gph annually. Repairs cannot be made to single-walled product pipe that receive failed test results from any of the above line tightness testing methods or have otherwise identified as having failed. Licensed tank testers may not re-test failed single-walled buried product pipe unless it has been upgraded to meet the secondary containment and monitoring requirements outlined in article 3. California Code of Regulations, title 23, division 3, chapter 17, section 2773(a) provides that a tank tester who willfully or negligently violate, cause, or allow for the violation of the provisions of chapters 16 and 17 may be liable civilly and in addition may be subject to administrative sanctions, including, but not limited to, notices of warning, letters of caution, fine assessments, denial, suspension, probation, or license revocation.

It is the Unified Program Agency's (UPA) responsibility to review single-walled product piping test results for failures. If failures have occurred, the UPA must take measures to ensure the failed pipe is removed from operation. UPAs cannot issue repair permits or allow for the repair of single-walled product piping. UPAs may allow the single-walled pipe to be upgraded to secondarily contained piping meeting article 3 requirements. Plans for permanent closure do not exempt the owner or operator from upgrade requirements.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

If you have questions regarding single-walled piping upgrades or testing requirements, please contact Kaitlin Cottrell at 916-319-0742 or Kaitlin.cottrell@waterboards.ca.gov.

Sincerely,



Tom Henderson
UST Leak Prevention Unit and
Office of Tank Tester Licensing Manager
State Water Resources Control Board

cc: [Via email only]

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