
State Water Resources Control Board

September 14, 2018

To: Unified Program Agencies and Other Interested Parties

ENHANCED LEAK DETECTION TESTING FOR HYDROSTATICALLY FILLED UNDERGROUND STORAGE TANKS

Recently the State Water Resources Control Board (State Water Board) became aware that hydrostatically filled underground storage tanks (USTs) installed on or after July 1, 2003 have not been tested using an independent third party evaluated enhance leak detection (ELD) test method as required by Health and Safety Code, division 20, chapter 6.7, section 25280 et seq. (H&SC), sections 25290.2(i) and 25290.1(j). Since becoming aware of this issue, State Water Board staff have been working with ELD testers to facilitate development and certification of a test method.

A third party evaluated ELD test method is now available for hydrostatically filled USTs. The test method, iotaVision™ by CGRS, Inc., completed the independent evaluation on July 17, 2018 by Ken Wilcox Associates. State Water Board staff have completed their review and this ELD test method is now listed in Local Guidance Letter 113.

Hydrostatically filled USTs installed¹ on or after September 14, 2018 shall use the appropriate third party evaluated ELD test method. To perform this test method, newly installed UST primary containments are required to be clean and dry. It is State Water Board staff's understanding that additional ELD test methods for hydrostatically filled USTs are being developed and/or under third party evaluation. The State Water Board will provide updates as additional test methods become available. The full list of ELD test methods can be found here:

https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lq113/methods/non-volumetric_tank_tightness_test_method-tracer_method_index.shtml

Unified Program Agencies (UPAs) should confirm selection of proper ELD testing during the plan review and permitting process. Additionally, for those hydrostatically filled

¹Installation date is the calendar day the tank was physically placed in the excavation.

USTs installed on or after July 1, 2003, but before September 14, 2018, owners, operators, and UPA inspectors should routinely review designated operator reports for interstitial alarms. Unusual operating conditions such as reoccurring alarms warrant further investigation and possible ELD testing.

For additional information regarding ELD testing, please contact Mr. Tom Henderson at (916) 319-9128 or tom.henderson@waterboards.ca.gov.

Sincerely,



Laura S. Fisher, Chief
UST Leak Prevention Unit &
Office of Tank Tester Licensing

cc: [Via email only]

Julie M. Osborn, Attorney III
Office of Chief Counsel
State Water Resource Control Board
julie.osborn@waterboards.ca.gov

Amantha Henkel, Supervisor
UST Enforcement Unit
State Water Resources Control Board
amantha.henkel@waterboards.ca.gov