

Spill Container Testing Requirements

California Code of Regulations, Title 23, Division 3, Chapter 16, Section 2637.1

Are spill containers required to be tested?

Yes. Spill containers used to comply with California Code of Regulations, title 23, division 3, chapter 16,¹ section 2635(b) must be periodically tested for tightness and after repairs.

[References cited: §§ 2637.1(a) & 2665(b).]

When are spill containers required to be tested?

Testing must occur at installation and at least once every 12 calendar months thereafter. In addition to periodic testing, testing is required within 30 days of the date of completion of a repair to the spill container to ensure it is tight. Repairs are required any time the spill container ceases to operate properly and causes the underground storage tank (UST) to be out of compliance with UST regulations. This document supersedes the guidance regarding the frequency of testing spill containers given in Local Guidance (LG) 166².

[References cited: §§ 2611, def. of “Repair” & 2637.1(a).]

How can testing due date be changed?

A UST owner or operator may change the due date of the test by performing testing early, but a test conducted late will not change the due date. A UST owner or operator that performs a test early may not return to the original due date and must perform the next test before the end of the new 12 calendar month period.

[Reference cited: § 2620(e).]

How is testing performed?

The test procedure used determines how the test is performed. At a minimum, the testing criteria must determine if the spill container is capable of containing the stored substance until it is detected and cleaned up. Manufacturer guidelines must be used if the guidelines meet the testing criteria. If manufacturer guidelines do not exist or do not meet the testing criteria, then an industry code or engineering standard, such as *Petroleum Equipment Institute’s Recommended Practices 1200* must be used. In the event that there are no manufacturer guidelines, industry codes, or engineering standards, or they do not meet the testing criteria, then a method developed by a California registered professional engineer must be used. Some examples of common test methods for testing spill containers can be found in Part II of the Spill Bucket

¹ All citations are from California Code of Regulations, title 23, division 3, chapter 16 unless specified otherwise.

² LG 166 is located at: https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/166.pdf

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Testing section of Enclosure 1 of LG 166. This document supersedes the guidance regarding how to perform a spill container test given in LG 166.

[Reference cited: § 2637.1(b).]

What determines a passing or failing result?

A passing result is when the spill container is determined to be capable of containing the stored substance until it is detected and cleaned up. The procedure used for testing determines the passing and failing criteria. If the spill container fails testing, the UST service technician must provide an explanation for why the equipment failed. This guidance supersedes clause c of subparagraph 1 of paragraph B of Part II of the Spill Bucket Testing section of Enclosure 1 of LG 166.

[Reference cited: § 2637.1(b).]

Who must perform testing?

The test must be performed by a qualified UST service technician with training or certification by: 1) the manufacturer of the spill container being tested; 2) the developer of the test equipment used; or 3) the developer of the test method used. If the above training or certification does not exist, then the UST service technician must have comparable training or certification. Comparable training or certification is training or certification in a testing process applicable to the device or system. For example, if a UST service technician will be testing a spill container using the manufacturer's guidelines and the manufacturer is no longer in business or does not provide training or certification, then the UST service technician may receive training or certification from another manufacturer of spill containers with comparable testing procedures to satisfy the training or certification requirement. This document supersedes paragraph B of Part I of the Spill Bucket Testing section of Enclosure 1 of LG 166.

[References cited: §§ 2637.1(c), 2715(f)(2)(C), & (E).]

How are the test results documented?

The results of the testing must be recorded on the "Spill Container Testing Report Form." A copy of the procedure used to test the spill container must be attached to the form, along with any data collected to determine the results of the test. The completed form, the attached procedure, and collected data must be submitted to the Unified Program Agency (UPA) within 30 days of the date of the completion of the test by hand-delivery, mail, facsimile, or other electronic methods. This guidance supersedes Part III of the Spill Bucket Testing section of Enclosure 1 and Spill Bucket Testing Report Form of Enclosure 2 of LG 166.

[References cited: §§ 2637.1(d) & (e).]

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Is the UPA required to be notified prior to performing the test?

Yes. UST owners or operators must notify their UPA at least 48 hours prior to conducting the test. The UPA is not required to be present for the test to occur. This document supersedes paragraph A of Part I of the Spill Bucket Testing section of Enclosure 1 of LG 166.

[Reference cited: § 2637.1(f).]

If there are further questions regarding the spill container testing 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>LG-166 Letter: Guidelines for Testing Spill Buckets</i>	January 2006
<i>LG-166 Enclosure 1: Guidelines for Testing Spill Buckets</i>	January 2006
<i>LG -166 Enclosure 2: Spill Bucket Testing Report Form</i>	January 2006
<i>LG-167: Qualifications & Scope of Work for UST Installers and Service Technicians</i>	March 2006
<i>LG-159: Annual Underground Storage Tank Compliance Inspection Handbook</i>	May 2011
<i>Overview of UST Containment and Monitoring Requirements</i>	June 2008