



UST Program Update March 2019

Adding Fluid to Hydrostatic Monitored Systems

The State Water Resources Control Board (State Water Board) has received inquiries regarding the activity of adding fluid to hydrostatically monitored components. Hydrostatic monitoring is a release detection method used to monitor the integrity of both the primary and secondary containment by continuously monitoring the liquid level within the interstitial space. Static fluid level and correct fluid type is essential for hydrostatic monitoring to be effective in monitoring underground storage tank (UST) components, therefore:

- Adding fluid to hydrostatically monitored components for maintenance or calibration must only be performed by a UST service technician as described in section 2715(f). (California Code of Regulations, tit. 23, div. 3, ch. 16 (UST Regulations), §2638(b).);
- UST service technicians must maintain training by the manufacturer to add fluid, when required (UST Regulations, §2715(f)(2));
- UST service technicians must always add fluid in accordance with the manufacturer's recommendations (UST Regulations, §2638(a)); and
- UST service technicians must insure the correct type of monitoring fluid is used as adding the incorrect fluid type could adversely affect the operation of the monitored component (UST Regulations, §2638(a)).

Adding hydrostatic fluid in response to an alarm condition always requires a UST service technician to determine and document the cause of the alarm. Adding hydrostatic fluid to prevent the release detection system from alarming is considered tampering and subject to a fine of not less than five thousand dollars or more than ten thousand dollars, by imprisonment in the county jail for not more than one year, or both in accordance with Health and Safety Code, chapter 6.7, section 25299(f)(2).

For more information regarding hydrostatic monitoring, please contact Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Reuse of Pipe After Permanent Closure

The State Water Board has had many inquiries regarding the reuse of pipe after permanent closure of USTs. Permanent closure requires all components of the UST be properly closed, including associated piping.

However, all components of the UST are not required to be permanently closed in the same manner.

Permanent closure must comply with Health and Safety Code, chapter 6.5, division 20 (H&SC) and UST Regulations, section 2672. Permanent closure includes the proper removal and disposal of all solids, fluids and vapors, and the collection of applicable soil and water samples. If piping is being considered for reuse in place, the reuse must meet all federal, state and local rules.

When a single-walled tank is replaced with a double-walled tank, existing double-walled piping that is approved/listed by Underwriters Laboratory (UL) for vapor, pressure or hydrostatic (VPH) monitoring may be subject to reuse if VPH can be installed and operated in accordance with H&SC, section 25290.1(e). UL approved pipe can be found on the pipe matrix at:

https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/matrix.shtml

For more information regarding piping reuse after permanent closure, please contact Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Additions to Local Guidance Letter 113

The State Water Board updated Local Guidance Letter 113 (LG113) to reflect the latest leak detection that has been approved by an independent third-party testing laboratory. The leak detection added includes methods for automatic tank gauging, tank tightness testing, line tightness testing, and large diameter line leak detection. The most recent additions to LG113 can be viewed at

https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/misc/lg113_revisions.shtml

For more information on LG113, please contact Mr. Cory Hootman at (916) 341-5668 or Cory.Hootman@waterboards.ca.gov.

Discarding Previously Closed or Removed USTs from Future CERS UST Submittals

When a UST is permanently closed in place or removed a CERS UST submittal is necessary to report the closure or removal of the UST. This submittal must include the correct Type of Action, either permanent closure in place or removal, and must include the Date of Closure or Removal.

Once the submittal closing or removing the UST(s) has been accepted it is no longer necessary to include the closed/removed UST(s) on future CERS submittals. A new CERS Frequently Asked Questions (FAQ) has been posted on the UST Program CERS FAQ page to assist in discarding the closed/removed tank(s) from future submittals. The new FAQ may be found here, under Business User FAQs, for reference:

https://www.waterboards.ca.gov/water_issues/programs/ust/cers/faqs.html

For more information on CERS UST submittals, please contact Ms. Lisa Jensen at (916) 319-0742 or

Lisa.Jensen@waterboards.ca.gov.

Duplicate UST Cleanup in CERS

On January 9, 2019 the California Environmental Protection Agency (CalEPA) sent instructions to affected local agencies regarding removing duplicate USTs from CERS. In addition, CalEPA provided an Excel spreadsheet with the CERS ID and submittal information to provide affected local agencies the information necessary to address any duplicate USTs in their jurisdiction. On January 29, 2019 CalEPA followed up with a second list of new duplicate USTs and sent that list, and instructions, to only those local agencies with probable duplicate USTs.

It is important for affected local agencies to address duplicate tanks for a variety of reasons, including:

- Potential for mis-reporting the number of USTs on Report 6;
- Energy Policy Act of 2005 reporting by the State Water Board to United States Environmental Protection Agency (U.S. EPA); and
- Ensuring only active USTs are assigned a unique CERS Tank ID with the rollout of CERS 3.

If you are an affected local agency, you should plan on completing the instructions for duplicate tank removal before the end of March 2019.

For more information on duplicate USTs in CERS, please contact Ms. Lisa Jensen at (916) 319-0742 or Lisa.Jensen@waterboards.ca.gov.