



UST Program Update September 2021

Acceptable Devices and Methods for Testing Line Leak Detectors

California Code of Regulations title 23, division 3, chapter 16, (UST Regulations) section 2638(a) requires line leak detectors (LLDs) to be certified at least once every 12 months to ensure they can detect leak rates of three gallons per hour (gph) at 10 pounds per square inch (psi) within one hour (section 2636(f)(2)). While UST Regulations do not prescribe the methods used to test LLDs, it is essential that LLDs are tested correctly. Some manufacturers of LLDs may require the use of a specific type of LLD test apparatus, however many underground storage tank (UST) service technicians build their own test apparatus to perform LLD tests as these devices are relatively simple and can be constructed from off-the-shelf components. Service technicians should ensure their testing equipment is in proper operating order prior to testing.

Modern UST systems operate at pressures substantially greater than 10 psi, therefore the testing apparatus is used to perform a test that is equivalent to three gph at 10 psi. There are generally two methods of LLD testing utilized. The first method reduces the operating line pressure to 10 psi to identify the three gph leak orifice prior to testing. The pressure reducer is removed allowing full operating line pressure and the test is performed. The second method identifies the operating line pressure but does not reduce the operating line pressure, instead utilizing a conversion chart identifying the volume equivalent of three gph at 10 psi. Both of these common LLD leak testing methods are described in detail in PEI, [Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities](#)¹ (RP-1200).

For additional information regarding acceptable devices and methods for testing LLDs, contact:

Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or

¹ <https://www.pei.org/news/petroleum-equipment-institute-updates-peirp-1200>

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Red Tag Requirements

Unified Program Agency (UPA) or State Water Board staff may apply a red tag to the fill pipe of a noncompliant UST system if a significant violation poses an imminent threat to human health or safety or the environment. Applying a red tag prohibits product input into or withdrawal from the system until the owner demonstrates the violation has been corrected to the satisfaction of the applying agency. Further, UST Regulations outline significant violations as those that cause or threaten to cause a liquid release, impair the UST system from detecting or containing a liquid release, or are chronic or committed by recalcitrant violators. State Water Board staff are aware of situations where red tags have been applied to USTs for conditions that do not meet the threshold of red tag application. For example, the initial failure of a secondarily contained spill container during testing likely does not meet the threshold for red tag application.

Recalcitrant UST owners or operators with violations that do not reach the level of immediate red tag application should be provided with a notice of significant violation, requiring the UST owner or operator to resolve the violation within seven days. The agency applying the red tag can only remove the red tag once the violation has been resolved.

Red tag supplies are provided by the State Water Board upon request. Additional information regarding the red tag application process as well as tabulated red tag statistics from the Semi-Annual UST Program Report (Report 6) can be found on the [UST Red Tag Requirements and Guidance](#)² web site.

For additional information regarding red tag requirements, contact:
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Rescinding of Health and Safety Restrictions

On July 30, 2021 the State Water Board sent correspondence through Lyris [discussing the rescinded COVID-19 health and safety restrictions](#)³ and the process to assist UST owners and operators returning their facilities to compliance. While this now may seem premature with the recent spike of the COVID-19 delta variant, this too shall pass and

² https://www.waterboards.ca.gov/water_issues/programs/ust/enforcement/red_tag_regs_index.html

³ https://www.waterboards.ca.gov/water_issues/programs/ust/docs/covid_rescind_letter.pdf

the process of returning to compliance outlined by the document applies. Specifically, for those facilities that have properly documented delays caused by health and safety restrictions, UPAs should assist in returning to compliance and continue to use their enforcement discretion to allow for a reasonable opportunity to return to compliance.

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