

## State Water Resources Control Board

Date

Facility Name  
Facility Address  
City, State Zipcode

**CERTIFIED MAIL No:**  
XXXX XXXX XXXX XXXX

### **SUBJECT: FORMAL NOTIFICATION TO FACILITY TO IMPLEMENT ENHANCED LEAK DETECTION TESTING**

This is a formal notification that underground storage tank (UST) system at the address listed above is subject to Enhanced Leak Detection (ELD) testing, based on information provided by the local water purveyor(s) and the State Water Resources Control Board's (State Water Board) Geographical Information System (GIS) mapping database (GeoTracker). Our information indicates this UST system is located within 1,000 feet of a public drinking water well. Part A of this correspondence discusses UST facility and well data related to GeoTracker. Part B explains the ELD requirements for UST systems within 1,000 feet of a public drinking water well. Part C explains the process for requesting reconsideration of this notification.

#### **PART A. UST FACILITY AND WELL DATA RELATED TO GEOTRACKER**

Local permitting agencies provided information on UST facilities within their jurisdictions to GeoTracker. This information is available on the GeoTracker website: <https://geotracker.waterboards.ca.gov>. To view this specific UST system, select Advanced Search under Tools. Find your facility by entering the street address and city on the Advanced Search – INFO page. Select "Permitted Underground Storage Tank (UST) facilities" and select Search at the bottom of the page. This will retrieve your facility and may also retrieve other UST facilities; select the appropriate UST and click Map. If you are unable to locate your UST facility or if you cannot retrieve the map for your facility, please contact Ms. Lisa Jensen at (916) 319-0742.

The State Water Board now provides public access to the reported locations of public water system groundwater wells. Previously, the State Water Board had obscured the actual locations of public water system wells (and some other wells) by displaying only a randomly-generated point within approximately one mile of the well's actual location. To review the well information, request a password to access the GeoTracker GAMA information system. For additional information, please visit the Groundwater Ambient Monitoring & Assessment Program page at : [http://www.waterboards.ca.gov/water\\_issues/programs/gama/well\\_location\\_information.shtml](http://www.waterboards.ca.gov/water_issues/programs/gama/well_location_information.shtml). Questions may be directed to GAMA staff at [WB.gama@waterboards.ca.gov](mailto:WB.gama@waterboards.ca.gov).

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Enclosure 1 provides the California Environmental Reporting System (CERS) ID number for the UST system, the name of the water purveyor(s), and the name and telephone number of the water purveyor(s) contact, if available. **To verify well information, you will need to contact the water purveyor(s).**

### PART B. UST SYSTEMS SUBJECT TO ELD TESTING

#### UST Systems with a Single-Wall Component

UST systems with a single-wall component have one or more of the following characteristics:

- single-wall tank,
- single-wall pressurized piping,
- single-wall conventional suction piping, or
- turbines without secondary containment.

Vent or tank riser piping, vapor recovery piping, and "safe" or "European" suction piping are not considered single-wall components if they meet the applicable criteria in the regulations [Cal. Code of Regs., Title 23, § 2636, subd. (a)].

The owner or operator of a UST system with one or more single-wall components located within 1,000 feet of a public drinking water well, as identified on GeoTracker, is required to submit and have a program of ELD testing approved by the local permitting agency within six months from the date of this formal notification. [Health & Saf. Code, § 25292.4 and Cal. Code of Regs., Title 23, §§2640 and 2644.1.] An approved program of ELD testing must be implemented no later than 18 months following this formal notification. The UST system with single-wall components will be subject to this requirement every three years thereafter, or until all single-wall piping and tanks are replaced with double-wall components. Also, please refer to Enclosure 2, Local Guidance (LG) letter 161-5.

To avoid triennial ELD testing, the UST system may be upgraded so that it does not have any single-wall component(s). If you decide to replace single-wall components with double-wall components, you must notify your local permitting agency and follow all required permitting procedures. You must complete the removal of single walled piping and components by the date that ELD testing is required for your UST system. You must also file a Request for Reconsideration (RFR) Form with the State Water Board after the old UST system is removed. Please note that you will have to conduct an ELD test on a new UST system before it is placed into use [Health & Saf. Code, § 25290.1(j)].

Low-interest loans and grants are available to help qualified owners and operators of small, independently owned and operated UST facilities remove and replace UST components. See Enclosure 3 for details.

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### UST Systems with Secondary Containment

UST systems with secondary containment have the following characteristics:

- double-wall tanks,
- double-wall piping,
- containment sumps, and
- under-dispenser containment.

For UST systems with secondary containment installed before July 1, 2003 which are located within 1,000 feet of a public drinking water well, one-time ELD testing is required. Health and Safety Code, §25289, subdivision (b) authorizes the State Water Board to require this testing. We find that the burden of the testing, including costs, bears a reasonable relationship to the need for regulatory agencies to be provided with information on tank integrity. Also, please see Enclosure 2.

The owner or operator of a UST system with secondary containment within 1,000 feet of a public drinking water well shall test the system once using an enhanced leak detection test approved by the local permitting agency within six months from the date of this formal notification. An approved program of ELD testing must be implemented no later than 18 months following this formal notification. [Cal. Code Regs., Title 23, § 2644.1, Health & Saf. Code, §25292.5 subd. (a)]

Low-interest loans and grants are available to help qualified owners and operators of small, independently owned and operated UST facilities remove and replace UST components. See Enclosure 3 for details.

### PART C. REQUEST FOR RECONSIDERATION OF THIS NOTIFICATION

If you believe that your UST system is not subject to the ELD testing requirement, you may request reconsideration from the State Water Board's UST & Site Cleanup Program Manager. Information on the request for reconsideration process is included in Enclosure 4 (RFR Form), as well as in Enclosure 2. [See also Cal. Code Regs., Title 23, § 2640, subd. (e)] If you have previously completed ELD testing, you are not required to submit an RFR, however, you must submit a copy of the test results to the State Water Board.

Anyone wishing to submit an RFR must fill out the form and submit it to both the local permitting agency and the State Water Board's UST & Site Cleanup Program Manager. The RFR must be received no later than 60 calendar days from the date this notification letter was mailed. The request must demonstrate at least one of the following:

- the UST system is properly closed;
- the UST system is exempt from regulation;
- no well is located within 1,000 feet of the closest component of the UST system, or

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- all wells within 1,000 feet are not public drinking water wells.

Regulations require the State Water Board's UST & Site Cleanup Program Manager to make a decision on the RFR and notify the person who requested reconsideration and the applicable local agency of the decision within 90 calendar days of receipt of a complete RFR package.

Also provided for reference is information about Senate Bill No.445 (2013 – 2014 Reg. Sess.) for single-walled underground storage tank (UST) permanent closure provisions, see Enclosure 5 and Enclosure 6. These provisions include the requirement that on, or before, December 31, 2025, the owner or operator of a UST shall permanently close the UST if it was designed and constructed before 1997 in accordance with paragraph (7) of section 25291(a) or if it was designed and constructed before 1984 and does not meet the requirements of section 25291(a)(1)-(6). [Health & Saf. Code, § 25292.05 subd. (a)]

If you have questions about this notification regarding ELD, please contact Ms. Lisa Jensen with the State Water Board at (916) 319-0742, [Lisa.Jensen@waterboards.ca.gov](mailto:Lisa.Jensen@waterboards.ca.gov).

Sincerely,

Daniel Newton, P.E.  
UST & Site Cleanup Program Manager

Enclosures (6)

1. UST facility name, CERS ID, and water purveyor contact information
2. Local Guidance Letter 161-5, Enhance Leak Detection
3. Replacement of Underground Storage Tank (RUST) Program brochure
4. RFR Form/Instructions
5. Senate Bill No.445 (2013 – 2014 Reg. Sess.) Summary of single-walled underground storage tank (UST) permanent closure provisions
6. Letter to Single-walled UST Owners and Operators

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### Enclosure 1: UST facility name, CERS ID, and water purveyor contact information

- **UST Facility Name:** Facility Name
- **CERS ID:** Facility CERS ID
- **Water Purveyor Name:** Water Purveyor
- **Water Purveyor Contact:** Contact