



Linda S. Adams
*Secretary for
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State Water Resources Control Board

Division of Water Quality

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Arnold Schwarzenegger
Governor

December 21, 2007

To: Underground Storage Tank (UST) Local Regulatory Agencies and Interested Parties

CLARIFICATION OF EXISTING REGULATIONS FOR UNDER-DISPENSER CONTAINMENT

It has come to our attention that there have been instances of incorrect application of under-dispenser containment (UDC)¹ regulations when owners or operators are installing or replacing dispensers². When a larger dispenser is placed over a smaller UDC there exists the strong possibility that piping within the dispenser no longer falls within the footprint of the UDC. The UDC acts as the secondary containment for piping (including all product piping, metering devices, valves, and appurtenances within the dispenser housing), which is intended to contain and prevent leaks from entering the soil and reaching groundwater. Dispenser piping that does not fall entirely over the footprint of the UDC is not secondarily contained and in the instance of a leak can result in a release to the environment.

If the piping within the dispenser extends beyond the footprint of the UDC, two options exist:

1. Replace the existing UDC with a new UDC, that encompasses the entire dimensions of the dispenser, or
2. Install a State Water Board approved under-dispenser spill containment or control system³ that will direct leaks from all dispenser piping into the existing UDC.

The installation of an under-dispenser spill containment or control system will ensure that in the occurrence of a leak, the release is directed to the UDC. In accordance with section 2636(g)(3)(A-C), the manufacturer of an under-dispenser spill containment or

¹ Under-dispenser containment is defined as secondary containment that is located under a dispenser (California Code of Regulations, Title 23, section 2611).

² A dispenser is defined as an aboveground or underground device that is used for the delivery of a hazardous substance from an underground storage tank. Dispenser includes metering and delivery devices, and fabricated assemblies located therein (California Code of Regulations, Title 23, section 2611).

³ An under-dispenser spill containment or control system is defined as a device that is capable of preventing an unauthorized release from under the dispenser from entering the soil and/or groundwater (California Code of Regulations, Title 23, section 2611).

control system may apply to the State Water Board's Underground Storage Tank Program Manager for approval of the system. Regulations provide that owners or operators may only install an under-dispenser spill containment or control system that has been approved.

Requests for under-dispenser spill containment or control system approvals can be submitted to:

State Water Resources Control Board
Division of Water Quality
Attn: Kevin Graves
UST Program Manager
P.O. Box 2231
Sacramento, Ca 95812

We appreciate your cooperation in this matter. If you have any questions pertaining to the details of this letter, please contact Ms. Laura S. Fisher-Chaddock at (916) 341-5870 (lchaddock@waterboards.ca.gov) or Ms. Donielle L. Jackson at (916) 341-5863 (dljackson@waterboards.ca.gov).

Sincerely,

Original signed by

Kevin L Graves, P.E.
Underground Storage Tank Program Manager