

UST Program Update June 2025

Single-Walled Underground Storage Tanks

Interactive Single-Walled UST Map

The State Water Resources Control Board (State Water Board) has prepared an interactive state map displaying the remaining facilities with single-walled underground storage tanks (USTs) or single-walled piping. The interactive map combines data sourced from GeoTracker, the California Environmental Reporting System (CERS), and the single-walled UST survey data provided by the Unified Program Agencies (UPAs). It includes features such as facility owner type, tank use, CalEnviroScreen 4.0 scores, Replacing, Removing, or Upgrading USTs (RUST) loan or grant application status, and the distance to the nearest public drinking water wells and gas stations. To ensure the map remains up to date, another single-walled UST survey will be distributed to the UPAs this month. The State Water Board will continue updating the map every 60 days to maintain an accurate count of single-walled UST facilities in preparation for the December 31, 2025, closure deadline.

The <u>single-walled UST map</u>¹ is available as a link on the State Water Board <u>single-walled UST webpage</u>.²

Improper Use of Temporary Closure

As of January 1, 2025, UPAs cannot grant temporary closure, or an extension of temporary closure, for any single-walled UST. Temporary closure applies to USTs that have temporarily ceased storing hazardous substances, *with the intent to resume storage* within the next 12 months.³ Single-walled USTs should not be placed into temporary closure, as they are required to be permanently closed on or before December 31, 2025.⁴

¹ https://experience.arcgis.com/experience/114d66f2c73f418fb2a286fb2ded2207

² https://www.waterboards.ca.gov/ust/single_walled.html

³ See California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2670(b)

⁴ See Health & Safety Code (H&SC), chapter 6.7, section 25292.05

With the closure deadline only seven months away, UST owners and operators of single-walled USTs should be preparing to permanently close their single-walled USTs to ensure compliance with H&SC, section 25292.05. The State Water Board expects UPAs to prioritize progressive enforcement of single-walled USTs, including those currently in temporary closure, until they comply or are permanently closed.

For information regarding single-walled USTs, please contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Emergency Tank Systems

State Water Board staff have observed several instances where USTs are being regulated as emergency tank systems but do not meet the definition of an emergency tank system and therefore, do not qualify for the associated unburied piping exemption in H&SC 6.7, section 25281.5(b)(3). Additionally, staff have also observed emergency tank systems that have line leak detectors (LLD) installed that are not performing release detection as required.

An emergency tank system is a UST system that stores diesel fuel or kerosene to be utilized during emergencies by one or more stationary devices⁵. Unburied product piping connected to an emergency tank system is excluded from the construction, monitoring, and testing requirements in Article 3 of the UST Regulations if it is visually inspected at least monthly and inspection logs are maintained for UPA review⁶. Product piping that is in a conduit through building walls or ceilings where both sides of the penetration can be visually observed also qualifies for the unburied piping exclusion.

If a UST system is connected to a stationary device that does not utilize the supplied diesel or kerosene *solely* during emergencies, the UST system is not an emergency tank system and does not qualify for the unburied piping exclusion. For example, a UST system that is connected to a boiler that operates continuously and utilizes the stored product as the primary source of fuel does not qualify as an emergency tank system and cannot utilize the unburied piping exclusion discussed above. UST systems connected to non-emergency stationary devices must meet all construction, monitoring, and testing requirements in Article 3 of the UST Regulations, including continuous monitoring and by a LLD that either restricts or shuts off flow when a leak is detected.

Finally, a LLD is only capable of conducting the 3.0 gallon per hour line tightness test if the turbine shuts off. UST systems that operate continuously do not allow the LLD to perform the line tightness test, thereby effectively bypassing the leak detection device.

⁵ H&SC, chapter 6.7 section 25281.5(c)

⁶ H&SC, chapter 6.7 section 25281.5(b)(3)

These systems should be programmed to perform periodic shutdowns to ensure the LLD can complete the required line tightness test.

For information regarding emergency tank systems, please contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Violation Reissuance Guidance – CERS FAQ

The State Water Board has posted a CERS FAQ on reissuing Untied States Environmental Protection Agency (U.S. EPA) Technical Compliance Rate (TCR) violations during the subsequent annual UST compliance inspection, if the violation remains uncorrected. The Reissuing Technical Compliance Rate Violations FAQ⁷ is available on the UST Leak Prevention Program website⁸ under the CERS FAQ webpage.⁹ The State Water Board emphasizes that this document applies only to the UST Program and should be viewed separately from the CalEPA CERS guidance document titled *Reporting Violations in CERS*.¹⁰

The State Water Board requires inspectors to reissue the same U.S. EPA TCR violation during the subsequent annual compliance inspection if it remains uncorrected. Failure to do so will result in the violation not being captured in the Report 6 data for that reporting period.

For additional information regarding the violation reissuance guidance document, contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov

⁷ https://www.waterboards.ca.gov/ust/cers/ru20_violation_reissuance_guidance.html

⁸ https://www.waterboards.ca.gov/ust/leak prevention/

⁹ https://www.waterboards.ca.gov/ust/cers/

¹⁰ https://cers.calepa.ca.gov/wp-content/uploads/2017/04/reporting-escalated-violations_general.pdf