
State Water Resources Control Board

Mach 8, 2013

To: Designated Operators, Underground Storage Tank Inspectors, and Other Interested Parties

LICENSING AND CERTIFICATION REQUIREMENTS FOR SERVICING UNDERGROUND STORAGE TANK ELECTRONIC LEAK DETECTION MONITORING EQUIPMENT

This letter is to clarify that all individuals servicing electronic consoles that control underground storage tank (UST) electronic leak detection monitoring (UST monitoring system) equipment must comply with the licensing and certification requirements for a service technician in section 2715(i) of title 23 of the California Code of Regulations. A service technician is any individual who installs or tests UST monitoring equipment, or provides maintenance, service, system programming or diagnostics, calibration, or trouble-shooting for UST monitoring system components. The State Water Resources Control Board (State Water Board) UST Program has determined "service" to include entering serial commands to retrieve UST monitoring system information.

BACKGROUND

In the mid-1980s, when California began implementation of the UST regulations, the State Water Board's UST Program established a fairly rigorous program of electronic leak detection monitoring of UST systems. Over the years, as technology developed, these UST monitoring systems have become extremely complex in both programming and operation. Given the complexity of these UST monitoring systems, the State Water Board adopted regulations to require that only trained, licensed and certified professionals are permitted to service UST monitoring system equipment.

REGULATORY REQUIREMENTS

California Code of Regulations, title 23, section 2715(i) requires that service activities related to the UST monitoring system equipment must be performed by a qualified service technician meeting specific licensing and training requirements. Pursuant to section 2715(i) any individual performing the work of a service technician (which the State Water Board interprets to include entering serial commands to retrieve UST monitoring system information) is required to: 1) possess or be employed by a person who possesses an appropriate contractor license or possess a State Water Board tank testing license; 2) be trained and certified by the manufacturer of the equipment; 3) renew training and certifications every 36 months; and 4) possess or work under the direct supervision of an individual physically present at the work site who possesses a current certificate from the International Code Council as a California UST Service Technician.

CURRENT SITUATION

It is the State Water Board's understanding that various types of individuals are entering serial commands to retrieve information from UST monitoring systems instead of using preset

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functions/commands prescribed by the manufacturer's operation manual. Serial commands have the ability to change UST monitoring system programming and affect how the UST monitoring system operates. The ability for an unqualified individual to enter serial commands poses a risk to the programming and operation of the UST monitoring system.

It also has been brought to the State Water Board's attention that excessive connecting and disconnecting directly to the UST monitoring system console's communication ports can damage the hardware.

REQUIREMENTS FOR RETRIEVING UST MONITORING SYSTEM INFORMATION

In order to avoid conflicts with the State Water Board's licensing and certification requirements and to allow individuals such as owners/operators and Designated Operators to retrieve UST monitoring system information, the State Water Board requires that entering serial commands be performed by: 1) individuals both licensed and certified to service the UST monitoring system equipment; or 2) software that does not allow the user to change the UST monitoring system's programming. To meet the requirements of section 2715(i), an individual that is licensed and certified to perform activities associated with servicing the UST monitoring system must evaluate the software and verify in writing that the proper commands are used and that the software cannot change or interfere with the programming related to the functionality of the UST monitoring system equipment. Individuals other than service technicians are permitted only to use evaluated software that does not allow the user to change the UST monitoring system's programming.

To address the issue of UST monitoring system hardware being damaged by excessive connecting and disconnecting of cables, the State Water Board recommends installing an extension cable that is permanently affixed to the UST monitoring system. Connecting to a manufacturer approved cable, rather than the hardware, should reduce the chance of damage when retrieving UST monitoring system information.

While this clarification is oriented towards Designated Operators, the same licensing, training, and certification requirements apply to any individual performing service activities.

If you have questions regarding servicing UST monitoring system equipment please contact Cory Hootman at (916) 341-5668 or chootman@waterboards.ca.gov.

Sincerely,



Laura S. Fisher, Chief
UST Leak Prevention Unit and
Office of Tank Tester Licensing

cc: Julie M. Osborn, Attorney III
Office of Chief Counsel
State Water Resources Control Board