



UST Program Update October 2021

Underground Storage Tank Leak Prevention January – December 2020 Annual Report

On September 9, 2021, the State Water Resources Control Board (State Water Board) provided underground storage tank (UST) stakeholders with the [California Underground Storage Tank Leak Prevention January – December 2020 Annual Report](#)¹. This report was developed in collaboration between the United States Environmental Protection Agency (U.S. EPA) and the State Water Board. The California Environmental Reporting System (CERS) and the California GeoTracker database were utilized to obtain report data. A few noteworthy data points include: releases discovered during system closure remain higher for single-walled systems than for double-walled systems; ten additional Unified Program Agencies (UPAs) have been approved for paperless reporting; COVID-19 health and safety restrictions expectedly decreased both the number of compliance inspections and red tag applications for the year; unauthorized release numbers remain very low; and the removal of single-walled tanks/piping continues to be slow.

For more information regarding the annual report, contact:
Mrs. Laura Fisher at (916) 341-5870, or Laura.Fisher@waterboards.ca.gov.

Secondary Containment Testing of Underground Storage Tanks

State Water Board staff are aware of secondary containment testing performed on tank interstices where service technicians are reaching the initial test level vacuum very quickly, often within a minute or less, far more quickly than that of tanks with similarly sized interstices. This condition is indicative of a blocked or collapsed interstice, where only portions of the interstice are being tested or monitored. While there may be several ways to test a UST interstice, if the secondary containment test cannot be performed in accordance with California Code of Regulations, title 23, division 3,

¹ https://www.waterboards.ca.gov/water_issues/programs/ust/docs/final_ust_leak_prevention_2020.pdf

chapter 16 (UST Regulations), section 2637, the system is out of compliance. If the UST cannot be repaired, it must be permanently closed.

The *Secondary Containment Testing Report Form* does not require the service technician to provide information on the time taken to reach the initial reading vacuum level, however service technicians should be aware that pulling a vacuum on a tank interstice should take 25-60 minutes in most cases. The State Water Board is aware of service technicians pulling a vacuum in less than five minutes, letting it hold for the prescribed test duration time, then passing the tank secondary containment test. This is obviously not acceptable, as only part of the interstice is tested.

If either the service technician or UST inspector is concerned with the secondary containment test only evaluating part of the UST secondary, additional testing should be performed. Performing a volume test using Boyle's Law ($P_1V_1 = P_2V_2$) would allow the service technician to determine the volume of interstice being tested. Tank manufactures can provide the interstice volumes upon request. If the interstice is blocked or collapsed, a repair should be performed. If the tank cannot be repaired, it must be permanently closed.

For additional information regarding secondary containment testing of USTs, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Wildfire Preparation and Recovery Guide

On August 31, 2021, the US Environmental Protection Agency (US EPA) released the [Wildfire Guide: Preparation and Recovery for Underground and Aboveground Storage Tank Systems](#)² to serve as guidance for UST owners and operators located in areas that are susceptible to wildfires. The guide provides recommended actions to take before and after a wildfire catastrophe to increase safety while reducing facility damage and inventory loss. The document also provides guidance on using new tools alongside [UST Finder](#)³ to determine the potential risks wildfires pose to facilities based on their geography and recent area weather conditions. These guidelines are based on federal practices and should only be implemented if they are compatible with state, local, or tribal programs.

For additional information regarding wildfire preparation / recovery or UST Finder, please contact:
Mrs. Laura Fisher at (916) 341-5870 or Laura.Fisher@waterboards.ca.gov.

² https://www.epa.gov/system/files/documents/2021-09/wildfire-guide_8-31-21_0.pdf

³ <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=b03763d3f2754461adf86f121345d7bc>

Striker Plate Requirements

State Water Board staff are reminding UST inspectors that tanks constructed prior to 1990 were often built without striker plates. All USTs are required to have a striker plate beneath each accessible opening (UST Regulations, section 2631(c)), however this requirement was not included as part of the UL 58 standard for steel constructed USTs until 1990, and some manufacturers did not include this as a construction standard until that date. While tanks without striker plates are out of compliance, they can meet this requirement through installation of a drop tube-mounted bottom protector (UST Regulations, section 2662(d)).

As UST owners and operators are well on their way through the second round of overflow prevention equipment inspections, many drop tubes have been replaced as part of the inspection process. When reviewing overflow prevention equipment inspections, UST inspectors should review the UST manufacturer and installation year to determine whether striker plates were built into the tank. If the tank in question was manufactured before striker plates became standard by that manufacturer and there is not a simple method to identify if the striker plate exists below the fill opening, the UST owner or operator should install a drop tube-mounted bottom protector. This will prevent damage to the bottom of the tank caused by manual dip-sticking, as this is still a standard practice during fuel delivery.

For additional information regarding striker plate requirements, please contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

Updates to Local Guidance 167 – Qualifications and Scopes of Work for Tank Installers and Service Technicians

The State Water Board has updated Local Guidance (LG) 167 on the necessary qualifications and scopes of work for Tank Installers and Service Technicians. The update clarifies scopes of work, licensing and training requirements for individuals working on USTs and related equipment. Additionally, the letter addresses the necessary qualifications required by the Contractors State Licensing Board (CSLB) in relation to UST work. This is in response to questions received by State Water Board staff concerning applicability of certain licenses obtained from the CSLB with regards to UST work. LG 167 and other LG letters can be found on the State Water Board's [UST Program – Available Local Guidance \(LG\) Letters](#)⁴ webpage.

⁴ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/

For additional clarification regarding contractor licensing requirements, please visit the CSLB website at www.cslb.ca.gov or contact CSLB by phone at (800) 321-2752 or by email at classifications@cslb.ca.gov.

For additional information regarding qualifications or scopes of work, contact:
Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or
Mr. Austin Lemire-Baeten at (916) 327-5612 or
Austin.Lemire-Baeten@waterboards.ca.gov