

From: Ricardo Martinez
To: [commentletters](#)
Subject: Comment Letter - Proposed UST Regulations
Date: Thursday, December 21, 2017 9:08:38 AM
Attachments: [Comments To Addendum Title 23.docx](#)



Good morning Jeanine Townsend, I have attached a letter with comments to addendum some sections to Title 23.

Section 2637 Secondary Containment Testing,
With the use of test water once the water has been used in a containment for testing, the water become a hazard due to residual hazardous substance, vapor may accumulate in the containment area.

HSC ARTICLE 8. Enforcement [25180 - 25196]

CCR Title 22 [Division 4.5. Environmental Health Standards for the Management of Hazardous Waste](#)

Owners and Operator should be fully responsible for the test water that was used for Secondary Containment Testing and was generated at there facilities. The new Secondary Containment Test Form failed to mention what was done with the test water used. Owners and Operator should be able to provide a manifest for the test water along with the Secondary Containment Test Report. This will help track the waste water and keep the owners and operators along with the testing companies accountable for the hazardous water.

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CCR Title 23 Division 3 Chapter 16

2611 Article 1 Definition Term

“Service Technician:

Means any individual who installs or tests monitor equipment, or provides maintenance, service, system programming or diagnostics, calibration, or troubleshooting for underground storage tank system components.

Addendum to Service Technician REPAIR, OR REPLACE.

In accordance with

Section 2638 (a) (b) (f) and Section 2715 (f) (1) (2) (A) (B)

Means any individual who installs, repairs, or replaces malfunctioning monitor equipment and its components that have ceased to function properly, or tests monitor equipment, or provides maintenance, service, system programming or diagnostics, calibration, or troubleshooting for underground storage tank system components.

CCR Title 23 Division 3 Chapter 16

2637 Secondary Containment Testing

Addendum to Secondary Containment Testing

Disposal and Transportation of Test Fluid. If the test fluid is reused, immediately following its final reuse, the generator must classify the test fluid pursuant to CCR, Title 22, Section 66262.11. If the reused test fluid is hazardous waste, it must be managed in accordance with all applicable requirements. Hazardous waste generators may accumulate hazardous wastes in closed tanks or containers, and must complete a Uniform Hazardous Waste Manifest and use a registered hazardous waste transporter to transport the hazardous waste to either a permitted hazardous waste facility or to another location authorized to accept the waste. The disposal of hazardous waste is not allowed without a permit from DTSC. Hazardous waste generators who wish to conduct hazardous waste treatment on-site must first obtain a permit per CCR, Title 22, Section 66270.1 or HSC, Section 25189.5. Note: Hazardous waste may not be disposed of to sewers, storm drains, surface waters, or to the land without a permit from DTSC and the Regional Water Quality Control Board.