Underground Storage Tank Program
June 2026 Update

Vacuum, Pressure, or Hydrostatic as a Line Leak Detector

California Code of Regulations, title 23 (Title 23), section 2652(a)(2) requires line leak detectors (LLDs) on buried, pressurized piping to be tested annually at a simulated leak rate equivalent to three gallons per hour (gph) at 10 pounds per square inch (psi). Section 2652(a)(2)(B) allows buried, pressurized piping equipped with vacuum, pressure, or hydrostatic (VPH) monitoring to use the VPH equipment as the system's LLD. The VPH equipment operating as the LLD must be tested using the manufacturer's test method at the leak rate specified in section 2652(a)(2). VPH equipment is not used in lieu of a LLD but is the LLD.

Currently, there is no manufacturer test method available for verifying that VPH systems can detect a release equivalent to three gph at 10 psi. Therefore, VPH systems must also have a testable mechanical or electronic LLD. When an approved test method for VPH becomes available, VPH equipment may be used as an LLD.

For more information on using VPH as a LLD, please contact:
Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

Certified Unified Program Agency Evaluation Website

State Water Resources Control Board (State Water Board) evaluation staff are updating the CUPA Evaluation Process Website[1] to align with the amended Title 23. The following webpages have been updated along with their associated citations:

Facility File Selection

The single-walled portion has been updated, and a section on emergency tank systems and Participating Agencies has been added.

CERS Quality Assurance Review

The single-walled UST system component has been removed, and a new component for overfill prevention and piping has been added.

[1] https://www.waterboards.ca.gov/ust/leak_prevention/performance-evaluations/

Oversight Inspection

A section regarding office visits and the review of inspection reports and testing documents has been added.

UST Closures

A section regarding GeoTracker, new sampling requirements, and a closure flow chart has been added.

Abandoned USTs Webpage

The abandoned UST definition has been added.

For additional information regarding the CUPA Evaluation Process website, contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov

Single-Walled UST Enforcement Updates

Single-Walled UST Webpage

The Office of Enforcement, UST Enforcement Unit has updated the Single-Walled UST Initiative[2] webpage to include the current single-walled UST map and list of facilities. The webpage also includes the background and timeline of single-walled UST requirements, enforcement guidance, and links to available funding.

Single-Walled Enforcement Survey

On April 24, 2026, the UST Enforcement Unit distributed follow-up surveys to UPAs with single-walled USTs within their jurisdiction. The data collected from the follow-up survey has been updated on the single-walled UST map[3] on the UST Enforcement Unit's single-walled UST webpage.

As of May 6, 2026, a preliminary review of the survey indicates California has:

- 29 single-walled facilities with 82 single-walled UST systems
    - 50 single-walled UST systems were emptied due to affixed red tag(s)
    - 21 single-walled facilities have applied for closure permits
    - 4 single-walled facilities are government-owned with 10 single-walled UST systems
- 6 single-walled facilities emergency tank systems with 11 single-walled UST systems
    - 2 single-walled emergency tank systems are government-owned

[2] https://www.waterboards.ca.gov/water_issues/programs/ust/enforcement/swust.html
[3] https://experience.arcgis.com/experience/0167aef5ced240ddb27331f6988dc8b2

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

Revisions to Completed UST Forms

State Water Board staff are aware of UPA inspectors requiring completed and signed UST test and designated operator inspection forms to be modified or replaced. If a document was accurate and complete at the time it was signed, the UPA should not request any modifications. Inspections performed by designated operators and tests performed by service technicians represent a snapshot in time. If the documents were complete and correct at the time of the inspection or test, those forms should not be altered later. However, if information in a UST test or inspection form were incorrect at the time the document was signed, the CUPA may require the UST owner or operator to correct the issue using an appropriate method.

For example, if a signed designated operator visual inspection form indicates that no service order existed to address a particular alarm, but a service order is later produced showing that the alarm was addressed prior to the inspection, the inspection document was correct at the time with the information available and the CUPA should not require the owner or operator to modify the document. The service order should be included in the next inspection report.

For more information regarding revisions to completed UST inspection forms, please contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov

Shear Valve Testing

State Water Board staff have received several questions about testing the under-dispenser-containment mechanical release detection equipment during the annual release detection equipment test. If the mechanical release detection equipment in the under-dispenser containment fails for any reason, at any time, it must be replaced with continuous electronic release detection equipment. This requirement applies to the float and chain assembly that interfaces with the shear valves. If the float and chain fail for any reason, they must be replaced with continuous electronic release detection equipment. The shear valve is not required to be replaced if it is functional.

Title 23, section 2663(c) requires service technicians to confirm that the impact shear valve used as part of the UDC monitoring will prevent hazardous substances from dispensing during annual testing. If the shear valve does not stop the flow of product, both the shear valve and the connected float and chain mechanism must be replaced in accordance with section 2652(a)(1)(B). The failed shear valve must be replaced with a functioning shear valve as these components are required by International Fire Code, Chapter 23, section 2306.7.4.

For questions regarding shear valve testing, please contact:
Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

New UST Regulatory Requirements Beginning July 1, 2026

Title 23 includes several requirements that will become effective later this year. USTs installed on or after July 1, 2026, must bear a marking, code stamp, or label located inside the sump collar perimeter.[4] This label must include:

- Manufacturer identification
- Production location
- Date of manufacture
- Maximum burial depth
- Maximum test pressure
- Openings not equipped with a striker plate, if applicable

Additionally, section 2642(b) requires tanks manufactured on or after July 1, 2026, to provide documentation to the owner confirming that the manufacturer verified continuity within the tank's interstitial space. The requirement for the label to include the production date helps determine whether continuity documentation from the manufacturer is required for the tank. Tanks arriving for installation on or after July 1, 2026, without the required label should be rejected. The continuity documentation must be maintained by the UST owner or operator for the life of the tank as part of the installation records.

Lastly, facilities with pressurized piping that are not routinely staffed must be equipped with continuous interstitial release detection equipment that shuts off the flow of hazardous substance through the piping when a release is detected or when the release detection system malfunctions. This requirement, which is also effective July 1, 2026, will prohibit the use of components such as mechanical line leak detectors that allow product to continue flowing after a release is detected, and mechanical or stand-alone release detection devices that do not power down the turbine. This requirement does not apply to emergency tank systems that are not routinely staffed.

For more information on new UST requirements that begin July 1, 2026, please contact:
Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

UST Certification of Installation/Modification Form

Title 23, section 2642(g) requires the UST Certification of Installation/Modification submittal element to be submitted to the California Environmental Reporting System (CERS) within 30 days of an installation inspection. Examples of installation inspections include tank, piping, or containment sump installation inspections. It is the UPA's

[4] See Title 23, section 2641(a)

responsibility to ensure that the CERS submittal includes this element before accepting the submittal.

Evaluation staff will review whether the UST Certification of Installation/Modification is being properly utilized. UPAs that do not correctly utilize the UST Certification of Installation/Modification submittal element may be issued a deficiency or incidental finding.

For questions regarding the UST Certification of Installation/Modification submittal element in CERS, please contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov

Lining USTs for Compatibility

Title 23, section 2640(a)(1)(A) requires UST primary and integral secondary containment to be compatible with the hazardous substance stored. Recently, there has been an increase in owners proposing to line the interior of their USTs under the assumption that doing so makes the UST compatible with emerging fuel blends. This assumption is incorrect. While the lined primary containment may be compatible with the proposed hazardous substance, the secondary containment remains incompatible and therefore does not meet the requirements of section 2640(a).

When reviewing UST plan checks, UPA inspectors should ensure that the UST owner and operator are not proposing to line their USTs to convert to a newer fuel that is incompatible with the existing secondary containment. For reference, fiberglass USTs manufactured prior to 1990 are incompatible with fuel blends above E10, and lining these tanks would not resolve the secondary containment incompatibility.

For more information on lining USTs to meet compatibility requirements, please contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

Omntec Delivery Defender Lite Overfill Alarm

Audible and visual alarms are an overfill prevention method available for UST systems equipped with secondarily contained vent and riser piping. When a facility with multiple USTs utilizes an audible and visual alarm for overfill prevention, the annunciator must be capable of alarming independently for each UST.

The Omntec Delivery Defender Lite Overfill Alarm (DDL) can monitor up to four USTs simultaneously and can provide audible and visual alarms for each individual UST.

During an inspection, the CUPA inspector should verify that the facility's overfill prevention method is properly installed and functioning as required. If the annunciator does not have the capability to alarm independently for each UST, the CUPA should cite UST Program Violation 2031002 and ensure that the UST owner or operator installs compliant overfill prevention equipment.

As a reminder, the DDL is not included in Local Guidance Letter 113 (LG 113) because it is not release detection equipment and LG 113 only includes release detection testing or methods.

For more information regarding overfill prevention methods, please contact: Stephanie Duong at (916) 322-8544 or Stephanie.Duong@waterboards.ca.gov