

EDMUND G. BROWN JR. GOVERNOR MATTHEW RODRIQUEZ SECRETARY FOR ENVIRONMENTAL PROTECTION

State Water Resources Control Board

April 22, 2016

To: Underground Storage Tank Owners and Operators and Other Interested Parties

UNDERGROUND STORAGE TANK PIPING INSTALLATION AND REPLACEMENT: UPDATED FEDERAL REQUIREMENTS EFFECTIVE APRIL 12, 2016

On April 12, 2016, updated federal requirements went into effect for piping. All piping, except safe suction piping, installed or replaced after April 11, 2016, must be secondarily contained and interstitially monitored. (Title 40 of the Code of Federal Regulations (40 C.F.R.), § 280.20)

For purposes of the federal requirements, piping includes any portion of a piping system connected to an underground storage tank (UST) that routinely contains regulated substances and is in contact with the ground. Also, the term "replacing piping" means removing 50 percent or more of a UST piping run, excluding connectors, and installing other piping. (40 C.F.R., § 280.12, definition of "replaced" for piping.) Safe suction piping is not subject to this updated federal requirement. According to 40 C.F.R., section 280.41(b)(ii), no release detection is required for suction piping that meets <u>all</u> of the following standards:

- (A) The below-grade piping operates at less than atmospheric pressure;
- (B) The below-grade piping is sloped so that the contents of the pipe will drain back into the storage tank if the suction is released;
- (C) Only one check valve is included in each suction line; and
- (D) The check valve is located directly below and as close as practical to the suction pump.

In California this updated federal requirement affects USTs installed before January 1, 1984 and motor vehicle fuel USTs installed in accordance with Health & Safety Code, section 25291(a)(7) that have single-walled piping. As of April 12, 2016, when a piping run is installed or when 50 percent or more of a single-walled piping run is replaced, the entire run of piping must be secondarily contained and interstitially monitored. For USTs with multiple piping runs, this definition applies independently to each piping run.

If you have questions regarding this letter, please contact me at (916) 341-5668 or by email at <u>cory.hootman@waterboards.ca.gov</u>.

Sincerely,

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Cory Hootman, P.E. Water Resource Control Engineer UST Leak Prevention Unit

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