

## Secondary Containment Testing Requirements

### California Code of Regulations, Title 23, Division 3, Chapter 16, Section 2637

#### **What secondary containment is required to be tested?**

Secondary containment used to comply with Health and Safety Code, division 20, chapter 6.7, sections 25290.2(c) and 25291(a) and California Code of Regulations, title 23, division 3, chapter 16,<sup>1</sup> sections 2666(a), (b), and (e) must be tested in accordance with section 2637 to demonstrate that the secondary containment can contain the stored substance until detected and cleaned up. Underground storage tank (UST) components that are equipped with a continuous monitoring that automatically monitors the integrity of both the primary and secondary containment such as components that are hydrostatically monitored or under constant vacuum or pressure are not required to be tested.

This document supersedes guidance given in Local Guidance (LG) 160,<sup>2</sup> issued on July 27, 2001, in response to the question “Should secondary containment testing be conducted on the fill/vapor riser sumps and spill containment boxes?”

[Reference cited: § 2637(a).]

#### **When is secondary containment testing required to be performed?**

Secondary containment testing is required periodically, upon the completion of repairs to the secondary containment, and upon discontinuing voluntary monitoring of the integrity of both the primary and secondary containment. Repairs to the secondary containment are required any time a secondary containment component ceases to operate properly and causes the UST to be out of compliance with UST requirements.

[References cited: §§ 2611, def. of “Repair,” & 2637(a) and Health and Safety Code, div. 20, ch. 6.7, § 25290.1(e).]

#### **When must secondary containment testing be completed?**

The term month means a calendar month. To comply with secondary containment testing requirements the period between testing cannot exceed the maximum number of months set forth in the regulations. Testing may be completed any time during or before the month testing is required but must be completed before the end of the month testing is required.

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<sup>1</sup> All citations are from California Code of Regulations, title 23, division 3, chapter 16 unless specified otherwise.

<sup>2</sup> LG 160 is located at:

[https://www.waterboards.ca.gov/water\\_issues/programs/ust/leak\\_prevention/lgs/160.shtml](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/160.shtml)

Please note, the following citation in LG 160 was moved from section 2637(a)(2) to section 2637(c) effective October 1, 2018.

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#### Installation and Periodic

Secondary containment systems require testing at installation, six months after installation, and at least once every 36 months thereafter. Installation testing is required to be completed after installation but before the system is placed into use. The month in which installation testing is completed determines the next month during which testing will be required to be completed again. The first periodic test is required six months after installation. This testing is required to be completed by the end of the sixth month after the month during which installation testing was completed. The next periodic test must be completed before the end of the 36th month after the first periodic test is required to be completed.

#### Repairs

Secondary containment components that are repaired must be tested by the end of the 30th day after the completion of the repair. The repaired component must be tested again as part of the next required periodic test, which is required to be completed by the 36th month after the month in which the last periodic test was required. Please note that the UST owner or operator may choose to change the periodic testing to the month of the repair test by testing the entire secondary containment system, instead of just the repaired components.

#### Discontinuing Voluntary Integrity Monitoring of the Primary and Secondary Containment

If voluntary monitoring of the integrity of both the primary and secondary containment is discontinued, testing must be completed by the end of the 30th day after the discontinuation of voluntary monitoring. The next test is required 36 months after the month that discontinued voluntary monitoring testing is required or at the time periodic testing is required, whichever is sooner.

[References cited: §§ 2620(e) & 2637(a).]

#### **How can the month the periodic testing is required change?**

The term month means a calendar month. A UST owner or operator may change the month periodic testing is required by performing testing earlier than required, during the desired month. Conducting testing late does not change the month testing is required. The number of months between tests is determined by when testing is required and not when testing is performed. A UST owner or operator that performs a test early may not return to the original month testing was required because the maximum number of months set forth in the regulations would be exceeded.

This document supersedes the State Water Resources Control Board's administrative guidance letter issued to Unified Program Agencies (UPAs) on January 29, 2013 titled *Testing and Certification Anniversary Dates*.

[Reference cited: § 2620(e).]

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#### **How much of the secondary containment system must be tested after a repair?**

Testing after a repair is required to demonstrate that the secondary containment component(s) in question is restored to proper operating condition. In order to demonstrate restoration of proper operating condition, it may be necessary to test a larger portion of the secondary containment system than just the repaired secondary containment component(s).

[References cited: §§ 2611, def. of “Repair” & 2637(a)(1)(B)(i).]

#### **How is testing performed?**

The test procedure used determines how the test is performed. At a minimum, the testing criteria must determine if the system performs at least as well as it did upon installation. For example, if the secondary containment system was tested upon installation by using a test method that applied a pressure of five pounds per square inch, then the periodic test must be conducted using a method that at least tests the system at an equivalent pressure.

Manufacturer guidelines must be used if the guidelines meet the testing criteria. If manufacturer guidelines do not exist or do not meet the testing criteria, then an industry code or engineering standard, such as *Petroleum Equipment Institute’s Recommended Practices 1200*, must be used. In the event there are no manufacturer guidelines, industry codes, or engineering standards, or they do not meet the testing criteria, then a method developed by a California registered professional engineer must be used.

This document supersedes guidance given in LG 160 regarding the question “When testing the sumps and dispenser containment, is it required that the entire containment be tested?”

[Reference cited: § 2637(c).]

#### **What determines a passing or failing test result?**

A passing test result is when the secondary containment performs at least as well as it did upon installation. The procedure used for testing at the time of installation determines the passing and failing test criteria. If the secondary containment fails testing, the UST service technician must provide an explanation for why the equipment failed in the applicable sections of the “Secondary Containment Testing Report Form.”

[References cited: §§ 2637(c) & Appendix VII, Sections VI, VIII, X, XII, XIV, XVI, XVIII, XX, & XXII.]

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#### **Who must perform the test?**

The test must be performed by a qualified UST service technician with training or certification by: 1) the manufacturer of the secondary containment being tested; 2) the developer of the test equipment used; or 3) the developer of the test method used. If the above training or certification does not exist, then the UST service technician must possess comparable training or certification. Comparable training or certification is training or certification in a test process applicable to the component or system. For example, if a UST service technician testing the secondary containment uses the manufacturer's guidelines and the manufacturer is no longer in business or does not provide training or certification, then the UST service technician may possess training or certification from another manufacturer of secondary containment with a comparable test procedure to satisfy the training or certification requirement.

[References cited: §§ 2637(d), 2715(f)(2)(A) & (E).]

#### **How are testing results documented?**

The UST service technician (technician) performing the test must record the results of testing on the "Secondary Containment Testing Report Form." The Form requires the technician to provide the reason for testing, facility information, technician information, testing results, and testing information. If the testing result for a component is marked as not applicable (NA) or fail, the technician must provide an explanation in the appropriate comments.

The Form identifies the reason for the test by marking the applicable box in the section titled "Type of Action." "Type of Action" identifies if the test is being performed to comply with testing associated with installation, six months after installation, repairs, or periodic testing. When testing is performed to comply with the requirement to test secondary containment components that have discontinued voluntary monitoring of the integrity of both the primary and secondary containment, the type of action should be marked as "36 Month Test" to indicate that the test is the first periodic test. The next periodic test is required by the end of the 36th month after the first periodic test is required.

Section I collects facility information. The technician must identify the facility by providing the California Environmental Reporting System number for the location along with a business name and physical address. The date testing occurred also is required to be provided in this section.

Section II collects information on the technician performing the test. The technician must provide a contractors/tank tester license number, International Code Council (ICC) certification number, and ICC certification expiration date. In addition, in each UST component information section the technician must identify the training and certification necessary to perform a test on that specific UST component and when the training and certification expires.

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Section III summarizes the results of testing. The technician must provide the results for each UST by indicating if the test result for each component associated with the UST is a “Pass” or “Fail.”. The technician should mark the not applicable (NA) box for any components listed in this section associated with a UST tested that does not exist or is not required to be tested. The technician must provide an explanation in each applicable UST component comment section (sections VI, VIII, X, XII, XIV, XVI, XVIII, XX, & XXII) for why each component is marked “Fail” or “NA.”

Section IV of the Form requires the technician to sign the “Secondary Containment Testing Report Form” certifying the accuracy of the results.

Sections V, VII, IX, XI, XIII, XV, XVII, XIX, XXI are UST component information sections. The technician must in each UST component information section identify the manufacturers of the components tested, identify the test method used to test that UST component, and identify the training and certification possessed by the technician to perform the test used. The technician identifies the manufacture of each component tested by listing the manufacturer in the appropriate UST components section and marking the applicable adjacent boxes that corresponds with the identifier for the results of that component provided in section III. In addition, these sections require the technician to attach a copy of the testing procedures that is specified in each UST component information, attach a copy of the data collected to determine testing results, and indicate the number of pages for the attached test procedure and collected data.

A copy of the completed “Secondary Containment Testing Report Form,” the attached procedures, and collected data must be submitted to the UPA and retained by the UST owner or operator for 36 months.

[References cited: §§ 2712(b)(1)(F), 2637(e), & Appendix VII.]

#### **Does the “Secondary Containment Testing Report Form” need to be submitted to the UPA?**

Yes. The completed “Secondary Containment Testing Report Form,” the attached procedure, and collected data must be submitted to the UPA within 30 days of the date testing was completed. The submission must be by hand-delivery, mail, facsimile, or other electronic methods. This document supersedes guidance given in LG 160 in response to the question “What is required regarding submittal of test results?”

[References cited: §§ 2611, def. of “Submit,” & 2637(e) & (f).]

#### **Is the UPA required to be notified prior to testing?**

Yes. UST owners or operators must notify their UPA at least 48 hours prior to testing. The UPA is not required to be present for the test to occur.

[Reference cited: § 2637(g).]

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**What if the secondary containment cannot be tested?**

If the UST owner or operator determines that the secondary containment cannot be tested, the secondary containment must be replaced with secondary containment that can be tested in accordance with section 2637.

[Reference cited: § 2637(b).]

If there are further questions regarding the secondary containment testing please contact UST Leak Prevention Unit staff at:

[https://www.waterboards.ca.gov/water\\_issues/programs/ust/contacts/ust\\_staff.shtml](https://www.waterboards.ca.gov/water_issues/programs/ust/contacts/ust_staff.shtml).

<b>Documents with Superseded Content</b>	
<i>LG-160: Underground Storage Tank Secondary Containment Testing</i>	July 2001
<i>LG-167: Qualifications &amp; Scope of Work for UST Installers and Service Technicians</i>	March 2006
<i>LG-159: Annual Underground Storage Tank Compliance Inspection Handbook</i>	May 2011
<i>Overview of UST Containment and Monitoring Requirements</i>	June 2008
<i>Testing and Certification Anniversary Dates</i>	January 2013
<i>Clarification Regarding Voluntary Pre-Testing and Preventative Maintenance for Containment Systems and Leak Detection Equipment</i>	November 2012