



UST Program Update September 2015

Notification of Revised Federal UST Regulations to UST Owners and Operators

The United States Environmental Protection Agency has recently made revisions to the federal underground storage tank (UST) regulations published in the Federal Register below.

<http://www.gpo.gov/fdsys/pkg/FR-2015-07-15/pdf/2015-15914.pdf>

On August 20, 2015, the State Water Resources Control Board (State Water Board) issued a letter to UST owners and operators notifying them that they must comply with these new federal UST regulations in addition to California UST statutes and regulations. A copy of the letter is posted at the website below.

http://www.waterboards.ca.gov/ust/adm_notices/fed_regs_comp_deadline.pdf

Enclosed with the letter are tables to assist UST owners and operators in determining which of the new requirements in the federal UST regulations will affect USTs operated in the State of California. The tables contain compliance deadlines and a general description of each of the new federal UST regulations that are more stringent than current California UST statutes and regulations. The State Water Board will provide more detailed guidance on how to meet the new federal UST requirements in the near future. For questions regarding the letter or the tables, contact Cory Hootman at cory.hootman@waterboards.ca.gov or (916) 341-5668, or Gabriel Berzamina at gabriel.berzamina@waterboards.ca.gov or (916) 524-5574.

Request for Interior Tank Lining Companies to Submit Notification of UST Lining Activities

Many Certified Unified Program Agencies (CUPAs) have expressed significant concern regarding compatibility issues associated with aging UST infrastructure. Particularly, it has been expressed that tank lining is occurring to repair or address these compatibility issues without understanding the root cause. As a result of the significant number of tank lining events going on throughout the state and not having a clear understanding as to why the increased lining events are occurring, **the State Water Board Office of Tank Tester Licensing is requesting that tank lining companies notify the State Water Board 7 days prior to commencing any tank lining activities.** This request is issued in the State Water Board letter below.

http://www.waterboards.ca.gov/water_issues/programs/ust/adm_notices/interior_tank_lining_notification_letter&form.pdf

To ensure that this message is received by tank lining companies, CUPAs should ask/remind the tank lining companies to complete the notification attached to the letter. CUPAs may also, at their discretion, complete the notification and submit to the State Water Board at the time of permit issuance and the State Water Board will then follow up with the tank lining company. The notifications will allow State Water Board staff to investigate and document and appropriately follow up on statewide issues associated with compatibility and/or with lining failure, whatever the case(s) maybe. For questions regarding this update, contact Sean Farrow at sean.farrow@waterboards.ca.gov or (916) 324-7493.

Franklin Fueling Phil-Tite 85000-1 Series Spill Containment Capacity

It has been brought to the State Water Board's attention that Franklin Fueling's Phil-Tite 85000-1 series spill containment does not always meet the minimum 5 gallon capacity requirement. It has been discovered that the volume within the rotatable (swivel) adaptor, which is normally covered with the dust cap, is incorrectly being included when measuring the capacity of the spill containment.

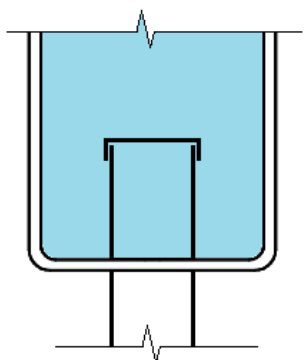


Figure 1 – Incorrect Capacity Measurement

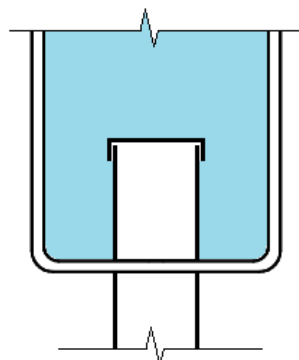


Figure 2 – Correct Capacity Measurement

The figures above show the cross section of a spill containment where the shaded area represents what is being included for the volumetric capacity. Figure 1 shows Franklin Fueling's method of measuring the capacity of the Phil-Tite 85000-1 series spill containment, in which the volume inside the rotatable (swivel) adaptor is being included for the volumetric capacity. This method of measuring the spill containment's capacity, however, is not consistent with the intended purpose of spill containment. The State Water Board deems the volume inside the rotatable (swivel) adaptor should not be included when measuring the spill containment's capacity, as shown in Figure 2.

A stainless steel sleeve or an extension of the spill containment that comes to grade may be used to achieve the minimum 5 gallon capacity. Franklin Fueling is making the necessary changes to their installation instructions for the 85000-1 series spill containment to clarify how to achieve the minimum 5 gallon capacity requirement without using the volume inside the rotatable (swivel) adaptor as part of the spill containment for new construction.

CUPAs should be aware of this matter and address the issue appropriately if spill containment is not meeting the 5 gallon minimum capacity requirement. For questions regarding this update, contact Cory Hootman at cory.hootman@waterboards.ca.gov or (916) 341-5668.