



# Underground Storage Tank Program

## May 2026 Update

### Inspection of Single-Walled Underground Storage Tanks

An underground storage tank (UST) has only three operating conditions: 1) operational; 2) temporary closure; or 3) permanent closure. Single-walled USTs that have not been permanently closed are considered operational and must be treated as such until permanent closure. Unified Program Agencies (UPAs) must continue to perform the annual compliance inspection even if the single-walled UST has been red tagged and all product has been removed from the tank.

There are some single-walled systems that are still storing motor vehicle fuel, for example emergency tank systems, or those systems the UPA did not require the product to be removed after applying the red tag. Single-walled UST systems with product must continue to perform all required tests and inspections, including but not limited to the designated UST operator inspection, cathodic protection testing, enhanced leak detection testing if located within 1,000 feet of a drinking water well, and release detection equipment testing, including testing of the automatic tank gauge. Failure to perform or pass any test or inspection must be cited on the UPA's inspection report. Additionally, the UPA has the authority to request additional testing relevant to compliance, in accordance with Health and Safety Code, chapter 6.7 (H&SC) section 25289(b). The UPA should pursue civil penalties in accordance with H&SC, section 25299 and consistent with their Inspection and Enforcement (I&E) Plan.

The State Water Resources Control Board (State Water Board) will be reviewing single-walled UST enforcement as part of the Certified Unified Program Agency Performance Evaluations.

For questions on single-walled UST inspection and enforcement expectations, please contact: Tom Henderson at (916) 319-9128 or [Tom.Henderson@waterboards.ca.gov](mailto:Tom.Henderson@waterboards.ca.gov)

### Single-Walled Enforcement Surveys

On April 24, 2026, the State Water Board UST Enforcement Unit distributed enforcement surveys to UPAs with single-walled USTs within their jurisdiction. The survey requests information on the remaining single-walled UST facilities, including closure status, any formal enforcement efforts, and any guidance or assistance needed

from the State Water Board. The survey results will be posted on the UST Enforcement Unit's single-walled UST webpage later this month.

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

## Monitoring Site Plans

California Code of Regulations, title 23 (Title 23), section 2650(c) outlines the requirements for a facility's monitoring site plan. This includes a scaled diagram indicating the layout of the tanks, piping and sumps to the extent known, locations of all release detection equipment, and each vacuum, pressure, or hydrostatically monitored zone (if applicable). As a reminder, scaled or as-built drawings have been required as part of the permit application for decades. The current version of Title 23 has simply unified the permit application and monitoring plan requirements.

State Water Board staff have received several questions regarding the level of detail required for these plans. For a diagram to be to-scale, the site plan required components must be depicted using established, proportional dimensions (for example, by including a scale bar on the plans). If completed properly, the State Water Board expects this plan to be a one-time submittal to the California Environmental Reporting System. If a new monitoring site plan needs to be drafted to meet the requirements of section 2650(c), this may be developed using a variety of methods, including professional drafting software.

Monitoring site plans are required to include only the information listed in section 2650(c). Topographic lines, parcel boundaries, utilities, ingress, or egress markings are not required to be on the monitoring site plan. When reviewing monitoring site plans, UPAs should confirm a scale bar or other scaling information is present and verify all release detection equipment locations are identified.

For additional information regarding monitoring site plans, contact: Austin Lemire-Baeten at (916) 327-5612 or [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov)

## Veeder Root TLS 350 End of Life Notification

The Veeder Root TLS-350 and earlier models (TLS-3XX) are the most common release detection equipment monitoring panels utilized in California. Veeder-Root has [discontinued sales and issued an End of Life Notification for all TLS-3XX systems.](#)<sup>1</sup> UST owners and operators may continue to use the TLS-3XX, however, if a component

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<sup>1</sup>[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj5w6iw9KKUAxXrDTQIHW8qCt8QFnoECBYQAQ&url=https%3A%2F%2Fdocs.veeder.com%2Fgold%2Fdownload.cfm%3Fdoc\\_id%3D11251&usg=AOvVaw29KEEdGjxsgp-6UX3pSna&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj5w6iw9KKUAxXrDTQIHW8qCt8QFnoECBYQAQ&url=https%3A%2F%2Fdocs.veeder.com%2Fgold%2Fdownload.cfm%3Fdoc_id%3D11251&usg=AOvVaw29KEEdGjxsgp-6UX3pSna&opi=89978449)

needs to be repaired, replacement parts are no longer being manufactured or supplied. As a result, this will require an upgrade to another tank monitoring system.

Currently, there is robust market for prohibited remanufactured or used Veeder Root TLS 3XX components. Title 23, section 2651(c) prohibits the use of release detection equipment that has been remanufactured or rebuilt by anyone other than the manufacturer of the device.<sup>2</sup> UPA inspectors should review permit applications, or maintenance and service records to determine whether any unauthorized repairs have been performed on the TLS-3XX and cite prohibited repairs. State Water Board recommends that UPAs cite at least the following violations:

*Failure of the release detection equipment to be installed, calibrated, operated, or maintained in accordance with manufacturer's specifications (UST Program Violation 2031006)*

UPAs should follow their I&E Plan when applying progressive enforcement.

For more information regarding repairs to the TLS-3XX, please contact: Michelle Suh at (916) 323-0878 or [Michelle.Suh@waterboards.ca.gov](mailto:Michelle.Suh@waterboards.ca.gov)

## **Addition to Local Guidance Letter 113 – PetroVac Auxiliary Vacuum Pump**

The State Water Board has updated Local Guidance Letter 113 (LG-113) with the Petro Specialties PetroVac Positive Displacement Vacuum Pump as a vacuum source for the [Veeder-Root Secondary Containment Leak Detection method](#).<sup>3</sup> A PetroVac auxiliary vacuum source may only be used in instances where a submersible turbine pump is not installed or as specified in the Veeder-Root Secondary Containment Vacuum Sensing module (see the California Installations section of the LG-113).

For more information regarding additions to LG-113, please contact: Stephanie Duong at (916) 322-8544 or [Stephanie.Duong@waterboards.ca.gov](mailto:Stephanie.Duong@waterboards.ca.gov)

## **28<sup>th</sup> Annual CUPA Conference – UST Leak Prevention and Office of Enforcement Presentations**

### **UST Leak Prevention Update 2026**

Tom Henderson discussed the changes to the UST Program during 2025 and expectations for 2026. This presentation was recorded for the Learning Management System.

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<sup>2</sup>See Title 23, section 2651(c)

<sup>3</sup>[https://www.waterboards.ca.gov/water\\_issues/programs/ust/leak\\_prevention/lg113/vendors/veeder\\_root\\_y.html](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/vendors/veeder_root_y.html)

### **[New UST Regulations: The Good, the Bad, and the Road Ahead](#)**

Austin Lemire-Baeten discussed the implementation of the new regulations since January 1, 2026, and expectation with Chapter 16 going forward. This presentation was recorded for the Learning Management System.

### **[UST Evaluations: What's New for You?](#)**

Magnolia Busse and Michelle Suh presented how the new Title 23 will impact CUPA Performance Evaluations. This presentation was recorded for the Learning Management System.

### **[UST Enforcement: From Single-walled to Abandoned Tanks and Beyond](#)**

Amber Camarena and Jenna Hartman presented an overview of the Office of Enforcement, UST Enforcement Unit's role in supporting UPAs with ongoing and emerging enforcement cases. They also discussed the Water Board's process for investigating and developing enforcement actions and the unit's prioritization of single-walled and abandoned USTs for 2026-2027.

### **[Single-walled Tanks Enforcement Strategies and Stories](#)**

Chase Mendenhall and Jenna Hartman discussed single-walled UST enforcement strategies and methods from the LA City Fire Department CUPA and State Water Board perspective. This course also encouraged audience discussion of current single-walled UST enforcement issues and approaches statewide, including preparing and issuing administrative enforcement orders.

### **[Steel Tanks: Allow Me to Reinroduce Myself](#)**

Steve Pollock (STI), Garrick Mullen (Watco Tanks), David Spaeth (TrueNorth Steel), and Austin Lemire-Baeten presented steel tank manufacturer and installation requirements from the steel fabricator perspective, and the lessons learned from working with the CUPAs and State Water Board.

### **[The CUPA Performance Evaluation and Assessment Process](#)**

Kaitlin Cottrell reviewed the UST portion of the CUPA Evaluation all-evaluators assessment process. This presentation was recorded for the Learning Management System.