



UST Program Update June 2021

Line Tightness Testing Requirements

State Water Resources Control Board (State Water Board) staff have fielded a number of questions regarding the annual line tightness testing requirements for secondarily contained pressurized underground pipe and whether the annual line tightness test can be performed by an electronic line leak detector (ELLD). Pressurized piping connected to underground storage tanks (UST) installed on or after July 1, 2004 are not required to perform an annual line tightness test and are therefore not included in this discussion.

The California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2636(f)(3) requires an annual simulated leak rate test capable of detecting a release equivalent to 0.1 gallon per hour (gph) at 150 percent of the normal operating pressure. Section 2636(f)(4) allows systems to utilize fail safe and positive shut off (FSPS) in lieu of the annual tightness test. Some systems, such as emergency generator systems, cannot utilize FSPS because of operational requirements and therefore the UST owner or operator must perform an annual line tightness test.

Simulated leak rate tests are a function of pressure, volume, and time. The standard line leak detector test performed annually requires a simulated leak rate of 3.0 gph (volume and time) at 10 pounds per square inch (pressure). This test could be performed at a pressure other than 10 pounds per square inch if there was a corresponding change in volume, time, or both. The ELLD can also modify the line tightness test parameters to arrive at the correct result. As the turbine can never exceed 100 percent operating pressure and therefore would not test at 150 percent of normal pressure, the ELLD achieves the simulated leak rate test results by either extending the time of the test, detecting a lesser volume, or both. ELLDs that are capable of performing the annual line tightness test must be listed in [Local Guidance \(LG\) 113 — List of Leak Detection Equipment and Methods for Underground Storage Tanks](#)¹ as capable of performing a 0.1 gph line tightness test.

¹ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/

For additional information regarding line tightness testing requirements, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Adhesive for NOV Pipe Fittings

NOV Fiberglass Pipe Systems has notified the State Water Board that due to ongoing shortages of a component chemical in the 8000 series resin kits, the PSX series resins will be shipped in lieu of the 8000 series resins on open purchase orders until the shortage is resolved. Both the 8000 series and PSX series resin kits are UL listed for use with all NOV pipe and fitting products. NOV notes this is the only solution available for the time being and will keep the State Water Board and Unified Program Agencies (UPAs) apprised of any changes to the status of the 8000 resin kits moving forward. UST inspectors will be able to detect the PSX resin as the color is bright red rather than the usual opaque amber color of the 8000 series resin.

For additional information regarding changes to pipe fitting adhesives, contact Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Use of California Environmental Reporting System “General” Violations When Specific Violations are Available

The State Water Board has observed an increase in the use of California Environmental Reporting System (CERS) “General” violations when specific violations are available. The consistent and correct use of specific violations is essential for a successful inspection and enforcement program. The use of specific violations provides UST owners or operators the correct citation for the compliance issue observed, allowing them to properly address the correct condition and further assist the UPA in resolving the compliance issue if further enforcement is required. CERS “General” violations do not include code citations which are needed to understand what provision of the UST Program is being violated. UPAs may have difficulty achieving compliance if the UST owner or operator is not fully aware of the specific requirements. Additionally, the consistent and correct use of violations is required to achieve accurate Technical Compliance Rate (TCR) reporting by the State Water Board to the United States Environmental Protection Agency (U.S. EPA).

As described in [LG 164-4—Reporting of Technical Compliance Rate \(For use on or after July 1, 2020\)](#)², TCR performance measures are used to assess national compliance with the federal UST Program as determined by the U.S. EPA. The use of a CERS “General” violation, rather than the specific TCR violation, could result in the incorrect reporting of TCR for that UST facility. For example, if UPAs observe a line leak detector not functioning properly, the violation would *never* be the CERS “General” violation number 2060. The correct violation would be the “Release Detection (USEPATCR 9d)” violation 2040025, for “Failure of the functional line leak detector monitoring pressurized piping” which would include both the citation for the UST owner or operator as part of the inspection report, and properly count the TCR for the facility.

To ensure consistent and correct reporting, UST inspectors should familiarize themselves with the [CERS violation library](#)³ to assist in using the correct violation, and prevent misuse of “General” violations. Violations associated with TCR compliance measures are identified in the CERS violation library with “USEPATCR” in the violation name. If a specific violation is not already available in the CERS violation library, UPAs are encouraged to propose to the State Water Board the potential addition of that violation to the CERS violation library.

For additional information regarding the use of CERS “General” violations when specific violations are available, contact:

Ms. Jessica Botsford at (916) 341-7338 or Jessica.Botsford@waterboards.ca.gov, or Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Manufacturer Name Change for UST Leak Detection Equipment and Methods

Effective September 1, 2020, Praxair Services, Inc. changed its name to Linde Services, Inc. The State Water Board has confirmed with Linde Services, Inc. that training and services remain the same, and [Local Guidance \(LG\) 113 — List of Leak Detection Equipment and Methods for Underground Storage Tanks](#)⁴ has been updated to reflect the name change for from Praxair Services, Inc. leak detection equipment and methods to Linde Services Inc. The following UST leak detection equipment and methods were formerly listed under the manufacturer name Praxair Services, Inc. and will now be found under Linde Services, Inc.:

² https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/lg_164_4.pdf

³ <https://cersbusiness.calepa.ca.gov/Public/Violations>

⁴ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/

- *Tracer Tight for Large Aboveground Storage Tank Systems*
- *Tracer ALD 2000 Automated Tank Tightness Test*
- *Tracer ALD 2000 Automated Line Tightness Test*
- *Tracer Tight Line Test*
- *Tracer Tight (NVTTT)*
- *Tracer Tight (Vapor-Phase Detector)*
- *SeeperTrace™*

The State Water Board will additionally modify all other documented references of Praxair Services, Inc. to Linde Services, Inc.

For additional information regarding the manufacturer name change from Praxair Services, Inc. to Linde Services, Inc., contact:

Mr. Sean Farrow at (916) 324-7493 or Sean.Farrow@waterboards.ca.gov, or
Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.