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Secretary for  
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# State Water Resources Control Board

## Division of Water Quality

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### FORMAL NOTIFICATION TO FACILITIES TO IMPLEMENT ENHANCED LEAK DETECTION TESTING

This is a formal notification that your underground storage tank (UST) system is subject to Enhanced Leak Detection (ELD) testing, based on information in the State Water Resources Control Board's (State Water Board) Geographical Information System (GIS) mapping database ("GeoTracker"). Our information indicates that your UST system is located within 1,000 feet of a public drinking water well(s). Part A of this letter discusses UST facility and well data related to GeoTracker. Part B explains the ELD requirements for UST systems within 1,000 feet of a public drinking water well. Part C explains the process for requesting reconsideration of this notification.

#### PART A. UST FACILITY AND WELL DATA RELATED TO GEOTRACKER

Local permitting agencies provided information on UST facilities within their jurisdictions to GeoTracker. This information is available on the GeoTracker website: <http://geotracker.waterboards.ca.gov>. Click on the Site/Facility Finder link under "Tools" and search for UST sites using the Address Search function. Find your facility by entering only the street number followed by an \*(asterisk) in that field and then the City name followed by an \* in the City field as the address is shown above. Then select Search for UST Sites by clicking that button and click on Search Records. This should retrieve your unique facility but you may also retrieve several other UST facilities; so just pick yours by clicking on REPORT and/or SHOW ON MAP at the end of your record. Enter more detailed search criteria, if you are unable to locate your UST facility. If you cannot retrieve the map and report for your facility, please contact Terry Snyder by phone (916) 341-5385, or at [tsnyder@waterboards.ca.gov](mailto:tsnyder@waterboards.ca.gov).

The Department of Health Services and local water districts provided information on public drinking water wells and their locations to GeoTracker. Due to security concerns, well location information is no longer available to the public and cannot be accessed on the GeoTracker website. Enclosure 1 provides the Facility ID number for your UST system, the name of the water purveyor(s) (owner of the public drinking water well), and the name and telephone number of the water purveyor(s) contact person, if available. **To verify well information concerning your facility, you will need to contact the water purveyor(s).**

*California Environmental Protection Agency*



## **PART B. UST SYSTEMS SUBJECT TO ELD TESTING**

### **UST Systems with a Single-Walled Component**

UST systems with a single-walled component have one or more of the following characteristics:

- single-walled tank,
- single-walled pressurized piping,
- single-walled conventional suction piping, and
- turbines without secondary containment.

Vent or tank riser piping, vapor recovery piping, and "safe" or "European" suction piping are not considered single-walled components if they meet the applicable criteria in the regulations [Cal. Code of Regs., Title 23, § 2636, subd. (a)].

The owner or operator of an UST system with one or more single-walled components located within 1,000 feet of a public drinking water well, as identified on GeoTracker, is required to submit and have a program of ELD testing approved by the local permitting agency within six months from the date of this formal notification. (Health & Saf. Code, § 25292.4 and Cal. Code of Regs., Title 23, §§2640 and 2644.1.) An approved program of ELD testing must be implemented no later than 18 months following this formal notification. Your UST system with single-walled components will be subject to this requirement every three years thereafter, or until you replace all single-walled piping and tanks with double-walled components. (*Id.*) Also, please refer to Enclosure 2, Local Guidance (LG) letter 161-3.

To avoid triennial ELD testing, you may upgrade your UST system so that it does not have a single-walled component. If you decide to replace your single-walled components with double-walled components, you must notify your local permitting agency and follow all required permitting procedures. You must complete the removal of single walled piping and components by the date that ELD testing is required for your UST system. You must also file a Request for Reconsideration (RFR) Form with the State Water Board after the old UST system is removed. Please note that you will have to conduct an ELD test on a new UST system before it is placed into use [Health & Saf. Code, § 25290.1(j)].

Low-interest loans and grants are available to help qualified owners and operators of small, independently owned and operated UST facilities remove and replace UST components. See Enclosure 3 (in orange) and Enclosure 4 (in yellow) for details.

## **UST Systems with Secondary Containment**

UST systems with secondary containment have the following characteristics:

- double-walled tanks,
- double-walled piping,
- containment sumps, and
- under-dispenser containment.

For UST systems with secondary containment that were installed before July 1, 2003 and are located within 1,000 feet of a public drinking water well, one-time ELD testing is required. Health and Safety Code, §25289, subdivision (b) authorizes the State Water Board to require this testing. We find that the burden of the testing, including costs, bears a reasonable relationship to the need for regulatory agencies to be provided with information on tank integrity. Also, please see Enclosure 2.

The owner or operator of an UST system with secondary containment within 1,000 feet of a public drinking water well must submit and have a program of ELD testing approved by the local permitting agency within six months from the date of this formal notification. An approved program of ELD testing must be implemented no later than 18 months following this formal notification. (Cal. Code Regs., Title 23, § 2644.1.)

Low-interest loans and grants are available to help qualified owners and operators of small, independently owned and operated UST facilities remove and replace UST components. See Enclosure 3 (in orange) and Enclosure 4 (in yellow) for details.

### **PART C. REQUEST FOR RECONSIDERATION OF THIS NOTIFICATION**

If you believe that your UST system is not subject to the ELD testing requirement, you may request reconsideration from the State Water Board's UST Program Manager. Information on the request for reconsideration process is included in Enclosure 5 (RFR Form, in blue), as well as in Enclosure 2. (See also Cal. Code Regs., Title 23, § 2640, subd. (e).) If you have previously completed ELD testing, you are not required to submit a RFR, however, you must submit a copy of the test results to the State Water Board.

Anyone wishing to submit an RFR must fill out the form and submit it to both the local permitting agency and the State Water Board's UST Program Manager. The RFR must be received no later than 60 calendar days from the date this notification letter was mailed. The request must demonstrate at least one of the following:

- the UST system is properly closed;
- the UST system is exempt from regulation;
- all nearby wells are more than 1,000 feet from the closest component of the UST system, or
- all nearby wells are not public drinking water wells.

Regulations require the State Water Board's UST Program Manager to make a decision on the RFR and notify the person who requested reconsideration and the applicable local agency of the decision within 90 calendar days of receipt of a complete RFR package.

If you have questions about this notification regarding ELD, please contact the State Water Board's UST Program by phone at (916) 341-5866 or by e-mail at [eld@waterboards.ca.gov](mailto:eld@waterboards.ca.gov) and leave a message so that a staff person can follow up.

Sincerely,

Kevin L. Graves, P.E., Manager  
Underground Storage Tank Program

Enclosures (5)

1. UST facility name, ID, and water purveyor contact information
2. Local Guidance Letter 161-3
3. Replacement of Underground Storage Tank (RUST) Program Flyer (in orange)
4. Installing Underground Storage Tanks (IUST) Program Flyer (in yellow)
5. RFR Form/Instructions (in blue)