Public Comment
Proposed UST Regs
Deadline: 4/11/18 by 12 noon

FASTECH
RETAIL PETROLEUM • RETAIL NATURAL GAS • CAR WASH SYSTEMS

RECEIVED
4-10-18
SWRCB Clerk

April 10, 2018

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-200

RE: COMMENT LETTER – PROPOSED UNDERGROUND STORAGE TANK REGULATIONS

Dear Ms. Townsend:

This letter serves to document comments and or questions on behalf of Fueling and Service Technologies Inc. (FASTECH) in response to the State Water Resources Control Board's proposed modifications to chapter 16 of division 3 of the California Code of Regulations, regarding underground storage tanks.

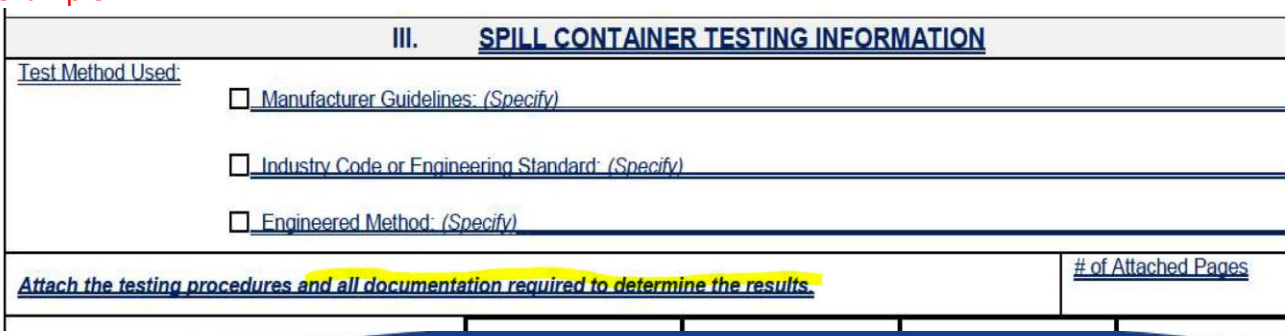
General Comments applying to all new test documentation forms (monitoring certification, secondary containment, spill container testing, overfill prevention equipment inspection):

Will the new state forms be available in a fillable word document?

Most all the new state forms have a field stating "Attach the testing procedures..." If a testing company performs the required testing per the *PEI RP1200, Recommended Practices for Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities,* is attaching that document or any additional test procedures necessary?

Most all the new state forms ask for "# of attached pages". Is that # for the given section or the submittal document total? For example, if a testing company has a three page test procedure for all secondary containment testing, should that page count be counted only once on one test form or should the same three pages be repeated on each section of the test form (i.e. tank annulars, lines, sumps, etc.).

Most all the new state forms also state "attach all documentation required to determine the results." This implies that the older "voluntary" forms also need to be submitted. Can you please clarify what backup documentation the state is requiring to be included when determining if results Pass or Fail? See below as an example



III. SPILL CONTAINER TESTING INFORMATION

Test Method Used:

☐ Manufacturer Guidelines: *(Specify)*

☐ Industry Code or Engineering Standard: *(Specify)*

☐ Engineered Method: *(Specify)*

Attach the testing procedures and all documentation required to determine the results.	# of Attached Pages

7050 VILLAGE DRIVE, SUITE D • BUENA PARK, CA 90621
OFFICE: (714) 523-0194 • FAX: (714) 523-4235 • WWW.FASTECHUS.COM

New Monitoring Certification System State Form:

Sections V & XVI (signature and Site plan): Given that technicians are required to state on page one of the state form that all information, including what is on the map is "true and/or complete and accurate", they are reluctant to venture a guess as to how the underground piping is run. We have always included all tanks, sumps, dispensers, console and the corresponding sensors but do not have access to as built plans that show piping layouts.

Date site map was prepared:
If you already have a site plan that shows all required information, you may include it, rather than this page, with your Monitoring System Certification Form. The site plan must show the general layout of tanks and piping and clearly identify locations of the following equipment, if installed: 1) monitoring system control panels; 2) in-tank liquid level probes (if used for leak detection); 3) devices monitoring tank annular spaces or vault; 4) devices monitoring product piping; 5) devices monitoring fill piping; 6) devices monitoring vent piping; 7) devices monitoring vapor recovery piping; 8) devices monitoring vent/transition sumps; 9) devices monitoring under-dispenser containment; 10) line leak detectors; and 11) devices monitoring any other secondary containment areas.

Section VI (Inventory of Equipment Certified): The new monitoring system certification state form indicates "SW Tank" for the "in-tank gauging" device/model. If the field is to only be used for single walled tanks, where is a tester to put the in-tank gauging model for double walled tanks?

UNDERGROUND STORAGE TANK
MONITORING SYSTEM CERTIFICATION FORM (Page 2 of 6)

VI. INVENTORY OF EQUIPMENT CERTIFIED

A separate Monitoring System Certification Form must be prepared for each monitoring system control panel.

Make of Monitoring System Control Panel	Model of Monitoring System Control Panel	Software Version Installed

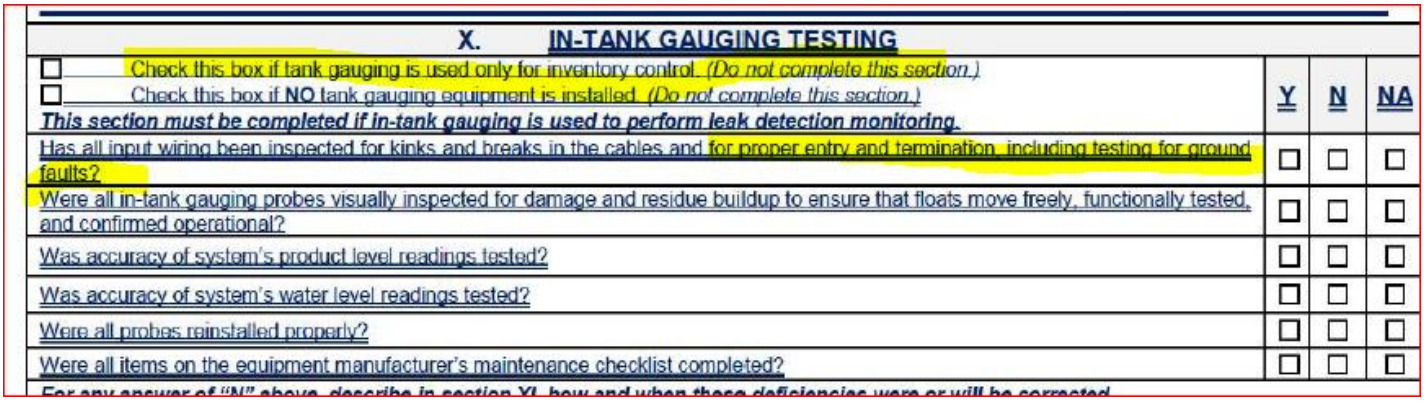
Check the appropriate boxes to indicate specific equipment inspected/serviced.

Monitoring Device Used	Device Model #	Monitoring Device Used	Device Model #
Tank ID: *(By tank number, stored product, etc.)*		**Tank ID:** *(By tank number, stored product, etc.)*	
☐ In-tank Gauging *(SW Tank)*		☐ In-tank Gauging *(SW Tank)*	
☐ Annular Space or Vault Sensor		☐ Annular Space or Vault Sensor	
☐ VPH Sensor		☐ VPH Sensor	
Product Piping		**PRODUCT PIPING**	

Section VIII (Monitoring System & Programming): Please provide clarification on this section that reads "…for residual buildup to ensure that floats move freely." This requirement is not a problem with 420, 304, 409, 111 sensors, but this cannot be verified on 208 & 323 floats which are contained in a housing. How do we look for residual build-up on sensors where the float is encased within a sensor body and cannot be inspected visually (i.e. Veeder Root 208/209/205, VR323, and Veeder Root 001 – stand-alone sensors)?

Were all sensors visually inspected for kinks and breaks in the cables and for residual buildup to ensure that floats move freely, functionally tested, and confirmed operational?

Section X (In tank gauging): Should section X be completed if the TLM/Probe is used for both inventory control and overfill prevention? Clarification: can you define what is meant by "proper entry and termination"?



X. IN-TANK GAUGING TESTING			
☐ Check this box if tank gauging is used only for inventory control. *(Do not complete this section.)* ☐ Check this box if **NO** tank gauging equipment is installed. *(Do not complete this section.)* ***This section must be completed if in-tank gauging is used to perform leak detection monitoring.***	Y	N	NA
Has all input wiring been inspected for kinks and breaks in the cables and for proper entry and termination, including testing for ground faults?	☐	☐	☐
Were all in-tank gauging probes visually inspected for damage and residue buildup to ensure that floats move freely, functionally tested, and confirmed operational?	☐	☐	☐
Was accuracy of system's product level readings tested?	☐	☐	☐
Was accuracy of system's water level readings tested?	☐	☐	☐
Were all probes reinstalled properly?	☐	☐	☐
Were all items on the equipment manufacturer's maintenance checklist completed?	☐	☐	☐
For any answer of "N" above, describe in section XI, how and when these deficiencies were or will be corrected.			

Monitoring Certification General Comments/Questions:

All references to testing of shear valves seems to have been removed from the new state form. We assume this to mean that shear valves are no longer required to be tested at the annual monitoring certification. Can you please confirm?

The section of the original monitoring certification state form that prompted the inspection of the overfill warning alarm

> *"For tank systems that utilize the monitoring system as the primary tank overfill warning device (i.e., no mechanical overfill prevention valve is installed), is the overfill warning alarm visible and audible at the tank fill point(s) and operating properly? If so, at what percent of tank capacity does the alarm trigger*?"

has been removed. Is it safe to assume that this has been removed due to the fact that the overfill prevention equipment is now only required to be performed triennially and is captured on its own form? Please confirm.

New Secondary Containment Testing Forms:

Section III: The state form summary page has been modified to have piping and other components associated with individual tanks. How are the following types of lines to be denoted: manifolded product, vent or vapor, syphon lines, abandoned and/future lines between sumps. Many stations are piped in such a way that multiple tanks "share" piping or a tank could have more than one product line associated with it. For example, we have a site that we test that has four tanks (87M, 87 aux, 91, D) and 6 lines (87 main PL, 87 manifolded PL, 87 syphon line, and 87 M to Diesel "future" line and 91 & Diesel PL's). Entering "shared" piping on multiple tanks would give the impression that each tank has dedicated lines. How should "shared" lines be entered in the summary section of the new secondary containment testing form so as not to show duplication?

Concerning verifying interstitial communication of secondary lines on shallow steel Bravo boxes or UDC's with rigid penetrations (no access to secondary to vent the line), how can communication be verified?

Overfill Prevention Equipment Inspection

Section IX: We have heard from some CUPA's that if vent piping is secondarily contained, then the ball float inspection may not be required. Can you please confirm if this is the case?

Is the vent piping secondarily contained?	☐ Yes ☐ No

Please clarify if this question refers to any and all forms of overfill protection or just one in particular?

At what level in the tank is the overfill prevention set to activate? *(Inches from bottom of tank.)*	

Please clarify if this refers to any and all forms of overfill protection or just one in particular?

What is the percent capacity of the tank at which the overfill prevention equipment activates?	

If you have any questions please call the undersigned at (714) 523-0194, extension 8327.

Sincerely,
FASTECH, Inc.

Glen Ragle
Testing Program Manager