



State Water Resources Control Board



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Arnold Schwarzenegger
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LG 167: QUALIFICATIONS AND SCOPE OF WORK FOR UST INSTALLERS AND SERVICE TECHNICIANS

(Available electronically at <http://www.waterboards.ca.gov/ust>)

To: Local Agencies, Tank Testers, and Other Interested Persons

The purpose of this letter is to 1) clarify training and certification requirements for individuals installing, repairing, calibrating, and maintaining underground storage tank (UST) systems or components thereof; and 2) provide guidance on which tasks should be conducted by qualified installers and service technicians.

QUALIFICATIONS

California Health and Safety Code (HSC), Section 25284.1, subdivision (a)(4)(A)(i) states that the State Water Resources Control Board (State Water Board) shall adopt regulations requiring UST installers and service technicians to meet minimum industry-established training standards.

Regulations implementing this statutory requirement have been adopted by the State Water Board, and can be found at Title 23, California Code of Regulations (CCR), Section 2715, subdivisions (g)-(i).

Minimum qualifications for installer and service technician classifications are defined in CCR, Section 2715 as follows:

Qualified Installers must possess or work under the direct and personal supervision of an individual physically present at the work site who possesses all of the following:

- 1) A valid, current contractor's license issued by the Contractors State License Board (may be issued to the installation company, not necessarily the individual on-site)¹, and
- 2) A valid, current certificate of training from the manufacturer(s) of the component(s) being installed, and
- 3) A valid, current UST Installation/Retrofitting certificate issued by the International Code Council (ICC).

Qualified Service Technicians must possess or work under the direct and personal supervision of an individual physically present at the work site who possesses all of the following:

- 1) One of several permissible valid, current contractor's licenses issued by the Contractors State License Board² (may be issued to the installation company, not

¹ Refer to LG 48-5 for more information on CSLB licensing requirements for UST installers.

² CCR, Title 23, section 2715, subdivision (i) identifies the following as permissible Contractors State License Board licenses for service technicians: (1) Class "A" General Engineering Contractor License; (2) C-10 Electrical Contractor License; (3) C-34 Pipeline Contractor License; (4) C-36 Plumbing Contractor License, or (5) C-61 (D40) Limited Specialty Service Station Equipment and Maintenance Contractor License.

- necessarily the individual on-site), or a Tank Tester's license issued to the individual by the State Water Board, and
- 2) A valid, current California UST Service Technician certificate issued by the International Code Council (ICC), and
 - 3) A valid, current certificate of training from the manufacturer(s) of the component(s) being tested, repaired, or serviced. In the event that no training or certification exists, the local agency may approve comparable alternate training or certification.

For both installers and service technicians, the qualified individual must be on-site providing direct and personal supervision at all times when work is being done on the UST system. The qualified individual should sign any required documentation for work done on the UST system (Monitoring System Certification Form, Secondary containment testing report form, etc.). Multiple individuals cannot combine qualifications to meet the requirements listed above. For example, consider an individual who possesses a CSLB license and current ICC Service Technician certificate, who is working with an individual possessing only a current manufacturer's training certificate. Because neither of these individuals is fully qualified, they cannot perform the work of a service technician, even if they are working together.

SCOPE OF WORK

The State Water Board has recently received numerous questions about whether specific repair, installation, and maintenance tasks should be conducted by a qualified installer or service technician. The following tasks are specifically identified in statute and/or regulations:

Tasks that MUST be conducted by a Qualified Service Technician

- All work related to UST leak detection monitoring equipment, including installation, repair, replacement, maintenance, and calibration;³
- Annual Monitoring System Certification;⁴ and
- Secondary containment testing, including initial testing of newly installed secondary containment systems.⁵

Tasks that MUST be conducted by a Qualified Installer

- Installation of an underground storage tank and/or connected piping;⁶ and
- Completion of all work on the tank/piping manufacturer's installation checklist.⁷

When considering who is qualified to perform tasks not specifically addressed in statute or regulations, it is important to recognize that the intent of these training and certification requirements is to ensure that individuals working with UST systems are adequately trained and knowledgeable in the tasks that they will be performing. Based on a review of the scope and content of ICC's UST Installation/Retrofitting and California UST Service Technician exams, we make the following recommendations:

³ CCR, Title 23, Section 2638, subdivision (b).

⁴ CCR, Title 23, Section 2638, subdivision (b).

⁵ CCR, Title 23, Section 2637, subdivision (d).

⁶ CCR, Title 23, Section 2715, subdivision (g).

⁷ CCR, Title 23, Section 2635, subdivision (d)(3).

1. A qualified service technician should be used to conduct repair or maintenance work on operating UST systems, so long as that work can be accomplished without any excavation. Repair and maintenance work may include replacement of components (including spill buckets, overfill prevention devices, and ancillary piping components like flex connectors, penetration fittings, etc.) located within sumps and under-dispenser containment, so long as the general layout of the UST system is not altered.
2. A qualified installer should be used to conduct all work requiring excavation and/or back-filling of any portion of the UST system. This may include the repair of buried tanks, piping, sumps, or under-dispenser containment where excavation is required to conduct the repair. Qualified installers may also replace components (excluding monitoring equipment) located within sumps and under-dispenser containment

If you have questions regarding this document, contact the UST Program at (916) 341-5775 or via e-mail at ust@waterboards.ca.gov.

Sincerely,

[Original Signed By]

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