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State Water Resources Control Board

Division of Water Quality

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Gray Davis
Governor

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our website at <http://www.swrcb.ca.gov>.*

October 7, 2003

To: All Local Underground Storage Tank (UST) Program Managers, CUPAs, and Regional Board UST Program Managers

FLEXIBLE PIPING ADVISORY

As you may know from previous State Water Resources Control Board staff correspondence, (April 23, 2003, e-mail from Ms. Laura Chaddock), several East Coast states have documented problems regarding degradation and failure of flexible piping. Some of the problems noted in these states include softening, delamination, creeping, disbondment, swelling, cracking, fitting and gasket failure, and blowout. It has come to our attention that California, as well as some of the other western states, may have sites with problems similar to those reported in the eastern states.

We do not know the current extent of flexible piping problems in California. Therefore, we believe that looking closer at those facilities with flexible piping is necessary to determine if there is a problem. We recommend that before conducting your inspections, you review previous inspection reports and determine whether there is flexible piping at the facility. During your inspections at facilities with flexible piping, we recommend that you document the condition of the flexible piping with photographs and note the progression of changes that may have occurred.

The State of Mississippi Department of Environmental Quality (MDEQ) has used photographs as well as written observations to document several incidents of flexible piping degradation and failure. MDEQ's website provides information on potential problems with flexible piping: <http://www.deq.state.ms.us/newweb/gwhome.nsf/pages/USTInformation>.

The website also includes a flexible piping identification guide and a letter to UST owners/installers in the State of Mississippi. In this letter, MDEQ lists some examples of visible evidence that may indicate that the integrity of the flexible piping system is compromised. We have enclosed a copy of this letter from MDEQ for your reference.

As mentioned in Ms. Chaddock's e-mail, Underwriters Laboratories (UL) is working to address the flexible piping degradation and failure problems. We reiterate Ms. Chaddock's suggestion that you report problems with flexible piping degradation and/or failures bearing a UL mark directly to UL. To file a report, complete the Consumer Product Report Form online at: <https://www.ul.com/consumers/conproddb.cfm>. (Reports are used by UL to investigate potential problems with listed products, which can lead to improved testing and design of products. As part of the online report, UL will accept images of the product. Additionally, a more complete

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investigation may be conducted if you send them a sample of the UL product.) If you would prefer, you may send the information and/or product sample directly to us and we will forward it to UL.

If you or your inspectors observe degradation or failure of flexible piping, please provide us with your documentation, including photographs. Please also send a duplicate copy of the Consumer Product Report Form you sent to UL so that we can also track these problems. You may send this information to: Mr. Michael Sahlin, State Water Resources Control Board, Division of Water Quality, Groundwater Quality Branch, P. O. Box 2231, Sacramento, CA 95812.

If you have questions about this advisory, please contact Mr. Michael Sahlin at (916) 341-5864 or sahlinm@swrcb.ca.gov, Ms. Laura Chaddock at (916) 341-5870 or chaddocl@swrcb.ca.gov, or me at (916) 341-5810 or alfordl@swrcb.ca.gov.

Sincerely,

[original signed by]

Leslie J. Alford, Chief
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Enclosure

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