



# UST Program Update June 2023

## Secondary Containment Testing

State Water Resources Control Board (State Water Board) staff have been asked about Unified Program Agencies (UPAs) requiring two passing results for secondary containment testing to determine whether the containment is tight. This is not a requirement of California Code of Regulations, title 23, chapter 16 (Underground Storage Tank (UST) Regulations), and UPA's do not have the authority to require additional testing without a local ordinance. A passing secondary containment test demonstrates the interstice is intact and can contain an unauthorized release until it has been detected and removed from the interstice.

For additional information regarding secondary containment testing, contact: Austin Lemire-Baeten at (916) 327-5612 or [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov), or Jenna Hartman at (916) 327-8563 or [Jenna.Hartman@waterboards.ca.gov](mailto:Jenna.Hartman@waterboards.ca.gov).

## Compatibility Documentation

Owners and operators storing newly developed hazardous substances often do not have an independent testing organization's statement of compatibility for their system to store new substances. As a result, those owners and operators are required to obtain statements of compatibility from the manufacturer for any UST components that will come into contact with the proposed hazardous substance. Select owners and operators are working with various fuel additive manufactures to compile lists of compatibility documentation that apply to the equipment in their systems and the hazardous substances stored therein. These lists are useful resources, but they do not exempt owners or operators from notifying the presiding UPA of a change of hazardous substance 30 days prior to the change in substance stored as required by UST Regulations, section 2711(c). This required notification must include compatibility documentation provided to the UPA prior to storage to demonstrate compatibility between the UST system and proposed hazardous substance.

For additional information regarding compatibility documentation, contact:  
Austin Lemire-Baeten at (916) 327-5612 or [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov),  
or Jenna Hartman at (916) 327-8563 or [Jenna.Hartman@waterboards.ca.gov](mailto:Jenna.Hartman@waterboards.ca.gov).

## **Linings on Secondarily Contained Tanks**

Any UST, single-walled or secondarily contained, can be lined one time either as a prophylactic measure or as a repair. If a tank has a release after being lined, the tank may not be repaired by lining. Lining can be performed with a spray coating, fiberglass, or other material that bonds directly to the primary containment of the tank. As part of any new lining, UST Regulations, section 2663(g) requires a tank integrity test be performed before returning the system to service.

Lining inspections require a vacuum test in accordance with UST Regulations, section 2663(h)(2), however, lining inspection vacuum tests are not tank integrity tests and cannot be used in lieu of integrity tests. Additionally, secondary containment testing as described in section 2637(c) does not meet the tank integrity testing requirements.

For additional information regarding linings of USTs, contact:  
Austin Lemire-Baeten at (916) 327-5612 or [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov),  
or Jenna Hartman at (916) 327-8563 or [Jenna.Hartman@waterboards.ca.gov](mailto:Jenna.Hartman@waterboards.ca.gov).

## **Active Licensed Tank Testers**

Local guidance letter 105 (LG-105) is a periodically updated document that lists tank testers with either current or recently expired tank tester licenses. Individuals without a current tank tester license are not permitted to test USTs within the State of California. Current versions of local guidance letters are posted to the [local guidance letters webpage](#)<sup>1</sup>.

For additional information regarding active licensed tank testers, contact:  
Kaitlin Cottrell at (916) 319-0742 or [Kaitlin.Cottrell@waterboards.ca.gov](mailto:Kaitlin.Cottrell@waterboards.ca.gov).

## **Office of Tank Tester Licensing Webpage Updates**

The Office of Tank Tester Licensing (OTTL) has updated the [OTTL webpage](#)<sup>2</sup> to provide additional functionality for the user interface. This webpage offers links to OTTL Regulations, testing notification forms, and the List of Leak Detection Equipment (LG-113). Additionally, the OTTL webpage provides licensing information for

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<sup>1</sup> [https://www.waterboards.ca.gov/ust/leak\\_prevention/lgs/](https://www.waterboards.ca.gov/ust/leak_prevention/lgs/)

<sup>2</sup> [https://www.waterboards.ca.gov/ust/tank\\_testers/](https://www.waterboards.ca.gov/ust/tank_testers/)

applicants, study materials for the exam, and the List of State Water Board Licensed Tank Testers (LG-105).

For additional information regarding the OTTL webpage updates, contact:  
Kaitlin Cottrell at (916) 319-0742, or [Kaitlin.Cottrell@waterboards.ca.gov](mailto:Kaitlin.Cottrell@waterboards.ca.gov).