



Underground Storage Tank Program

September 2026 Update

Local Guidance 202 - Inspection and Enforcement Plan

The State Water Resources Control Board (State Water Board) has posted [Local Guidance \(LG\) 202 - Underground Storage Tank Program Inspection and Enforcement \(I&E\) Plan](#).¹ This guidance supplements the California Environmental Protection Agency's [2025 I&E guidance document](#)² by addressing requirements specific to underground storage tanks (USTs) in California Code of Regulations, title 23, division 3, chapter 16, section 2610 et seq. (UST Regulations).

The State Water Board recommends that all Unified Program Agencies (UPAs) review their current I&E plan to ensure alignment with UST Regulation requirements. Evaluation staff will continue to review I&E plans as part of the Unified Program Evaluation process. UPAs with I&E plans containing outdated citations or missing components required under sections 2682(b) and 2694 may be issued an incidental finding.

For questions regarding the LG 202, contact Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Continuity Confirmation Requirements

Continuity confirmation is a requirement of UST Regulations, section 2640(b)(4) and must be performed on piping during the release detection equipment testing for Type 3 UST systems and during the secondary containment testing for Type 1 and 2 UST systems. Continuity is determined by ensuring the piping interstice is unobstructed.

Continuity may be demonstrated using a variety of methods; however, the State Water Board expects continuity to be confirmed between the turbine or piping sump and the furthest dispenser. Continuity confirmation is required only for piping and is not currently required for secondarily contained tanks or sumps. This does not preclude the

¹ https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg202.pdf

² <https://calepa.ca.gov/wp-content/uploads/2025/03/CalEPA-IE-Plan-Guidance-Document-2024-3-13-25-Revision.pdf>

inspectors from requesting the UST owner or operator to confirm secondarily contained sumps are properly constructed and monitored.

The State Water Board recognizes that confirming piping continuity may be difficult at some facilities due to how these systems were constructed. In most cases, owners and operators are not expected to make any construction modifications to existing systems solely to facilitate continuity confirmation. UST Regulations allow the UPAs to confirm continuity “to the extent practical”.³ The State Water Board is aware of single point test units currently in development that should allow continuity to be determined from one location, typically the turbine sump. Once these test units become widely available, confirming continuity would be practical at virtually all facilities.

For additional information on continuity confirmation requirements, contact Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Correct OPW 71SO Installation and Inspection Forms

The [October 2024 UST Program Update](#)⁴ notified UPAs that OPW 71SO overfill prevention valve (71SO) Appendix A was the only authorized form for 71SO installations and 36-month overfill prevention equipment testing. OPW has since provided new manufacturer procedures to its [71SO Testable Overfill Prevention Valves Installation and Maintenance Instructions](#).⁵ This new procedure uses tank calibration charts to calculate the 71SO upper tube length without relying on riser or manway height measurements to determine initial or final shut-off level.

Service technicians must utilize the correct form as prescribed by the manufacturer. UPAs must ensure the new OPW manufacturer procedures and forms are used for all 71SO installations and overfill prevention equipment testing. Individuals performing installations or testing must be certified by the manufacturer.

For more information regarding the OPW overfill documentation, contact Stephanie Duong at (916) 322-8544 or Stephanie.Duong@waterboards.ca.gov.

Construction and Monitoring Requirements for Facilities with Multiple UST Types

The State Water Board often receives questions regarding construction and monitoring requirements for facilities that have a combination of UST types. A facility with a Type 3 UST system operating independently, with no shared piping or sump components with a

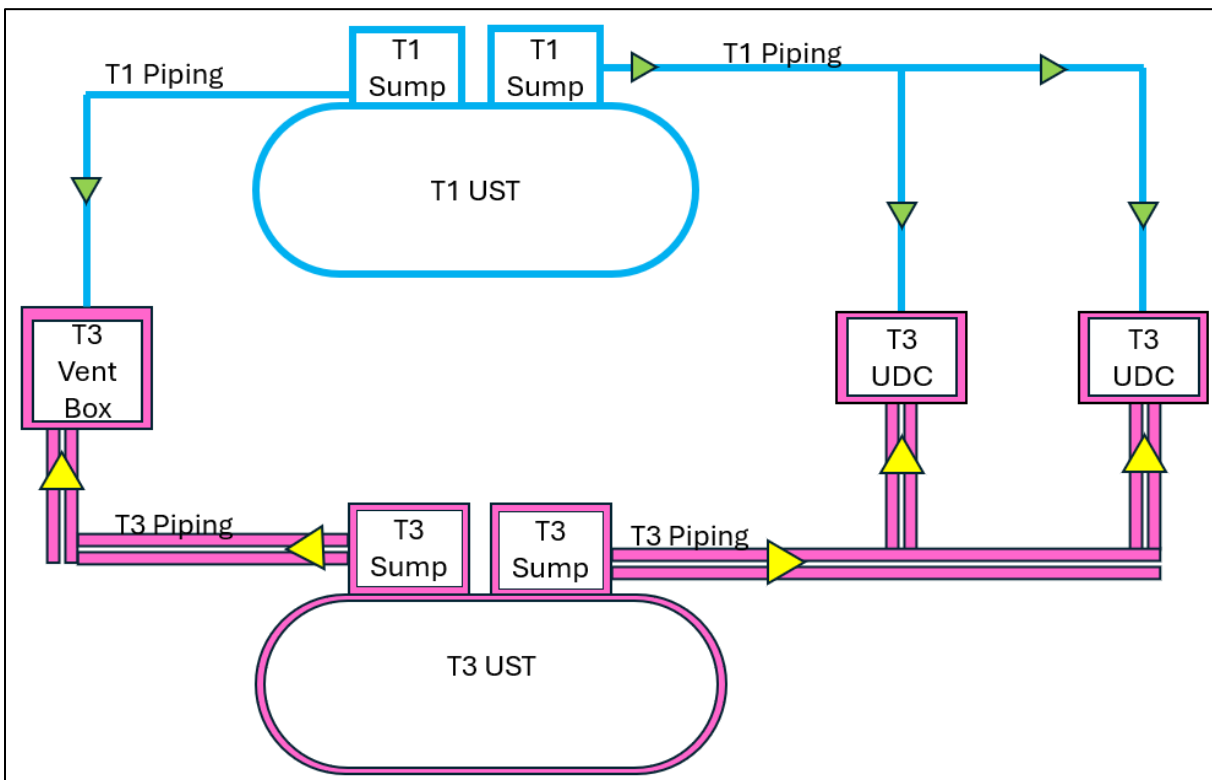
³ See UST Regulations, section 2542(c)(2), 2663(a), 2666(d)

⁴https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/updates/docs/2024/october-2024-ust.pdf

⁵ [https://www.opwglobal.com/docs/libraries/retail-fueling/installation-instructions/71so-testable-\(h15524pa\)-rev-t-\(4-27-2025\).pdf?sfvrsn=a7552ac7_2](https://www.opwglobal.com/docs/libraries/retail-fueling/installation-instructions/71so-testable-(h15524pa)-rev-t-(4-27-2025).pdf?sfvrsn=a7552ac7_2)

Type 1 or 2 UST system, may be constructed, tested, and monitored in accordance with the respective tank installation dates. For systems that share piping between different tank types, construction, testing, and monitoring requirements are based on the installation date of each respective tank, from the piping connection point back to the tank. Any sump or piping after the connection point that is shared by a Type 3 and a Type 1 or Type 2 system must meet the construction, monitoring and testing requirements of the Type 3 system.

The following illustration below depicts a UST system with different Tank Types and their associated piping and sumps.



During plan check review and inspections, UPA inspectors should verify that piping and sumps meet the applicable construction and monitoring requirements in UST Regulations. If non-compliance is identified, UPA inspectors should cite the appropriate construction and monitoring violation and continue with progressive enforcement until the facility returns to compliance.

For more information on multi-type UST facilities, contact Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.