

# COMPLIANCE ASSISTANCE BULLETIN

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## News You Can Use

### UNDERGROUND STORAGE TANK UPGRADE & REPAIR PLAN REVIEW & APPROVAL REQUIREMENTS

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**Purpose**

**Why We Are Contacting You:** The purpose of this bulletin is to inform underground storage tank (UST) owners and construction contractors of common UST upgrade and repair actions that require review, permit, and approval by the Sacramento County Environmental Management Department (EMD).

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**Issue**

The California Code of Regulations (CCR) requires EMD to review and permit these upgrade and repair actions. The following list provides examples of some common upgrade or repair actions that trigger this requirement.

- Any tank, sump, or under dispenser containment (UDC) upgrade or repair.
- Any piping upgrade or repair (including relocation of existing pipes or installation of additional piping).
- Monitoring system panel upgrade or repair involving re-wiring or re-programming (e.g. software/firmware upgrade with re-wiring or re-programming).
- Modification or upgrades that are associated with the air quality control of the UST system (e.g. enhanced vapor recovery upgrade, in-station diagnostics, or vapor processing systems).

Some upgrade or repair actions are unlikely to impact the UST systems structurally or their monitoring sensors, therefore, they are categorically approved without requiring EMD review. However, proper contractor certification and/or licenses are still required for these actions. The following list provides examples of these actions:

- Like-for-like replacement (same make & model) of sensors, drop tube, fuel turbines, mechanical line leak detector, flex connectors (inside a sump or UDC).
  - Like-for-like replacement of spill container (same make & model) that is located inside a sump.
  - Software/firmware upgrades of the monitoring system panel without re-wiring or
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re-programming.

- Dispenser repair (above shear valve) without impacting underground piping or UDC.

The above list of example upgrade or repair actions are intended to provide general guidance only. Any proposed upgrade or repair actions that don't fit into the above listed categories should be consulted with EMD to determine if a permit is required.

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**What This Means To You**

If you plan on upgrading or repairing your UST system and the proposed action requires EMD review and permit, you or your designee must:

1. Complete and submit an "Application For A Permit To Install, Upgrade, or Repair Underground Storage Tank(s) For Hazardous Substances" to EMD for review. A permit (Authority Letter To Construct) will be issued upon approval of the proposed upgrade or repair.
2. UST owner or its designee must receive this permit (Authority Letter To Construct) before proceeding with UST construction work.
3. UST owner or its designee must follow all permit conditions, including but not limited to, inspection, testing, and plan/report submittal requirements.

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**You must comply**

UST owners, its designee, or construction contractors who fail to comply with the EMD UST review and permitting requirements may be subject to enforcement action.

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**For More Information Or Assistance**

If you need more information or have questions concerning UST permit requirement, please contact John Elkins at (916) 876-7884.

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**Disclaimer**

The information contained in this Compliance Assistance Bulletin is based upon the statutes and regulations and is intended to provide a basic overview to help achieve compliance. This document does not replace or supersede relevant statutes and regulations and is not intended as legal advice. All interested parties should monitor changes to relevant statutes and regulations for updates.

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