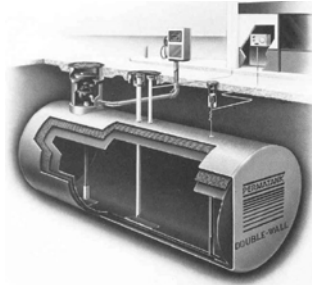




COMMON UNDERGROUND STORAGE TANK VIOLATIONS



UST Compliance Workshop
October 2, 2008

Robert Rapista
Supervising Environmental Health Specialist

Department of Environmental Health
Hazardous Materials Division

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Total Permitted UST Facilities: 1097

Total Retail UST Facilities: 726

Total Non-retail UST Facilities: 379

Total Military UST Facilities: 50



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10 *Preventable* Top 10 Common Violations

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#10

**Facility employees not trained
(no documentation)**

#10. Facility employees not trained (no documentation)

23 CCR § 2715

- (A) Operation of the UST system consistent with the facility's best management practices (BMPs)
- (B) Employee's role with regard to the monitoring equipment as specified in the facility's monitoring plan.
- (C) Employee's role with regard to spills and overfills as specified in the facility's response plan .
- (D) Contact person(s) for emergencies and monitoring equipment alarms.

Designated Operator is responsible for the annual training



#9

**Designated Operator (DO)
Monthly Checklist missing or
incomplete**

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Hazardous Materials Division

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#9. Designated Operator (DO) Monthly Checklist missing or incomplete

23 § CCR Title 2715(c)(d)(e)

- (c) The DO shall perform monthly visual inspections of all USTs and each inspection shall be recorded in a monthly inspection report.
- (d) The DO shall provide the owner or operator a copy of each monthly inspection report, and alert the owner or operator of any condition discovered during the monthly visual inspection that may require follow-up actions.
- (e) The owner or operator shall maintain a copy of the monthly inspection record and all attachments for the previous twelve months. The records shall be maintained on-site or, if approved by the local agency, off-site at a readily available location.

#9. Designated Operator (DO) Monthly Checklist missing or incomplete

Common Violations Observed:

- DO does not attach a maintenance receipt when applicable
- Incorrect test dates are listed
- DO monthly inspections not available for review
- DO does not attach monitoring system alarm history report / log if applicable



#8

**Designated Operator (DO)
Notification/Change form not
submitted &/or DO not ICC
certified**

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**#8. Designated Operator (DO)
Notification/Change form not submitted &/or
DO not ICC certified**

23 § CCR 2715(a)(b)

- (a) By January 1, 2005, owners of underground storage tank systems shall submit a signed statement to the local agency indicating that the owner understands and is in compliance with all applicable underground storage tank requirements, and identifying the designated UST operator(s) for each facility owned. The owner shall inform the local agency of any change of designated UST operator(s) no later than 30 days after the change.
- (b) Effective January 1, 2005, designated UST operators shall possess a current certificate issued by the International Code Council (ICC) indicating he or she has passed the California UST System Operator exam.

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Lately, inspectors noticing DO's with expired ICC certificates.



DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 P. O. BOX 129261, SAN DIEGO, CA 92112-9261
 (619) 338-2222 FAX (619) 338-2139 1-800-253-9923
<http://www.cdcehmt.ca.gov/doh-hmd/index.html>

Designation of Underground Storage Tank (UST) Operator
UST Owner Statement of Understanding and Compliance with UST Requirements

Facility Name:	Facility Permit #:
Facility Address:	Phone: ()
City:	Zip Code:
Reason for Submitting this Form (Check One) <input type="checkbox"/> Initial Certification <input type="checkbox"/> Change of Designated Operator <input type="checkbox"/> Certificate Renewal	
Designated UST Operator(s) for this Facility	
PRIMARY DESIGNATED UST OPERATOR	
Designated Operator's Name:	Relation to UST Facility (Check One)
Business Name (if different from above):	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone #:	<input type="checkbox"/> Service Technician <input type="checkbox"/> Third-Party
International Code Council Certification #:	Expiration Date: / /
ALTERNATE 1 (Optional)	
Designated Operator's Name:	Relation to UST Facility (Check One)
Business Name (if different from above):	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone #:	<input type="checkbox"/> Service Technician <input type="checkbox"/> Third-Party
International Code Council Certification #:	Expiration Date: / /
ALTERNATE 2 (Optional)	
Designated Operator's Name:	Relation to UST Facility (Check One)
Business Name (if different from above):	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone #:	<input type="checkbox"/> Service Technician <input type="checkbox"/> Third-Party
International Code Council Certification #:	Expiration Date: / /
NOTIFY THE LOCAL REGULATORY AGENCY WITHIN 30 DAYS OF ANY CHANGES TO THIS INFORMATION	
I certify that, for the facility indicated at the top of this page, the individual(s) listed above will serve as Designated UST Operator(s). The individual(s) will conduct and document monthly facility inspections and annual facility employee training, in accordance with California Code of Regulations, Title 23, Sections 2715(e) - (f). Furthermore, I understand and am in compliance with the requirements (statutes, regulations, and local ordinances) applicable to underground storage tanks.	
NAME OF TANK OWNER OR OWNER'S AGENT (Please Print)	DATE: / /
SIGNATURE OF TANK OWNER OR OWNER'S AGENT	OWNER'S PHONE #: ()

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1. If you change DO submit form within 30 days to HMD
2. check DO credentials- check monthly DO checklist, DO needs to put their information on that form
3. Verify online www.iccsafe.org



#7

**Certification of Financial
Responsibility not onsite/current**

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Hazardous Materials Division

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#7. Certification of Financial Responsibility not onsite/current

HSC § 25292.2 (a)

All owners and operators of an underground tank system shall maintain evidence of financial responsibility for taking corrective action and for compensating third parties for bodily injury and property damage caused by a release from the underground tank system



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NOTE: Effective July 1, 1995, California Small Businesses and California Businesses with 500 employees or less must demonstrate at least \$5,000, exclusive of the UST Cleanup Fund, businesses with over 500 employees must demonstrate at least \$10,000. (Chap. 6.75 H&S.C. Sect. 25299.32)

The Chief Financial Officer or the owner or operator must sign, under penalty of perjury, a letter worded EXACTLY as follows or you may complete this letter by filling in the blanks with appropriate information:

LETTER FROM CHIEF FINANCIAL OFFICER

I am the Chief Financial Officer for MAKE BELIEVE CO. 123 TANK STREET FUND CITY, CA 90001. P.O. BOX 100, FUND CITY, CA 90001

This letter is in support of the use of the Underground Storage Tank Cleanup Fund to demonstrate financial responsibility for taking corrective action and/or compensating third parties for bodily injury and property damage caused by an unauthorized release of petroleum in the amount of at least \$ 5,000 per occurrence and \$ 5,000 annual aggregate coverage.

Underground storage tanks at the following facilities are assured by this letter: MAKE BELIEVE CO. STATION #1. 123 TANK ST. FUND CITY, CA 90001 and MAKE BELIEVE CO. STATION #2. 789 SITE AVE. FUND CITY, CA 90002.

- 1. Amount of annual aggregate coverage being assured by this letter. \$ 5,000
2. Total tangible assets. \$ (Asset Figures)
3. Total liabilities. \$ (Liability Figures)
4. Tangible net worth (subtract line 3 from line 2. Line 4 must be at least 10 times line 1). \$ (Net Worth Figures)

I hereby certify that the wording of this letter is identical to the wording specified in subsection 2808.1(d)(1), Chapter 18, Division 3, Title 23 of the California Code of Regulations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed at FUND CITY, CA (Place of Execution)

On JULY 3, 1995 (Date)

Rhea Cycle (Signature)

RHEA CYCLE (Printed Name)

OWNER (Title)

UST 629, revised 4/91

CFO letter or insurance policy (any proof of renewal)



#6

Monitoring procedures not
available/completed/ submitted to
HMD

**#6. Monitoring procedures not
available/completed/ submitted to
HMD**

23 § CCR 2632(b)

(b) Owners or operators of underground storage tanks subject to this section shall implement a monitoring program approved by the local agency and specified in the UST operating permit.....

Inspectors mainly finding incorrect information on current monitoring form: wrong sensors model numbers, wrong LLD info, suction vs. pressurized for delivery systems.

<div style="text-align: center;"> <p>COUNTY OF SAN DIEGO CUPA DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION P.O. BOX 12041 SAN DIEGO, CA 92112-0041 (619) 338-2222 FAX (619) 338-2377 1-800-251-8933</p> <p>UNDERGROUND STORAGE TANK MONITORING PLAN (Page 1 of 2)</p> </div> <p>TYPE OF ACTION <input type="checkbox"/> 1 NEW PLAN <input type="checkbox"/> 2 CHANGE OF INFORMATION</p> <p>PLAN TYPE <input type="checkbox"/> 1 MONITORING IS IDENTICAL FOR ALL USTs AT THIS FACILITY <input type="checkbox"/> 2 THIS PLAN COVERS ONLY THE FOLLOWING UST SYSTEMS (Specify):</p> <p>BUSINESS NAME (Same as FACILITY NAME or DBA (Data Base Business A/D)) FACILITY ID# _____</p> <p>BUSINESS SITE ADDRESS _____ CITY _____ CA ZIP CODE _____</p> <p style="text-align: center;">II. EQUIPMENT TESTING AND PREVENTIVE MAINTENANCE</p> <p>Testing, preventive maintenance, and calibration of monitoring equipment (e.g., sensors, probes, line leak detectors, etc.) shall be performed at the frequency specified by the equipment manufacturer's instructions, or annually, whichever is more frequent, and that such work must be performed by qualified personnel. (21 CFR 192.204, 206, 208, 260.)</p> <p>MONITORING EQUIPMENT IS SERVICED <input type="checkbox"/> 1 ANNUALLY <input type="checkbox"/> 2 OTHER (Specify): _____</p> <p style="text-align: center;">III. MONITORING LOCATIONS</p> <p><input type="checkbox"/> 1 NEW SITE PLOT PLAN/AS PREFERRED WITH THIS PLAN <input type="checkbox"/> 2 SITE PLOT PLAN/AS PREVIOUSLY IS LIMITED (21 CFR 192.264)</p> <p style="text-align: center;">IV. TANK MONITORING IS PERFORMED USING THE FOLLOWING METHODS:</p> <p><input type="checkbox"/> 1 CONTINUOUS ELECTRONIC TANK MONITORING OF ANNUAL INTERSTITIAL SPACES OR SECONDARY CONTAINMENT VAPOR WITH AUDIBLE AND VISUAL ALARMS (21 CFR 192.264)</p> <p>PANEL MANUFACTURER _____ MODEL # _____</p> <p>LEAK SENSOR MANUFACTURER _____ MODEL # _____</p> <p><input type="checkbox"/> 2 AUTOMATIC TANK GAUGING (ATG) SYSTEM USED TO MONITOR SINGLE WALL TANKS (21 CFR 192.264)</p> <p>PANEL MANUFACTURER _____ MODEL # _____</p> <p>IN-TANK PROBE MANUFACTURER _____ MODEL # _____</p> <p>LEAK TEST FREQUENCY: <input type="checkbox"/> a. CONTINUOUS <input type="checkbox"/> b. DAILY (Specify) _____ <input type="checkbox"/> c. WEEKLY _____</p> <p>PROGRAMMED TESTS: <input type="checkbox"/> a. 0.1 gpa <input type="checkbox"/> b. 0.2 gpa <input type="checkbox"/> c. OTHER (Specify): _____</p> <p><input type="checkbox"/> 3 MONTHLY STATISTICAL INVENTORY RECONCILIATION (21 CFR 192.264)</p> <p><input type="checkbox"/> 4 WEEKLY MANUAL TANK GAUGING (MTG) (21 CFR 192.264) - TESTING PERIOD: <input type="checkbox"/> a. 14 HOURS <input type="checkbox"/> b. 40 HOURS _____</p> <p><input type="checkbox"/> 5 TANK INTEGRITY TESTING (21 CFR 192.264)</p> <p>TEST FREQUENCY: <input type="checkbox"/> a. ANNUALLY <input type="checkbox"/> b. BIENNIALY <input type="checkbox"/> c. OTHER (Specify): _____</p> <p style="text-align: center;">V. PIPE MONITORING IS PERFORMED USING THE FOLLOWING METHODS (Check all that apply)</p> <p><input type="checkbox"/> 1 CONTINUOUS MONITORING OF PIPE PIPING SCHEMS AND OTHER SECONDARY CONTAINMENT WITH AUDIBLE AND VISUAL ALARMS (21 CFR 192.264)</p> <p>PANEL MANUFACTURER _____ MODEL # _____</p> <p>LEAK SENSOR MANUFACTURER _____ MODEL # _____</p> <p>PIPING LEAK ALARM TRIGGERS AUTOMATIC PCMP (i.e., TURBINE) SHUTDOWN <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p>FABRICE DISCONNECTION OF THE MONITORING SYSTEM TRIGGERS AUTOMATIC PCMP SHUTDOWN <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p><input type="checkbox"/> 2 MECHANICAL LINE LEAK DETECTOR (MLLD) THAT ROUTINELY PERFORMS 3.0 gpa LEAK TESTS AND RESTRICTS OR SHUTS OFF PRODUCT FLOW WHEN A LEAK IS DETECTED (21 CFR 192.264)</p> <p>MLLD MANUFACTURER _____ MODEL # _____</p> <p><input type="checkbox"/> 3 ELECTRONIC LINE LEAK DETECTOR (ELLD) THAT ROUTINELY PERFORMS 3.0 gpa LEAK TESTS (21 CFR 192.264)</p> <p>ELLD MANUFACTURER _____ MODEL # _____</p> <p>PROGRAMMED IN LINE LEAK TEST: <input type="checkbox"/> 1 MINIMUM ANNUAL 0.2 gpa <input type="checkbox"/> 2 MINIMUM ANNUAL 0.1 gpa</p> <p>ELLD DETECTION OF A PIPING LEAK TRIGGERS AUTOMATIC PCMP (i.e., TURBINE) SHUTDOWN <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p>ELLD FABRICE DISCONNECTION TRIGGERS AUTOMATIC PCMP (i.e., TURBINE) SHUTDOWN <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p><input type="checkbox"/> 4 PIPE INTEGRITY TESTING - TEST FREQUENCY: <input type="checkbox"/> a. ANNUALLY <input type="checkbox"/> b. EVERY 3 YEARS <input type="checkbox"/> c. OTHER (Specify): _____</p> <p><input type="checkbox"/> 5 VISUAL PIPE MONITORING - TEST FREQUENCY: <input type="checkbox"/> a. DAILY <input type="checkbox"/> b. WEEKLY <input type="checkbox"/> c. MONTHLY (4 TIMES THE UTILITY OPERATOR'S) (Allow for a maximum of 4 times the utility operator's permit for each 48 hr or 95% (21 CFR 192.264))</p> <p><input type="checkbox"/> 6 SUCCESSION PIPING PERITS EXEMPTION CRITERIA (21 CFR 192.264)</p> <p><input type="checkbox"/> 7 NO REGULATED PIPING PER HEALTH AND SAFETY CODE, DIVISION 28, CHAPTER 7 IS CONNECTED TO THE TANK SYSTEM</p> <p><input type="checkbox"/> 8 OTHER (Specify): _____</p> <p style="text-align: right;">HM 4222-A-FCF Underground Storage Tank - Monitoring Plan (08/00) page 1 of 4</p>	<div style="text-align: center;"> <p>COUNTY OF SAN DIEGO CUPA DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION P.O. BOX 12041 SAN DIEGO, CA 92112-0041 (619) 338-2222 FAX (619) 338-2377 1-800-251-8933</p> <p>UNDERGROUND STORAGE TANK MONITORING PLAN (Page 2 of 2)</p> </div> <p style="text-align: right;">This plan has been prepared and is: <input type="checkbox"/> Approved <input type="checkbox"/> Approved with conditions* Date: _____ / _____ / _____ Specialist: _____ License Agent: _____, License No. _____</p> <p style="text-align: center;">VI. UNDER DISPENSER CONTAINMENT (UDC) MONITORING</p> <p><input type="checkbox"/> 1 UDC MONITORING IS PERFORMED USING THE FOLLOWING METHOD:</p> <p><input type="checkbox"/> 1.1 CONTINUOUS FLOOR MONITORING <input type="checkbox"/> 1.2 FLOOR AND GROUND ASSEMBLY <input type="checkbox"/> 1.3 ELECTRONIC STAND-ALONE <input type="checkbox"/> 1.4 NO DISPENSERS <input type="checkbox"/> 2 OTHER (Specify): _____</p> <p>PANEL MANUFACTURER _____ MODEL # _____</p> <p>LEAK SENSOR MANUFACTURER _____ MODEL # _____</p> <p>DETECTION OF A LEAK INTO THE UDC TRIGGERS AUDIBLE AND VISUAL ALARMS <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p>FABRICE DISCONNECTION OF UDC MONITORING SYSTEM TRIGGERS AUTOMATIC PCMP SHUTDOWN <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p>UDC MONITORING STOPS THE FLOW OF PRODUCT AT THE DISPENSER <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p><input type="checkbox"/> 2 UDC CONTAINER <input type="checkbox"/> 1 SINGLE WALLED <input type="checkbox"/> 2 DOUBLE WALLED</p> <p>IF DOUBLE WALLED:</p> <p>UDC INTERSTITIAL SPACE IS MONITORED BY: <input type="checkbox"/> 1 LIQUID <input type="checkbox"/> 2 PRESSURE <input type="checkbox"/> 3 VACUUM</p> <p>ALARM WITHIN THE SECONDARY CONTAINMENT OF THE UDC TRIGGERS AUDIBLE AND VISUAL ALARMS <input type="checkbox"/> a. YES <input type="checkbox"/> b. NO</p> <p style="text-align: center;">VII. PERIODIC SYSTEM TESTING</p> <p><input type="checkbox"/> 1 HAZARD TESTING: THIS FACILITY HAS BEEN NOTIFIED BY THE STATE WATER RESOURCES CONTROL BOARD THAT EQUIPMENT LEAK DETECTION SHALL BE PERFORMED PERIODICALLY PERFORMED EVERY 14 MONTHS AS REQUIRED (21 CFR 192.264)</p> <p><input type="checkbox"/> 2 SECONDARY CONTAINMENT COMPONENTS ARE TESTED EVERY 14 MONTHS</p> <p style="text-align: center;">VIII. RECORDKEEPING</p> <p>The following monitoring maintenance records are kept for the facility:</p> <p><input type="checkbox"/> Alarm logs <input type="checkbox"/> Visual Inspection Records <input type="checkbox"/> Leak emergency testing results <input type="checkbox"/> Leak testing results (and supporting documentation records) <input type="checkbox"/> Tank gauging results (and supporting documentation records) <input type="checkbox"/> ATG Testing results (and supporting documentation records) <input type="checkbox"/> Calibration Records <input type="checkbox"/> Equipment maintenance and calibration records</p> <p style="text-align: center;">IX. TRAINING</p> <p><input type="checkbox"/> Personnel with UST monitoring responsibilities are familiar with all of the following documents relevant to their job duties:</p> <p style="text-align: center;">REFERENCE DOCUMENTS MAINTAINED AT FACILITY (Check all that apply)</p> <p><input type="checkbox"/> THIS UNDERGROUND STORAGE TANK MONITORING PLAN (Required)</p> <p><input type="checkbox"/> OPERATING MANUALS FOR ELECTRONIC MONITORING EQUIPMENT (Required)</p> <p><input type="checkbox"/> CALIFORNIA UNDERGROUND STORAGE TANK REGULATIONS</p> <p><input type="checkbox"/> CALIFORNIA UNDERGROUND STORAGE TANK LAW</p> <p><input type="checkbox"/> STATE WATER RESOURCES CONTROL BOARD (SWRCB) PUBLICATION: "HANDBOOK FOR TANK OWNERS - MANUAL AND STATISTICAL OVERVIEW RECONCILIATION"</p> <p><input type="checkbox"/> SWRCB PUBLICATION: "UNDERSTANDING AUTOMATIC TANK GAUGING SYSTEMS"</p> <p><input type="checkbox"/> OTHER (Specify): _____</p> <p><input type="checkbox"/> This facility has a "Designated UST Operator" who has passed the California UST System Operator Exam administered by the International Code Council (ICC). The "Designated UST Operator" will train facility employees in the proper operation and maintenance of the UST system annually, and within 30 days of loss. This training will include, but is not limited to, the following:</p> <ul style="list-style-type: none"> Operation of the UST system in a manner consistent with the facility's best management practices The facility employee's role with regard to the monitoring equipment as specified in this UST Monitoring Plan The facility employee's role with regard to spills and overfills as specified in the UST Response Plan Names of contact persons for emergency and reporting actions <p style="text-align: center;">X. COMMENTS/ADDITIONAL INFORMATION</p> <p>Provide additional comments here or indicate how many pages with additional information on specific monitoring procedures are attached to this plan.</p> <p style="text-align: center;">XI. PERSONNEL RESPONSIBILITIES</p> <p>The UST Owner/Operator is responsible for ensuring that: 1) the facility maintain UST monitoring activities and maintenance of UST leak detection equipment covered by this plan occurs; 2) all conditions that indicate a possible release are investigated; and 3) all monitoring records are maintained properly. The following personnel are responsible for performing the monitoring and equipment maintenance:</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>NAME</th> <th>TITLE</th> </tr> <tr> <td>_____</td> <td>_____</td> </tr> <tr> <td>NAME</td> <td>TITLE</td> </tr> <tr> <td>_____</td> <td>_____</td> </tr> </table> <p>The Designated Operator shall perform a monthly visual inspection of the facility, provide a report to the owner/operator, and inform the owner/operator of any conditions that need further action.</p> <p style="text-align: center;">XII. OWNER/OPERATOR SIGNATURE</p> <p>CERTIFICATE: I certify that the information provided herein is true and accurate to the best of my knowledge.</p> <p>APPLICANT MANUFACTURER _____ DATE: _____ / _____ / _____</p> <p>APPLICANT NAME (print): _____</p> <p style="text-align: right;">HM 4222-A-FCF Underground Storage Tank - Monitoring Plan (08/00) page 2 of 4</p>	NAME	TITLE	_____	_____	NAME	TITLE	_____	_____
NAME	TITLE								
_____	_____								
NAME	TITLE								
_____	_____								

USE NEW FORM



#5

**Secondary containment testing
not completed or results not
submitted to DEH**

#5. Secondary containment testing not completed or results not submitted

23 CCR § 2637(a)&(e)

- (a) Secondary containment systems installed on or after January 1, 2001 shall be tested upon installation, 6 months after installation, and every 36 months thereafter. Secondary containment systems installed prior to January 1, 2001 shall be tested by January 1, 2003 and every 36 months thereafter.
- (e) UST owners and operators shall submit a copy of the test report to the local agency within 30 days of the completion of the test.

Inspectors will generally know before they go out if your site is due or should have been done

#5. Secondary containment testing not completed or results not submitted

Most Common Violation is not conducting test by due date

The 36 month test is due from the original test date, not the date they completed repairs

Example:

Full SCT conducted 5/1/06. 2 failures observed. Failures re-tested 7/15/06 under approved repair permit. Next full SCT is due?

5/1/09

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Hazardous Materials Division

23

More time than enough reason it was not submitted because it was not done

#5. Secondary containment testing not completed or results not submitted to DEH

How do I prevent this violation?

- Complete your SCT on time
- Pay attention to monthly Designated Operator reports, your most recent test date is listed
- Follow-up with testing contractor to ensure test results were submitted to DEH. Maintain copy of test results on site
- Contact your area inspector to double check your your due date or conduct a file review

Change of ownership does not change the timeline test date either



#4

Audible/Visual alarms not working

#4. Audible/Visual alarms not working

23 CCR § 2632(c)(2)(B)

The continuous monitor system shall be connected to an audible and visual alarm system approved by the local agency



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#4. Audible/Visual alarms not working

23 CCR § 2635(b)(2)(a)

Alert the transfer operator when the tank is 90 percent full by restricting the flow into the tank or triggering an audible and visual alarm



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#4. Audible/Visual alarms not working

How do I prevent this violation?

If installed, use the test button on the side of acknowledge switch to check light is working



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#4. Audible/Visual alarms not working

How do I prevent this violation?

- When technicians are conducting maintenance, have them check the audible/visual alarm of the outside overfill mechanism and monitoring panel inside store
- Create a schedule to change light bulbs. Yearly is recommended.



#3

**Dispenser Containment not
adequately monitored**

#3. Dispenser Containment not adequately monitored

23 CCR § 2636(f)(1) or (f)(5)(A)

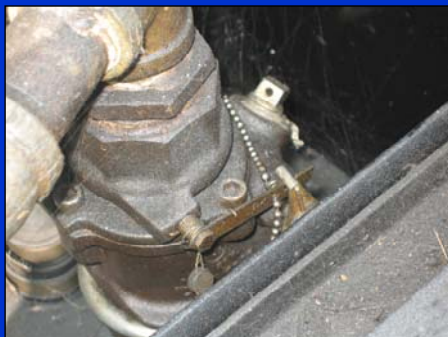
Must either stop the flow of product at the dispenser, or activates an audible/visual alarm



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#3. Dispenser Containment not adequately monitored

Common observations

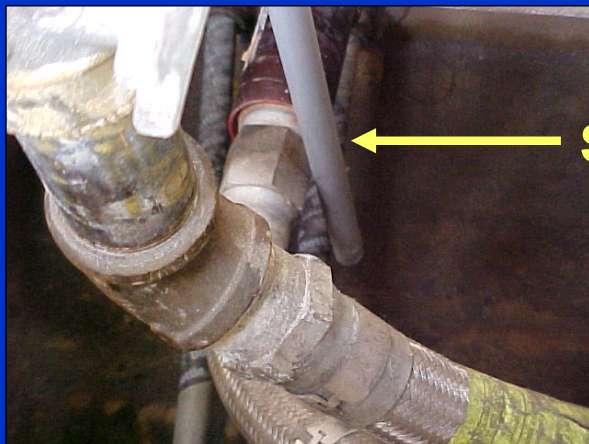


Float chain disconnected/ loose



No float chain

#3. Dispenser Containment not adequately monitored



Sensor not functional / raised
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No real good reason for this violation because, DO's should be looking in the UDCs every month anyway

#3. Dispenser Containment not adequately monitored

How do I prevent this violation at my site?

- If you have bravo boxes, ensure your Designated Operator is checking that the floats and chains are connected properly during their monthly inspections
- Ensure your sensors are always at the lowest point of the containment system being monitored



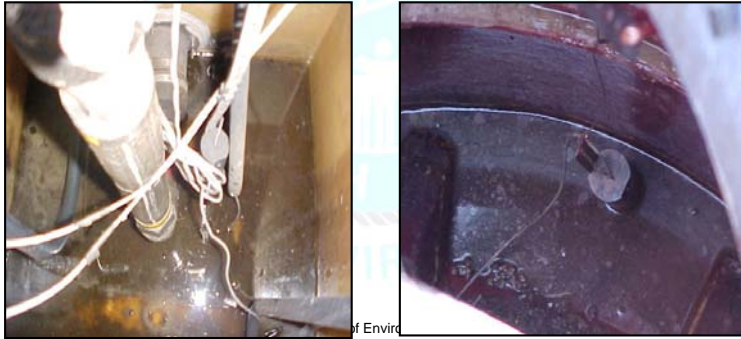
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#2. Liquid in Sump

CCR Title 23 § 2631(d)(4)

The secondary containment system shall be equipped with a collection system to accumulate, temporarily store, and permit removal of any liquid within the system.



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#2. Liquid in Sump

How do I prevent this violation?

- Remove liquid within 48 hours of alarm. **NOTE: Liquid must be managed appropriately.**
- May need to replace sump lid gaskets more frequently. Yearly is recommended
- Check sumps for water intrusion thoroughly. Not only at piping/electrical penetrations. Fix as needed. May or may not require a permit

#2. Liquid in Sump

How do I prevent this violation?

Minimize water intrusion in sumps



Replace bad gaskets

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#2. Liquid in Sump

How do I prevent this violation?

Minimize water intrusion in sumps



Mats



Improve manway lids



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Hazardous Materials Division

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#1. Raised Sensors

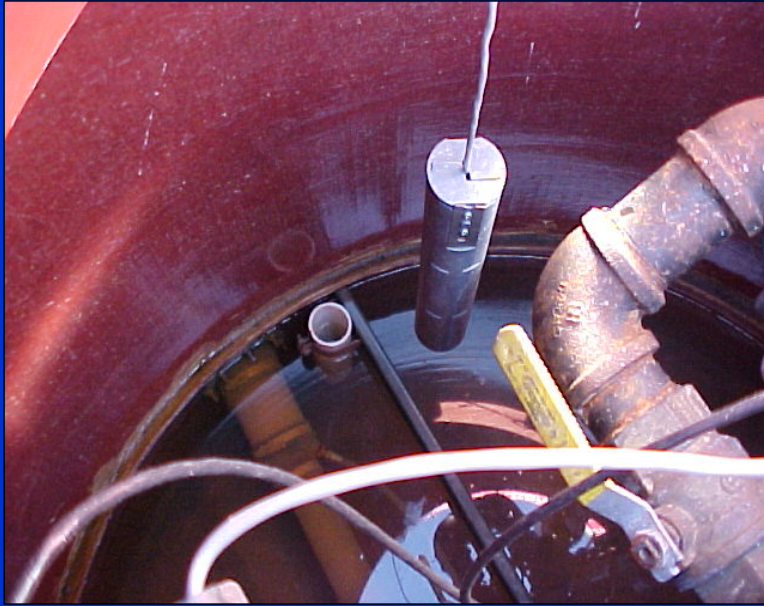
23 CCR § 2641(a)

Owners or operators of existing USTs subject to this article shall implement a monitoring program which is capable of detecting an unauthorized release from any portion of the underground storage tank system at the earliest possible opportunity

HSC § 25299(f)

Monitoring system disabled or tampered with and/or monitoring records falsified.

#1. Raised Sensors



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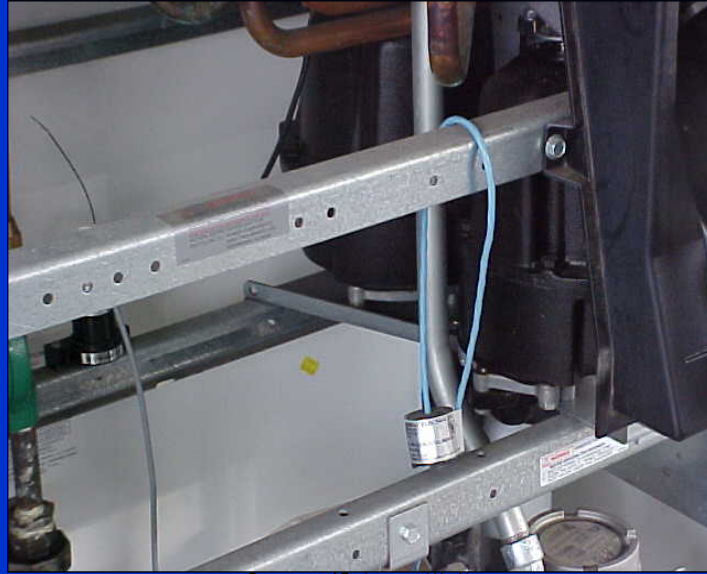
#1. Raised Sensors



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#1. Raised Sensors



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#1. Raised Sensors

How do I prevent this violation?

- Anytime you have a contractor at your site, double check the sensor location before they close the lids. Owner/Operator is always responsible
- Do not raise sensors
- Install sensor sleeves and/or tamper resistant systems (pins, tamper proof sensors, lead seals, etc.)

TAMPER PROOF SYSTEMS



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HSC 6.7 § 25299. VIOLATIONS; CIVIL AND CRIMINAL PENALTIES

(f)(2) Any person who intentionally disables or tampers with an automatic leak detection system in a manner that would prevent the automatic leak detection system from detecting a leak or alerting the owner or operator of the leak, shall, upon conviction, be punished by a fine of not less than five thousand dollars (\$5,000) or more than ten thousand dollars (\$10,000), by imprisonment in the county jail for not more than one year, or by both the fine and imprisonment.



Department of Environmental Health
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Questions?

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