



RE: UNIFIED UST REPAIR/MODIFICATION GUIDELINES ESTABLISHED BY THE SONOMA COUNTY CERTIFIED UNIFIED PROGRAM AGENCIES

In response to recent surveys by private industry, the Certified Unified Program Agencies (CUPAs) of Sonoma County have met and discussed our interpretations of when a permit is required for repair and/or alteration to a UST system. Our goal was to work toward uniformity and consistency in our county's management and enforcement of UST regulations. The CUPAs of Sonoma County Fire, Santa Rosa Fire, Petaluma Fire, Healdsburg Fire and Sebastopol have agreed in a united interpretation of conditions and circumstances when permits are required.

As a rule of thumb, the activities below require either a regulatory witness to the recertification or the inspector review of cut sheets and/or specifications to verify the continued effectiveness of the spill monitoring and prevention systems of a UST facility. While the local CUPA has the final say and may decide on a case-by-case basis to require a permit for certain repairs, we have agreed that, generally speaking, the following common alteration and repair actions **will require a permit**:

Major Permit

- Any project that requires breaking or removing concrete, asphalt or soil from over the tank slab, piping trench or dispenser island;
- Installation of conduit into any UST system sump where the sump wall is penetrated;
- Replacement of direct bury fill or vapor buckets;
- Repairs to sumps and UDCs, including penetration fitting repair/replacement, sump riser/tank joint repair or lid replacement requiring cutting and replacement of fiberglass; Test boot replacement does not require a permit, nor does tightening mechanical fittings;
- Placement of a UST into temporary closure per CCR Title 23, Division 3, Chapter 16 Section 2671 or H&SC Chapter 6.7 Section;
- Pulling new monitoring system cable, and replacement of monitoring system or release prevention components (such as sensors, leak detectors, and TLM Probes) with units of different make, model or part number (not "Like-for-Like");
- Cold start (see below);

Minor Permit

- Installation of dispenser conversion frames;
- Replacement of sensors, leak detectors, and TLM Probes ("Like for Like");
- Replacement of overfill prevention drop tubes or ball float valve;

- Repairs on product, vent or vapor pipe in UDC or sump;
- Replacement of flex connector in a UDC or sump;

Technicians often request to perform alterations and repairs during annual monitoring certifications or triennial secondary containment tests. Since UST systems can vary greatly in age, condition and design, the ultimate decision to require a permit is at the discretion of the Inspector on site.

If a site or monitoring system is shut down or not properly functioning, the repair may be made concurrently with the application of a permit. For after-hours, weekend or holiday service calls, it is acceptable to perform emergency repairs of monitoring system components or programming provided that the UST owner or technical service provider makes a verbal notification of work performed and submits a permit application the next working day. Under no circumstances shall a UST System be altered in order to operate in an illegal state, such as sensor reprogramming to defeat required operation like positive shut down. These activities will be regarded as tampering.

Cold Starts Cold starts require a permit when the console has to be reprogrammed manually. If the archive matches the programming that was in place during the last monitoring system certification, and the programming can be successfully restored from the archive after a cold start, (not counting ISD programming), no permit is required. However, the alarm history must be printed and included with the station record before the cold start, if possible.

Service technicians must archive the programming after each monitoring system certification, and send that system set up record to the CUPA with the annual certification. After a permit-required cold start, the sensor operation will have to be verified by an inspector, so cold start permit fees apply and may differ depending on the size and complexity of the facility. A copy of the setup after the cold start must be supplied to the inspector.

ALL USTs shall comply with all applicable testing, design and engineering standards as described in the California Code of Regulations Title 23 - Chapter 16 (23 CCR) and Chapter 6.7 of the California Health and Safety Code (CSHC).

NOTE: WHEN THE REPAIRS ON A UST SYSTEM REQUIRE UPDATES TO THE UST TANK FORMS AND/OR MONITORING AND RESPONSE PLANS, IT IS THE RESPONSIBILITY OF THE OWNER/OPERATOR TO SUBMIT THESE CHANGES ELECTRONICALLY (ON THE CERS SITE) WITHIN 30 DAYS OF THE CHANGES.

FAILURE TO OBTAIN THE REQUIRED UST MODIFICATION REPAIR PERMIT CAN RESULT IN SUSPENSION OR REVOCATION OF THE UST PERMIT TO OPERATE AND FURTHER LEGAL ENFORCEMENT. THE TANK OPERATOR AND/OR TANK OWNER IS RESPONSIBLE FOR OBTAINING THE NECESSARY PERMIT(S).

For any proposed upgrade or repair that varies from those listed above, please contact the CUPA having jurisdiction over the site to determine if a permit is required.