Environmental Health Services Hazardous Materials Program (CUPA)

2000 Alameda de las Pulgas, Suite #100 San Mateo, CA 94403 Phone:(650) 372-6200 | Fax: (650) 627-8244

smchealth.org/cupa

2022 Permit Requirements for Underground Storage Tank Repairs

General guiding principle – **if you break concrete or cut into fiberglass, a permit will be required**. "Like for like" means replacing equipment with equipment that serves the same purpose and has the same functionality, not necessarily for the same model number. For example, if you change a Veeder-Root -404 (5'4" to 7') Interstitial Sensor for a Veeder-Root -409 (10' to 12') Interstitial Sensor, no permit is required.

Even if a permit is not required, you are still required to notify the district inspector and submit retesting results upon completion.

Type of Repair	Permit Required?	Details
Dispenser Repairs		•
Impact/shear/fire valves	No	
Vapor impact/shear valves	No	
Piping/Flex line	No	
Dispenser Replacement	No	
Set Dispenser aside (for other repair)	No	
Conversion Frame Installation	No	
Monitoring System	·	•
Sensors, Leak Detectors, TLM Probes	No	
Ball Float Valves	No	
ISD Components (e.g. Flow meter)	No	
CPU/ECPU replacement	No	
External Overfill Alarm	Yes	If changing from flapper to external audible alarm or vice versa
Software upgrades (warm start only)	No	Notify district inspector prior to upgrade and submit report within 30 days of upgrade
Software upgrades (cold start)	No	Emergency repairs, notify district inspector as soon as possible after the repairs and submit results within 30 days.
Turbine/Dispenser Relays	No	
Sump/UDC Repairs		
Fiberglass repair of sump or UDC	Yes	For a leaking or cracked sump.
Top hat or top hat lids	No	
Traffic Plate or sump street cover	No	Unless connected to sump.
Penetration Fittings within	No	

Revised 05/25/2022 Page **1** of **3**

Environmental Health Services Hazardous Materials Program (CUPA)

2000 Alameda de las Pulgas, Suite #100 San Mateo, CA 94403

Phone:(650) 372-6200 | Fax: (650) 627-8244 smchealth.org/cupa

a sump		
•Test Boot within the sump	No	
Sealing a sump	No	
Turbine replacement	No	
Tanks/Lines		
Product pipe repair in a sump or UDC	No	
Vapor line repair in a sump or UDC	No	
Flex Connectors in a sump or UDC	No	
Drop Tube replacement	No	
Vent Stack Riser repair	No	
Fill Riser repair in sump	No	
Fill Bucket in a sump	No	
Vapor Bucket in a sump	No	
Direct Bury Fill Bucket	Yes	
Direct Bury Vapor Bucket	Yes	
Direct Bury Fill Riser	Yes	

FREQUENTLY ASKED QUESTIONS

- 1. If a site is shut down due to the need for a sensor or leak detector replacement, may we make the replacement and apply for the permit concurrently? **Yes**
- 2. If the monitoring system is not properly functioning unless a component is replaced, may we make the replacement and apply for the permit concurrently? **Yes**
- 3. Is a permit always required whenever a monitoring system component replacement is NOT "like for like"? **Not always.** If it is equipment is completely different (ie: switching from electronic to mechanical, or External Annunciator Overfill to Flapper), **yes**, a permit is required. If equipment serves the same purpose and has the same functionality, then **no**.
- 4. If, to determine the exact scope of work for a piping, sump or UDC repair, we need to excavate, may we do so prior to obtaining a permit? For exploratory or emergency repairs, **yes**. Notify district inspector as soon as you can and submit permit application if needed.
- 5. Is there any exception to the requirement of pulling a permit when concrete is broken? **Yes**. If you are only replacing the street cover over sump, you do not need a permit. Notify inspector prior to beginning the work.

Revised 05/25/2022 Page 2 of 3

Environmental Health Services Hazardous Materials Program (CUPA)

2000 Alameda de las Pulgas, Suite #100 San Mateo, CA 94403 Phone:(650) 372-6200 | Fax: (650) 627-8244

smchealth.org/cupa

- 6. If, in the course of annual Air Quality testing or in the course of Secondary Containment testing, repairs are needed, are we permitted to make them and apply for the permit concurrently (e.g. boot repairs, bucket or drop tube replacements)? **Yes**
- 7. Do you have any "permitting" interest in dispenser hoses, nozzles or any other vapor recovery equipment? **No**
- 8. Regarding tank temporary closures, do you require the tanks to be inerted? **No**, product is to be removed. Water may be used as ballast; however, ballast water may have to be disposed of as a hazardous waste.
- 9. Regarding tank temporary closures, do you require the monitoring system to remain operational? **Yes.** If possible, keep monitoring system operating. However, if there is no electricity for a period of time, tank monitoring may be maintained by manually sticking tanks and keeping a log.
- 10. Does your agency regulate ASTs beyond what is required by APSA and SPCC regulations? If so, where are these regulations located? **No**

Dermot Casey
dcasey@smcgov.org
(650) 339-0212
UST Coordinator

Revised 05/25/2022 Page **3** of **3**