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State Water Resources Control Board

Division of Water Quality

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Arnold Schwarzenegger
Governor

~ Transmitted Via Email ~

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To: Local Implementing Agencies and Interested Parties

UNDERGROUND STORAGE TANK (UST) OWNERS/OPERATORS SUBJECT TO CALIFORNIA AIR RESOURCES BOARD (ARB) EXECUTIVE ORDER (EO) G-70-211 REQUIRING LIQUID CONDENSATE TRAPS TO HAVE ENHANCED VAPOR RECOVERY (EVR) SYSTEM CERTIFICATION

The purpose of this letter is to inform UST owners/operators that before altering liquid condensate traps to meet the ARB requirements, the Local Implementing Agency should be consulted to determine existing compliance of the liquid condensate trap with California Health and Safety Code (CH&SC), Chapter 6.7 and the California Code of Regulation (CCR), Title 23.

It has come to our attention that over the years several liquid condensate traps have been installed without permit or meeting the necessary design and construction requirements. Consulting with the Local Implementing Agency prior to the installation of the EVR system provides owners/operators the opportunity to bring the liquid condensate trap into compliance during the required EVR construction. If the Local Implementing Agency is not consulted, and equipment is installed or if work has already started, there is a possibility that the liquid condensate trap may need to be removed or altered again to ensure that the liquid condensate trap is compliant with both the State Water Board and ARB regulations.

Liquid condensate traps are small containment vessels designed to accumulate condensed vapors from UST vent and vapor recovery piping when it is not possible to achieve the necessary slope from the dispenser to the UST. Liquid condensate traps are regulated by the State Water Resource Control Board (State Water Board) for the purpose of groundwater quality protection and by the ARB for the purpose of air quality protection.

The Local Implementing Agency and UST owner/operators should consult Local Guidance (LG) Letter 169, which details the regulatory requirements that apply to liquid condensate traps under the CH&SC, Chapter 6.7 and the CCR, Title 23.¹

If you have any questions concerning liquid condensate traps please contact me at 916-341-5870 or lfisher@waterboards.ca.gov.

Sincerely,

Laura S. Fisher, Chief
UST Leak Prevention Unit

¹ http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/lg169_clarification.pdf

