



State of Utah

Department of  
Environmental Quality

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*Executive Director*

DIVISION OF ENVIRONMENTAL  
RESPONSE AND REMEDIATION  
Brad T Johnson  
*Director*

OLENE S. WALKER  
*Governor*

GAYLE F. McKEACHNIE  
*Lieutenant Governor*

ERRU-178-04

October 8, 2004

Re: **Recent changes in the R311 Utah Underground Storage Tank (UST) Rules**

Dear Contractors:

There have been several significant changes in the UST Rules that will affect any contractor who tests Cathodic Protection (CP) Systems and Automatic Line Leak Detectors (ALLD) on USTs. Starting September 9, 2004, any person testing CP and ALLDs in Utah must be a Certified UST Tester and must satisfy the eligibility requirements. UST CP Testers must submit an application with documentation of training in Cathodic Protection Testing and ALLD testers must submit documentation of training for the equipment used for testing ALLDs. Documentation of Financial Assurance and the \$150.00 Certification Fee, if applicable, must be included with the application. CP and ALLD Testers Certification are a subset of the UST Testers Certification, so if you are currently a Utah UST Precision Tester, you do not need to pay the Certification Fee.

### **Qualifications for Cathodic Protection Testers**

The federal regulation governing USTs, 40 CFR 280.31(b) states that *All UST systems equipped with cathodic protection systems must be inspected for proper operation by a **qualified cathodic protection tester**...* and 40 CFR 280.12 defines a *Cathodic protection tester* as *... a person who can demonstrate an understanding of the principles and measurements of all common types of cathodic protection systems as applied to buried or submerged metal piping and tank systems. At a minimum, such persons must have education and experience in soil resistivity, stray current, structure-to-soil potential, and component electrical isolation measurements of buried metal piping and tank systems.*

There are a number of NACE Certifications that meet the above requirements for a Cathodic Protection Tester. The *Cathodic Protection Testers Certification, Corrosion Technician Certification* and any higher level of NACE Certifications would satisfy this requirement. If you are NACE Certified, documentation of NACE Certification should be included with your UST CP Tester Application. **NACE Certification is not required to do Cathodic Protection Testing, however, the testers must document an acceptable level of education.**

### **Cathodic Protection Reporting Requirements**

The CP tester who performs the test shall provide (at a minimum), the following information: Location of test points, test results in volts or millivolts, pass/fail determination for each tank, line, flex connector, or other UST system component tested, the criteria by which the pass/fail determination is made, and a site plat showing locations of test points (**R311-203-5(d)**). Cathodic Protection Evaluation forms are available from the Division of Environmental Response and Remediation/UST Section or on our web site <http://undergroundtanks.utah.gov/ustcomp/ustcert.htm>.

### **Automatic Line Leak Detector Testing Requirements**

The test shall simulate a leak and provide a determination based on the test whether the leak detector functions properly and meets the requirements of 40 CFR 280.44(a). If a sump sensor is used as an automatic line leak detector, the sensor shall be located as close as is practical to the lowest portion of the sump (**R311-203-5(b)**). When a sump sensor is used as a leak detector, the containment sump shall be tested for tightness annually, according to the manufacturers guidelines or standards, or by another method approved by the Executive Secretary (**R311-203-5(c)**).

If you have questions concerning this matter or need any assistance, please contact **David Wilson** at (801) 536-4138.

Sincerely,

Brad T Johnson, Executive Secretary (UST)  
Utah Solid and Hazardous Waste Control Board

BTJ/DJW/hsp