



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 24, 2014

Kevin Graves
Underground Storage Tank and Site Cleanups Program Manager
State Water Resources Control Board
1001 I Street, 25th floor
Sacramento, CA 95812

Subject: Energy Policy Act Implementation Study of California's UST Prevention Program

Dear Kevin:

EPA is pleased to share the attached review of California's UST Leak Prevention Program.

EPA Region 9 contracted with Booz Allen Hamilton (Booz Allen) in 2013 to perform an evaluation of state program compliance with and implementation of the federal Energy Policy Act of 2005's UST provisions. Booz Allen reviewed records, procedures, and regulations for all EPA Region 9 states and territories, an effort that included offsite review of programmatic documents and onsite interviews with key program personnel. Booz Allen also observed UST field inspections in each state and territory, including inspections in three California counties.

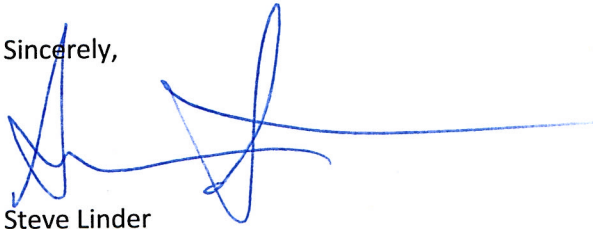
The Booz Allen study calls out a number of high-performing aspects of California's program, which are summarized on pp 39-40. SWRCB demonstrates a comprehensive track record of Energy Policy Act implementation, with advanced leak detection and other aspects of California's program predating the federal UST regulations. California's program benefits from a thorough investment in inspector resources and training, as well as database management and public records access. The report commends SWRCB for its ICC license requirement for all UST inspectors, designated operators, and service technicians, thus providing a consistent foundation of UST knowledge throughout the state. The additional requirement of continuing education goes further and provides an ongoing need for inspectors and other UST professionals to participate in formal and informal training sessions, ensuring UST knowledge remains current. The report highlights California's lower rate of new releases in connection to state requirements that UST systems be double-walled and monitored using VPH technology.

Other report highlights show California's progress toward implementing the CERS database and the challenges posed by developing a comprehensive statewide data set. The report identifies various incentives and disincentives for compliance faced by UST system owners, including the significant financial resources owners face to operate in compliance.

This effort has helped Region 9 establish important baseline knowledge of our states' programs. Thank you to your staff and the CUPAs that were part of the study (Monterey, Fresno, and Sacramento) for working with us and our contractor in this past year to coordinate on- and off-site file reviews, interviews, on-site inspections, comments on the draft report, and discussions of BAH's findings at the 2014 Region 9 All-States Meeting.

We are pleased that this comprehensive outside evaluation confirms that California's significant work to implement the UST program has resulted in a program which in many ways meets and exceeds national standards of quality. For further information, you may contact me at (415) 972-3369.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Linder', with a long horizontal flourish extending to the right.

Steve Linder
Manager, Region 9 Underground Storage Tank Program
EPA Region 9

Enclosure