



State Water Board Assessment of UST Program Element as Part of the CalEPA Unified Program Evaluation

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Agenda

Background; Brief Review of CalEPA's New Evaluation Process

- CalEPA Evaluation Process In Brief

UST Program Element Evaluation

- State Water Board UST Program Element Evaluation and Assessment
- Most common UST deficiencies
- CERS Data Mining Demonstration

CalEPA Evaluation Process In Brief

Notification

- Letter notifying CUPA of evaluation
- Letter requesting information

Assessment

- Assessment of information provided
- Meetings held for clarification
- Oversight Inspections

Conclusion

- Summary of Findings Report completed
- Deficiency Progress Update Reports

State Water Board

Assessment of UST Program

Element



State Water Board Participation in the CalEPA Unified Program Evaluation Process

- First Evaluation Team Meeting
- CUPA Q & A Meeting with Evaluation Team
- Second Evaluation Team Meeting
- Exit Briefing



Information Necessary for State Water Board to Perform Remote Assessment, and How Information is Provided to CalEPA

- Administrative Documents
- Program Specific Documents
- Facility Files
- FTP Site
- Jump Drive
- Email

State Water Board Remote Assessment

- Review of CUPA information:
 - Documents Submitted by CUPA (as requested by CalEPA and State Agencies)
 - CERS Data
 - Previous Evaluation Documents
 - CUPA's Website
 - Application for Certification
 - Interviews, Supplemental Questionnaire
- Determine if field visit(s) are needed:
 - Oversight Inspections
 - Verification Inspections

Interactive Communication

- Teleconference
- Web-based conferencing allows:
 - Attendees to View Same Document
 - Live Demonstration of Information and Documents by CalEPA, CUPA, and Evaluation Team
 - Real Time Editing of Draft Preliminary Summary of Findings



Where the Rubber Meets the Road

Introductions and Consultation

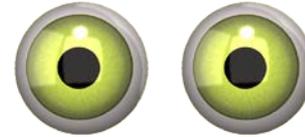
- State Water Board initial contact:
 - Conference call with CUPA
 - Preferably before or shortly after receiving CUPA material
- Topics:
 - Policy and Procedures
 - Questions clarifying initial review of CUPA information

Oversight Inspections

- Scheduled in Advance of the Actual Scheduled Evaluation
 - This allows for flexibility in scheduling with the CUPA
 - Ensures that the oversight inspections do not interfere with the limited time assigned for State Agency review
- Schedule Inspection with the CUPA Directly
- Looking for a Cross Section of CUPA Inspectors

UST Program Element

Review of Administrative Documents



- Self Audit Reports
- Annual Single Fee Report
- ICC Documentation
- Administrative Procedures
 - Inspection and Enforcement Plan
 - Data Management Procedure
 - Permitting Policy
- Local Ordinance
- Fee schedule
- Supplemental Inspection Procedures

UST Facility File Information

- Facility file information should be limited to items not available in CERS:
 - Unified Program Facility Permit (UST Element)
 - Annual UST compliance inspection reports
 - UST test results and certifications, including any re-testing
 - UST RTC documentation and correspondence
 - UST Enforcement documentation
 - UST closure documentation

Evaluation and Assessment Elements

Compliance Inspections

- Routine compliance inspections conducted annually
- Conducted per statute and regulations, as outlined in LG 159, for example:
 - With or without service contractor
 - Inspector ICC certification
 - Providing inspection report to owner/operator
 - Citing all identified failures and violations
 - Associating violations with specific UST's or UST systems;
 - Testing documentation reviewed within 30 days, and failures followed up on
 - Verify CERS UST Submittal information

Other UST Program Activities

- Reporting all UST violations, including significant operational compliance (SOC) criteria, in CERS when UST violations are cited during the annual UST compliance inspection
- UST Violations identified in CERS:
 - match the inspection report
 - are consistently recorded
- Utilizing correct Unified Program Violation Library UST violation number

CERS Data and Submittals

- Accepted UST submittals
 - ICC California UST Inspectors accepting UST submittals
 - UST related fields accurate and complete
 - Required UST uploads are present
 - UST Submittals accepted in a timely fashion
 - UST RTC in an acceptable timeframe

UST Significant Operational Compliance

- SOC - Report 6
 - Review past three fiscal years
 - Timeliness of Report
 - SOC numbers make sense (trends)
 - RD and RP criteria identified in CERS CME
 - Number of Inspections Reported
 - Facility, tank counts and inspection numbers are similar to CME, and Self Audit Report

UST Red Tags

- Red Tag
 - Policy and Procedures
 - Completion of Report 6



UST Element of the Unified Program Facility Permit

- Consolidated Unified Program Facility Permit must contain UST Operating Permit Requirements
- Correct issuance date
- Withholding permit when UST is out of compliance

Temporarily Abandoned & Closed USTs

- Temporarily Abandoned USTs
 - Maintained in CERS
 - Implementing temporary abandonment procedure
- Closed USTs
 - Following removal or abandonment in place procedures
 - Following sampling procedures
 - Maintaining closure documentation
 - Document CUPA's satisfaction with closure documentation

Additional Areas of Evaluation and Assessment

- ELD Implementation for identified facilities
 - Well proximity one time test
 - Well proximity every three years
 - New construction
- Fee schedule sufficient to implement the UST program, may be combined with other sources of revenue
- Enforcement per statute and regulations
- Follow up with CalEPA regarding UST surcharge fee collection and remittance

Common UST Deficiencies

- The CUPA is not consistently ensuring that all appropriate UST related information in CERS is accurate and complete
- CUPA personnel that are not certified as International Code Council (ICC) California UST Inspectors are accepting UST facility submittals in CERS
- The CUPA is issuing Unified Program Facility Permits, which includes the UST operating permit, to facilities that are not in compliance with UST Program requirements

Common UST Deficiencies

- The CUPA is not consistently reporting all inspection, violation, including significant operational compliance (SOC) criteria, and enforcement information in, examples include:
 - The CUPA is citing multiple, different Violation Numbers for the same violation
 - The CUPA uses a “General” or “General- Local Ordinance” violation to cite UST violations when the CUPA does not have a Local Ordinance to cite and use these violations

Common UST Deficiencies

- The CUPA is not inspecting all UST facilities annually
- The CUPA is not consistently conducting complete annual UST compliance inspections
- The CUPA is not consistently requiring facilities to submit UST testing and leak detection documentation
- The CUPA is not consistently or correctly associating violations to specific UST's or UST systems

Common UST Deficiencies

- The CUPA is not consistently requiring UST facilities with testing or leak detection failures to return to compliance
- The CUPA is not consistently requiring UST facilities to implement periodic ELD testing due to proximity to public drinking water wells
- Not consistently documenting CUPA's satisfaction with closure documentation

CERS Data Mining Demonstration

CERS Review for Evaluations

California Environmental Reporting System: Regulator Katrina Valerio Account Sign Out Tools Reports

CERS Regulator Submittals Facilities Businesses Regulators Compliance Responders Reports

Regulator Home
Home

Instructions/Help

Welcome to the CERS Regulator Portal. Review the Dashboard and Action Required Panels below for submittals and requests requiring attention by your agency. Select the links across the top of the page to access other CERS data. New users may wish to review the [Regulator Portal Questions and Answers Page](#).

I would like to...

- [View/Search My Agency's Submittals](#)
- [View All Actions Needed](#)
- [Search Inspections \(New Inspection\)](#)
- [Search Enforcements \(New Enforcement\)](#)

Other Tasks

- [All CERS Regulator Reports...](#)
- [Register with another Regulator](#)
- [CERS Enhancement Listing](#)

Dashboard Process Submittals Search Submittals

Activity	Total	New (<10 days)	Older (>30 days)
Unreviewed Submittal Elements Awaiting Review ("Submitted")	6	0	6
Submittal Elements with status "Under Review"	0	0	0

My Regulator Action Required Item (None) View All...

Regulator Notifications View All Notifications

The short list of most recent Regulator Notifications has been removed to improve the speed of the Regulator Home Page. You can view [All Notifications](#), or select a facility, business, or regulator and select the Notifications link on the left to see Notifications specific to that entity.

Version 2.23.0010 | [Enhancements](#) | [CERS Central](#) [Diagnostics](#) | [Conditions of Use](#) | [Privacy Policy](#) | [Contact](#) | [Help](#)

California Environmental Reporting System: Business | © 2016 California Environmental Protection Agency
CERS Technical Support: [Request Technical Assistance](#)

UST Program Reports

These reports compile submitted UST data from ~100% of California's regulated UST facilities (14,535 as reported by SWRCB, October 2011).

Compliance, Monitoring, and Enforcement Reports

[Inspection Summary Report by Regulator \(Report 6\)](#)

Counts of regulated UST facilities, active and closed UST systems, inspections, and SOC statistics.

[Inspection Summary Report by Regulator \(Annual\)](#)

Counts of regulated UST facilities, facilities inspected over a specified date range, Routine Inspections versus Other Inspections, and Return-to-Compliance statistics for Class III violations.

[Enforcement Summary Report by Regulator \(Annual\)](#)

Counts of Violations by Class, Enforcements by Enforcement Type, and Fines/Penalties.

[Red Tag Facility Details Report](#)

List Red Tags affixed during a specified date range.

[Semi-Annual Report](#)

Counts of regulated UST facilities, active and closed UST systems, inspections, and the Significant Operational Compliance statistics.

[Statewide Leak Prevention Report](#)

Counts of regulated UST facilities statewide, active UST systems, inspections performed over a specific time period, and combined operational compliance statistics.

Facility / Tank / Monitoring Summary Reports

[Facility Summary by Owner Type](#)

Provides counts of actively regulated UST facilities by Owner Type, grouped by Regulator.

[Facility Summary by Financial Responsibility Mechanism](#)

Provides counts of actively regulated UST facilities by Financial Responsibility Mechanism, grouped by Regulator.

[Facility/Tank Summary by Construction/Monitoring Type](#)

Provides counts of active UST systems falling within a user-defined set of criteria for tank construction and monitoring, grouped by Regulator.

[BOE Facility/Owner Search Tool](#)

Provides a tool to search for UST facilities by BOE Number, facility site address, and UST Property Owner and UST Tank Owner information.

UST Data Download

[UST Facility/Tank Data Download](#)

Generates an Excel file containing UST Facility / Tank data that has been "Accepted" by Regulators.

[UST CME Data Download](#)

Generates an Excel file containing UST Inspection, Violation, and Enforcement data.



UST Program Report: UST Facility/Tank Data Download

[Home](#) » [Reports](#) » [UST Program](#) » [UST Facility/Tank Data Download](#)

Instructions/Help



This report generates an Excel file containing UST Facility / Tank data.

- Selecting 'accepted' UST data (this is the default for this report) provides a report of facilities and tanks data for every regulated UST site *that has at least one accepted UST submittal*. This includes facilities where all tanks have been closed or removed. This report should match or closely match the facility and tank counts in Report 6.
- Selecting 'last submittal only' provides a report of facilities and tanks data derived from the **most recent** submittal with a status of 'submitted', 'in process' or 'accepted'. This report may not provide complete data as it does not include data from prior other 'accepted' submittals. 'Not accepted' submittals are not included in either report.

UST Program Report: UST Facility/Tank Data Download

Regulator CERS ID Tank Use Tank Primary Containment Piping Primary Containment Convert Codes to Display Values Date Submitted to Tank Contents Tank Capacity to
GallonsDate Installed to Accepted Submittal Only Last Submittal Only (regardless submittal status) [Generate Excel Report](#)

Turning on Filters

The screenshot shows Microsoft Excel with a data table titled "Facility Identification and Location". The table has 9 columns: CERS ID, Facility ID, Facility Name, Facility Street Address, Facility City, Facility ZIP Code, Type of Action, Tank ID #, and Manufacturer. The "Filter" menu is open, showing options like "Sort A to Z", "Sort Z to A", "Custom Sort...", "Filter", "Clear", and "Reapply".

CERS ID	Facility ID	Facility Name	Facility Street Address	Facility City	Facility ZIP Code	Type of Action	Tank ID #	Manufacturer
10033771	30-020-TMP002	AT&T CORP - LCL15	1241 W Alton Ave	Santa Ana	92707	Confirmed/Updated Information	LCL15U001	Modern Welding
10122613	FA0025897	La Palma 76	5482 La Palma Ave	La Palma	90623	Confirmed/Updated Information	2	Modering Welding
10122613	FA0025897	La Palma 76	5482 La Palma Ave	La Palma	90623	Confirmed/Updated Information	1	Modern Welding
10138183		G&M Oil Co. #1	1300 Pacific Coast Hwy	Seal Beach	90740	Confirmed/Updated Information	3	UNKNOWN
10138183		G&M Oil Co. #1	1300 Pacific Coast Hwy	Seal Beach	90740	Confirmed/Updated Information	5	UNKNOWN
10138183		G&M Oil Co. #1	1300 Pacific Coast Hwy	Seal Beach	90740	Confirmed/Updated Information	2	JOOR
10138183		G&M Oil Co. #1	1300 Pacific Coast Hwy	Seal Beach	90740	Confirmed/Updated Information	4	UNKNOWN
10138183		G&M Oil Co. #1	1300 Pacific Coast Hwy	Seal Beach	90740	Confirmed/Updated Information	1	JOOR

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Overview UST Facility Info UST Tank & Monitoring Plan Info UST Cert of Installation & Mod

Ready

UST Data Download Queries

- Do all tanks have an installation date?
- Do all tanks have an associated spill bucket?
- Do all tanks have over fill protection?
- Is primary containment construction for tanks, and piping, listed?
- Do all double-wall tanks, and piping, list the containment construction of secondary containment?
- Do all VPH systems have Vent Piping Transition Sumps identified properly?
- Are there any VPH Systems identified as having single-wall components?
- Is there any double-wall piping installed between January 1, 1984 and June 30, 2004 which doesn't list continuous interstitial monitoring?

UST CME Report

UST Program Report: CME Data Download

[Home](#) » [Reports](#) » [UST Program](#) » [CME Data Download](#)

Instructions/Help

This report generates an Excel file containing UST CME (Inspection, Violation, Enforcement) data. Please note, this report compiles "Accepted" UST data from ~100% of California's regulated UST facilities (14,535 as reported by SWRCB, October 2011).

UST Program Report: CME Data Download

Regulator	Orange County Environmental Health 		
Inspection/Enforcement Date Range	7/1/2014 	to	6/30/2015 
Only Export Outstanding Violations	<input type="checkbox"/>		
Convert Codes to Display Values	<input checked="" type="checkbox"/>		
			Generate Excel Report

Are there violations without Return to Compliance?

General Violation Information						
Violation Type N	Class	Violation Date	Return to Comp	Actual Return to Compliance Date	Violation Comment	Violation Category
2010004	Class 1	07/18/2014	08/17/2014		Records of individuals trained by the designated operator (D Administration/Documen D	
2010007	Class 1	07/18/2014	08/17/2014		Certification of financial responsibility (CFR) expired on 5/27 Administration/Documen F	
2030013	Class 1	07/18/2014	08/17/2014		The last designated operator (DO) monthly inspection repor Operations/Maintenance D	
2030021	Class 1	07/03/2014	08/02/2014		The tank at this site is being operated without a permit due t Operations/Maintenance F	
2030033	Class 1	07/18/2014	08/17/2014		A copy of the monitoring plan was not observed at the facilit Operations/Maintenance M	
2030046	Class 1	07/18/2014	08/17/2014		A copy of the leak response plan was not observed at the fac Operations/Maintenance R	

Overview UST Inspections **UST Violation Details** UST Enforcements

6 of 859 records found

Are there upcoming inspections, or overdue inspections?

General Inspection Information								
906	907	910	911	912	913a	917	929	
Inspection Date	Inspection Type	Number of Class I Violations	Number of Class II Violations	Number of Minor Violations	Significant Operational Compliance	Returned to Compliance	Inspection Details Available	Inspection Comments
05/05/2015	Routine	0	0	0	With both Release Detection and Release Prevention		No	NOTICE_FOR_MISSING/INCC
05/04/2016	Routine	0	0	11	With only Release Prevention		Yes	NOVC:CERS;DAILY LOG FOR M
04/16/2015	Routine	0	0	9	With both Release Detection and Release Prevention	07/06/2015	Yes	TLS 350R,PIPE VAC VR-100,BE
04/07/2016	Routine	0	0	10	With only Release Prevention	05/04/2016	Yes	VRTLS 350; 87M/87AUX, 91/D
12/11/2014	Routine	0	0	25	With both Release Detection and Release Prevention		Yes	NOVC FAILED TO SUBMIT AS
12/07/2015	Routine	0	0	12	No Significant Operational Compliance		Yes	NOVC:1)MISSING 2014 CTLS
07/11/2014	Routine	0	0	0	No Significant Operational Compliance		No	<NOVC:DSL MLLD FAILED;87
07/09/2015	Routine	0	0	0	No Significant Operational Compliance		No	NOVC-CERT.ATG'S ,CONVERT
08/13/2014	Routine	0	0	40	No Significant Operational Compliance		Yes	NOVC LINING CERT,UDC 3/4
05/05/2016	Routine	0	0	0	With both Release Detection and Release Prevention	05/05/2016	No	LAST CP SYS CERT ON 111115
12/08/2015	Routine	0	0	6	With only Release Prevention		Yes	NOVC:(1)SB989 TEST'2014 NO
08/25/2014	Routine	0	0	0	With both Release Detection and Release Prevention	08/25/2014	No	DOCS-CERS SUBMITTED;PAN
07/28/2014	Routine	0	0	2	With both Release Detection and Release Prevention	10/01/2014	Yes	NOVC SUBMIT TEST OF 4/9/1
07/20/2015	Routine	0	0	0	With only Release Prevention		No	<NOVC:CERS DOCS NOT ACC
10/27/2014	Routine	0	0	6	No Significant Operational Compliance		Yes	<SCTR FAILED FOR DSL STP &
10/30/2015	Routine	0	0	8	With only Release Detection	11/17/2015	Yes	NOVC CERS, MONIT.CERT.PA
09/25/2014	Routine	0	0	9	With both Release Detection and Release Prevention		Yes	NOVC FOR 87 VAPOR SPILL B
09/22/2015	Routine	0	0	4	With both Release Detection and Release Prevention		Yes	NOVC: UPDATE UST FACILITY
02/25/2015	Routine	0	0	7	With both Release Detection and Release Prevention		Yes	NOVC ISSUED FOR ERRORS C
02/22/2016	Routine	0	0	0	With both Release Detection and Release Prevention		No	CTLS 02/22/16.SPBK TO BE TE
08/25/2014	Routine	0	0	0	With both Release Detection and Release Prevention	08/25/2014	No	ALL DOCS CURRENT IN CERS;
08/18/2015	Routine	0	0	1	With only Release Detection		Yes	NOVC FOR CERS AND CORRE
09/03/2014	Routine	0	0	0	With both Release Detection and Release Prevention	09/03/2014	No	CTLS-090913,NO SCTR-VPH,D
08/28/2015	Routine	0	0	1	With only Release Prevention		Yes	BOX(208/304);NOVC:CERS;M
08/18/2014	Routine	0	0	1	With only Release Detection		Yes	<NOVC:EXPD FRCT> ALL FNS
03/30/2016	Routine	0	0	2	With only Release Prevention	04/15/2016	Yes	NOVC: UPDATE UST FACILITY
10/06/2014	Routine	0	0	0	With both Release Detection and Release Prevention	10/06/2014	No	ALL DOCS SUBMITTED FOR R

Useful Tools for CERS Review

- UST FAQ: Which forms require uploading to CERS?
- UST FAQ: General Reporting Requirements for UST Sites (<https://cersbusiness.calepa.ca.gov/Help>)
- LG 159 Enclosure - Annual Underground Storage Tank Compliance Inspection Handbook (http://waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/)
- CalEPA Unified Program Guidance Letter 14-08, Reporting Underground Storage Tank Information (<http://www.calepa.ca.gov/CUPA/Bulletins/default.htm>)
- California Code of Regulations Title 27 Data Dictionary (<http://cersapps.calepa.ca.gov/Public/DataRegistry/DataElements?dataSourceID=39>)

Questions on CalEPA Evaluation Process Should be Directed to:

Please Contact:

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