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April 11, 2018

Ms. Laura Fisher and Mr. Cory Hootman
c/o Ms. Jeanine Townsend, Clerk to the Board
California State Water Resources Control Board

Submitted via email to commentletters@waterboards.ca.gov

Subject: Comments to Proposed Amendments to California Code of Regulations Title 23

Dear Mr. Hootman and Ms. Fisher,

Belshire is please to present to the California State Water Resources Control Board (SWRCB) comments to the proposed amendments to California Code of Regulations Title 23 (23 CCR). The comments provided are primarily regarding the training and visual inspections by the Designated Operator (DO).

The following comments are specific to citations noted.

2715 (c) (1) (A) and (B) Define Initial Training

These section discuss the requirement for initial and ongoing training. Section (B) provides a requirement for training "after the initial training". Belshire recommends that this be specified to explain that (B) is referring to the annual refresher training.

2715 (c) (3) and (4) List of Employees

2715 (c) (3) requires a list of trained employees and is language that had not been added or modified. 2715 (4) then goes on to say that the Training Certificate satisfies (3). Since the Training Certificate is not optional, then Belshire recommends removing 2715 (c) (3).

Appendix XIII Sections III. and V.

These sections do not provide enough room to list all potential issues in the detail required to provide owners and operators the information they will need to take proper corrective action. Belshire recommends the following:

1. Remove the requirement for the owner and operator to sign and record follow up actions. This requirement is not new and is not specified to be documented as such in 40 CFR 280.
2. If the requirement for the owner and operator to sign and record follow up actions will be kept on the regulated form, then either put each section on its own separate page or add a comment to allow the DO to include additional pages.

Appendix XIII Section VIII.

In this section, the form requires the DO to answer, "Have all containment sumps, that have had a leak detection alarm since the previous inspection, been responded to by a qualified UST service technician?" 2716 (b)(2) provides the requirement to review the alarm history and, "verify that each alarm condition was documented and responded to appropriately." It does not specify that the

response by a UST service technician. In fact, some alarms can be resolved without a response by a UST service technician (such as removal of liquid from a containment sump that has caused a sensor to alarm). Belshire recommends removing the service technician from Appendix XIII Section VIII.

Appendix XIII Sections IX.

This section does not provide enough room to list all equipment at some facilities. Belshire recommends either putting each section on its own separate page or adding a comment to allow the DO to include additional pages.

Thank you,

Sincerely,

A handwritten signature in black ink, appearing to read 'Glen VanderVeen', with a long horizontal flourish extending to the right.

Glen VanderVeen

VP Auditing and Compliance Services
Belshire Environmental Services, Inc.