

State Water Resources Control Board

Updated April 30, 2019

To: Unified Program Agencies

INSPECTION OF ABANDONED UNDERGROUND STORAGE TANKS

During the Abandoned Underground Storage Tank (AbUST) Initiative, the State Water Resources Control Board (State Water Board) and the United States Environmental Protection Agency (U.S. EPA) observed that AbUSTs were not consistently being inspected, included in Report 6, or reported through the California Electronic Reporting System (CERS) by the Unified Program Agencies (UPAs). This correspondence and attached *Abandoned Underground Storage Tank Compliance Checklist* have been updated to address the new Report 6 technical compliance rate (TCR), to clarify regulatory requirements for conducting inspections of AbUST facilities, and when AbUST information is required to be included in Report 6 and CERS.

California Health and Safety Code, division 20, chapter 6.7, section 25288 requires all USTs be inspected annually, including AbUSTs. USTs are considered abandoned when the UST is out of service and the operating permit requirements are not being implemented, but the UST has not been properly closed, removed, or decommissioned before January 1, 1984.

Understanding that many AbUSTs have limited or no site access, the State Water Board has developed minimum criteria for documenting and reporting compliance of AbUSTs. The minimum inspection and reporting criteria for AbUSTs with limited or no site access is included in the attached *Abandoned Underground Storage Tank Compliance Checklist*. UPAs with full site access to AbUSTs will perform a standard UST inspection in accordance with the California Health and Safety Code and the UPA Inspection and Enforcement Plan.

The number of UST compliance inspections conducted, TCR determinations, and number of active USTs shall include AbUSTs. UPAs are required to include AbUST inspections data in the Report 6. Further, UPAs are required to ensure that AbUSTs installed after January 1, 1984 or those that were previously regulated, as described in the CERS [Frequently Asked Questions](#), are included in CERS with the UST element set to "Applicable".

The State Water Board has observed consistent progress by the UPAs in conducting annual compliance inspections, reporting through the Report 6 and adding appropriate AbUSTs to

CERS. For additional clarification, please contact Mr. Tom Henderson at (916) 319-9128 or tom.henderson@waterboards.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Laura Fisher". The signature is written in a cursive, flowing style.

Laura S. Fisher, Chief
UST Leak Prevention Unit &
Office of Tank Tester Licensing

Attachment: *Abandoned Underground Storage Tank Compliance Checklist*

cc: [Via email only]

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