

# California UST Program – CUPA/PA Data Study

## Summary

The U.S. Environmental Protection Agency (EPA) and Redhorse Corporation compiled this report to better understand California’s Underground Storage Tank (UST) program performance information, knowing that 92 different agencies contribute to statewide totals. Under the EPA’s direction, Redhorse Corporation obtained and analyzed UST program data for 82 Certified Unified Program Agencies (CUPAs) and 10 Participating Agencies (PAs). The following data were collected for State Fiscal Year (SFY) 2014-2015, from July 2014 through June 2015: UST inventories, UST inspection statistics, and Significant Operational Compliance (SOC) rates for each CUPA and PA. California Environmental Reporting System (CERS) submittal information and Compliance, Monitoring, and Enforcement (CME) data in CERS, current as of December 2015, were collected and reported by the State Water Resources Control Board (State Water Board) to the EPA. Additionally, permit fees charged for UST installation, operation, and closure were obtained from CUPA and PA fee schedules or permit application forms.

### Preliminary Findings

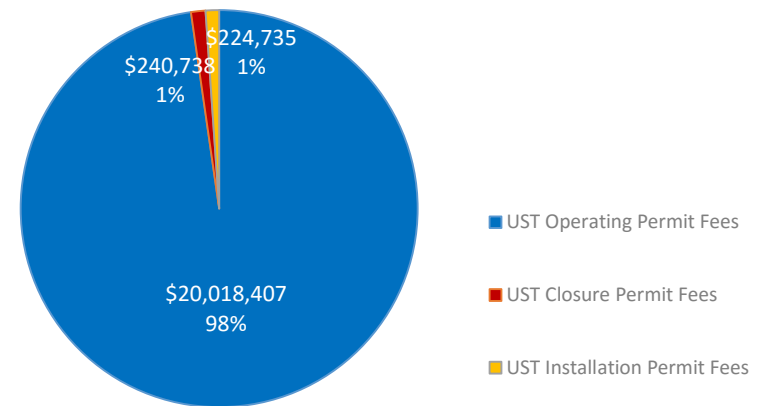
Statewide totals for UST program performance measures, as reported, mask substantial variability across individual CUPAs and PAs. This variability does not appear to be correlated with CUPA or PA size.

- Annual INSPECTION RATES vary between 40% and 100% (94% statewide)
- Facility Significant Operational COMPLIANCE RATES vary between 16% and 100% (66% statewide)
- CERS SUBMITTALS REVIEWED and VERIFIED vary between 0% and 100% of facilities (65% statewide)
- COMPLIANCE & ENFORCEMENT DATA in CERS varies between 0% and 100% of facilities (85% statewide)

UST permit fees (installation, operation, and closure) also vary widely across CUPAs and PAs, although between 82% and 100% of permit fees come from operating permits.

- UST OPERATING PERMIT FEES vary between \$105 and \$3,273 per year for a facility with three 10,000 gallon USTs, depending on the CUPA or PA jurisdiction.

Estimated FY14-15 Revenues, All CUPA/PAs



The EPA and Redhorse propose to further compare permit revenues with CUPA and PA performance metrics. Such a comparison would identify where low revenue appears to negatively impact UST program performance and which management practices could be studied and promoted. Future efforts may seek to better understand and share these practices with additional CUPAs and PAs.

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Figure 1: Annual UST Facility Inspection Rates

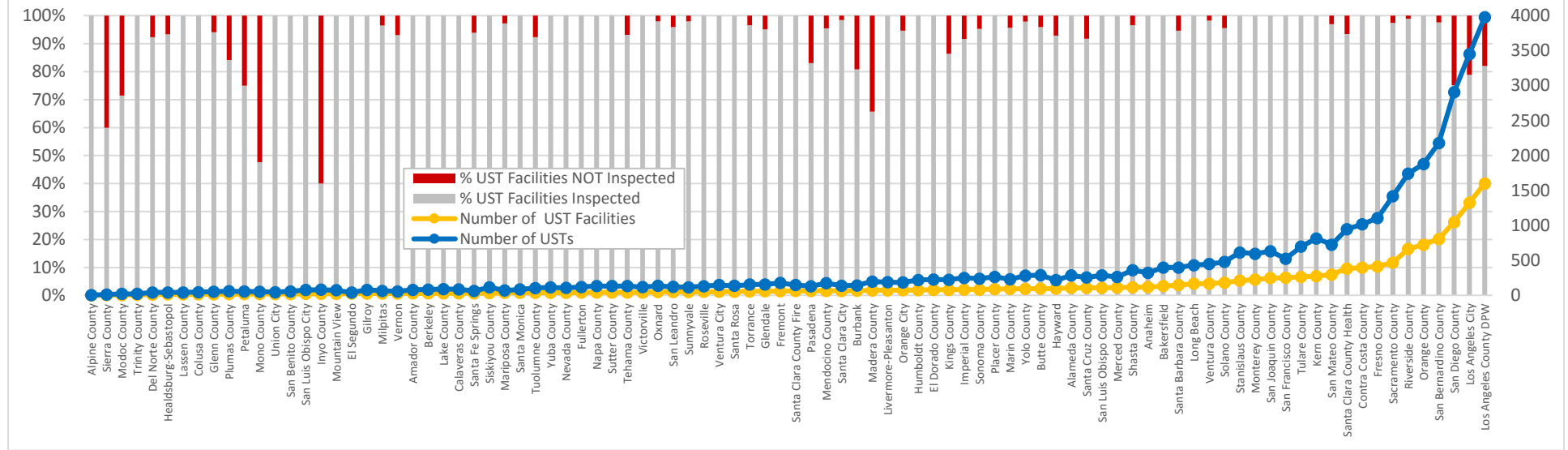
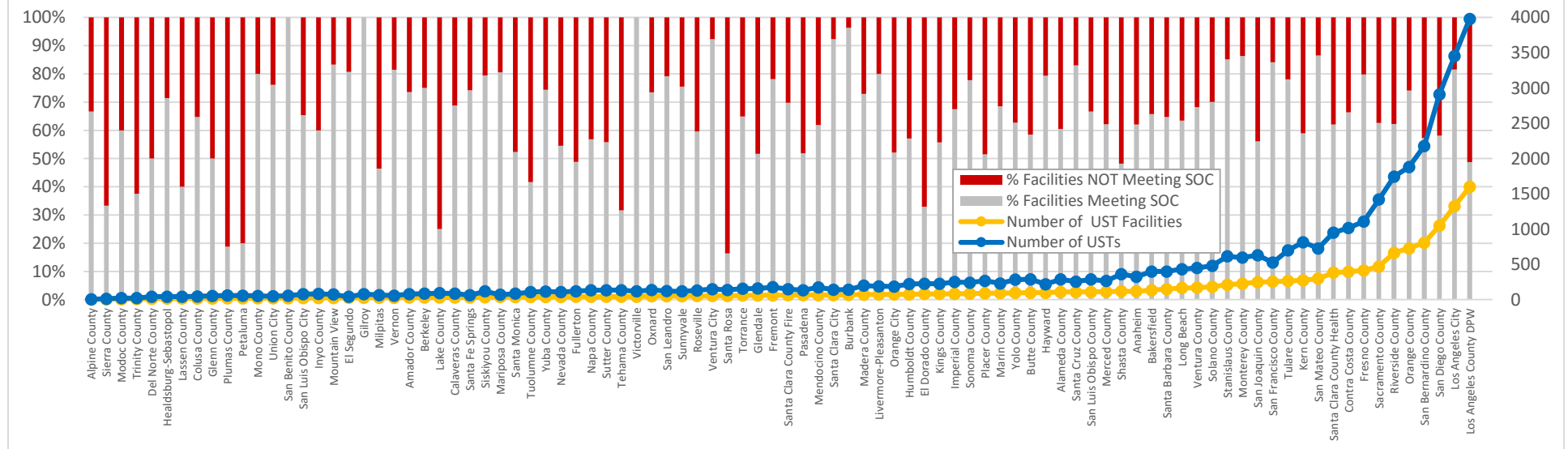


Figure 2: Significant Operational Compliance (SOC) Status of UST Facilities



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Figure 3: CUPA/PA Review & Verification of CERS UST Information

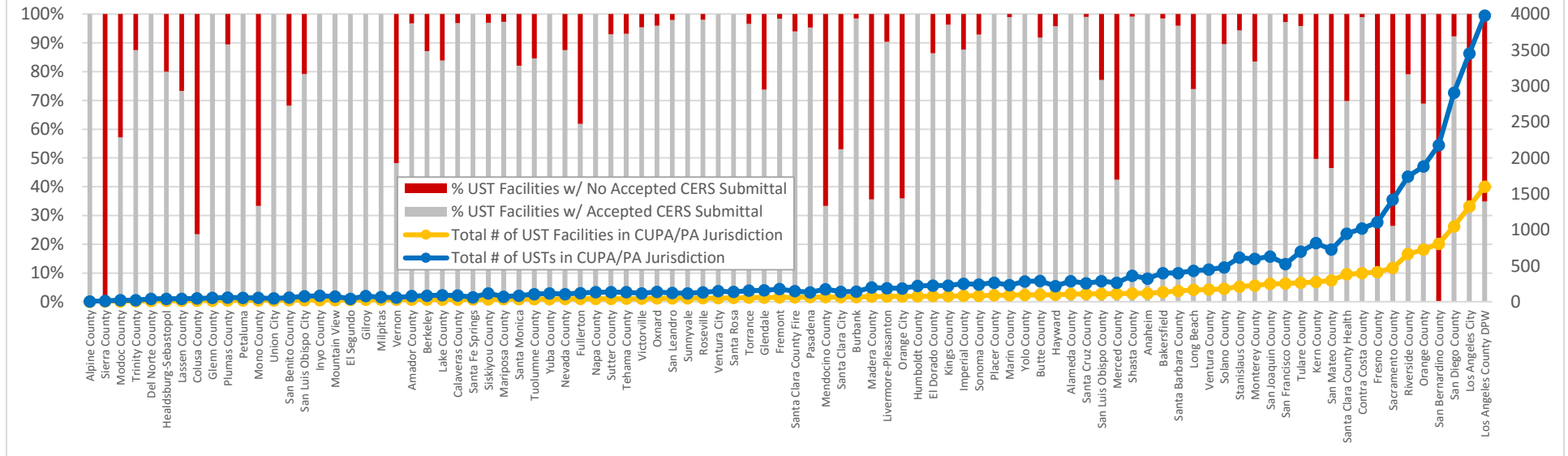
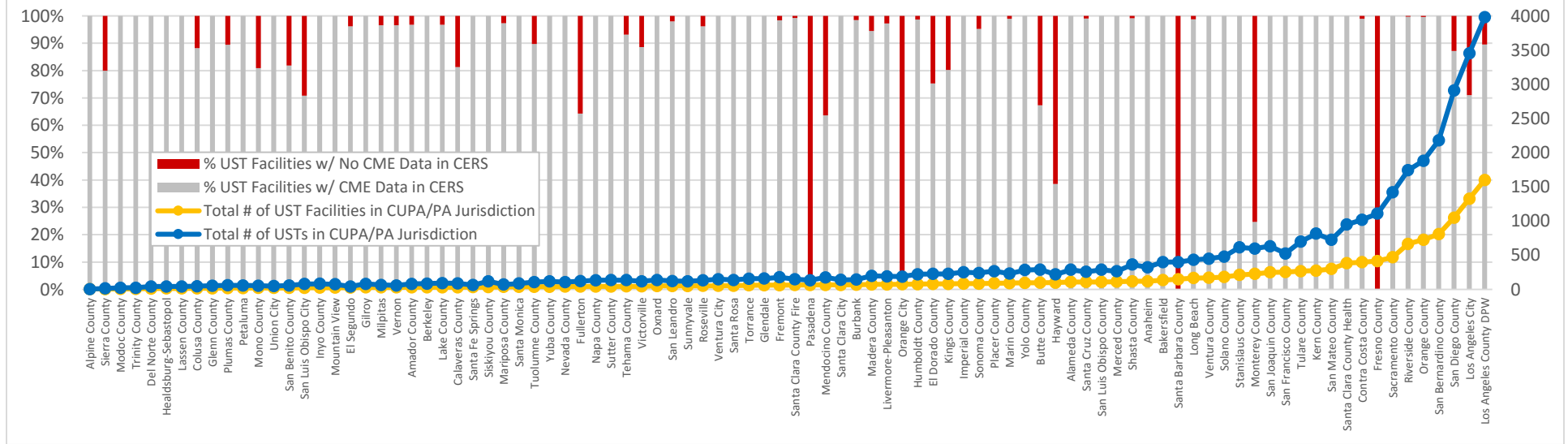
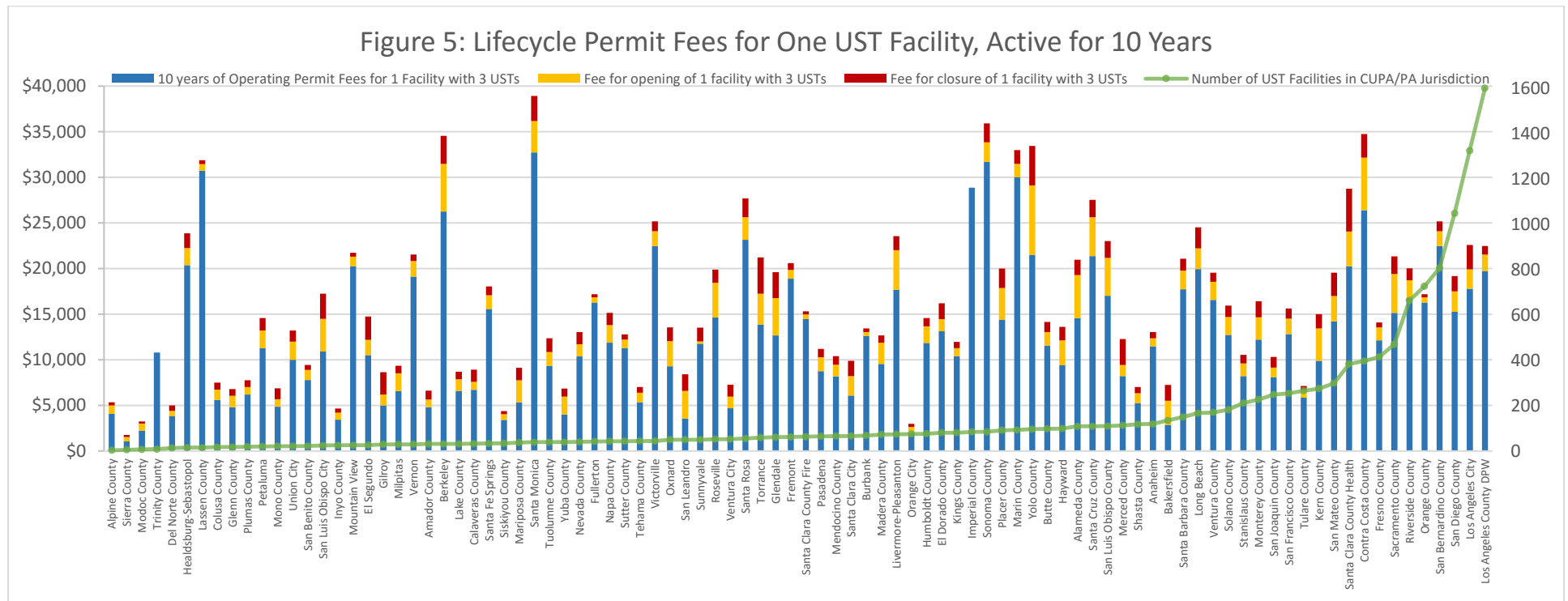


Figure 4: CUPA/PA Reporting of CERS UST Compliance & Enforcement Data



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## General Assumptions

Several assumptions were made in order to create the included charts and calculate estimated revenues for individual CUPAs and PAs. These assumptions include:

- A “typical” UST facility contains three 10,000-gallon USTs.
- Some CUPAs and PAs charge hourly installation and closure fees, so ten hours for UST installation and six hours for UST closure were used to calculate typical fees.
- When facility and UST information in Report 6 did not match up (for example five removed USTs corresponding with zero facilities), the number of USTs was used for calculations and approximately three USTs per facility was assumed, rounded up if not divisible by three (five USTs=two facilities).
- Additional assumptions for specific CUPAs and PAs are included in the master spreadsheet, available upon request.

## References

1. California Environmental Protection Agency (Cal/EPA). 2014. UST Program Statistics: Report 6 Semiannual/Quarterly Data, July – December 2014. Available at: [http://www.waterboards.ca.gov/water\\_issues/programs/ust/leak\\_prevention/docs/qtrlydata/july\\_december2014.pdf](http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/docs/qtrlydata/july_december2014.pdf)
2. Cal/EPA. 2015. UST Program Statistics: Report 6 Semiannual/Quarterly Data, January – June 2015. Available at: [http://www.waterboards.ca.gov/water\\_issues/programs/ust/leak\\_prevention/docs/qtrlydata/jan\\_june2015.pdf](http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/docs/qtrlydata/jan_june2015.pdf)
3. California Environmental Reporting System (CERS). 2015. December 2015 Quarterly CERS Underground Storage Tank Data Status Report.
4. UST fee information was obtained from CUPA websites (<http://cersapps.calepa.ca.gov/Public/Directory/>) and phone calls to select CUPAs.