



UST Program Update November 2015

Compliance with California and Federal UST Regulations Notification

On October 21, 2015 the State Water Board sent out notice, via Lyris, to UST owners and operators describing federal regulations they need to meet in addition to California's UST requirements. UST owners and operators must comply with the new federal UST regulations that became effective October 13, 2015. The letter informs owners and operators where they can find more information on how to meet federal UST regulations. In addition, detailed tables have been compiled to assist UST owners and operators in determining which of the new requirements in the federal UST regulations need to be met and by when. The tables contain compliance deadlines, a general description of each of the new federal regulations that are more stringent than California UST statutes and regulations, and the federal citation. A copy of the letter is posted at http://www.waterboards.ca.gov/ust/tech_notices/docs/ca_fed_regs.pdf.

CERS Data Dictionary Error

On October 6, 2015, Cal/EPA sent notification through its Unified Program Listserv that errors exist in the Unified Program Data Dictionary as it relates to the following UST program data fields in the "Training" portion of the "UST Monitoring Plan" section:

- 490-69b UST Monitoring Plan
- 490-69c Operating manuals
- 490-69d CA UST Regulations
- 490-69e CA UST Law
- 490-69f SWRCB Handbook for Tank Owners- Manual and Statistical Inventory Reconciliation
- 490-69g SWRCB Publication: Understanding Automatic Tank Gauging Systems
- 490-69h Other Training Documents

Specifically the "information descriptions" incorrectly describe these data elements as "Indicates that facility personnel are familiar with the....." The correct "information description" should be "The [listed document] is retained at the facility." These fields were taken from the old UPCF Form D, but their descriptions were changed somewhere during the transfer to the California Environmental Reporting System (CERS) Data Dictionary. The familiarity question is asked in field 490-69a, which currently makes checking the boxes of fields 490-69b – 490-69h completely redundant.

Both CalEPA and the State Water Resources Control Board (State Water Board) have agreed that the best way to handle this error, until it can be properly addressed through a Title 27 rulemaking, is by hiding fields 490-69b – 490-69h in CERS and revising the existing informational "help" bubble for data element 490-69a to say:

“Select the box to verify that personnel with UST monitoring responsibilities are familiar with all of the following documents relevant to their job duties:

- UST Monitoring Plan
- Operating Manuals for Electronic Monitoring Equipment
- CA UST Regulations
- CA UST Law
- SWRCB Handbook for Tank Owners- Manual and Statistical Inventory Reconciliation
- SWRCB Publication: Understanding Automatic Tank Gauging Systems”

The informational help bubble for data element 490-69i (Specify Other Training Documents) will also change to “Indicate if other training documents are kept. List documents in the space provided.”

In addition, CalEPA will be coordinating with CUPAs that have portals so similar changes can be made in their data management systems.

CUPAs should not cite violations for these hidden sections of the monitoring plan, and any existing violations should be rescinded. For more information, contact Gabriel Herrera at gabriel.herrera@waterboards.ca.gov or (916) 319-9128.

Updated UST Data Posted on the Web

The State Water Board has posted the following updated Report 6 related information to our website:

Public Record Summary Information on Underground Storage Tanks – This page is required to be published annually by the Federal Energy Act of 2005 and shows a summary of UST facility information and a table listing the source and cause information for UST releases reported during the past reporting period. The page can be found at http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/public_record_sum_info.shtml.

Report 6 Semiannual Data – This table shows the number of active UST facilities and USTs, the number of USTs that were permanently closed, the number of USTs that were installed, and inspection information for the reporting period. The table can be found at http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/docs/qtrlydata/jan_june_2015.pdf.

Red Tags Issued Through June 2015 – This table lists the Red Tags issued through June 2015 and is sorted by the reporting period issued and by the regulatory agency that issued them. Select “Red Tags affixed by CUPAs (listed by CUPA or Date affixed)” at http://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/index.shtml.

For more information on any of these tables, please contact Gabriel Herrera at gabriel.herrera@waterboards.ca.gov or (916) 319-9128.

Office of Tank Tester Licensing Request for Interior Tank Lining Companies to Submit Notification of UST Lining Activities

As previously advised in the October State Water Board Monthly update, many CUPAs have expressed significant concern regarding compatibility issues associated with aging UST infrastructure. Particularly, it has been expressed that tank lining is occurring to repair or address these compatibility issues without understanding the root cause. As a result of the significant number of tank lining events going on throughout the state and not having a clear understanding as to why the increased lining events are occurring, **the State Water Board Office of Tank Tester Licensing is requesting that tank lining companies notify the State Water Board 7 days prior to commencing any tank lining activities.** This request is issued in the State Water Board letter below.

http://www.waterboards.ca.gov/water_issues/programs/ust/adm_notices/interior_tank_lining_notification_letter&form.pdf