



# UST Program Update February 2018

## Underground Storage Tank Compliance Inspection Data Review

The State Water Resources Control Board (State Water Board) is required by the Energy Policy Act of 2005 to certify compliance with the provisions of the Act annually. The United States Environmental Protection Agency (US EPA) has directed the State Water Board to utilize the California Environmental Reporting System (CERS) to verify inspection frequency element.

Preparation for the 2017 calendar year certification, which is transmitted to US EPA in February of 2018, is underway. State Water Board has requested that erroneous and incomplete UST inspection information be updated. This effort is necessary so that the State of California can make a positive certification to US EPA confirming that California meets the Federal three-year inspection frequency.

State Water Board has run reports to determine if all UST facilities have been inspected pursuant to the federal three-year inspection frequency. While most UPAs have completed the review process, some UPAs have yet to ensure the correct information has been uploaded to CERS. Directions on how to run the report are posted at [https://www.waterboards.ca.gov/ust/adm\\_notices/cers\\_ust\\_inspection\\_reports.pdf](https://www.waterboards.ca.gov/ust/adm_notices/cers_ust_inspection_reports.pdf). Please review your UPAs information and update inspection information forthwith.

## UST Lining and Repair – Notification Request

The State Water Board has seen a dramatic increase in the number of UST entries for primary repairs and linings. To better understand the root cause of the increase in repairs and lining, the State Water Board has made multiple requests that tank lining companies notify the State Water Board prior to performing UST linings. The response to these requests has been underwhelming.

The State Water Board is requesting UPAs to notify the State Water Board prior to expected UST entries. The request for notification allows the State Water Board to follow the process and collect relevant information to assist in proper updates to the regulations. The State Water Board has revised the previously issued Tank Lining Notification and request the *Underground Storage Tank Entry Notification* form be used for all UST entries, including lining, periodic inspections and repairs. The revised document can be found here: [https://www.waterboards.ca.gov/ust/adm\\_notices/cupa\\_ust\\_entry\\_notification.pdf](https://www.waterboards.ca.gov/ust/adm_notices/cupa_ust_entry_notification.pdf)

The State Water Board is also finding that UST owners or operators are not adequately demonstrating the structural integrity of the USTs prior to lining or repairing. Some of the problems observed by the State Water Board are:

- Lining installed without structural integrity testing performed by a California State Licensed Engineer.
- UPAs not being presented with structural certifications prior to repair or lining.
- UPAs not reviewing structural certifications prior to authorizing repair or lining.
- Lining and repairs being performed without UPA notification or permits.
- Improper contractor licenses being utilized to perform tank entries.

For questions or notifications regarding notification of UST lining, repair or entry, please contact Mr. Tom Henderson at (916) 319-9128 or [tom.henderson@waterboards.ca.gov](mailto:tom.henderson@waterboards.ca.gov).

## **Contractors Performing Internal Inspections or Repairs on Underground Storage Tanks**

The State Water Board has directed contractors performing underground storage tank internal inspections, repairs or linings to submit a *UST internal inspection Form* to the State Water Board within 14 days of completion of the inspection. Letters were sent to all known UST inspection contractors by certified mail in November 2017. The contractor submittal does not relieve the UST owner or operator of demonstrating structural integrity to the UPA prior to repairing, upgrading, or certifying the UST for continued use.

The contractor Underground Storage Tank Internal Inspection Form can be obtained here: [https://www.waterboards.ca.gov/ust/docs/underground\\_internal\\_inspection.pdf](https://www.waterboards.ca.gov/ust/docs/underground_internal_inspection.pdf)

For contractors with questions regarding UST internal inspections, please contact Mr. Tom Henderson at (916) 319-9128 or [tom.henderson@waterboards.ca.gov](mailto:tom.henderson@waterboards.ca.gov).