



UST Program Update

July 2021

Underground Storage Tank Closure Sampling Requirements

Through the Unified Program evaluation process, the State Water Resources Control Board (State Water Board) has observed a number of instances where Unified Program Agencies (UPAs) have underground storage tank (UST) closure sampling requirements that are inconsistent with California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), article 7, section 2672(d). These incorrect procedures could lead to undetected releases harmful to human health or the environment and must be corrected by the UPA.

The inconsistent procedures observed during the evaluation process require the incorrect number of soil samples to be collected, such as only one sample taken for USTs less than 1,000 gallons, or three samples taken for larger USTs, and often exclude groundwater sampling.

UST Regulations, section 2672(d) requires:

- a minimum of two soil samples taken at each end of the UST, two feet into native material.
- groundwater samples if groundwater is found in the excavation pit.
- one soil sample be taken for each 20-linear feet of trench for pipe.
- if the UST or any portion thereof is not removed, at least one boring shall be taken as close as possible to the midpoint beneath the tank.

To ensure consistent implementation of closure sampling requirements, the State Water Board recommends UPAs review their sampling and closure procedures and amend or update as necessary. Additionally, updating sampling and closure procedures with any UST Regulation changes that may occur is best management practice.

For additional information regarding UST closure sampling requirements or to request examples of sampling and closure procedures, contact:

Ms. Jessica Botsford at (916) 341-7338 or Jessica.Botsford@waterboards.ca.gov, or Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

California Environmental Reporting System Frequently Asked Questions

The California Environmental Protection Agency (CalEPA) has modified the [California Environmental Reporting System \(CERS\) Central help page](#)¹. Frequently asked questions (FAQs) related to USTs have been replaced with a link to the newly updated [State Water Board's CERS FAQ page](#)². Previously, CalEPA and the State Water Board maintained separate UST FAQ pages which was at best a redundant practice and required unnecessary work to provide two versions of the same information. This modification will improve content, accessibility, and consistency of the UST FAQs.

For additional information regarding updates to CERS FAQs, contact:

Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or
Mr. Austin Lemire-Baeten at (916) 327-5612 or
Austin.Lemire-Baeten@waterboards.ca.gov.

Changing Stored Substance to Renewable Diesel

In a [letter dated July 31, 2013](#)³, the State Water Board with the California Air Resources Board discussed diesel made from non-petroleum sources (renewable) being the equivalent of diesel made of petroleum. Despite this, there have been numerous questions regarding the ability of UST owners and operators to store renewable diesel in USTs. Any renewable diesel that meets California reformulated diesel regulations and ASTM D975 is considered diesel fuel that can be used with both existing and new UST infrastructure and motor vehicle engines.

The United States Environmental Protection Agency has also recently [addressed renewable fuels](#)⁴ and agrees that fuel meeting ASTM D975, to include renewable diesel, is diesel. No additional compatibility requirements are necessary beyond those required for diesel regardless of the original stock source. Like petroleum diesel, renewable must account for the biodiesel percentages. For example, a blend of 60 percent

¹ <https://cers.calepa.ca.gov/about-cers/help-materials/>

² https://www.waterboards.ca.gov/water_issues/programs/ust/cers/faqs.html

³ https://www.waterboards.ca.gov/water_issues/programs/ust/tech_notices/joint_statement_rd.pdf

⁴ <https://www.epa.gov/renewable-fuel-standard-program/news-notice-and-announcements-renewable-fuel-standard>

renewable diesel and 40 percent biodiesel must be marked as B40. Biodiesel blends require the fuel type properly notated in CERS.

While CERS does not require any notation for renewable fuel other than “diesel”, biodiesel blends require additional notation in CERS, as detailed in the CERS FAQ, [“How Should I Report Tank Contents?”](#)⁵.

For additional information regarding renewable diesel requirements, contact: Ms. Laura Fisher at (916) 341-5870 or Laura.Fisher@waterboards.ca.gov, or Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Single-Walled and Abandoned UST Facility List

The State Water Board has provided representative lists of both single-walled and abandoned USTs within the State of California on the Leak Prevention web site. The single-walled UST data was collected from CERS and includes UST facility addresses. The single-walled UST list does not include UST facilities owned or operated by the federal government. Rather than redacting federal facility information that may present security concerns, for simplicity, all federal facilities have been removed from this list. The information provided in this list was obtained from CERS, and while we have a high degree of confidence there may be errors. The State Water Board has not confirmed the CERS data with on-site construction. The single-walled UST list is part of the more comprehensive [Permanent Closure Requirements for Underground Storage Tank with Single-Walled Components](#)⁶ web page and the information will be updated periodically. The [abandoned UST facility list](#)⁷ is a collection of information provided by the UPAs as part of the Report 6. This information will be updated each April and October following the Report 6 submittals.

For additional information regarding list of single-walled and abandoned USTs, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

⁵ https://www.waterboards.ca.gov/water_issues/programs/ust/cers/tutorials/bu06_tank_contents.html

⁶ https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html

⁷ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/docs/report_6_abandoned_tanks_publish.xlsx

Revised CERS UST Violation Library

In May 2021, CalEPA distributed the revised CERS UST violation library to the UPAs. The new violation library becomes effective on August 2, 2021. The revisions to the UST violation library are mostly cosmetic, with minor modifications to violation descriptions for consistency, and a minor clarification of existing line leak detector operation requirements.

For additional information regarding the CERS UST violation library revisions, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.