State Water Board Assessment of UST Program Element as Part of the CalEPA Unified Program Evaluation

Presented by:

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Agenda

Background; Brief Review of CalEPA’s New Evaluation Process

• CalEPA Evaluation Process In Brief

UST Program Element Evaluation

• State Water Board UST Program Element Evaluation and Assessment
• Most common UST deficiencies
• CERS Data Mining Demonstration
CalEPA Evaluation Process In Brief

Notification
- Letter notifying CUPA of evaluation
- Letter requesting information

Assessment
- Assessment of information provided
- Meetings held for clarification
- Oversight Inspections

Conclusion
- Summary of Findings Report completed
- Deficiency Progress Update Reports
State Water Board
Assessment of UST Program
Element
State Water Board Participation in the CalEPA Unified Program Evaluation Process

- First Evaluation Team Meeting
- CUPA Q & A Meeting with Evaluation Team
- Second Evaluation Team Meeting
- Exit Briefing
Information Necessary for State Water Board to Perform Remote Assessment, and How Information is Provided to CalEPA

- Administrative Documents
- Program Specific Documents
- Facility Files

- FTP Site
- Jump Drive
- Email
State Water Board Remote Assessment

• Review of CUPA information:
  • Documents Submitted by CUPA (as requested by CalEPA and State Agencies)
  • CERS Data
  • Previous Evaluation Documents
  • CUPA’s Website
  • Application for Certification
  • Interviews, Supplemental Questionnaire

• Determine if field visit(s) are needed:
  • Oversight Inspections
  • Verification Inspections
Interactive Communication

- Teleconference
- Web-based conferencing allows:
  - Attendees to View Same Document
  - Live Demonstration of Information and Documents by CalEPA, CUPA, and Evaluation Team
  - Real Time Editing of Draft Preliminary Summary of Findings
Where the Rubber Meets the Road
Introductions and Consultation

- State Water Board initial contact:
  - Conference call with CUPA
  - Preferably before or shortly after receiving CUPA material

- Topics:
  - Policy and Procedures
  - Questions clarifying initial review of CUPA information
Oversight Inspections

• Scheduled in Advance of the Actual Scheduled Evaluation
  • This allows for flexibility in scheduling with the CUPA
  • Ensures that the oversight inspections do not interfere with the limited time assigned for State Agency review
• Schedule Inspection with the CUPA Directly
• Looking for a Cross Section of CUPA Inspectors
UST Program Element

Review of Administrative Documents

- Self Audit Reports
- Annual Single Fee Report
- ICC Documentation
- Administrative Procedures
  - Inspection and Enforcement Plan
  - Data Management Procedure
  - Permitting Policy
- Local Ordinance
- Fee schedule
- Supplemental Inspection Procedures
UST Facility File Information

• Facility file information should be limited to items not available in CERS:
  • Unified Program Facility Permit (UST Element)
  • Annual UST compliance inspection reports
  • UST test results and certifications, including any re-testing
  • UST RTC documentation and correspondence
  • UST Enforcement documentation
  • UST closure documentation
Evaluation and Assessment Elements
Compliance Inspections

• Routine compliance inspections conducted annually
• Conducted per statute and regulations, as outlined in LG 159, for example:
  • With or without service contractor
  • Inspector ICC certification
  • Providing inspection report to owner/operator
  • Citing all identified failures and violations
  • Associating violations with specific UST’s or UST systems;
  • Testing documentation reviewed within 30 days, and failures followed up on
  • Verify CERS UST Submittal information
Other UST Program Activities

- Reporting all UST violations, including significant operational compliance (SOC) criteria, in CERS when UST violations are cited during the annual UST compliance inspection

- UST Violations identified in CERS:
  - match the inspection report
  - are consistently recorded

- Utilizing correct Unified Program Violation Library UST violation number
CERS Data and Submittals

• Accepted UST submittals
  • ICC California UST Inspectors accepting UST submittals
  • UST related fields accurate and complete
  • Required UST uploads are present
  • UST Submittals accepted in a timely fashion
  • UST RTC in an acceptable timeframe
UST Significant Operational Compliance

- SOC - Report 6
  - Review past three fiscal years
  - Timeliness of Report
  - SOC numbers make sense (trends)
  - RD and RP criteria identified in CERS CME
  - Number of Inspections Reported
  - Facility, tank counts and inspection numbers are similar to CME, and Self Audit Report
UST Red Tags

- Red Tag
  - Policy and Procedures
  - Completion of Report 6
UST Element of the Unified Program Facility Permit

- Consolidated Unified Program Facility Permit must contain UST Operating Permit Requirements
- Correct issuance date
- Withholding permit when UST is out of compliance
Temporarily Abandoned & Closed USTs

• Temporarily Abandoned USTs
  • Maintained in CERS
  • Implementing temporary abandonment procedure

• Closed USTs
  • Following removal or abandonment in place procedures
  • Following sampling procedures
  • Maintaining closure documentation
  • Document CUPA’s satisfaction with closure documentation
Additional Areas of Evaluation and Assessment

• ELD Implementation for identified facilities
  • Well proximity one time test
  • Well proximity every three years
  • New construction

• Fee schedule sufficient to implement the UST program, may be combined with other sources of revenue

• Enforcement per statute and regulations

• Follow up with CalEPA regarding UST surcharge fee collection and remittance
Common UST Deficiencies

• The CUPA is not consistently ensuring that all appropriate UST related information in CERS is accurate and complete

• CUPA personnel that are not certified as International Code Council (ICC) California UST Inspectors are accepting UST facility submittals in CERS

• The CUPA is issuing Unified Program Facility Permits, which includes the UST operating permit, to facilities that are not in compliance with UST Program requirements
Common UST Deficiencies

• The CUPA is not consistently reporting all inspection, violation, including significant operational compliance (SOC) criteria, and enforcement information in, examples include:
  • The CUPA is citing multiple, different Violation Numbers for the same violation
  • The CUPA uses a “General” or “General- Local Ordinance” violation to cite UST violations when the CUPA does not have a Local Ordinance to cite and use these violations
Common UST Deficiencies

• The CUPA is not inspecting all UST facilities annually
• The CUPA is not consistently conducting complete annual UST compliance inspections
• The CUPA is not consistently requiring facilities to submit UST testing and leak detection documentation
• The CUPA is not consistently or correctly associating violations to specific UST’s or UST systems
Common UST Deficiencies

- The CUPA is not consistently requiring UST facilities with testing or leak detection failures to return to compliance
- The CUPA is not consistently requiring UST facilities to implement periodic ELD testing due to proximity to public drinking water wells
- Not consistently documenting CUPA’s satisfaction with closure documentation
CERS Data Mining Demonstration
CERS Review for Evaluations

California Environmental Reporting System: Regulator

Regulator Home

Instructions/Help

Welcome to the CERS Regulator Portal. Review the Dashboard and Action Items below for submittals and requests requiring attention by your agency. Select the links across the top of the page to access other CERS data. New users may wish to review the Regulator Portal Questions and Answers Page.

I would like to:
- View/Search My Agency's Submittals
- View All Actions Needed
- Search Inspections (New Inspection)
- Search Enforcements (New Enforcement)

Other Tasks
- All CERS Regulator Reports
- Register with another Regulator
- CERS Enhancement Listing

Dashboard

Activity | Total | New (<10 days) | Older (>30 days)
---------|-------|--------------|--------------
Unreviewed Submittal Elements Awaiting Review ("Submitted") | 6 | 0 | 6
Submittal Elements with status "Under Review" | 0 | 0 | 0

My Regulator Action Required Item (None)

Regulator Notifications

The short list of most recent Regulator Notifications has been removed to improve the speed of the Regulator Home Page. You can view All Notifications, or select a facility, business, or regulator and select the Notifications link on the left to see Notifications specific to that entity.
These reports compile submitted UST data from ~100% of California’s regulated UST facilities (14,535 as reported by SWRCB, October 2011).

### Compliance, Monitoring, and Enforcement Reports

- **Inspection Summary Report by Regulator (Report 6)**
  - Counts of regulated UST facilities, active and closed UST systems, inspections, and SOC statistics.

- **Inspection Summary Report by Regulator (Annual)**
  - Counts of regulated UST facilities, facilities inspected over a specified date range, Routine Inspections versus Other Inspections, and Return-to-Compliance statistics for Class III violations.

- **Enforcement Summary Report by Regulator (Annual)**
  - Counts of Violations by Class, Enforcements by Enforcement Type, and Fines/Penalties.

- **Red Tag Facility Details Report**
  - List Red Tags affixed during a specified date range.

- **Semi-Annual Report**
  - Counts of regulated UST facilities, active and closed UST systems, inspections, and the Significant Operational Compliance statistics.

- **Statewide Leak Prevention Report**
  - Counts of regulated UST facilities statewide, active UST systems, inspections performed over a specific time period, and combined operational compliance statistics.

### Facility / Tank / Monitoring Summary Reports

- **Facility Summary by Owner Type**
  - Provides counts of actively regulated UST facilities by Owner Type, grouped by Regulator.

- **Facility Summary by Financial Responsibility Mechanism**
  - Provides counts of actively regulated UST facilities by Financial Responsibility Mechanism, grouped by Regulator.

- **Facility/Tank Summary by Construction/Monitoring Type**
  - Provides counts of active UST systems falling within a user-defined set of criteria for tank construction and monitoring, grouped by Regulator.

- **BOE Facility/Owner Search Tool**
  - Provides a tool to search for UST facilities by BOE Number, facility site address, and UST Property Owner and UST Tank Owner information.

### UST Data Download

- **UST Facility/Tank Data Download**
  - Generates an Excel file containing UST Facility / Tank data that has been "Accepted" by Regulators.

- **UST CME Data Download**
  - Generates an Excel file containing UST Inspection, Violation, and Enforcement data.
This report generates an Excel file containing UST Facility/Tank data. Selecting 'accepted' UST data provides a report of facilities and tanks data for every regulated UST site that has at least one accepted UST submittal. This includes facilities where all tanks have been closed or removed. This report should match or closely match the facility and tank counts in Report 6.

Selecting 'last submittal only' provides a report of facilities and tanks data derived from the most recent submittal with a status of 'submitted', 'in process' or 'accepted'. This report may not provide complete data as it does not include data from prior other 'accepted' submittals. 'Not accepted' submittals are not included in either report.

This report allows you to select the date range for the data to be included in the report. You can choose to include 'accepted' submittals only or 'last submittal only' regardless of submittal status. You can also convert codes to display values.

Generate Excel Report.
CERS UST Facility/Tank Data Download

This spreadsheet contains UST Facility, Tank, Monitoring Plan, and Certification of Installation/Modification data exported from the California Environmental Reporting System (CERS).

Use Excel's worksheet tabs or the hyperlinks below to access the export data. Please note, this exported data only includes data that has been "Accepted" by Regulators. Any UST Facility data that has been "Submitted" but has never been "Accepted" by a Regulator is not shown.

Tank counts:
- The 'UST Facility Info' table (the first generated worksheet) Field 404, 'Total Number of USTs', provides a count of all tanks listed in the accepted submittal shown on that table. It may not be equal to the next worksheet 'UST Tank and Monitoring Plan Info Count of Exported Records' shown on this page. The UST Tank and Monitoring Plan Info is a count of all tanks reported on all accepted submittals. In some cases, such as if a tank ID is altered or a business user reports additional tanks on a submittal, there will be tanks reported on one submittal and not on another. The 'UST Tank and Monitoring Plan Info Count of Exported Records' includes all such tanks.
- Date Range vs No Date Range:
  - Tanks reported in CERS that do not have a tank install date will be reported if no date range is selected. They will not be reported if a date range is selected.
  - UPA staff are encouraged to ensure that all active tanks have a tank installation date and that all permanently closed or removed tanks have a tank closure date.
- Report 6: This report will report all tanks and therefore should be consistent with 'UST Tank and Monitoring Plan Info Count of Exported Records'. The date range limitations are also the same, tank records with no date installed or closed will not be counted if the report is run with a date range.

Data Export Date/Time: 7/5/2016 3:12:05 PM
Record Filtering Criteria (if any): Facility regulated by CUPA
Data submitted on or after 7/1/2013.

<table>
<thead>
<tr>
<th>Generated Worksheets</th>
<th>Count of Exported Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>UST Facility Info</td>
<td>472</td>
</tr>
<tr>
<td>UST Tank &amp; Monitoring Plan Info</td>
<td>1333</td>
</tr>
<tr>
<td>UST Cert of Installation &amp; Mod</td>
<td>1</td>
</tr>
</tbody>
</table>

For more information about the meaning of the Unified Program Data Dictionary (UPDD) codes, visit the CUPA Data Registry at the following URL:
https://cersapps.calepa.ca.gov/DataRegistry
Turning on Filters

![Excel spreadsheet with filters turned on](image)

<table>
<thead>
<tr>
<th>CERS ID</th>
<th>Facility ID</th>
<th>Facility Name</th>
<th>Facility Street Address</th>
<th>Facility City</th>
<th>ZIP Code</th>
<th>Type of Action</th>
<th>Tank ID #</th>
<th>Manufacturer</th>
</tr>
</thead>
<tbody>
<tr>
<td>10033771</td>
<td>30-020-TMP002</td>
<td>AT&amp;T CORP - LCL15</td>
<td>1241 W Alton Ave</td>
<td>Santa Ana</td>
<td>92707</td>
<td>Confirmed/Updated Information</td>
<td>LCL15U001</td>
<td>Modern Welding</td>
</tr>
<tr>
<td>10122613</td>
<td>FA0025897</td>
<td>La Palma 76</td>
<td>5482 La Palma Ave</td>
<td>La Palma</td>
<td>90623</td>
<td>Confirmed/Updated Information</td>
<td>2</td>
<td>Modering Welding</td>
</tr>
<tr>
<td>10138183</td>
<td>FA0025897</td>
<td>G&amp;M Oil Co. #1</td>
<td>1300 Pacific Coast Hwy</td>
<td>Seal Beach</td>
<td>90740</td>
<td>Confirmed/Updated Information</td>
<td>5</td>
<td>UNKNOW</td>
</tr>
<tr>
<td>10138183</td>
<td>FA0025897</td>
<td>G&amp;M Oil Co. #1</td>
<td>1300 Pacific Coast Hwy</td>
<td>Seal Beach</td>
<td>90740</td>
<td>Confirmed/Updated Information</td>
<td>4</td>
<td>UNKNOW</td>
</tr>
<tr>
<td>10138183</td>
<td>FA0025897</td>
<td>G&amp;M Oil Co. #1</td>
<td>1300 Pacific Coast Hwy</td>
<td>Seal Beach</td>
<td>90740</td>
<td>Confirmed/Updated Information</td>
<td>3</td>
<td>JOOR</td>
</tr>
<tr>
<td>10138183</td>
<td>FA0025897</td>
<td>G&amp;M Oil Co. #1</td>
<td>1300 Pacific Coast Hwy</td>
<td>Seal Beach</td>
<td>90740</td>
<td>Confirmed/Updated Information</td>
<td>1</td>
<td>JOOR</td>
</tr>
</tbody>
</table>

[View Excel spreadsheet](image)
Are there tanks without Install dates?
UST Data Download Queries

• Do all tanks have an installation date?
• Do all tanks have an associated spill bucket?
• Do all tanks have over fill protection?
• Is primary containment construction for tanks, and piping, listed?
• Do all double-wall tanks, and piping, list the containment construction of secondary containment?
• Do all VPH systems have Vent Piping Transition Sumps identified properly?
• Are there any VPH Systems identified as having single-wall components?
• Is there any double-wall piping installed between January 1, 1984 and June 30, 2004 which doesn’t list continuous interstitial monitoring?
UST CME Report

**UST Program Report: CME Data Download**

This report generates an Excel file containing UST CME (Inspection, Violation, Enforcement) data. Please note, this report compiles "Accepted" UST data from ~100% of California's regulated UST facilities (14,635 as reported by SWRCB, October 2011).

**Regulator:** Orange County Environmental Health

Inspection/Enforcement Date Range:
- **7/1/2014** to **6/30/2015**

Only Export Outstanding Violations: 
- [ ]

Convert Codes to Display Values: 
- [ ]

Generate Excel Report
Are there violations without Return to Compliance?

<table>
<thead>
<tr>
<th>Violation Type</th>
<th>Class</th>
<th>Violation Date</th>
<th>Return to Comp Date</th>
<th>Actual Return to Compliance Date</th>
<th>Violation Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010004</td>
<td>Class 1</td>
<td>07/18/2014</td>
<td>08/17/2014</td>
<td></td>
<td>Records of individuals trained by the designated operator (DO) Inspections/Compliance</td>
</tr>
<tr>
<td>2010007</td>
<td>Class 1</td>
<td>07/18/2014</td>
<td>08/17/2014</td>
<td></td>
<td>Certification of financial responsibility (CFR) expired on 5/27 Inspections/Compliance</td>
</tr>
<tr>
<td>2030013</td>
<td>Class 1</td>
<td>07/18/2014</td>
<td>08/17/2014</td>
<td></td>
<td>The last designated operator (DO) monthly inspection report Operations/Maintenance</td>
</tr>
<tr>
<td>2030021</td>
<td>Class 1</td>
<td>07/03/2014</td>
<td>08/02/2014</td>
<td></td>
<td>The tank at this site is being operated without a permit due to Operations/Maintenance</td>
</tr>
<tr>
<td>2030033</td>
<td>Class 1</td>
<td>07/18/2014</td>
<td>08/17/2014</td>
<td></td>
<td>A copy of the monitoring plan was not observed at the facility Operations/Maintenance</td>
</tr>
<tr>
<td>2030046</td>
<td>Class 1</td>
<td>07/18/2014</td>
<td>08/17/2014</td>
<td></td>
<td>A copy of the leak response plan was not observed at the facility Operations/Maintenance</td>
</tr>
</tbody>
</table>

6 of 859 records found
Are there upcoming inspections, or overdue inspections?

<table>
<thead>
<tr>
<th>Inspection Date</th>
<th>Inspection Type</th>
<th>Of Class I VI</th>
<th>Of Class II VI</th>
<th>Of Minor VI</th>
<th>With both Release Detection and Release Prevention</th>
<th>With only Release Prevention</th>
<th>Turned to CoI</th>
<th>On Details A</th>
<th>Inspection Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>05/03/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>11</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:CERS:DAILY LOG FOR MISSING/INCO</td>
</tr>
<tr>
<td>05/04/2016</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>9</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td>TLS 350,B,PIPE VAC VR-100,B</td>
</tr>
<tr>
<td>04/07/2016</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>10</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
<td>VRTLS 350; 87M/87AUK, 91/B</td>
</tr>
<tr>
<td>12/11/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>25</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td>NOVC FAILED TO SUBMIT AS</td>
</tr>
<tr>
<td>12/07/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>12</td>
<td>No Significant Operational Compliance</td>
<td>No</td>
<td></td>
<td></td>
<td>NOVC:1)MISSING 2014 CTLS</td>
</tr>
<tr>
<td>07/11/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>No Significant Operational Compliance</td>
<td>No</td>
<td></td>
<td></td>
<td>&lt;NOVC:DSL MLDS FAILED;87</td>
</tr>
<tr>
<td>07/09/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>No Significant Operational Compliance</td>
<td>No</td>
<td></td>
<td></td>
<td>NOVC:CERT.ATG'S,CONVERT</td>
</tr>
<tr>
<td>08/13/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>40</td>
<td>No Significant Operational Compliance</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC LINING CERT,UDC 3/4</td>
</tr>
<tr>
<td>05/03/2016</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td>LAST CP SYS CERT ON 111115</td>
</tr>
<tr>
<td>12/08/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>6</td>
<td>With only Release Prevention</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:(1)S8988 TEST'2014 NO</td>
</tr>
<tr>
<td>08/25/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>With both Release Detection and Release Prevention</td>
<td>No</td>
<td></td>
<td></td>
<td>DCVS-CERS SUBMITTED;PAN</td>
</tr>
<tr>
<td>07/28/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>With both Release Detection and Release Prevention</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:SUBMIT TEST OF 4/9/14</td>
</tr>
<tr>
<td>07/29/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td>&lt;NOVC:CERS DOCS NOT ACCORD</td>
</tr>
<tr>
<td>10/27/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>6</td>
<td>No Significant Operational Compliance</td>
<td>Yes</td>
<td></td>
<td></td>
<td>&lt;SCR FILTER FAILED FOR SSL STP &amp;</td>
</tr>
<tr>
<td>10/30/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>8</td>
<td>With only Release Detection</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC CERS,MONIT.CERT.PA</td>
</tr>
<tr>
<td>09/25/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>9</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:FOR 87 VAPOR SPILL</td>
</tr>
<tr>
<td>09/22/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:UPDATE UST FACILITY</td>
</tr>
<tr>
<td>02/25/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>7</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC:ISSUED FOR ERRORS CO</td>
</tr>
<tr>
<td>02/22/2016</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td>CTLS 02/22/16.SPBK TO BE T</td>
</tr>
<tr>
<td>08/25/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>With both Release Detection and Release Prevention</td>
<td>No</td>
<td></td>
<td></td>
<td>ALL DOCS CURRENT IN CERS;</td>
</tr>
<tr>
<td>08/18/2015</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>With only Release Detection</td>
<td>Yes</td>
<td></td>
<td></td>
<td>NOVC FOR CERS AND CORRESP</td>
</tr>
<tr>
<td>09/03/2014</td>
<td>Routine</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>With both Release Detection and Release Prevention</td>
<td>Yes</td>
<td></td>
<td></td>
<td>CTLS-090913, NO SCR:VPH,</td>
</tr>
<tr>
<td>08/28/2015</td>
<td>Routine</td>
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<td>With only Release Prevention</td>
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<td>BOX(208/394);NOVC:VPH,</td>
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<td>With both Release Detection and Release Prevention</td>
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<td>ALL DOCS SUBMITTED FOR R</td>
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Useful Tools for CERS Review

• UST FAQ: Which forms require uploading to CERS?
• UST FAQ: General Reporting Requirements for UST Sites (https://cersbusiness.calepa.ca.gov/Help)
• LG 159 Enclosure - Annual Underground Storage Tank Compliance Inspection Handbook (http://waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/)
• CalEPA Unified Program Guidance Letter 14-08, Reporting Underground Storage Tank Information (http://www.calepa.ca.gov/CUPA/Bulletins/default.htm)
• California Code of Regulations Title 27 Data Dictionary (http://cersapps.calepa.ca.gov/Public/DataRegistry/DataElements?dataSourceID=39)
Questions on CalEPA Evaluation Process Should be Directed to:

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