

Reporting a TIUGA (former UST in CERS) as an AST subject to APSA

How to report a Tank in an Underground Area (TIUGA), formerly reported as an Underground Storage Tank (UST) in CERS, as an aboveground storage tank (AST) subject to the Aboveground Petroleum Storage Act (APSA).

This is a guide to help owners/operators to properly report a tank that was previously reported as a UST but has now been determined to be a TIUGA subject to APSA and is no longer regulated as a UST. For more information about APSA and TIUGAs, refer to Office of the State Fire Marshal (OSFM) guidance here: <http://osfm.fire.ca.gov/cupa/apsa>.

As described in detail below, the submittal process to report this change includes updating the Business Activities questions, the Hazardous Materials Inventory (Inventory), the site map, and the UST section to remove this tank from the UST portion of your CERS submittals.

CERS 3, currently scheduled for release in March 2019, includes a simplified process for changing the status of a UST to an AST. Until then the following steps are necessary. For further assistance please contact your local Certified Unified Program Agency (CUPA) representative.

Preparation for Submittal

Confirm the specific Tank ID for the UST, then complete the optional TIUGA Notification Form. This is an optional form on the OSFM website: http://osfm.fire.ca.gov/cupa/pdf/TIUGA_Notification_form-18May2018.pdf. It is designed to be completed by the Tank Facility owner/operator for the purpose of establishing a tank meets the definition of a TIUGA as specified in California Health and Safety Code (HSC), section 25270.2(o), that it is being monitored in accordance with the APSA requirements found in HSC Chapter 6.67, and that it is no longer considered a UST. If you are unsure how to complete the form, contact your Designated Operator, Professional Engineer, or your CUPA for assistance. After completing the form, save it as a PDF file.

After the form has been completed and saved as a PDF, log into CERS to complete the submittal process as follows:

Step 1-Select either the 'Start Facility Submittal' or 'Start/Edit Submittal' buttons

The screenshot shows the CERS Business Portal interface. At the top, there is a green navigation bar with buttons for Home, Submittals, Facilities, Compliance, and My Business. Below this is a header for 'Home: Dans Test Site Business Organization'. A 'Common Tasks' section contains four tiles: 'Start Facility Submittal' (highlighted with a red arrow), 'Add Facility', 'People/Users', and 'Contact Your Local Regulator(s)'. Below the tasks is a 'Facilities' table with columns for Facility Name, Address, Last Submittal, and CERS ID. A red arrow points to the 'Start / Edit Submittal' button in the first row of the table.

Facility Name	Address	Last Submittal	CERS ID
Dans Test Site 1	123 Main St. Soquel 95073	12/7/2018	10138123

Step 2- Prepare Draft Submittal page

Click the 'Start' button on Facility Information, Hazardous Materials Inventory, Emergency Response and Training Plans, Underground Storage Tanks and Aboveground Petroleum Storage Act.

CERS Business Home Submittals Facilities Compliance My Business

Prepare Draft Submittal: Dans Test Site 1

Home >> Prepare Submittal (10138123)

Instructions/Help

Use this page to prepare draft submittals for your facility to transmit to your local regulator(s). Make sure to review any status and guidance messages for your forms or submittals by selecting the guidance icons.

- Select "Start" button to create a submittal from scratch or copied from a previous submittal.
- Select "New" and "Edit" buttons to complete specific submittal forms or provide supplemental documentation.
- Select "Discard" button to delete a draft form/documentation when you need to re-start a form or it is no longer relevant for your draft submittal.
- Select "Not Applicable" if you believe the submittal element is no longer relevant for your facility (e.g., closed UST tank).
- Select "Submit" when you are ready to transmit one or more submittals to your local regulator(s). ALL submittals must include a Facility Information element.

Training Use Only! Perform Official Submittals Here

If there has been **NO CHANGE** in the HMBP submittal elements (*Facility Information, Hazardous Material Inventory, and Emergency Response/Training Plans*) since the last submittal, you may select the following button to prepare them. **Create All HMBP Submittal Elements**

Facility Information

SUBMITTED Dec. 7, 2018 Start Not Applicable

- Business Activities
- Business Owner/Operator Identification

Hazardous Materials Inventory

SUBMITTED Dec. 7, 2018 Start Not Applicable

- Hazardous Material Inventory (23)
- Site Map (Official Use Only): Upload Document(s) (4)

Emergency Response and Training Plans

SUBMITTED Nov. 17, 2017 Start Not Applicable

- Emergency Response/Contingency Plan: Upload Document(s)
- Employee Training Plan: Provided Elsewhere in CERS

Underground Storage Tanks

SUBMITTED Dec. 7, 2018 Start Not Applicable

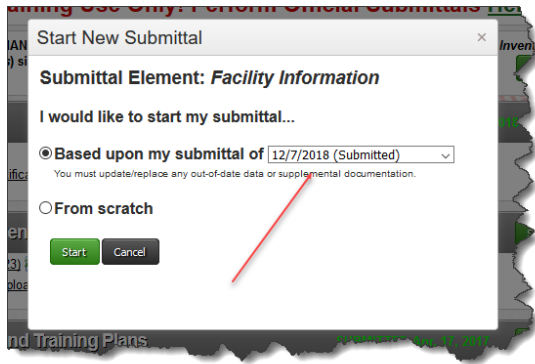
- UST Facility Operating Permit Application
- Tanks
 - UST Tank Information/Monitoring Plan - Tank ID # 1
 - UST Tank Information/Monitoring Plan - Tank ID # 2
- UST Certifications of Installation/Modification
- UST Monitoring Site Plan

Aboveground Petroleum Storage Act

SUBMITTED Dec. 7, 2018 Start Not Applicable

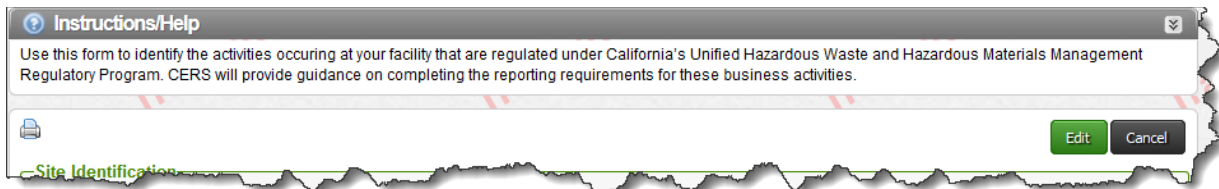
- Aboveground Petroleum Storage Act Documentation: Provided Elsewhere in CERS

For all 5 sections, confirm your submittal will be based upon most recent submittal, then click the 'Start' button:



Step 3-Verify Facility Information

Select and open the 'Business Activities' form. Select the 'Edit' button on either screen:

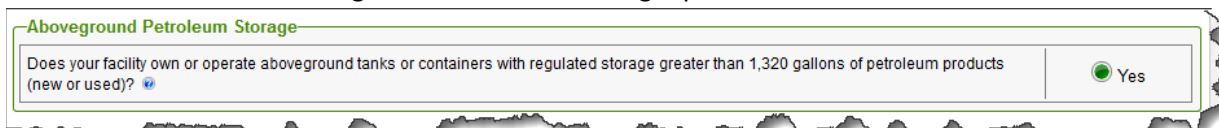


On the Business Activities screen:

- a. Do NOT change the UST question; the answer must be 'YES' for now:



- b. Answer Yes to the Aboveground Petroleum Storage question:

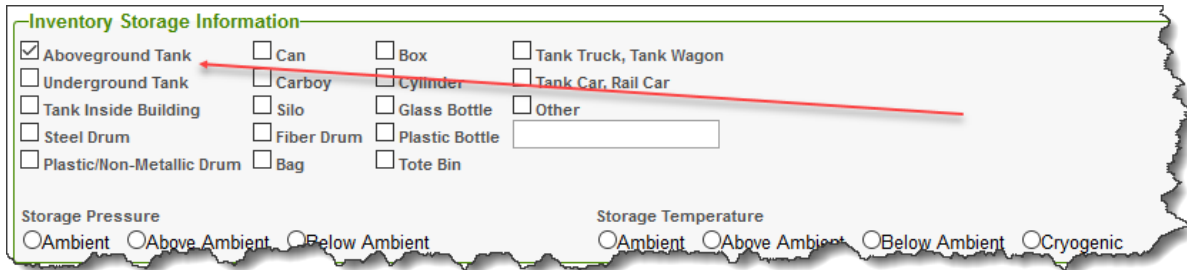


- c. At the bottom of the 'Business Activities' form, enter this statement and the correct tank ID: *'Effective the date of this submittal, Tank #xxxxx is no longer regulated as a UST. This tank meets the definition of a TIUGA subject to APSA.'*
- d. Select the 'Save' button. If the Business Owner/Operator Information screen opens make any necessary changes and select 'Save' again. The Prepare Draft Submittal screen will be displayed.

Step 4-Update the HMIS and Emergency Response and Training Plan Submittal Elements

Select and open the Hazardous Materials Inventory. **Remember that you are to start from the most recent submittal.**

- Update the Inventory as needed to reflect all changes. For the tank, select the 'edit' button next to the hazardous material currently in the tank and select 'Aboveground tank' as the type of container. Deselect 'Underground tank'. When finished it should look like this:



Inventory Storage Information

Aboveground Tank Can Box Tank Truck, Tank Wagon
 Underground Tank Carboy Cylinder Tank Car, Rail Car
 Tank Inside Building Silo Glass Bottle Other
 Steel Drum Fiber Drum Plastic Bottle
 Plastic/Non-Metallic Drum Bag Tote Bin

Storage Pressure
 Ambient Above Ambient Below Ambient

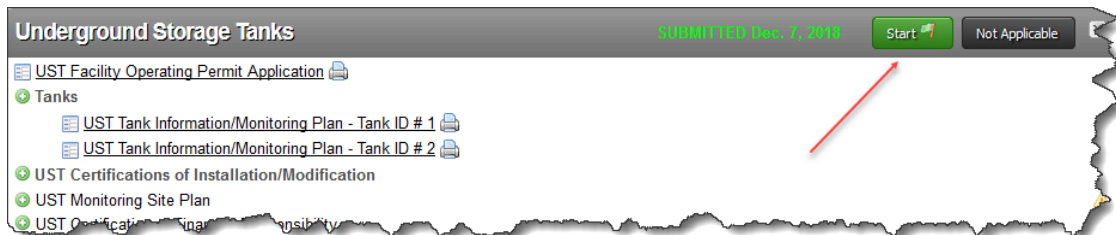
Storage Temperature
 Ambient Above Ambient Below Ambient Cryogenic

- Select 'Save'. The screen will close back to the list of inventory items. Select 'Done' to complete the change.
- If necessary, upload a revised Site Map
- Update the Emergency Response and Training Plans section similarly.

Step 5-Update the Underground Storage Tanks Submittal Element

Select and open the UST submittal.

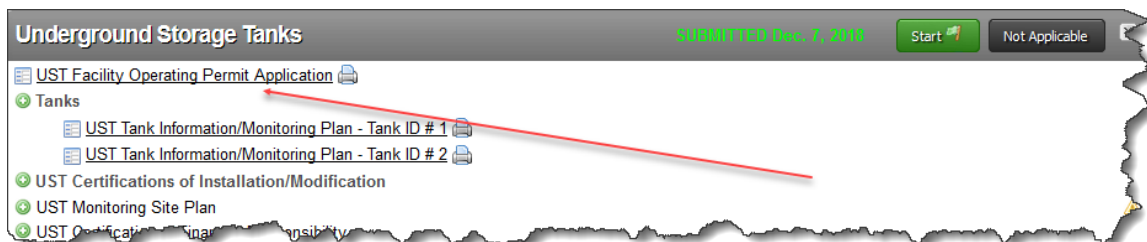
- Select the UST Facility Operating Permit Application. Select the 'Start' button and select from the most recent submittal.



Underground Storage Tanks SUBMITTED Dec. 7, 2018 Start Not Applicable

- UST Facility Operating Permit Application
- Tanks
 - UST Tank Information/Monitoring Plan - Tank ID # 1
 - UST Tank Information/Monitoring Plan - Tank ID # 2
- UST Certifications of Installation/Modification
- UST Monitoring Site Plan
- UST Certification of Financial Responsibility

- Select the UST Facility Operating Permit Application:



Underground Storage Tanks SUBMITTED Dec. 7, 2018 Start Not Applicable

- UST Facility Operating Permit Application
- Tanks
 - UST Tank Information/Monitoring Plan - Tank ID # 1
 - UST Tank Information/Monitoring Plan - Tank ID # 2
- UST Certifications of Installation/Modification
- UST Monitoring Site Plan
- UST Certification of Financial Responsibility

- c. Check the 'Confirmed/Updated Information' button and select 'Save':

CERS Business Home Submittals Facilities Compliance My Business

UST Facility Operating Permit Application: Dans Test Site 1
Home » Prepare Submittal (10138123) » UST: UST Facility Operating Permit Application (Draft)

Instructions/Help
You must complete this form within 30 days of all new permits, permit changes, or facility information changes. You will also need to update/confirm your tank, monitoring plan, and other pertinent UST-related forms.
All facilities **must** provide a BOE Number—valid numbers are 8 digits long starting with the numbers 44... State and federal facilities should use 44032062. If **ALL** underground tanks at your facility **ONLY** contain NON-petroleum productions, you can provide this generic BOE Number: 44000000. Contact your local regulator if you are unsure what number to provide.
The former paper version of this form was called "UST Operating Permit Application-Facility Information" (Form A).
More information about UST Financial Responsibility Mechanisms is available at the Water Board's Underground Storage Tank Cleanup Fund [Financial Responsibility web page](#).

Discard Save Cancel

Type of Action
 Confirmed/Updated Information
 New Permit
 Renewal Permit
 Temporary Facility Closure
 Permanent Facility Closure
 Transfer Permit

Facility Information
 Dans Test Site 1
 123 Main St
 Soquel, CA 95073

Tank Operator
 Tank Operator Name: John Doe
 Phone: 408-123-4567

- d. Select the UST tank that is being changed to a TIUGA, then select 'Start New Submittal' and select start from the most recent submittal.

Underground Storage Tanks SUBMITTED Dec 7, 2018 Start Not Applicable

UST Facility Operating Permit Application

Tanks
 UST Tank Information/Monitoring Plan - Tank ID # 1
 UST Tank Information/Monitoring Plan - Tank ID # 2

UST Certifications of Installation/Modification
 UST Monitoring Site Plan
 UST Certification of Financial Responsibility

- e. Select 'Edit'

CERS Business Home Submittals Facilities Compliance My Business

UST Tank Information/Monitoring Plan: Dans Test Site 1
Home » Prepare Submittal (10138123) » UST: UST Tank Information/Monitoring Plan (Draft)

Instructions/Help
Use this form to enter data for new UST systems or revise data for an existing UST system. You must complete a separate form for each affected tank. For tanks that are part of a compartmentalized unit, each compartment is considered a separate tank. This information is required within 30 days of permit or facility information changes unless your local agency requires approval prior to making the changes.
Select **Edit** to modify/add your UST tank/system information.
The former paper version of this form was called "UST Operating Permit Application-Tank Information" (Form B).

Discard View Monitoring Plan Edit Cancel

Type of Action
 Type of Action (UST Tank)
 Confirmed/Updated Information

- f. Select 'Permanent Closure Onsite, enter a comment similar to this in the 'Additional Description' field:
 'This tank has been determined to be a Tank in Underground Area (TIUGA). It is no longer regulated as a UST but will be regulated effective the date of this submittal under the APSA program element.'
- g. Select 'Save':

The screenshot shows a web form for UST closure. The 'Type of Action' section has radio buttons for 'Confirmed/Updated Information', 'New Permit', 'Renewal Permit', 'Temporary UST Closure', 'UST Permanent Closure on Site' (selected), and 'UST Removal'. The 'Facility Information' section contains: 'Dans Test Site 1', '123 Main St', 'Soquel, CA 95073'. The 'Tank Description' section includes: 'Tank ID # 1', 'Date UST System Installed 11/20/2000', 'Tank Configuration: A Stand-alone Tank', 'Date Existing UST Discovered 11/20/2010', 'Number of Compartments in the Unit 1', 'Date UST Permanently Closed 12/17/2018', and 'Additional Description: This tank has been determined to be a Tank in Underground Area (TIUGA). It is no longer regulated as a UST but will be regulated effective the date of this submittal under the APSA program element.' A red arrow points to the 'Save' button in the top right corner.

Note: The next screen will be the 'UST Monitoring Plan' page, no changes are required on this page; click 'Save'.

Step 6-Prepare APSA submittal and notification of a TIUGA

- a. Select 'Start'.

The screenshot shows the APSA submittal status page. The title is 'Aboveground Petroleum Storage Act'. The status is 'SUBMITTED Dec. 7, 2018'. There is a 'Start' button and a 'Not Applicable' dropdown menu. Below the status bar, there is a link: 'Aboveground Petroleum Storage Act Documentation: Provided Elsewhere in CERS'. A red arrow points to the 'Start' button.

- b. Select 'Edit' if you have submitted an APSA submittal in the past.

The screenshot shows the APSA submittal status page. The title is 'Aboveground Petroleum Storage Act'. The status is 'DRAFT Dec. 7, 2018'. There is a 'Submit' button and a 'Discard' button. Below the status bar, there is a link: 'Aboveground Petroleum Storage Act Documentation: Provided Elsewhere in CERS'. There are also links for 'Discard Draft Submittal', 'Miscellaneous State-Required Documents', and 'Add Comment To Regulator'. A red arrow points to the 'Edit' button.

- c. Select the 'Start' button. If prompted, always select the choice for 'based on most recent submittal'. If your Hazardous Materials Inventory is current and includes the tank contents it is okay to select 'Provided Elsewhere in CERS' and choose 'Hazardous Materials Inventory' as shown below, or you can upload your APSA Tank Facility Statement in this section, then 'Save'.

- d. Upload the TIUGA Notification Form. Select the hyperlink marked 'Miscellaneous State-Required Documents' and upload the completed TIUGA Notification Form, then 'Save'.

Note: Even though the CERS field indicates this form is 'state-required', it is not—it is a recommended form so facilities can notify the regulator they have a TIUGA. The form can be found on the Office of State Fire Marshal website at http://osfm.fire.ca.gov/cupa/pdf/TIUGA_Notification_form-18May2018.pdf.

Step 7-Submit the updated submittal elements

Once you are back on the 'Prepare Draft Submittal' page verify that all 5 submittal elements have been checked and click 'Submit Selected Elements'. That's it, you are done! Note that you can also include comments to your CUPA. Refer to the screenshot on the following page.

Submittal Summary: Dans Test Site 1
 Home » Draft Submittal » Submittal Summary (10138123)

Instructions/Help

Final Submittal Checklist

- Does your Submittal include a **Facility Information** submittal element?
 Your submittals must always include a **Facility Information** element with current business activities and owner/operator forms. The "Submit Selected Elements" button below will be disabled if you have not met this requirement. You will need to return to the [Prepare Draft Submittal](#) page and "Start" one.
- Are you submitting all of the elements needed by your facility's regulator?
 If you must submit multiple elements for your facility (e.g., Inventory, UST), return to [Prepare Draft Submittal](#) to "Start" other elements, and then "Submit" all the elements at the same time.
- Is your CERS Account authorized to submit data to the Regulator?
 The "Submit Selected Elements" button will be disabled if your CERS Account does not have "Lead Business User" or "Approver" permissions.
- Have you reviewed the Certification Statement shown below?
 Select "Submit Selected Elements" below to submit information to your regulator.

Confirm, Certify, and Submit Your Facility Submittal Submit Selected Elements

Certification Statement: Based on my own knowledge and/or on my inquiry of those individuals responsible for obtaining the information, I, Dan Firth (CERS Account username *danfirth*), certify on 12/7/2018 under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete.

Facility Information	Ready To Submit	<input checked="" type="checkbox"/>
Information will be reported to Santa Cruz County Environmental Health. Add Comment To Regulator		
Hazardous Materials Inventory ▲	Ready To Submit	<input checked="" type="checkbox"/>
Information will be reported to Santa Cruz County Environmental Health. Add Comment To Regulator		
Emergency Response and Training Plans	Ready To Submit	<input checked="" type="checkbox"/>
Information will be reported to Santa Cruz County Environmental Health. Add Comment To Regulator		
Underground Storage Tanks ▲ ⓘ	Ready To Submit	<input checked="" type="checkbox"/>
Information will be reported to Santa Cruz County Environmental Health. Add Comment To Regulator		
Aboveground Petroleum Storage Act	Ready To Submit	<input checked="" type="checkbox"/>
Information will be reported to Santa Cruz County Environmental Health. Add Comment To Regulator		

Step 8 Subsequent Business submittal instructions

On your next regularly scheduled submittal if there are no other USTs at the facility change the answer to the UST question on the Business Activities screen to = No.

Note to CUPAs: After you accept the business submittal transferring the UST tank to APSA if there are no other UST tanks at the site change the UST Reporting requirement = Not Applicable.