State Water Resources Control Board The CUPA Performance Evaluation Process

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Water Boards

CUPA Conference 2023

Topics

- UST Evaluation Updates
- Evaluation Overview
- Pre-Evaluation
- UST Evaluation Process
- Post-Evaluation
- Evaluation Guidance
- Looking Forward

UST Evaluation Updates

- Staff changes
- Single-walled UST system focused
- CUPA Evaluation webpage
- Outreach to CUPAs
- CERS training

CUPA Performance Evaluation Overview

- Title 27, Article 8, Section 15330
- Coordination, consolidation and consistency in implementation and enforcement of all Unified Program Elements
 - HSC, chapter 6.11, section 25404
- Provide guidance, training, and support to CUPAs

Facility File Selection

- Randomly selected
- Criteria:
 - Single-walled USTs
 - Government-owned USTs
 - Design/construction
 - Closures

UST Facility Files Requested

	Number of Files Requested					
Number of UST Facilities	Minimum	Maximum				
1 to 10	5	All				
11 to 100	7	15				
101 to 250	10	20				
251 to 750	15	30				
751 to 1000+	20	50				

Oversight Inspection Preparation

6

- Previous evaluation history
- Determine number of oversight inspections
 - CERS UST Facility/Tank Data
 - Active UST facilities
 - Single-walled UST facilities
 - ICC UST Inspectors
- Coordinate oversight inspection(s)
 Upcoming routine inspections
 Schedule in advance with CUPA

UST Evaluation Process

7

- Kickoff Meeting
- Information Follow-Up Request
- Oversight Inspection
- CERS Review
- File Review
- Preliminary Summary of Findings
- Q&A Meeting
- Exit Briefing

Kickoff Meeting

- Opportunity to meet with CUPA
- Gather information for evaluation
- Review supplemental questionnaire



Information Follow-Up Request

CUPA received evaluation notification
 Uploads files to SharePoint within 60 days

- After CUPA uploads to SharePoint:
 - CalEPA notifies evaluators
 - Evaluators review Enclosure 1 and 2
 - Missing files provided to CalEPA lead
 - CalEPA sends follow-up request to CUPA
 - Upload cycle resumes
- If files are still missing, the lead evaluator will reach out to the CUPA contact directly

Oversight Inspection

CAUTION

MILLIONS

- Off-site
 - Review CERS UST facility information
- On-site
 - Review facility information with CUPA
 - Observe CUPA inspection
 - Debrief with CUPA

CERS Reports

UST Program Reports

Compliance, Monitoring, and Enforcement Reports-

Inspection Summary Report by Regulator (Report 6)

Counts of regulated UST facilities, active and closed UST systems, inspections, and TCR statistics.

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.

UST Routine Inspection Frequency Search

Provides an Excel table identifying the date of the most recent Routine UST Inspection performed with a text field for comment/explanation. This report is for the UPA to comply with the annual Energy Policy Act of 2005 reporting requirement due to the State Water Board each January 31st.

-Facility / Tank / Monitoring Summary Reports-

UST Facility Search

Provides a list of sites that are or were a UST site, including sites that reported a UST submittal or had a reported UST inspection, grouped by Regulator.

-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.

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 Consolidated Facility/Tank Data Download For US EPA

This report is a subset of the CERS UST Facility/Tank Data Download report. It generates an Excel file formatted for US EPA.

California Water¹Boards

CERS Reports

- Facility Tank Data Download
 - Initial selection Facility Files
 - Quality assurance/quality control checklist
 - NEW Single-walled criteria
 - Tank construction requirements

UST Program Reports

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Generates an Excel file containing UST Inspection, Violation, and Enforcement data.

UST Program Report:	UST Facility/Tank Data Dow	nload	
Regulator	State Water Resources Control Board	~	
CERS ID 😟		Date Submitted	to 📰
Tank Use 🖲	All Uses	✓ Tank Contents	All Contents 🗸
Tank Primary Containment 🖲	All Containment Types 🗸	Tank Capacity 🥹	Gallons
Piping Primary Containment @	All Containment Types 🗸	Date Installed 🥺	to 📰
Convert Codes to Display Values	v	Accepted Submittal Only	۲
		Last Submittal Only (regardless submittal status)	O Generate Excel Report

	Α	G	н	1	J	К	L	м	N
1						General UST T	ank Permit II	nfo	
2	1 a	430	432	432-a	433	434	436	435	430-a
3	CERS ID 🔻	Type of Action 🖵	Tank ID 🔻	CERS TankID ▼	Tank Manufacturer 💌	Tank Configuration 💌	Tank Capacity In Gallo	Date UST System Installed 💌	Date UST Permanently Closed V
1334	10217665	UST Change to AST	26861	10217665-0	BAMBACIGO	A Stand-alone Tank	8000	5/27/1999	
1335	10190992	UST Permanent Closure on Site	22D	10190992-0	Total Containment	A Stand-alone Tank	10000	1/1/1991	7/2/2014
1336	10217308	UST Permanent Closure on Site	25587	10217308-0	MODERN WELDING	A Stand-alone Tank	520	1/21/1995	2/1/2004
1337	10221106	UST Permanent Closure on Site	26499	10221106-0	Modern Welding	A Stand-alone Tank	1000	1/1/1986	3/21/2018
1338	10165827	UST Removal	1	10165827-0	TRUSCO	A Stand-alone Tank	10000	11/1/1997	5/5/2020
1339	10165827	UST Removal	2	10165827-0	TRUSCO	A Stand-alone Tank	10000	11/1/1997	5/5/2020
1340	10166189	UST Removal	3	10166189-0	MODERN WELDING	A Stand-alone Tank	10000	1/1/1900	7/2/2014
1341	10166189	UST Removal	2	10166189-0	MODERN WELDING	A Stand-alone Tank	10000	1/1/1900	7/2/2014
1342	10166189	UST Removal	4	10166189-0	MODERN WELDING	A Stand-alone Tank	10000	1/1/1900	7/2/2014
1343	10166189	UST Removal	1	10166189-0	MODERN WELDING	A Stand-alone Tank	10000	1/1/1900	7/2/2014
1344	10173907	UST Removal	7	10173907-0	Xerxes	One in a Compartm	4000	4/1/2009	4/1/2009

	Α	AD	AE	AF	AG		АН		AJ		AL
1		l Preventior	ı			Pro	duct / Waste Piping Co	nst	uction		
2	1a	452c	452d	460	458		464		464b		464d
		Fill Tube					Primary		Secondary		Piping/Turbine
		Shut-Off		Piping	Piping		Containment		Containment		Containment
3	CERS ID 💌	Valve 🔻	Exemp 🝷	Construction 💌	System Type	-	Construction	-	Construction	-	Sump 💌
8	10121980	Yes	No	Double-walled	Pressure		prt A to Z		Fiberglass	[Double-walled
13	10123237	Yes	No	Double-walled	Pressure		prt Z to A		Fiberglass	[Double-walled
21	10124923	Yes	No	Double-walled	Pressure	Sor	t by Color >		Fiberglass	[Double-walled
22	10124923	Yes	No	Double-walled	Pressure	She	eet ⊻iew >		Fiberglass	[Double-walled
23	10124944	Yes	No	Double-walled	Pressure		ear Filter From "Piping System Type"		Fiberglass	[Double-walled
24	10124944	Yes	No	Double-walled	Pressure		er by Color >		Fiberglass	[Double-walled
25	10124947	Yes	No	Double-walled	Pressure		arch		Fiberglass	[Double-walled
26	10124947	Yes	No	Double-walled	Pressure		✓ (Select All)		Fiberglass	[Double-walled
•						H	23 CCR §2636(a)(3) Suction Conventional Suction Gravity				

✓ Pressure

Cancel

OK



UST CME Data Download

UST Program Reports

-Compliance, Monitoring, and Enforcement Reports

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

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UST Program Report: CME Data Download			
Regulator State Water Resources Contr Inspection/Enforcement Date Range 1/1/2020 Convert Codes to Display Values Image: Convert Codes to Display Values	rol Board	Generate Excel Report	

UST CME Data Download

G	н	I	J	К	L	М
Violation Type Number	Class	Violation Date	Scheduled Return to Compliance Date	Actual Return to Compliance Date	Days to RTC	Actual Return to Compliance Qualifier
2030037	Minor	2/17/2021	3/20/2021	2/18/2021	1	Documented
2030013	Minor	2/17/2021	3/20/2021	2/17/2021	0	Documented
2010004	Minor	2/17/2021	3/20/2021	2/23/2021	6	Documented
2030013	Minor	5/5/2021	6/4/2021	5/5/2021	0	Documented
2010010	Minor	12/9/2020	1/8/2021	1/25/2021	47	Documented
2010003	Minor	12/9/2020	1/8/2021	1/25/2021	47	Documented
2010016	Minor	12/9/2020	1/8/2021	1/25/2021	47	Documented
2010007	Minor	12/9/2020	1/8/2021	12/24/2020	15	Documented
2010015	Class 2	12/9/2020	12/23/2020	12/30/2020	21	Documented
2010010	Minor	9/24/2020	10/25/2020	9/25/2020	1	Documented
2030013	Class 2	8/5/2020	8/19/2020		#NUM!	

Violation Type Numbers

- Leak Detection Violations
 - US EPA UST Performance Measures
 - Ties in with Report 6 information

California Environmental Reporting System: Business

CERS Business

Unified Program Violation Library CERS Data Registry » Unified Program Violation Library

Instructions/Help

The Unified Program Violation Library is a repository of standard violation descriptions Unified Program Agencies (UPAs) may use in their field inspections, and **must** be used by Unified Program Agencies (UPA) when reporting violation detail data to the California Environmental Reporting System (CERS). UPAs must either report violation information directly into the CERS user interface or via machine-to-machine electronic data transfer (EDT). The violation library is reviewed and modified as necessary on an annual basis, using the <u>change management process</u>. For more information about the Unified Program Violation Library please contact CalEPA Unified Program at <u>CUPA@calepa</u>.

The Unified Program Violation Library serves as a compilation of common violations for consistent reporting purposes only. The Unified Program Violation Library is not an exhaustive list of all violations and the inclusion, or non-inclusion, of any specific violation implies nothing and shall be construed as a policy statement, interpretation or guidance from CaIEPA or any of its Boards, Departments or Offices. The Unified Program Violation Library is not a legal document containing any advice, and under no circumstances shall the State of California be liable for any actions taken or omissions made from reliance on any information contained herein.

CERS Central Home Page

Sign In Help

Violation Name	USEPATCR	Violation Description			
Violation Type Number		Violation Source	~		
Violation Program	UST Program 🗸	Violation Category	Select a Category	~	Search
Begin Date Greater Than		End Date Less Than			

Drag a column header and drop it here to group by that column

	Name T	Program T	Description T	Туре # 🔻	Begin Date	End Date
View	Designated Operator (DO) - Identification Notification (USEPATCR 10)	UST Program	Failure to submit the "Designated Underground Storage Tank Operator Identification Form" within 30 days of installing a UST system or within 30 days of a change in DO.	2010003	10/1/2018	12/31/2099
View	Designated Operator - Inspection Records (USEPATCR 12)	UST Program	Failure to maintain on-site, or off-site at a readily available location if approved by the UPA, copies of Designated Operator inspection records as follows: Designated operator monthly inspection	2010004	10/1/2018	9/30/2020
View	Designated Operator - Inspection Records (USEPATCR 12) (USEPA Priority)	UST Program	Failure to maintain on-site, or off-site at a readily available location if approved by the UPA, copies of the "Designated Underground Storage Tank Operator Visual Inspection Report" and all attachmen	2010004	10/1/2020	12/31/2099
View	Financial Responsibility (USEPATCR 11)	UST Program	Failure to submit and maintain complete and current Certification of Financial Responsibility or other mechanism of financial assurance.	2010007	10/1/2018	12/31/2099
View	Owner/Operator Statement of Understanding and Compliance (USEPATCR 10)	UST Program	Failure to submit the "Underground Storage Tank Statement of Understanding and Compliance Form."	2010016	10/1/2018	12/31/2099
View	Release Detection Monitoring and Maintenance Records (USEPATCR 9d)	UST Program	Failure to maintain monitoring records for release detection and/or maintain records of appropriate follow-up actions.	2030001	10/1/2018	9/30/2020

CME Data Download

	Α	G	Н	I. I.	J	K	L
1	Facility				General Viola	ition Information	
2	1 a	930	931	932	933	934	
					Scheduled Return	Actual Return	
		Violation		Violation	to Compliance	to Compliance	
3	CERS I 🔻	Type Number 💌	Class 🔻	Date 🖵	Date 💌	Date 🖵	Days to RTC 💌
36	10033987	2030021	Class 2	3/8/2022	4/7/2022	3/15/2022	7
75	10123237	2030008	Minor	9/21/2022	10/21/2022	9/21/2022	0
84	10123237	2060020	Class 2	9/21/2022	10/21/2022	9/21/2022	0
138	10124944	2030003	Minor	10/27/2022	11/26/2022	10/27/2022	0
197	10124950	2030008	Minor	10/6/2022	11/5/2022	10/6/2022	0
199	10124950	2030036	Class 2	10/6/2022	11/5/2022	1/5/2023	91
203	10124950	2030003	Class 2	10/6/2022	11/5/2022	10/6/2022	0
209	10124950	2030025	Class 2	10/6/2022	11/5/2022	10/6/2022	0

CME Data Download

Generated Worksheets	Count of Exported Records	Routine Inspection	Other Inspection	Routine Class 1 & 2 RTC within 90 Days	Class I Violation	Class II Violation	Minor Violation
Regulated Facilities	546						
UST Inspections	54	53	1	3.77%			
UST Violations Details	28				4	3	21
UST Outstanding Violations	2						
UST Enforcements	0						

CME Data Download

- Enforcement data
 - Violations
 - AEO
 - Red Tag information

	Α	G	н	I. I.	J	Q	R	S	Т
1	Facility		Gene	eral Enforcement In	formation			F	Red Tag Information
2	1 a	914	915	916	917a	925	913b	913c	913d
		Type of Enforcement	Date of Enforcement	Type of Formal Enforcement	Date a Referred Case Settled	Enforcement			Violations Causing
3	CERS ID	Action 💌	Action 🖵	Action 💌	or Dropped 💌	Comments 💌	Red Tag Issue 💌	Red Tag Numbe 💌	Red Tag 🛛 💌
4	10033984	Notice of Violati	6/21/2018				No		
18	10123246	Notice of Violati	6/21/2018				No		
18 21 38 58	10124923	AEO - UP	1/24/2020	Administrative	2/11/2020		No		
38	10124953	Notice of Violati	6/21/2018				No		
58	10149181	Notice of Violati	6/21/2018				No		
81 90 106	10165827	Notice of Violati	3/15/2018				No		
90	10166157	Notice of Violati					No		
106	10169771	Notice of Violati	6/21/2018				No		
113	10169831	Notice of Violati					No		
120	10173907	Notice of Violati					No		
141	10206661	Notice of Violati	6/21/2018				No		
152	10206793	Notice of Violati	6/21/2018				No		
162	10212637	Notice of Violati	6/21/2018				No		
170	10216558	Notice of Violati	6/21/2018				No		
175 186	10216561	Notice of Violati					No		
186	10216579	Notice of Violati	6/21/2018				No		

CERS Assistance



- California Environmental Reporting System (CERS)
 Frequently Asked Questions
- Contacting directly for assistance
- Data Management Workshops

Report 6

- Timely reporting
 - March 1
 - September 1
- Technical compliance rate
 - CA vs CUPA
- Consistent reporting
 - CERS CME data
 - Self-audit reports

July - Dec	Jan - Jun		
			% Inspected
		Report 6 (total)	CERS (total)
			6

Technical Compliance Rate		
CA Technical Compliance Rate		

Administrative Documents

- I&E Plan
 - Consistency and implementation of UST regulations and H&SC
- Data Management Procedures
 - UST CERS submittals
 - UST CME data
- Self-Audits
 - Align with Report 6 data
- Local ordinance
 - Must be consistent or more stringent
 - UST operating permit

Administrative Documents

Permit procedures

- Title 23, Section 2711 and 2712
- HSC, Ch 6.7, Sections 25285-25287
- Closure procedures
 - Title 23, Section 2672 and HSC, Ch 6.7, Section 25298
 - Leaking Underground Fuel Tank (LUFT) Manual
- ICC Certification(s)
 - Number of ICC UST inspectors
 - Verify ICC certification(s) are current

UST Operating Permit

Common issues:

- Citations
 - Ch. 6.75, Ch. 17, Ch. 18
 - Fire Code
 - Federal
- References
 - "Suspension"
 - Revocation for noncompliance
 - "Post in a conspicuous place"*
 - Permit is not transferrable*



UST Operating Permit Conditions

Common issues:

- Notify CUPA within 30 days of changing the substance stored
 - UST regulations, Section 2711(c)
- Owner or operator must report <u>any</u> unauthorized releases
 - H&SC, Sections 25294 and 25295
- The UST operating permit shall be maintained <u>on-site</u>
 - UST regulations, Section 2712(i)

UST Operating Permit

- CERS IDs
- CERS tank ID numbers
- Issuance date
- Expiration date
- Incorporation by reference Title 23, Sections 2610-2717.7 HSC, Ch. 6.7, Sections 25280-25296 and 25298-25299.6

ISSUE DATE	Name of CUPA Line 2 Certified Unified Program Agency CUPA Address City, CA Zip Code Phone IIFIED ROGRAM FACILITY PERMIT Month/Day/Year	
FACILITY INFORMATION CERS ID BUSINESS NAME SITE ADDRESS PERMIT HOLDER IN ORDER TO MAINTAIN T		PR OPERATOR CONDITIONS FOR
ALL APPLICABLE UNIFIER PERMIT TYPE PROGRAM ELEMENT A HAZARDOUS MATERIALS B HAZARDOUS MATERIALS C ABOVEGROUND PETROLE D CALIFORNIA ACCIDENTAL E HAZARDOUS WASTE GEN	ROGRAM ELEMENTS. RELEASE RESPONSE PLAN and INVENTORY (HMF MANAGEMENT PLAN (HMMP) and INVENTORY STATEMENT (HMIS) EUM STORAGE ACT (APSA) . RELEASE PREVENTION (CALARP) ERATOR	APPLICABLE
- ermit-By-Rule (PBR), Cond	itionally Authorized (CA), and Conditionally Exempt (C	E) TANK CONTENT
	ISSUE DATE EXPIRATION DATE EXPIRATION DATE FACILITY INFORMATION CERS ID BUSINESS NAME SITE ADDRESS PERMIT HOLDER IN ORDER TO MAINTAIN T MUST COMPLY WITH THE ALL NOPLICABLE UNIFIED PERMIT TYPE PROGRAM ELEMENT A HAZARDOUS MATERIALS B HAZARDOUS MATERIALS B HAZARDOUS MATERIALS C ABOVEGROUND PETROLE D CALIFORNIA ACCIDENTAL E HAZARDOUS WASTE GEN F TIERED DEPLICIENCE OF F COMIT-BY-Rule (PBR), COM	Name of CUPA Line 2 Certified Unified Program Agency CUPA Address City, CA Zip Code Phone UNIFIED REOGRAM FACILITY PERMIT ISSUE DATE Month/Day/Year EXPIRATION DATE Month/Day/Year EXPIRATION DATE CERS ID BUSINESS NAME SITE ADDRESS PERMIT HOLDER IN ORDER TO MAINTAIN THE PERMIT TO OPERATE, THE OWNER OF MUST COMPLY WITH THE PROVISIONS OF THE LAW AND PERMIT OF ALC, OP LICABLE UNIFIED + ROGRAM ELEMENTS. PERMIT TYPE PROGRAM ELEMENT A HAZARDOUS MATERIALS RELEASE RESPONSE PLAN and INVENTORY (HMF) B HAZARDOUS MATERIALS RELEASE RESPONSE PLAN and INVENTORY (HMF) B HAZARDOUS MATERIALS INVENTORY STATEMENT (HMIS) C ABOVEGROUND PETROLEUM STORAGE ACT (APSA) D CALIFORNIA ACCIDENTAL RELEASE PREVENTION (CALARP) E HAZARDOUS WASTE GENERATOR F TIERED DEPENDIEUM STORAGE ACT (APSA) D CALIFORNIA ACCIDENTAL RELEASE PREVENTION (CALARP) E HAZARDOUS WASTE GENERATOR F TIERED DEPENDING OF THAZARDOUS WASTE ON-SITE TREATMENT (COLD - demit.By-Rule (PBR), Conditionally Authorized (CA), and Conditionally Exempt (COLD - demit.By-Rule (PBR), Conditionally Authorized (CA), and Conditionally Exempt (COLD - demit.By-Rule (PBR), Conditionally Authorize

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CUPA Logo

Here

NAME OF CUPA Name of CUPA Line 2 Certified Unified Program Agency

UNIFIED PROGRAM FACILITY PERMIT

APPLICABLE LAWS / PERMIT CONDITIONS

A. <u>HAZARDOUS MATERIALS RELEASE RESPONSE PLANS and</u> <u>INVENTORY (HMRRP)</u>

- 1. HSC, Division 20, Chapter 6.95, Article 1
- 2. CCR, Title 19, Division 2, Chapter 4.5

B. <u>HAZARDOUS MATERIALS MANAGEMENT PLAN (HMMP) and</u> <u>HAZARDOUS MATERIALS INVENTORY STATEMENT (HMIS)</u>

- 1. HSC, Division 12, Part 2, Chapter 1, Article 2, Section 13143.9
- CCR, Title 24, Part 9 (California Fire Code), Chapter 50, Sections 5001.5.1 and 5001.5.2

C. ABOVEGROUND PETROLEUM STORAGE ACT (APSA)

1. HSC, Division 20, Chapter 6.67

D. CALIFORNIA ACCIDENTAL RELEASE PREVENTION (CALARP)

- 1. HSC, Division 20, Chapter 6.95, Article 2
- 2. CCR, Title 19, Division 2, Chapter 4.5

E. HAZARDOUS WASTE GENERATOR

- 1. HSC, Division 20, Chapter 6.5
- 2. CCR, Title 22, Division 4.5, Chapters 10-45

F. TIERED PERMITTING OF HAZARDOUS WASTE ON-SITE TREATMENT

1. HSC, Division 20, Chapter 6.5

2 COD, The 22, Division 4.5, Chapters 10-45

G. UNDERGROUND STORAGE TANK (UST)

- 1. HSC, Division 20, Chapter 6.7, Sections 25280-25296; and 25298-25299.6
- 2. CCR, Title 23, Division 3, Chapter 16, Sections 2610-2717.7

Inspection & Test Reports

- Violations cited
- Violation type number cited
 - Report 6
- Follow-up documentation
 - Inspections
 - Correspondence
 - Graduated series of enforcement

Temporary Closure

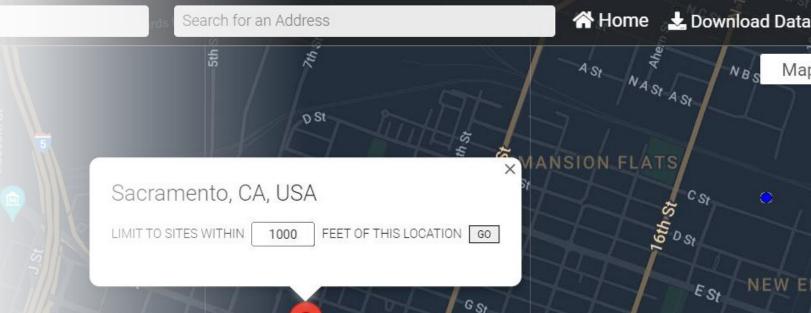
- Title 23, Sections 2670 and 2671 and HSC, Ch. 6.7, Section 25298
 - Annual compliance inspection conducted
 - Site assessment conducted if extension is granted
 - Reuse after temporary closure
 - Temporary closure does not exceed 24 months
- CERS status
 - Type of Action' updated to 'Temporary UST Closure'

Permanent Closure

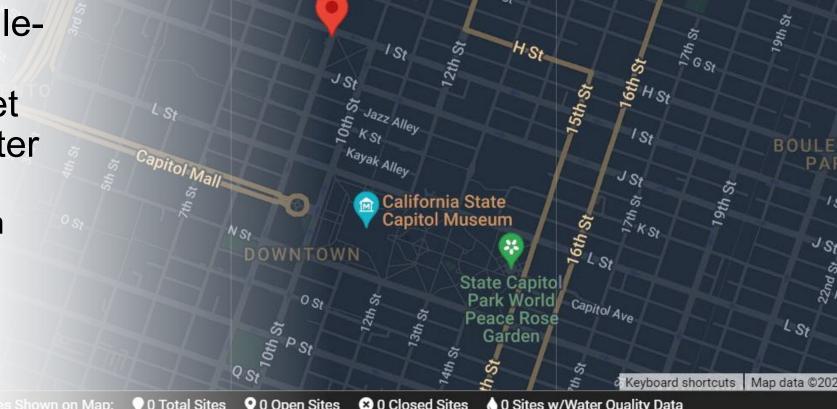
- Title 23, Sections 2670 and 2672
- HSC, Ch. 6.7, Section 25298
- Closure documentation
- CERS



Enhanced Leak Detection



- UST systems with singlewalled components located within 1000 feet of a public drinking water well
 - Title 23, Ch 16, Section 2644.1
 - HSC, Ch 6.7, Section 25292.4



Enforcement

RTC

- CERS CME data
- Facility files
- Correspondence
- Report 6
 - Red tags issued
 - TCR
- Graduated series of enforcement
 - I&E Plan



Preliminary Summary of Findings

- Identify:
 - Deficiencies
 - Incidental Findings
 - Observations
 - Achievements, Outstanding Implementation, & Challenges
 - Carryovers from previous evaluations
- Reviewed by State Water Board management prior to Q&A meeting

Deficiencies

"Identify specific aspects regarding systemically inadequate implementation of the Unified Program."

- CalEPA webpage

Common Deficiencies:

- UST operating permit inconsistent with UST Regulations and H&SC.
- Late Report 6
- Not documenting return to compliance within 60 days for testing and leak detection failures
- Not ensuring single-walled UST related information in CERS is accurate and complete

Incidental Findings

"Identify specific incidents or activities regarding implementation of the Unified Program."

- CalEPA webpage

Common incidental findings:

- Overfill and Secondary Containment exemption
- I&E Plan content and citations
- Preparing complete inspection reports
 - Emphasis on SW components with missing violation data
- ELD Testing

Observations

Recommendations regarding implementation of the Unified Program Common observations:

- Number of single-walled UST systems in CUPA's jurisdiction
- Oversight inspection comments
- Anomalies that do not impact program
 - Could become more than an observation in future evaluations

Achievements, Outstanding Implementation & Challenges

Common examples:

- Carryover deficiencies or incidental findings corrected or resolved prior to evaluation timeframe
- CUPA participation in TAGs, training, workshops
- Oversight inspection(s)
- Effort to notify single-walled tank owners of December 31, 2025 deadline
- Response to local emergency declarations and statewide recovery efforts
- Website

Q&A Meeting

- Review PSOF with CUPA and CalEPA Team
- Opportunity to provide and/or clarify information
- PSOF revisions

Exit Briefing

- Last opportunity to meet as a group to discuss the Summary of Findings
 - PSOF can still be revised at this point, if applicable
- Evaluation survey provided
- Final Summary of Findings (FSOF) drafted
 - Reviewed by State Water Board and CalEPA management
- End of evaluation

Progress Reports

- Constructive content:
 - Proactive changes
 - Contacting us directly ahead of the EPR due date
 - Highlighting changes
 - Training logs + Training outlines

Progress Reports

- Common occurrences:
 - Missing corrective action items
 - Carryovers
 - Reassessed during next evaluation
 - If corrected or resolved:
 - "Achievements,
 - Outstanding Implementation, & Challenges" section
 - If not corrected or resolved, noted on PSOF
 - "Closed, but not corrected"

Evaluation Closure

- Progress Report process completed
- CalEPA issues final evaluation closing letter to CUPA
- Evaluation results (2019- present) <u>https://calepa.ca.gov/cupa/evaluations/s</u> <u>chedule/</u>

Evaluation Guidance

- UST Performance Evaluation webpage
 <u>https://www.waterboards.ca.gov/water_is</u>
 <u>sues/programs/ust/performance-</u>
 <u>evaluations.html</u>
- UST Statutes and Regulations <u>https://www.waterboards.ca.gov/water_is</u> <u>sues/programs/ust/regulatory/#regs</u>
- Local Guidance Letters
 <u>https://www.waterboards.ca.gov/water_is_sues/programs/ust/leak_prevention/lgs/</u>
- UST Monthly Updates
 <u>https://www.waterboards.ca.gov/ust/cup</u> a/updates/

Evaluation Guidance

- LUFT Guidance Manual <u>https://www.waterboards.ca.gov/water_issu</u> <u>es/programs/ust/luft_manual/guidance_ma</u> <u>nual_sept2012.pdf</u>
- Single-Walled UST webpage <u>https://www.waterboards.ca.gov/ust/single</u> <u>walled_systems.html</u>
- Unified Program Laws and Regulations <u>https://calepa.ca.gov/cupa/lawsregs/</u>
- CalEPA Performance Evaluation Webpage <u>https://calepa.ca.gov/cupa/evaluations/</u>

UST Program Email List Subscriptions



Looking Forward

- On-site training with CUPA staff
- CUPA Evaluation Guidance webpage
- Continue improving the UST evaluation program
- Focus on enforcement
- Provide support for all CUPA UST programs
- Provide a positive, constructive, and beneficial evaluation experience

QUESTIONS?

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