

TCR & REPORT 6: HOW TO THRIVE & SURVIVE YOUR UST EVALUATION

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UST Leak Prevention – Evaluation Program

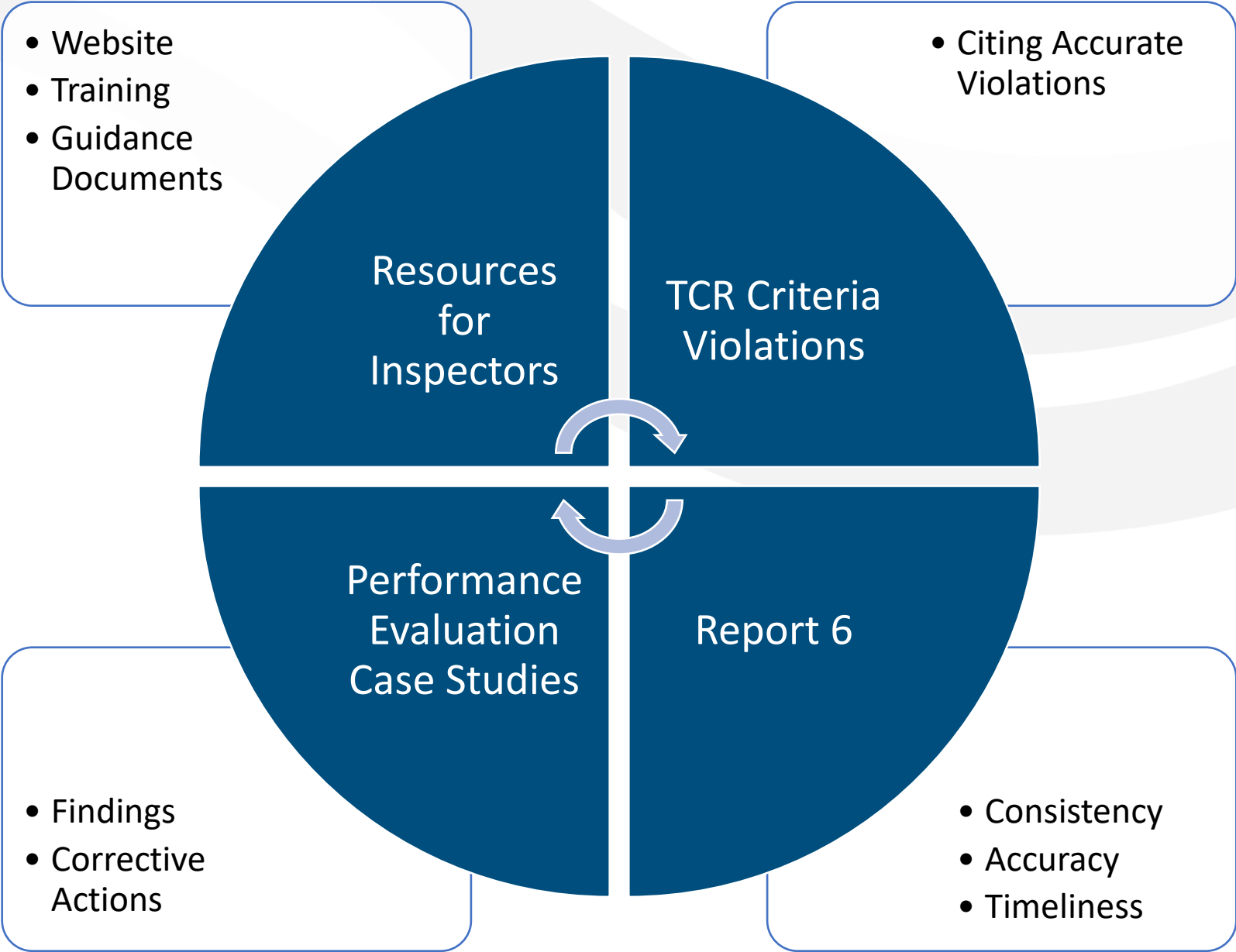
Question 1 – Slido Placeholder

Question 2 – Slido Placeholder

Question 3 – Slido Placeholder

Acronyms

- RTC – Return to Compliance
- TCR – Technical Compliance Rate
- Report 6 – Semi-Annual Reporting Requirement
- OPE – Overfill Prevention Equipment
- IF/Def - Incidental Finding/Deficiencies



- Website
- Training
- Guidance Documents

Resources
for
Inspectors

- Citing Accurate Violations

TCR Criteria
Violations

Performance
Evaluation
Case Studies

- Findings
- Corrective Actions

Report 6

- Consistency
- Accuracy
- Timeliness

Website is LIVE



CUPA EVALUATION UNDERGROUND STORAGE TANKS

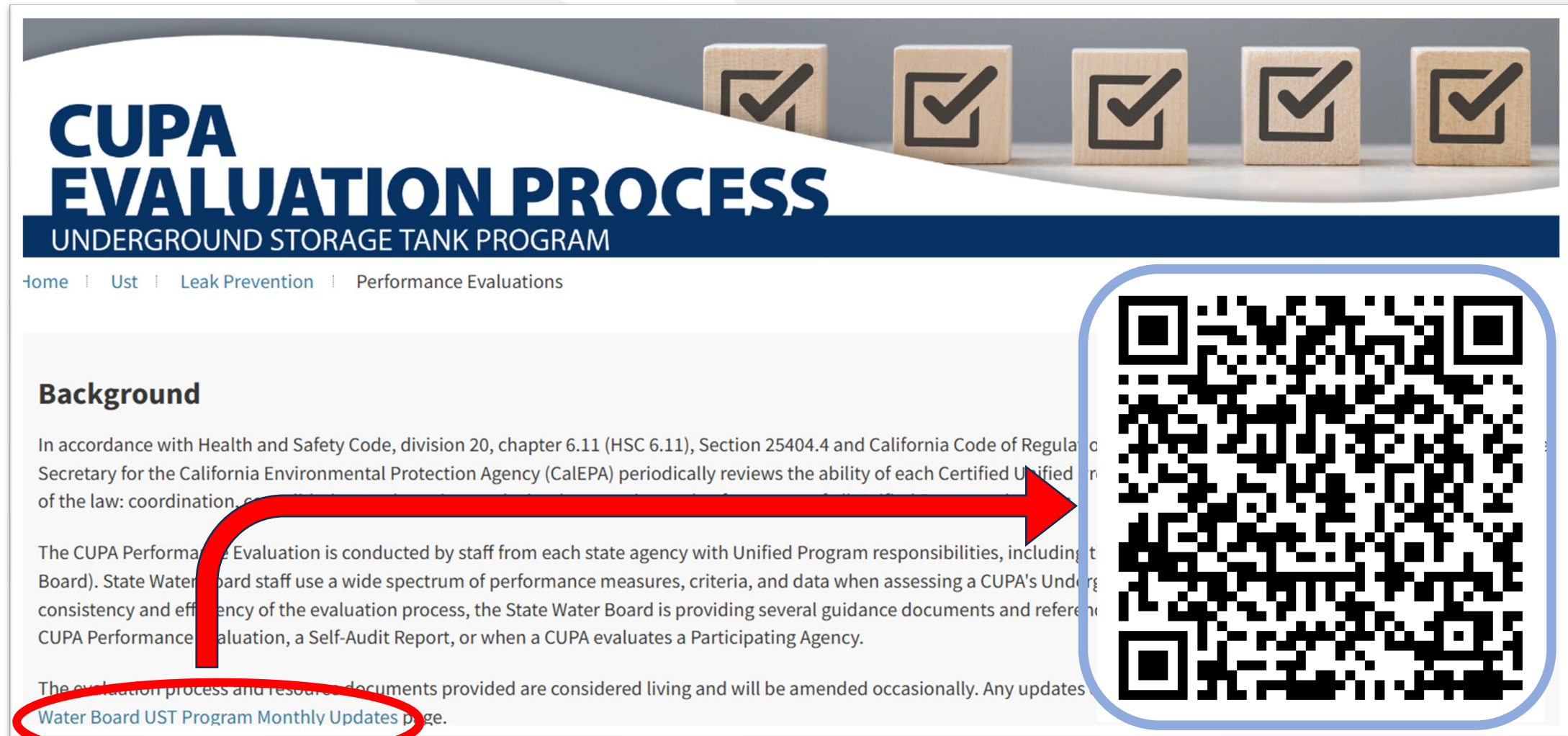
Home | Ust | Leak Prevention | Performance



Background

In accordance with Health and Safety Code, division 1, section 15330, the Secretary for the California Environmental Protection Agency (CalEPA) periodically reviews the ability of each Certified Unified Program Agency (CUPA) to continuously meet the intent of the law: coordination, consolidation, and consistency by implementation and enforcement of all Unified Program elements.

UST Program Monthly Updates



**CUPA
EVALUATION PROCESS**
UNDERGROUND STORAGE TANK PROGRAM


Home | Ust | Leak Prevention | Performance Evaluations

Background

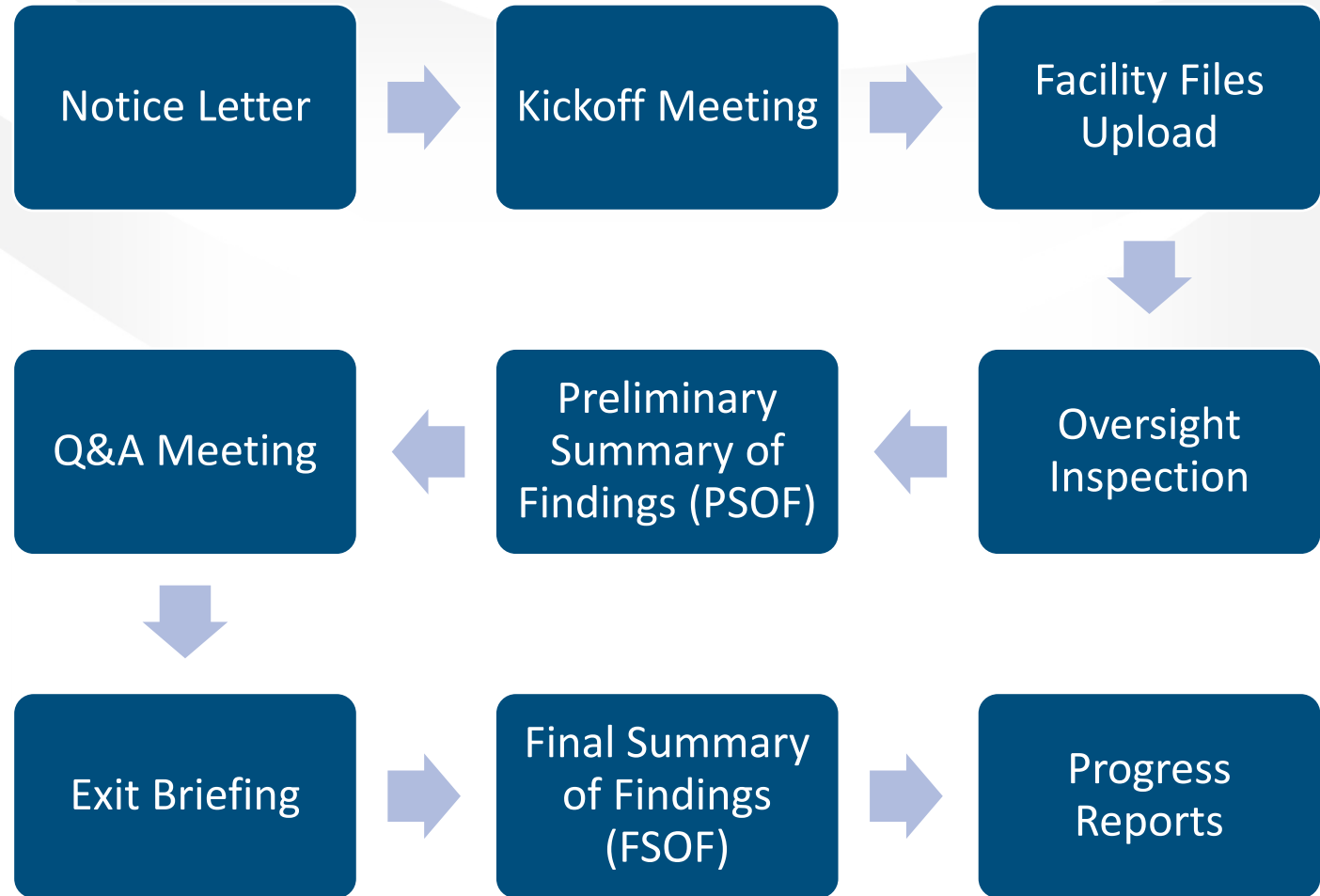
In accordance with Health and Safety Code, division 20, chapter 6.11 (HSC 6.11), Section 25404.4 and California Code of Regulations, the Secretary for the California Environmental Protection Agency (CalEPA) periodically reviews the ability of each Certified Unified Program Agency (CUPA) to enforce the law: coordination, consistency, and efficiency of the law.

The CUPA Performance Evaluation is conducted by staff from each state agency with Unified Program responsibilities, including the State Water Board. State Water Board staff use a wide spectrum of performance measures, criteria, and data when assessing a CUPA's Underlying Program. To ensure consistency and efficiency of the evaluation process, the State Water Board is providing several guidance documents and reference materials. CUPA Performance Evaluation, a Self-Audit Report, or when a CUPA evaluates a Participating Agency.

The evaluation process and resource documents provided are considered living and will be amended occasionally. Any updates will be posted on the [Water Board UST Program Monthly Updates page](#).



CUPA Evaluation Process



Facility File Selection

Number of UST Facilities	Number of Files Requested	
	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

Facility File Review

Inspection
reports

Testing
documents

Permits

CERS
Accuracy

Other
submissions

Examples of Deficiencies/Incidental Findings

Missed violation on CERS or inspection report

Incorrect violation issued

Incomplete or inaccurate information

Inconsistent identification of UST construction

CERS QAQC

UST Facility/Tank Data Download

All UST Systems	▶
Post July 1, 2004 UST Systems	▶
Secondarily Containment UST Systems (January 1, 1984 through June 30, 2003)	▶
Single-Wall UST Systems	▶
Single-Wall Piping	▶
Hazardous Substance Tank's OPE Exemption	▶

OPE and Waste Oil Tanks

2. Select UST Facility/Tank 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.

[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 specific inspection.

[UST Routine Inspection Frequency Report](#)
Provides an Excel table identifying the tanks inspected with a text field for comments for the annual Energy Policy Act of 2005, due 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.

[BOE Facility/Owner Search Tool](#)
Provides a tool to search for UST facility by Property Owner and UST Tank Owner.

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.

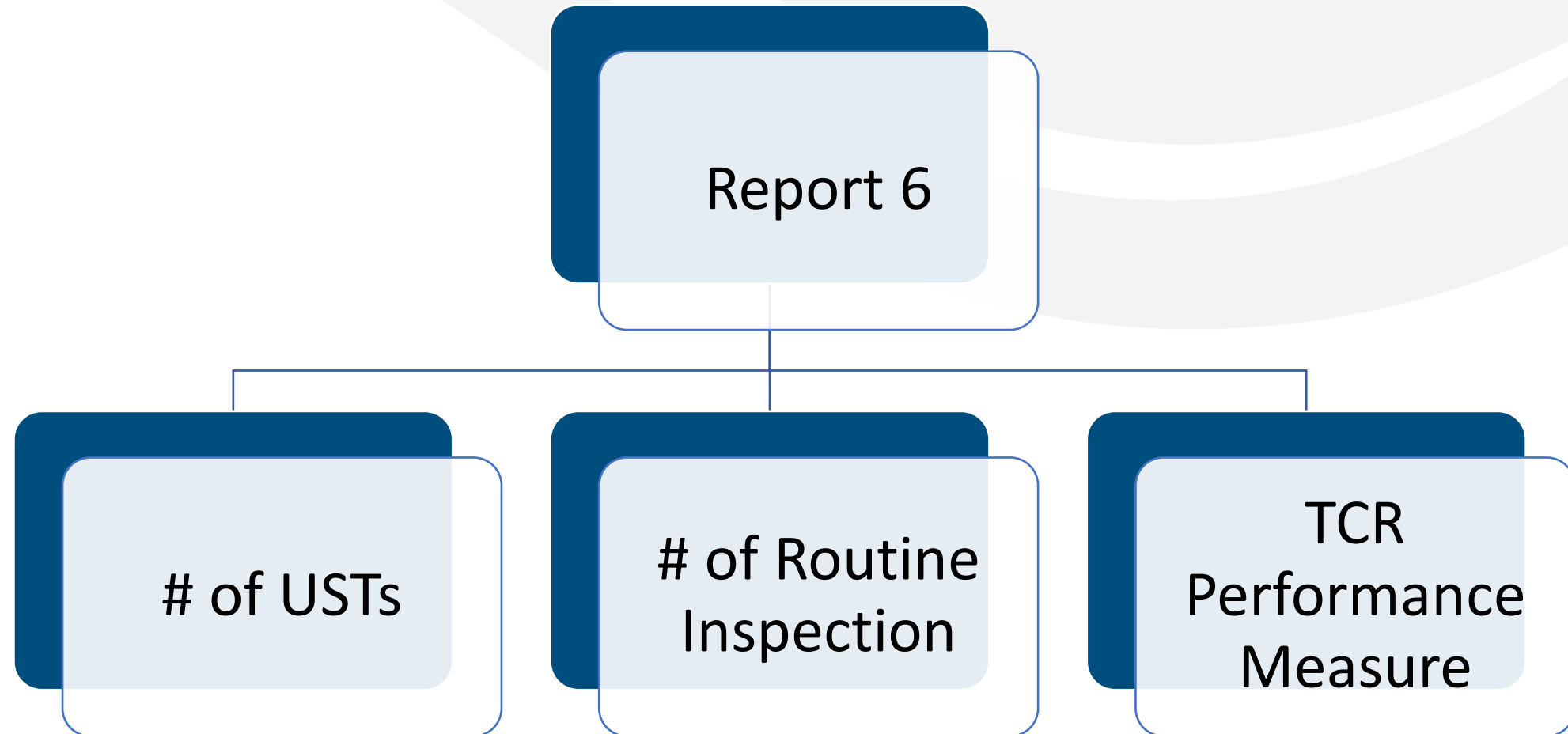
[UST Consolidated Facility/Tank Data Download](#)
This report is a subset of the CERS UST data. This report is an Excel file formatted for US EPA.

a. USTs using OPE exemption

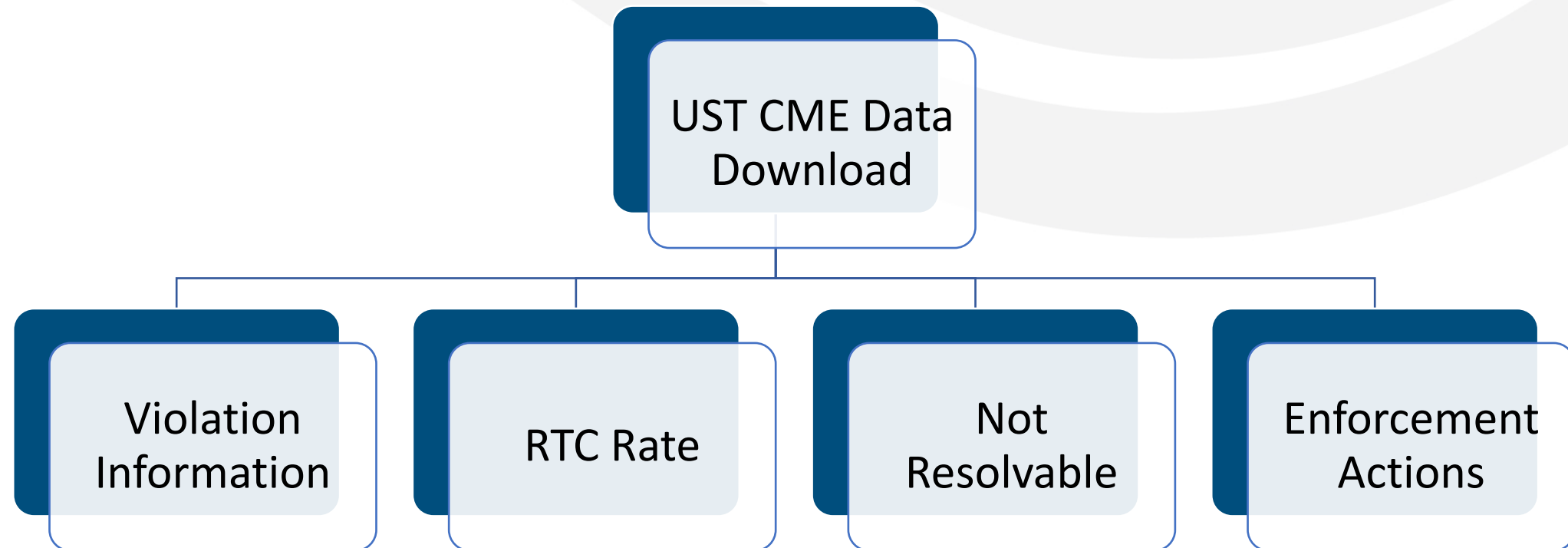
- i. 452a: **No**
- ii. 452b: **No**
- iii. 452c: **No**
- iv. 452d: **Yes**

	AC	AD	AE	AF	AG	AH	AI
1		Tank Overfill Prevention					
2	445a	452a	452b	452c	452d	460	458
3	Other Secondary Containment Construction	Audible/Visual Alarm	Ball Float	Fill Tube Shut-Off Valve	Exempt	Piping Construction	Piping System Type
404		No	No	No	Yes	Other	Gravity
486		No	No	No	Yes	Other	Gravity
48		No	No	No	Yes	Other	Gravity
573		No	No	No	Yes	Other	Gravity
308	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
309	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
310	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
311	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
312	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
313	vault	No	No	No	Yes	Single-walled	Conventional Suctic Steel
276							
277							

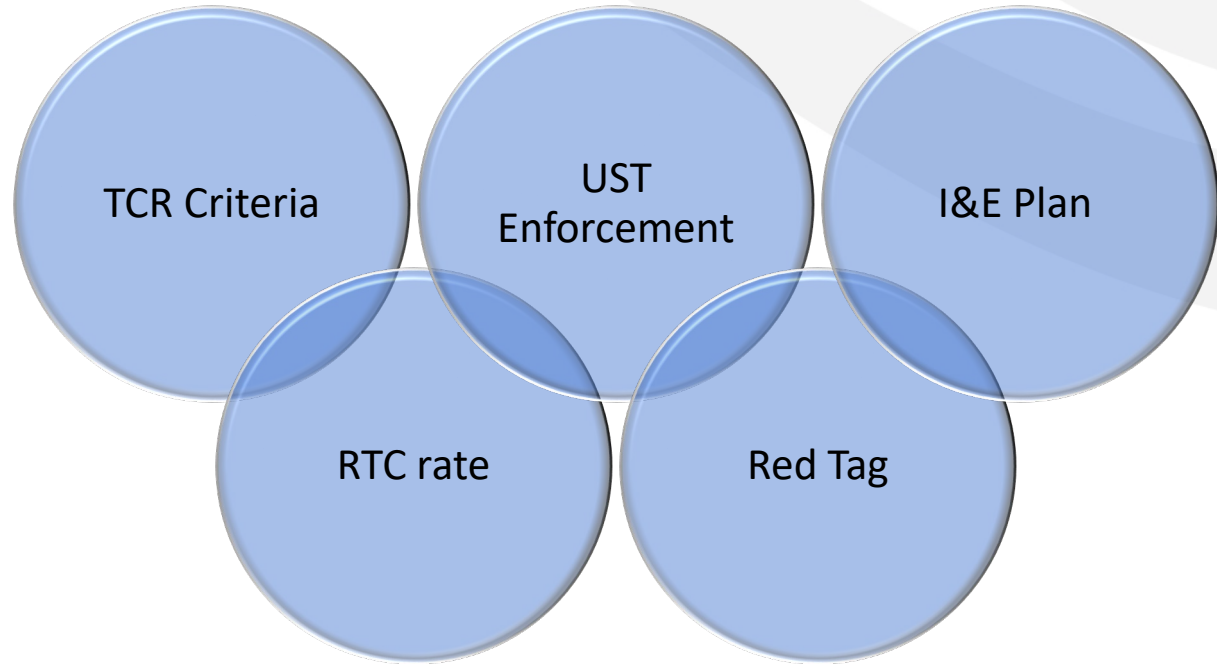
Inspection, Violation, Enforcement Data Review



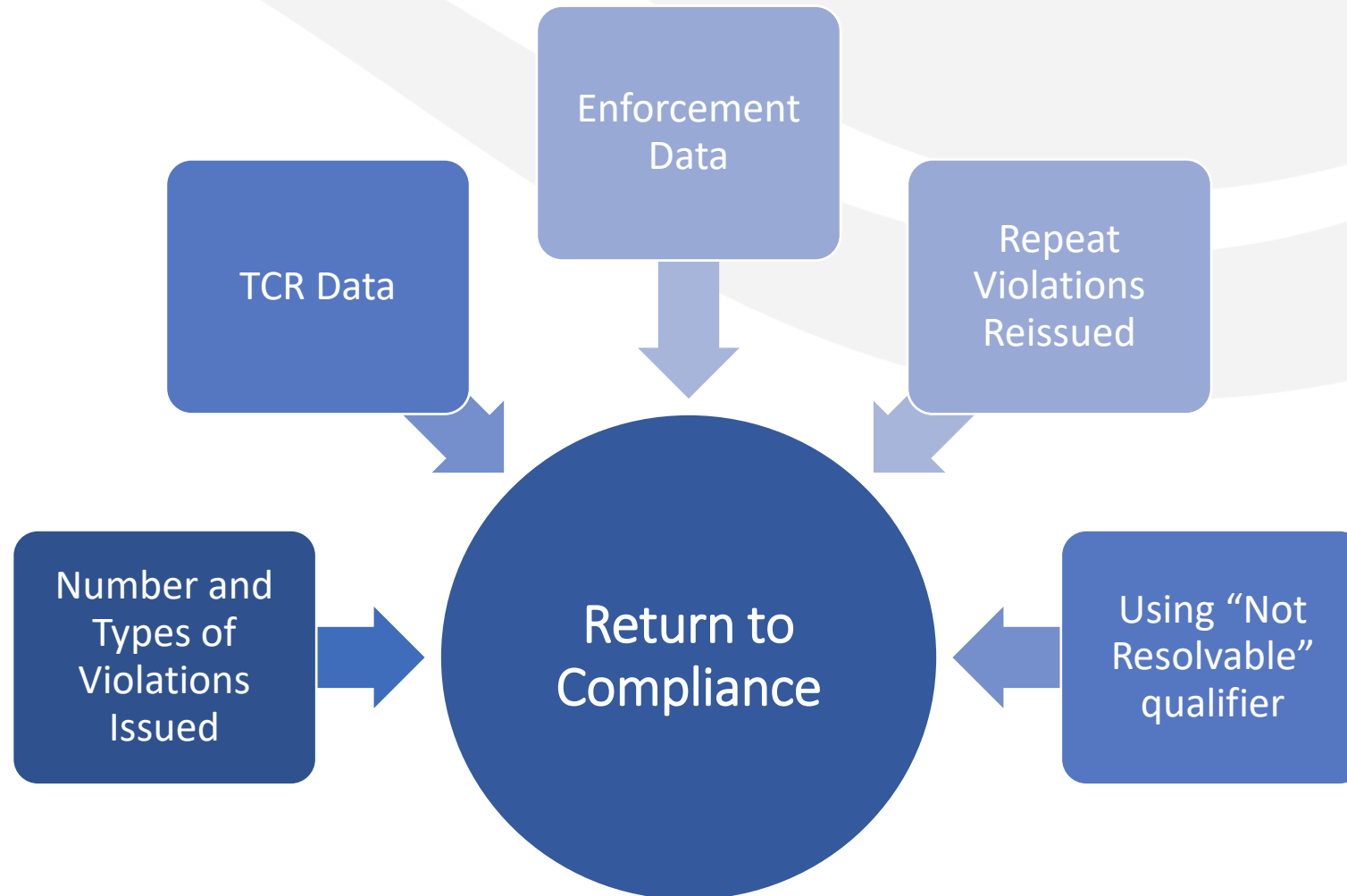
Inspection, Violation, Enforcement Data Review



Enforcement



Return to Compliance (RTC)



Examples of Deficiencies/Incidental Findings

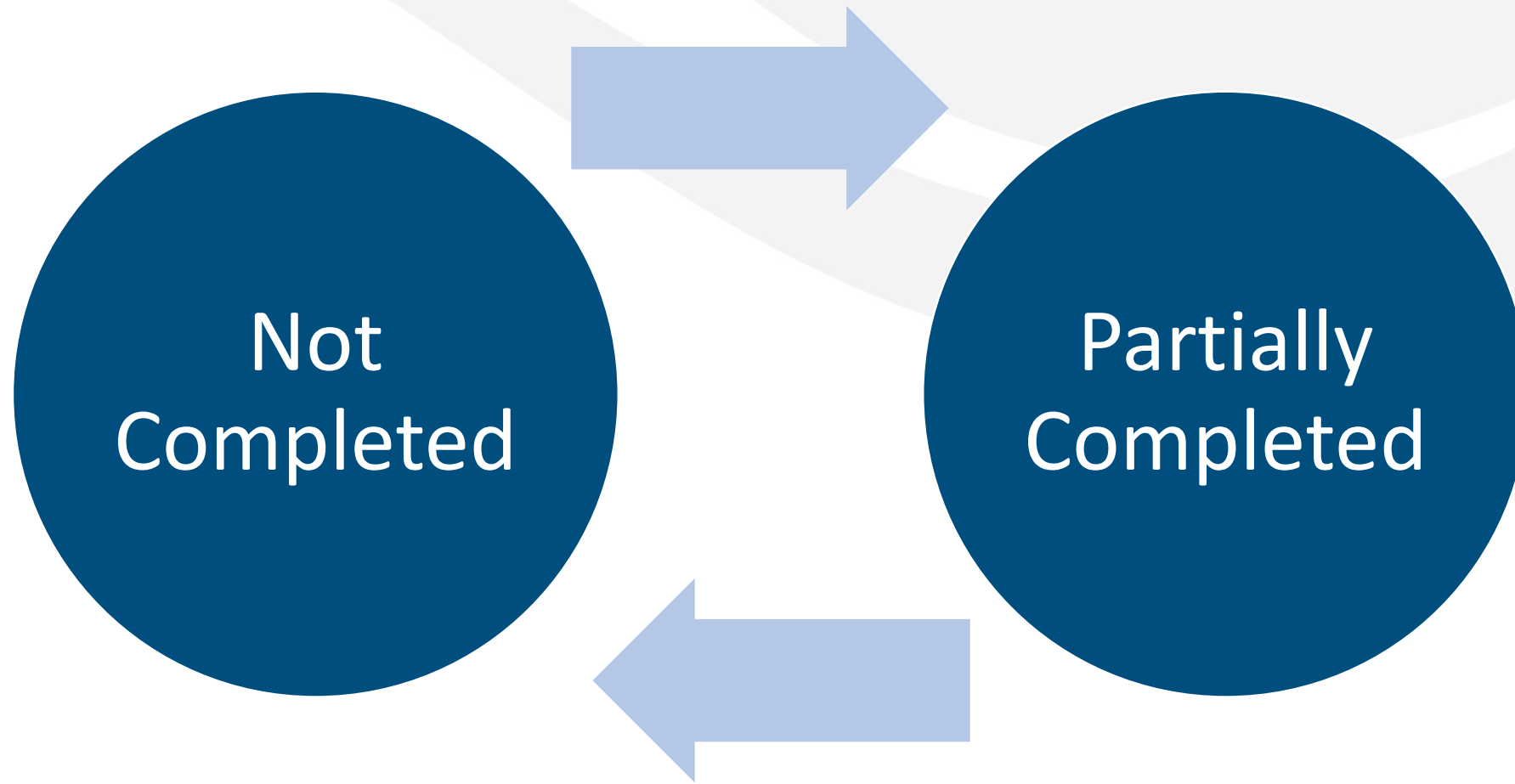
Not applying enforcement as outlined in the I&E Plan

Violations with no RTC and follow-up enforcement has not been applied

Repeated violations were not cited

TCR is High or Low

Unresolved Deficiencies and Findings



Inspection Frequency

Regulatory

- Compliance Inspection
- Special Inspection

CERS

- Routine Inspection
- Other Inspection

Training for CUPA

Magnolia

- Report 6 Training

Kaitlin

- CERS Quality Assurance, General CERS Training

Jenna and Michelle

- Field Training

Jenna

- ICC Training



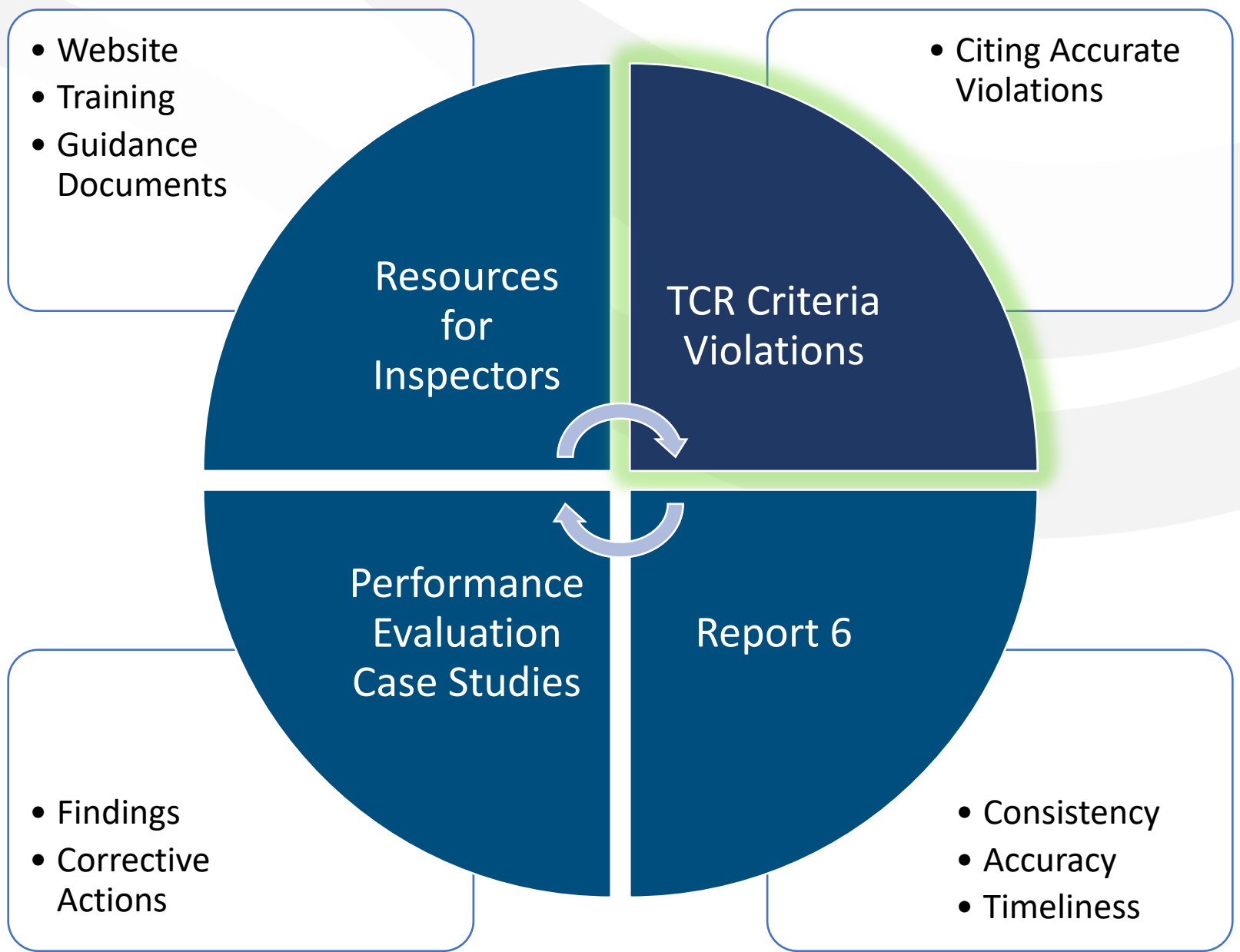
Evaluation Links

- CalEPA CUPA Performance Evaluations
- Acronym Library



Statutes, Regulations, and Local Guidance Letters

- Underground Storage of Hazardous Substances (Health & Safety Code, Chapter 6.7) (January 1, 2024)
- UST Regulations (CCR, Title 23, Chapter 16) (October 1, 2020)
- Local Guidance (LG) Letters
- CCR, Title 27, Article 8, Section 15330



Conducting UST Inspections

- Assessment of:
 - Physical Violations
 - Paperwork Violations
 - CERS Accuracy
 - Personnel on site

13,287



Technical Compliance Rate

What constitutes failing TCR?

9a = Spill Prevention

9b = Overfill Prevention

9c = Corrosion Protection

9d = Release Detection

9a

9b

9c

9d

What constitutes failing TCR?

- Violation Type Number 2060020



9a

Spill
Prevention

Issued 1,638
(2024)

12.3% of
facilities

What constitutes failing TCR?

- Violation Type Number 2030036



9b

Overflow
Prevention

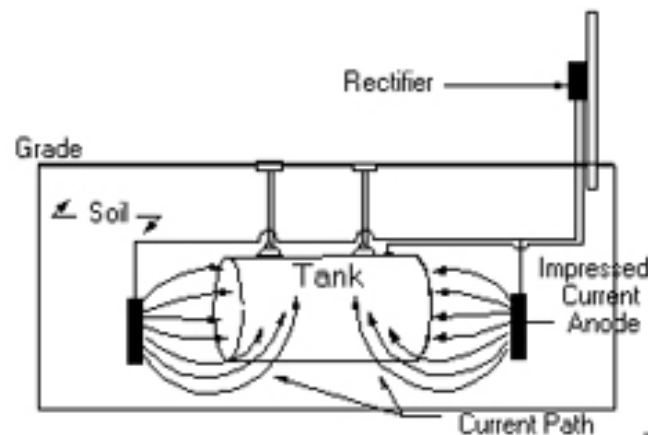
Issued 1,285
(2024)

9.7% of
facilities

What constitutes failing TCR?

- Violation Type Number 2030009
 - Impressed Current/Sacrificial Anode
- Violation Type Number 2030029
 - Lined Tank Requirements

9c

Corrosion
PreventionIssued 98
(2024)0.7% of
facilities

What constitutes failing TCR?



9d

Release
Detection

What constitutes failing TCR?

1

2030043 – Monitoring
Equipment

2

2030025 – LLD
Failures

3

2030001 – Release
Detection Records

35 (9d) Types in Violation Library

3,918 (9d) Violations issued in 2024

29.5% of Facilities

Technical Compliance Rate

Same Day RTC

- Replace sensor Like for Like
- Owner printed documents
- Removed Liquid

	Occurred On	Type	Class	Actual RTC	RTC Qualifier
Select	9/26/2022	Water in Secondary Containment	Minor	9/26/2022	Documented
Select	9/26/2022	Unsafe UST Operation (USEPA Priority)	Minor	9/26/2022	Documented
Select	9/26/2022	Double-Walled Pressurized Pipe -Interstitial Monitoring (USEPATCR 9d) (USEPA Priority)	Minor	9/26/2022	Observed
Select	9/26/2022	Designated Operator - Inspection Records (USEPATCR 12) (USEPA Priority)	Minor	9/26/2022	Documented

Common Non-TCR Criteria Violations

Number	Name
2010 / 2015	General / General Local Ordinance
2030021	Failure to Obtain Operating Permit
2030035	Unsafe UST Operation
2030003	Audible and Visual Alarm
Non-UST	Incorrect Program Violation



USEPA Reporting Requirements

Assistance



LG
164-4

Semi-Annual
UST Program
Report

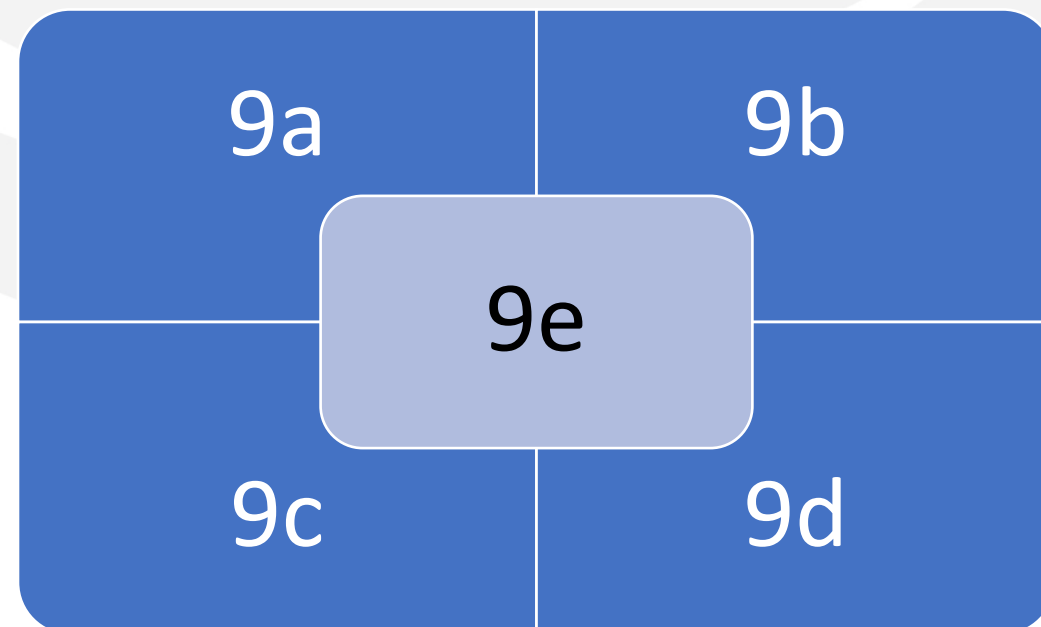
Technical Compliance Rate

Violation Issued:

9a or 9b or 9c or 9d = 0 TCR (9e)

No Violation Issuance:

9a or 9b or 9c or 9d = 1 TCR (9e)



Technical Compliance Rate



Technical Compliance Rate

2024 California Data

- 13,287 Inspections
- 5,224 Failed TCR (9e=0)
- 8,063 Passed TCR (9e=1)
 - **60.68%**



Technical Compliance Rate

January – June 2024

7,108 Inspections

- 2,715 Failed

TCR (9e=0)

- 4,393 Passed

TCR (9e=1)

- **61.80%**

July – December 2024

6,179 Inspections

- 2,509 Failed

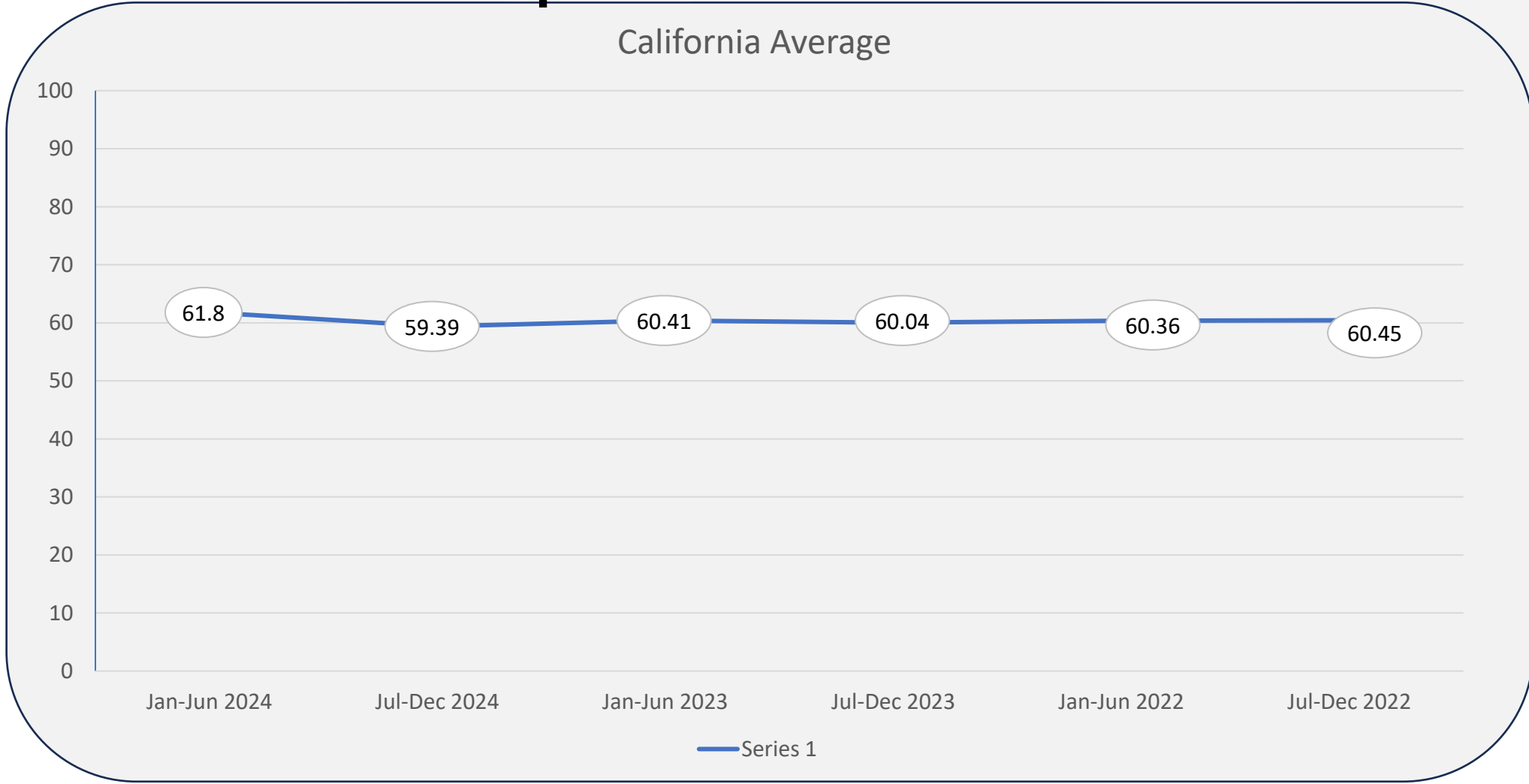
TCR (9e=0)

- 3,670 Passed

TCR (9e=1)

- **59.39%**

Technical Compliance Rate



Technical Compliance Rate

Example

- 100 Inspections
- 35 Failed TCR (9e=0)
- 65 Passed TCR (9e=1)
 - 65%

Question 4 – Slido Placeholder

Question 5 – Slido Placeholder

Low TCR in Evaluations

- Report 6 for Evaluation Window
 - UST Inspectors have a good rate of citing violations
 - Violations are being reissued each year without RTC

0-40%
Range

Lack of
Enforcement

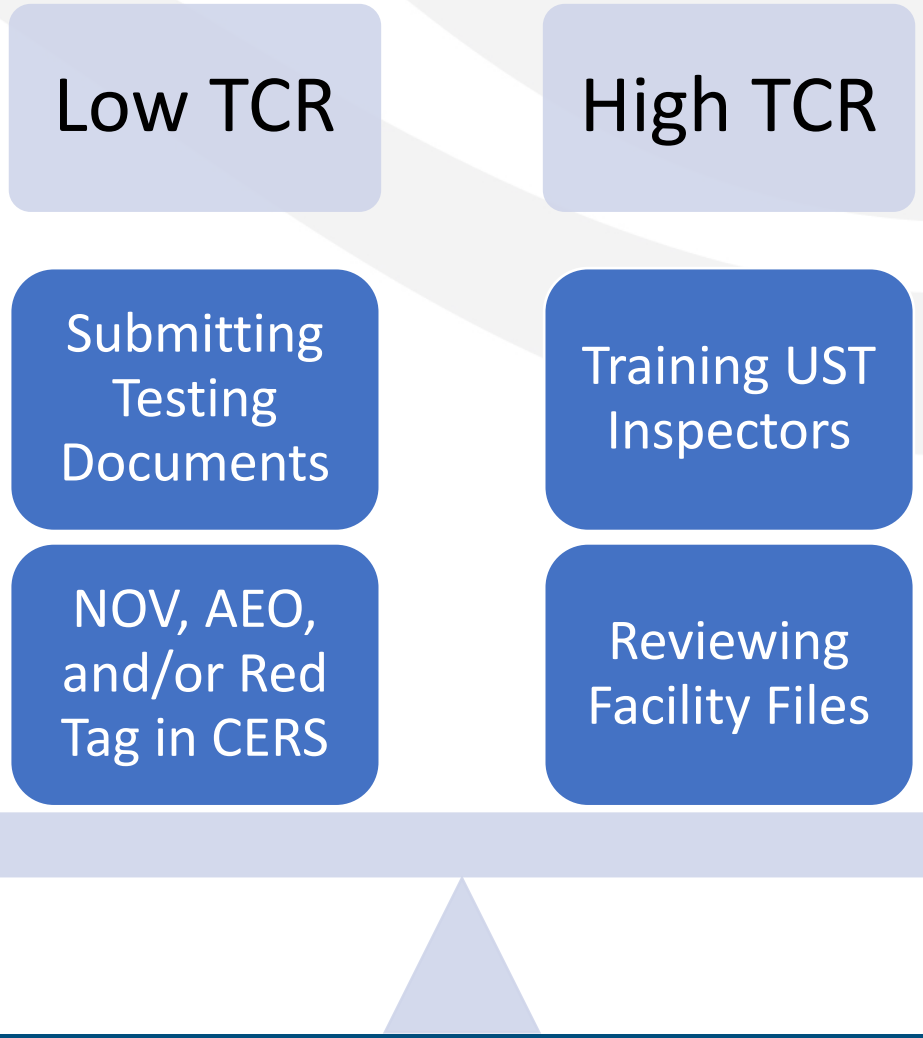
High TCR in Evaluations

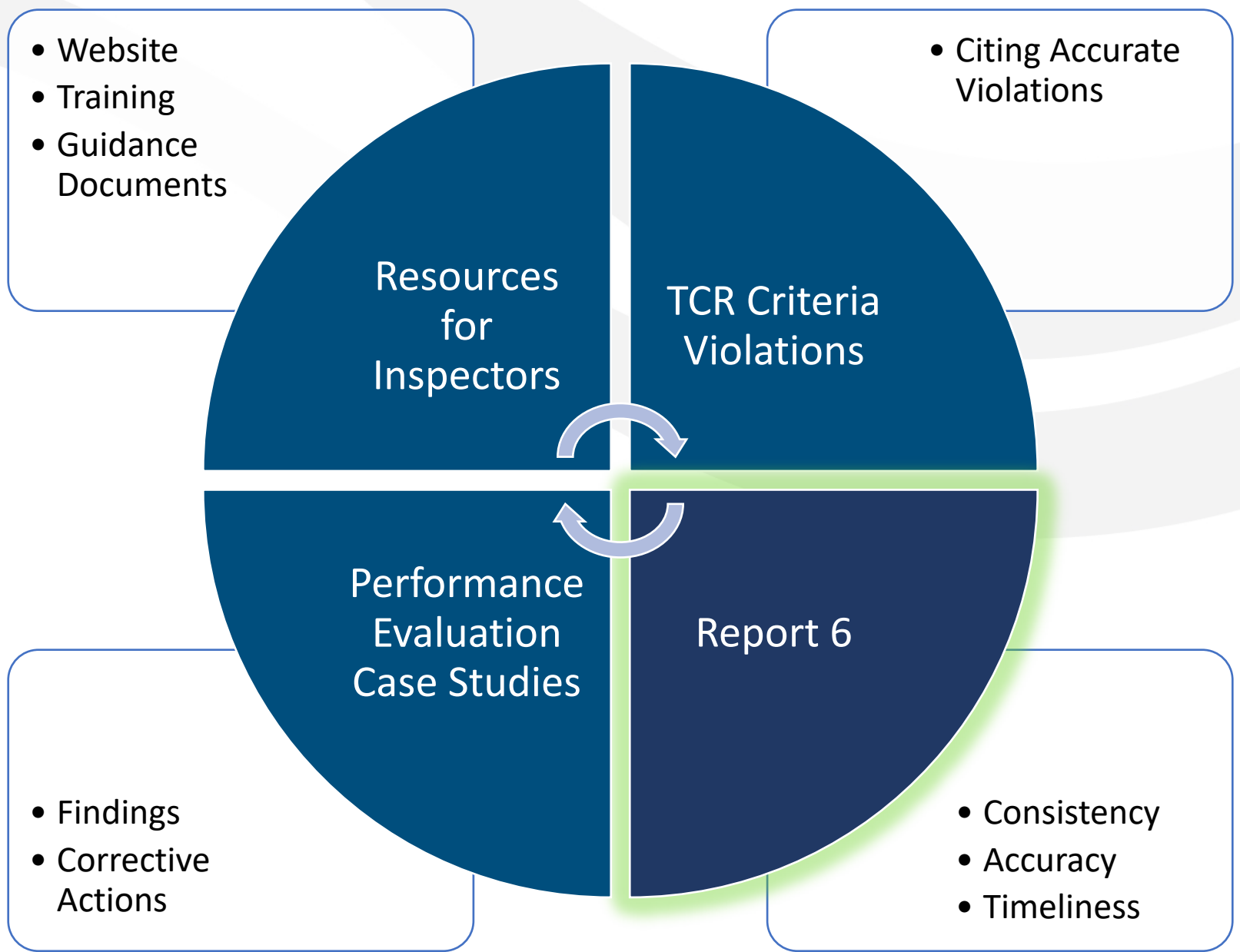
- Report 6 for Evaluation Window
 - CERS Data Transfer Issues
 - UST Inspectors have a poor rate of citing violations
 - Potentially **NO** TCR violations cited for years

80-100%
Range

Need for
Training

Corrective Actions





Overview

U.S. EPA Reporting Requirement

- Deadlines: March 1 and September 1

Data for LUST Trust Fund

- Cleanup efforts, enforcement, and remediation

Reporting Types

Components

Paper

- Manual entry

Paperless

- 87% of UPAs (77 of 89)
- Verified information is Correct in CERS

- Regulated UST Facilities
- Active Petroleum UST Systems
- Active Non-Petroleum UST Systems
- TCR Information
- Red Tags Data
- Abandoned UST Facility Information
- Temporary Closure Facility Information
- Discrepancies

CERS Reports for Paperless Reporters

Report 6

Red Tags

UST Facility Tank Data Download

UST Program Report: Inspection Summary Report by Regulator (Report 6)

Regulator: State Water Resources Control Board

Inspection Date Range: [] to []

Include Breakdown Data:

Generate Excel Report

UST Program Report: Red Tag Facility Details Report

Regulator: State Water Resources Control Board

Red Tag Issued Between: [] to []

Generate Excel Report

UST Program Report: UST Facility/Tank Data Download

Regulator: -- All Regulators --

CERS ID: []

Tank Use: -- All Uses --

Tank Primary Containment: -- All Containment Types --

Piping Primary Containment: -- All Containment Types --

Convert Codes to Display Values:

Date Submitted: [] to []

Tank Contents: -- All Contents --

Tank Capacity: [] to [] Gallons

Date Installed: [] to []

Accepted Submittal Only:

Last Submittal Only (regardless submittal status):

Generate Excel Report

Report 6

	A	B	C	D	E	F	G	H	I
1	Run Date: 2/19/2025 8:07:54 AM								
2	Inspection Date Range: 7/1/2024 To 12/31/2024								
3									
4	Regulator	# of Active Regulated Facilities	# Active Petroleum Systems	# Closed Petroleum Systems	Petroleum Systems reclassified under APSA	# Active Haz Sub Systems	# Closed Haz Sub Systems	Haz Systems reclassified under APSA	# Routine Inspections
5		727	2088	9	0	32	2	0	353
6	Total	727	2088	9	0	32	2	0	353

- Active Regulated Facilities
- Active Petroleum Systems
- Active Hazardous Substance Systems

Technical Compliance Rate Determinations							
9a	9b	9c	9d	9e	10	11	12
Spill Prevention	Overfill Prevention	Corrosion Protection	Release Detection	Technical Compliance Rate	DO/Owner Training	Financial Responsibility	DO Inspection
298	322	353	239	190	337	320	328
298	322	353	239	190	337	320	328

- TCR Breakdown

UST Inventory Changes

UST Facility Tank Data Download

- UST Installs
- UST **Closures**

L	M	N	O	P	Q
General UST Tank Permit Info					
433	434	436	435	430-a	430-b
Tank Manufacturer	Tank Configuration	Tank Capacity In Gallons	Date UST System Installed	Date UST Permanently Closed	Date Existing UST Discovered
	A Stand-alone Tank	25000	8/1/1998		
	A Stand-alone Tank	1000	8/1/1998		
	A Stand-alone Tank	25000	8/1/1998		
	A Stand-alone Tank	500	8/1/1998		
	A Stand-alone Tank	500	8/1/1998		
ern Weld	A Stand-alone Tank	10000	1/1/1987		

Abandoned USTs

Abandoned UST Checklist



Abandoned USTs

- Inspected Annually
- Have a failing TCR
- 9e=0

Temporary Closures

Temporary Closures

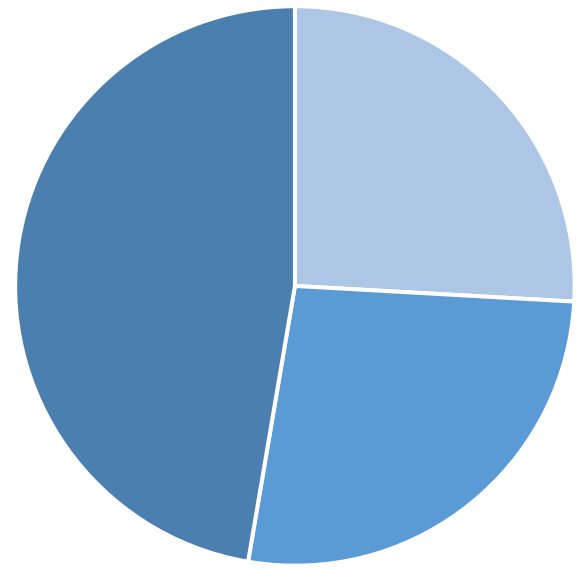
- Inspected Annually
- Identified each cycle
- May not have failing TCR

103	104		430	432	432-a
Facility Street Address	Facility City	Facility ZIP Code	Type of Action	Tank ID	CERS TankID
1049 BALD ROCK Rd	BERRY CREEK	95916	Temporary UST Closure	2	10276117-0
1049 BALD ROCK Rd	BERRY CREEK	95916	Temporary UST Closure	3	10276117-0
1049 BALD ROCK Rd	BERRY CREEK	95916	Temporary UST Closure	1	10276117-0
8226 Skyway	Paradise	95969	Temporary UST Closure	diesel	10276219-00
8226 Skyway	Paradise	95969	Temporary UST Closure	87	10276219-00
8226 Skyway	Paradise	95969	Temporary UST Closure	91	10276219-00
2639 ORO DAM Blvd	OROVILLE	95966	Temporary UST Closure	2	10276243-0
2639 ORO DAM Blvd	OROVILLE	95966	Temporary UST Closure	3	10276243-0

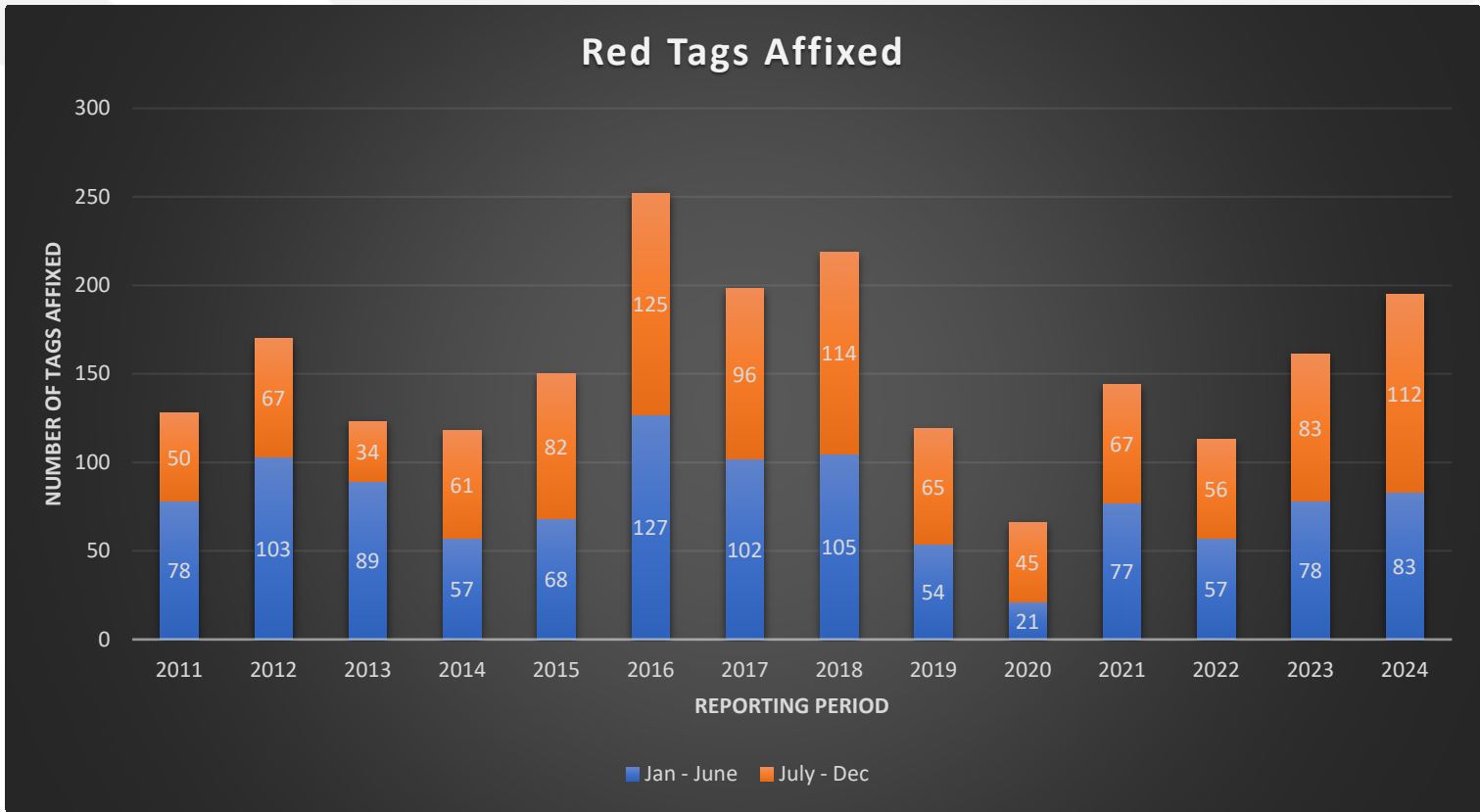
Question 6 – Slido Placeholder

Red Tag Data

2024 Red Tags



■ Liquid Release ■ Impaired Leak Detection ■ Recalcitrant



Red Tags

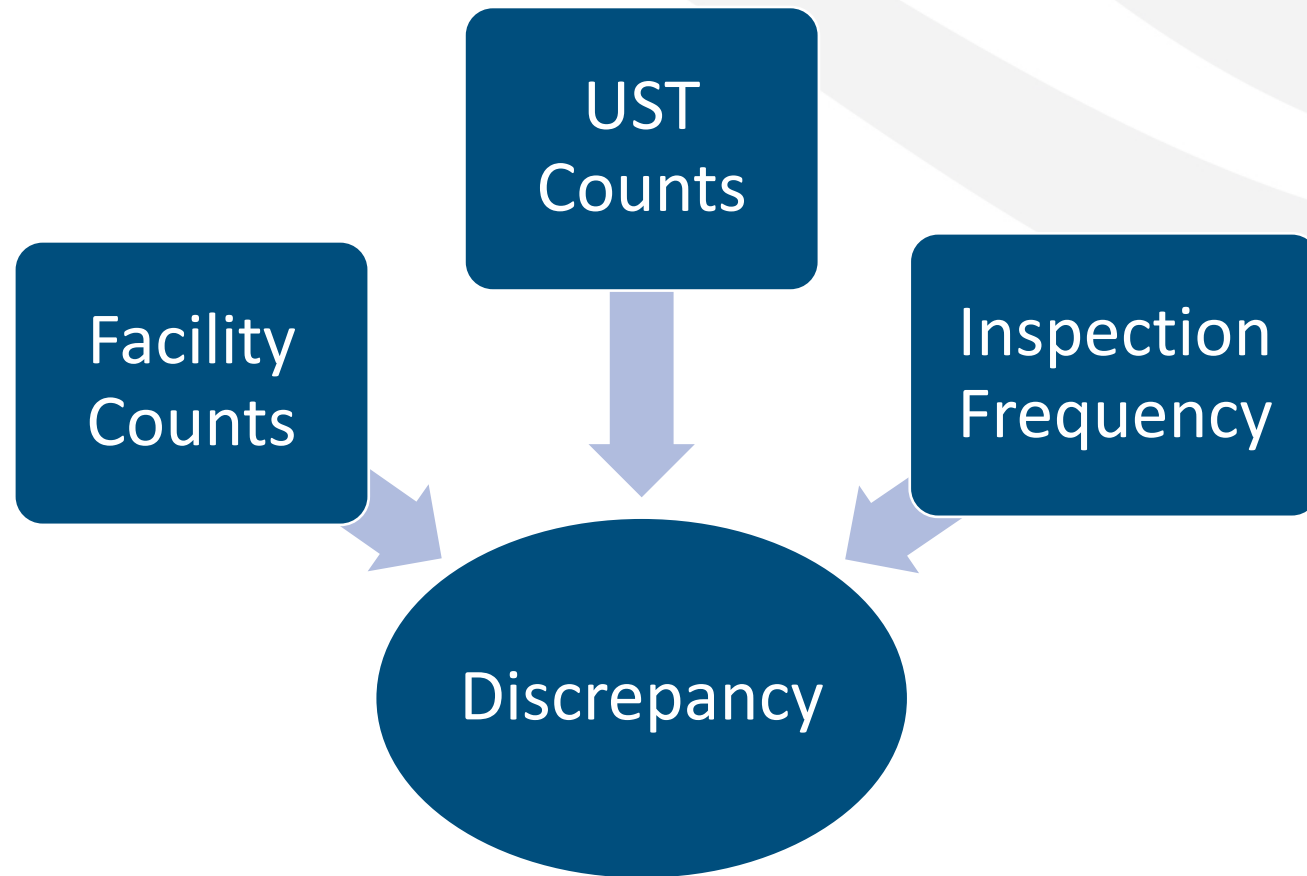
Reminder, all enforcement
needs to be entered into
CERS



How to enter Red Tag information



Reporting Discrepancies



- Use the UST Discrepancy boxes for any deviation from CERS

- 27% of discrepancies were identified by UPA

Reporting Discrepancies

Petroleum UST Discrepancies

Column B: 724 actual active regulated facilities this reporting period not 728. Facilities with CERS id's 10965796, 10968181, 10971187 and 10974355 are in plan check pending a final inspection and are not yet active regulated facilities ($728 - 4 = 724$). 714 facilities last reporting period: 11 New facilities and 1 facility closed ($714 + 11 - 1 = 724$)

Column C: 2084 actual active petroleum systems this reporting period not 2095. CERS id 10475404 reporting 2 tanks but one tank was recently added and is still in plan check and pending a final inspection; CERS id 10965796 is reporting 3 tanks but still in plan check pending a final inspection and CERS id 10971187 just completed construction 2/13/2025 and is reporting 7 new tanks which will be counted next reporting period ($2095 - 11 = 2084$). 2053 active petroleum systems last reporting period; 41 new systems, 10 systems closed for a net change of +31 petroleum systems ($2053 + 31 = 2084$)

Column D: 10 actual closed petroleum systems this reporting period not 9. CERS id 10141909 closed 1 tank system and is no longer reporting in CERS for a total of 10 closed petroleum systems.]

Hazardous Substance UST Discrepancies

Column F: No Discrepancies. 34 non-petroleum tanks last reporting period with 2 removed for a total of 32 remaining.

Column G: No Discrepancies. 2 non-petroleum tanks removed.]

- Use the UST Discrepancy boxes for any deviation from CERS

- 27% of discrepancies were identified by UPA

Rejection

Agency Code: 19070	Reporting Period: July – Dec 2024
Agency Name	[REDACTED]
Person Completing Form	
Phone Number	
Email Address	
Number of Field Constructed USTs at end of reporting period	
Check if NO Abandoned USTs	<input checked="" type="checkbox"/>
Check if NO Temporarily Closed USTs	<input type="checkbox"/>

What will result in a rejected Report 6?

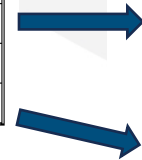
- Incomplete Forms
- Outdated Forms
- Inaccurate Data

I certify that the following information was verified on 02/20/2025 as correct in California Environmental Reporting System (CERS) Report 6 and the Red Tag Report for the reporting period. 07/01/2024 – 12/31/2024

Rejection

Agency Code: 19070		Reporting Period: July – Dec 2024	
Agency Name			
Person Completing Form			
Phone Number			
Email Address			
Number of Field Constructed USTs at end of reporting period			
Check if NO Abandoned USTs		<input checked="" type="checkbox"/>	
Check if NO Temporarily Closed USTs		<input type="checkbox"/>	

I certify that the following information was verified on 02/20/2025 as correct in California Environmental Reporting System (CERS) Report 6 and the Red Tag Report for the reporting period. 07/01/2024 – 12/31/2024



Agency Code: 19070		Reporting Period: July - December 2024	
Agency Name			
Person Completing Form			
Phone Number			
Email Address			
Number of Field Constructed USTs at end of reporting period		0	
Check if NO Abandoned USTs		<input checked="" type="checkbox"/>	
Check if NO Temporarily Closed USTs		<input type="checkbox"/>	
Number of Red Tags issued this reporting period		0	

I certify that the following information was verified on 2/26/2025 as correct in California Environmental Reporting System (CERS) Report 6 and the Red Tag Report for the reporting period. 07/01/2024 – 12/31/2024

Corrections to Report 6 must be submitted by the deadline

Most Common Rejection

What would cause this Report 6 to be rejected?

A	B	C	D	E	F	G	H	I
Regulator	CERSID	# Active Petroleum Systems	# Closed Petroleum Systems	Petroleum Systems reclassified under APSA	# Active Haz Sub System	# Closed Haz Sub System	Haz Systems reclassified under APSA	# Routine Inspections
		4	0	0	0	0	0	2
		1	0	0	0	0	0	3
		3	0	0	0	0	0	2
		2	0	0	0	0	0	3
		3	0	0	0	0	0	3
		3	0	0	0	0	0	2
		3	0	0	0	0	0	1
		3	0	0	0	0	0	4
		2	0	0	0	0	0	2
		0	0	0	0	0	0	4
		1	0	0	0	0	0	1

Duplicate Routine Inspections

How to Report a Multi-Day Inspection:



Routine Inspections

- One annually
- “Other” inspection type
- Discrepancies identified

Report 6 Corrective Actions

Report 6

- Two consecutive cycles

Facility File Review

- Inspection Reports
- Associated Leak Detection/Testing Documents

6 of 18 (30%)
of 2024
Evaluations

Report 6 Website

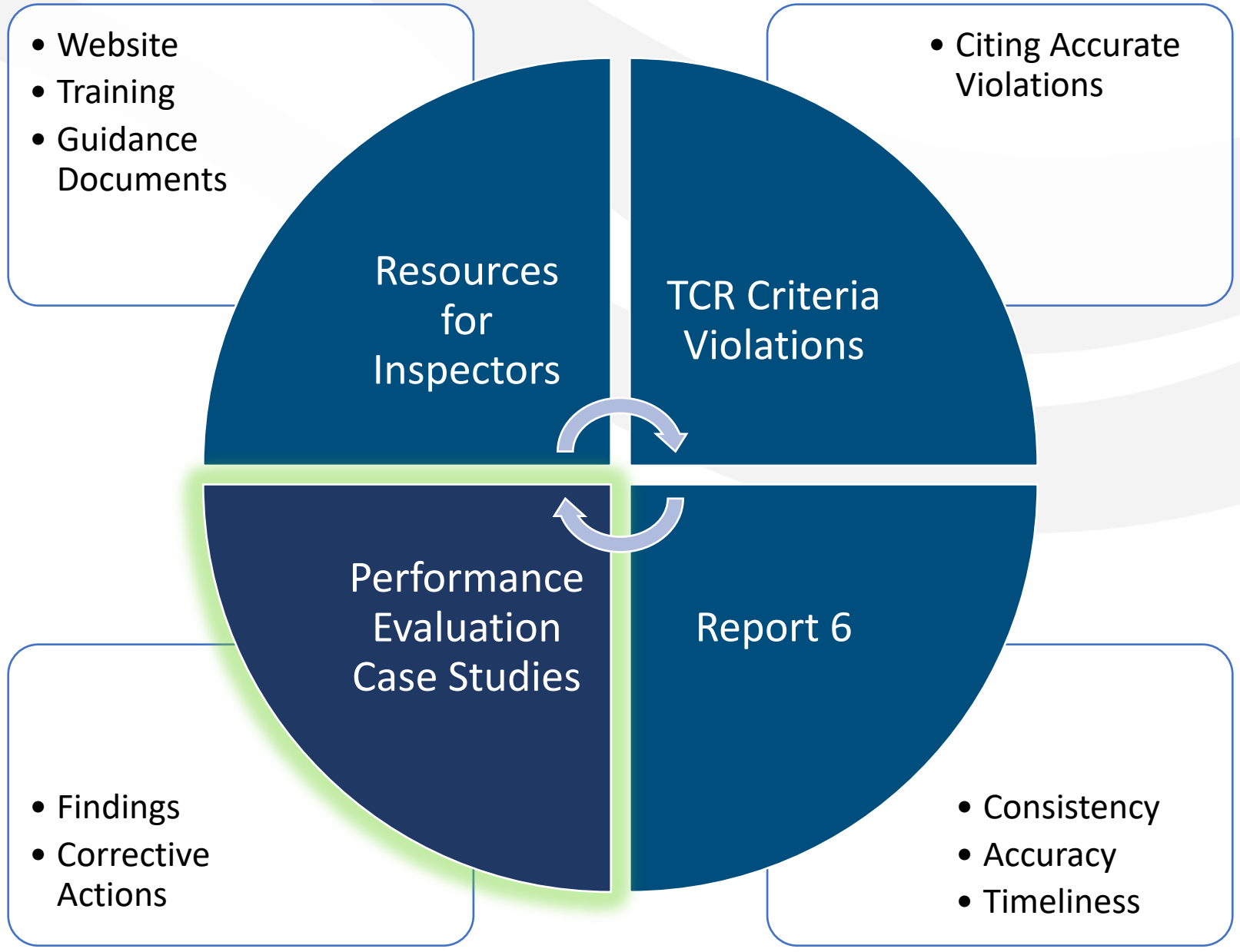
Report 6

Semi-Annual UST Program Report

- Report 6
 - Semiannual/Quarterly Data
 - January - June 2024
 - July - December 2023
 - January - June 2023
 - July - December 2022
 - January - June 2022
 - July-December 2021
 - January - June 2021
 - July - December 2020
 - January - June 2020
 - July - December 2019
 - January - June 2019
 - Red Tag Regulations, Instructions and Reported Data
 - List of Reported Abandoned UST Facilities

Report 6 and Compliance Inspection Report

- Accuracy of Data Provided
- Timeliness of Reporting

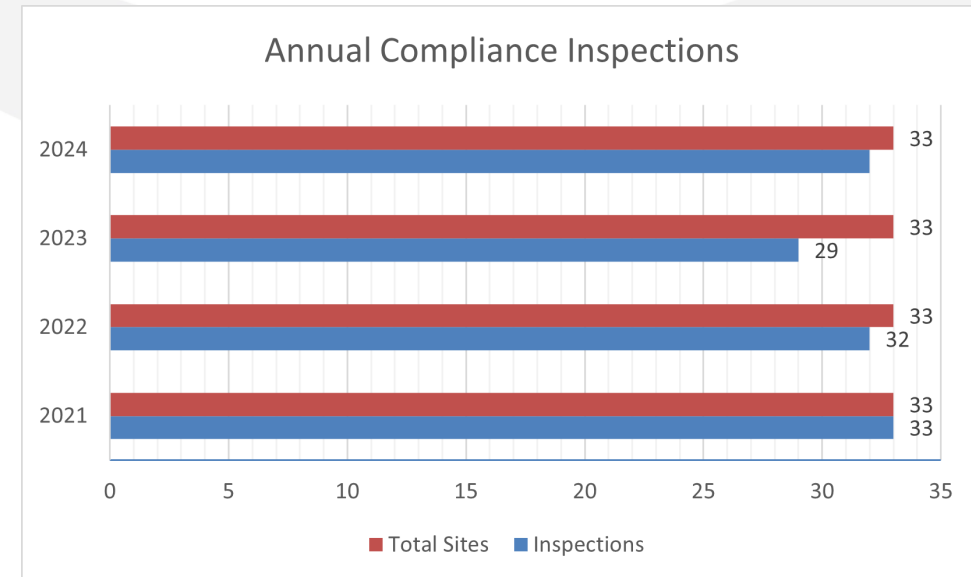


Example 1

Example 1

Annual Compliance Inspections

- 2021: 33 of 33 (100%)
- 2022: 32 of 33 (97%)
- 2023: 29 of 33 (91%)
- 2024: 32 of 33 (97%)



Example 1

Technical Compliance Rate:

A) Jan – June 2024: 71%

B) July – Dec 2024: **94%**

C) Jan – June 2023: **82%**

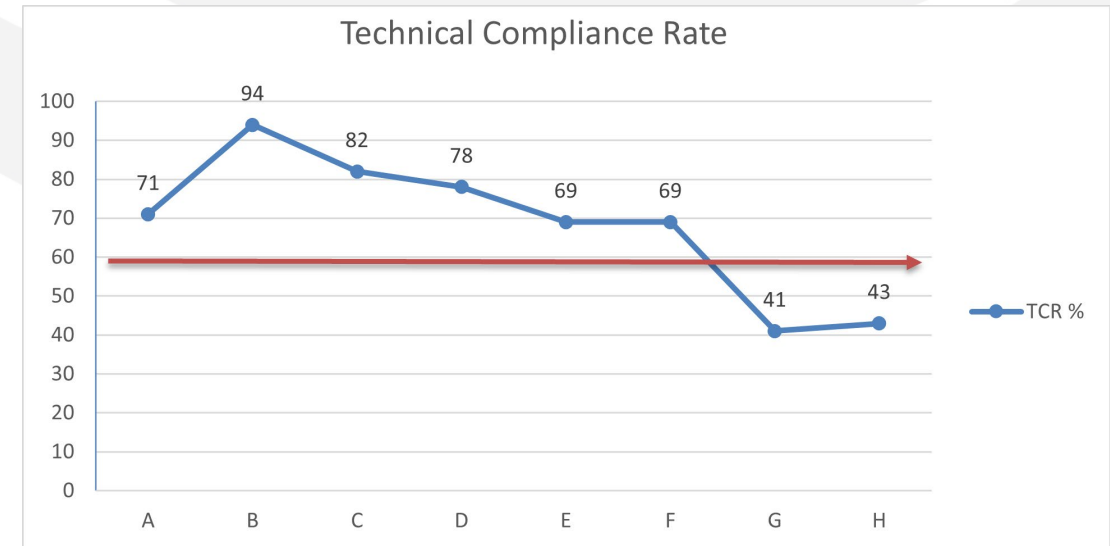
D) July – Dec 2023: 78%

E) Jan – June 2022: 69%

F) July – Dec 2022: 69%

G) Jan – June 2021: **41%**

H) July – Dec 2021: **43%**



Example 1 - Abandoned Facility and TCR

Inspection

Report 6 Information	No	Yes
Facility in compliance with Spill Prevention (USEPATCR 9a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Overfill Prevention (USEPATCR 9b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Corrosion Protection (USEPATCR 9c)	<input type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Release Detection (USEPATCR 9d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with USEPATCR 9a, 9b, 9c and 9d (USEPATCR 9e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Designated Operator Training (USEPATCR 10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Financial Responsibility (USEPATCR 11)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facility in compliance with Designated Operator Inspection Requirements (USEPATCR 12)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Report 6 TCR

J	K	L	M	N	O	P	Q
Technical Compliance Rate Determinations							
9a Spill Preventic	9b Overfill Prevention	9c Corrosion Protection	9d Release Detection	9e Technical Compliance Ra	10 DO/Owner Training	11 Financial Responsibilit	12 DO Inspectio
1	1	1	1	1	1	1	1

CERS

Violation Details

	Occurred On	Type	Class
Select	5/22/2024	Permanent Closure (USEPA Priority)	Class 2

Example 1 -Red Tags Not Uploaded to CERS

CUPA Identified Red Tag

Red Tag Facility Name	CERS ID	Red Tag Number	Date Affixed	Date Removed	Significant Violation
[REDACTED]	[REDACTED] 547	[REDACTED]	9/10/24	N/A	3

Facility Identification and Location			General Enforcement Information					
1a	1	3	914	915				913b
CERS ID	Facility ID	Facility Name	Type of Enforcement Action	Date of Enforcement Action	Count of Linked Class I Violations	Count of Linked Class II Violations	Count of Linked Minor Violations	Red Tag Issued
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	11/14/2023	0	1	0	No
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	11/14/2023	0	2	0	No
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	11/14/2023	1	3	0	No
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	12/9/2024	0	1	0	No
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	11/14/2023	3	2	0	No
[REDACTED]	[REDACTED]	[REDACTED]	Notice of Violat	11/14/2023	1	0	0	No

No Enforcement Identified

Example 1 – Corrective Actions

Issue #1

- Lack of enforcement

Issue #2

- Violation identification

Issue #3

- Abandoned facility inspection - TCR

Corrective Action

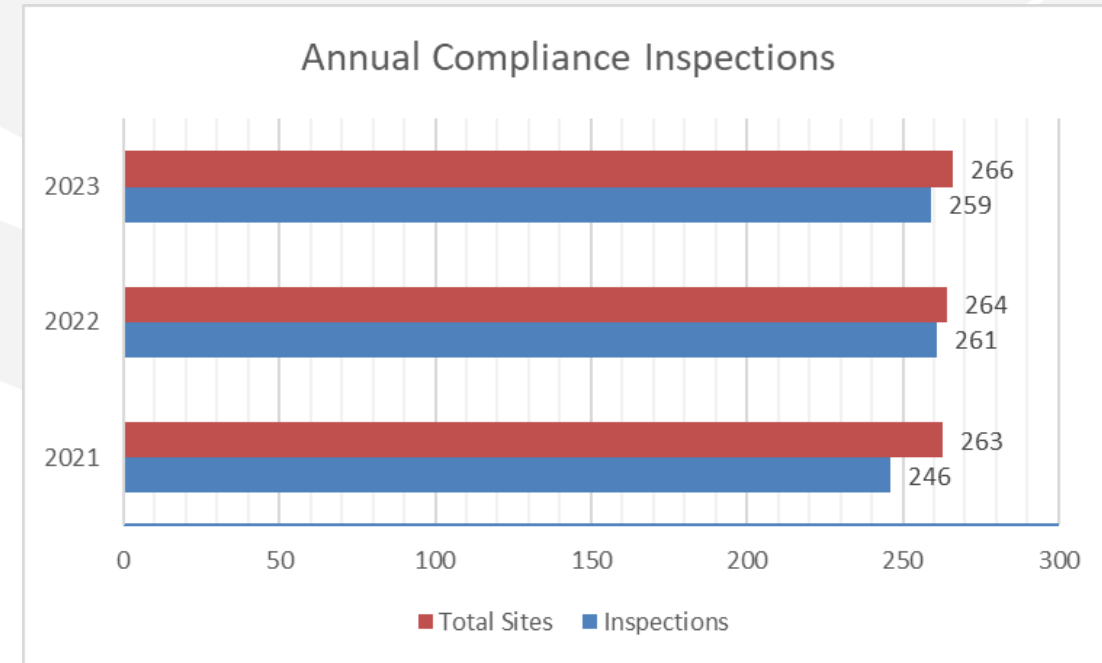
- Revise applicable procedures
- Train staff
- Report 6
- Provide facility records for State Water Board to review

Example 2

Example 2

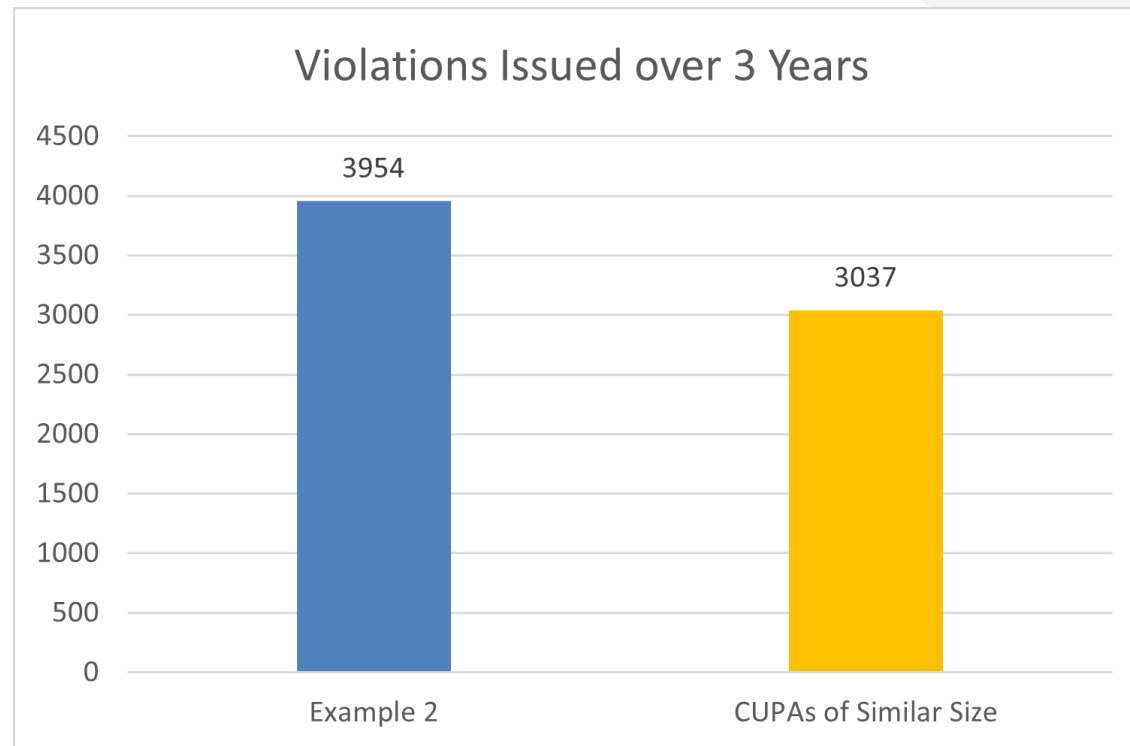
Annual Compliance Inspections

- 2021: 246 of 263 (93%)
- 2022: 261 of 264 (98%)
- 2023: 259 of 266 (97%)



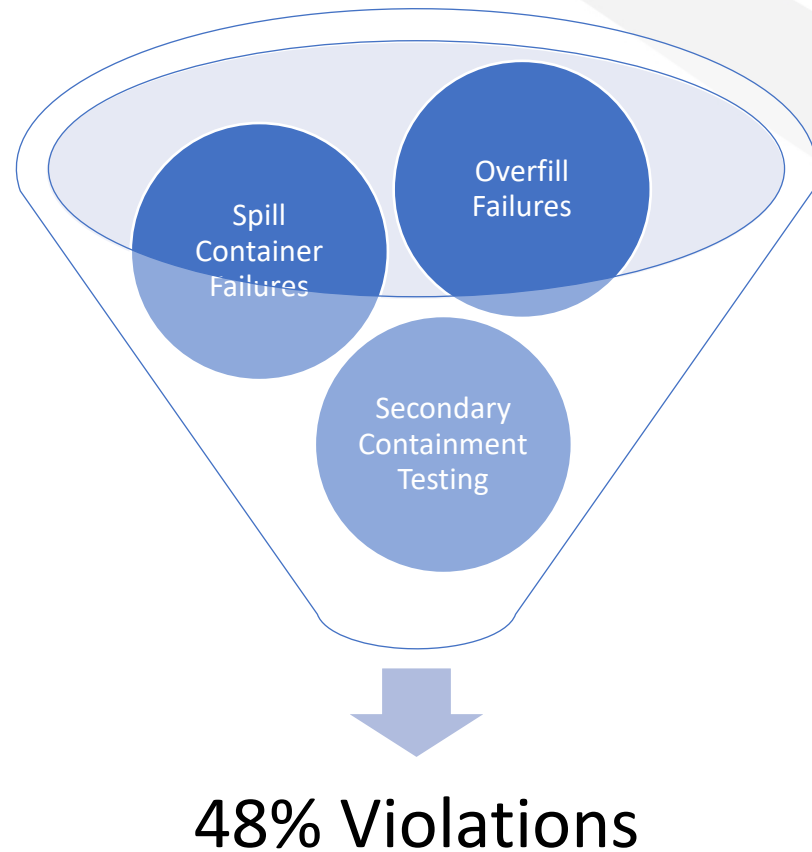
Example 2

2020-2023 Violation Data



- Averaged 8 CUPAs of similar size
- Example had written 917 more Violations in 3 years
 - 305 Per Year

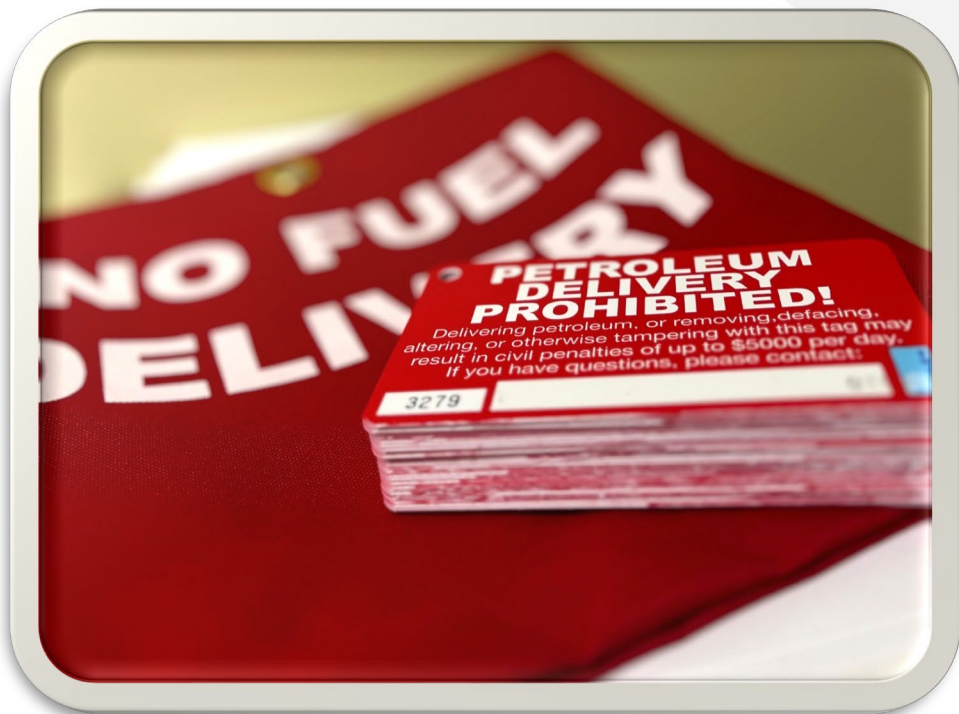
Example 2 – Issue 1



CME Data

- 984 Open Violations
 - 3.7 per facility
- 12 sites
 - Failed initial 2018 Overfill
 - Never conducted a second

Example 2 – Issue 1



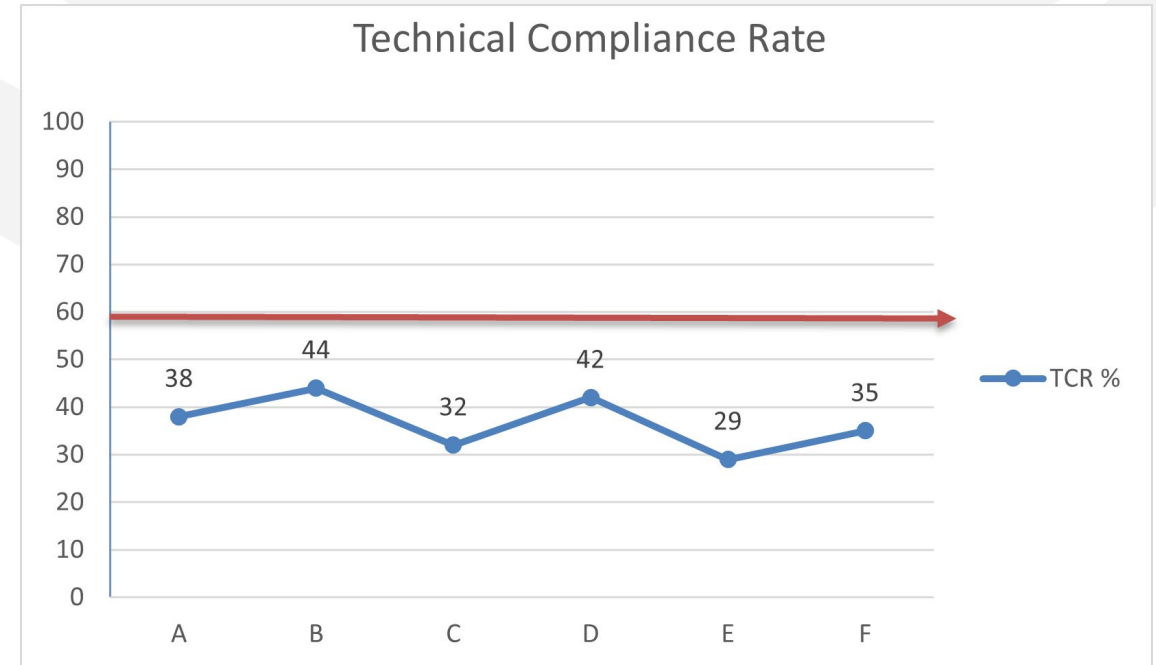
CME Data

- 882 NOVs in CERS
- 27 Red Tags 2020-2024
- 12 from Office of Enforcement

Example 2 – Technical Compliance Rate

- A) Jan – June 2023: **38%**
- B) Jan – June 2022: **44%**
- C) July – Dec 2022: **32%**
- D) Jan – June 2021: **42%**
- E) July – Dec 2021: **29%**
- F) Jan – June 2020: **35%**

[CA Average: 59-61%]



Example 2 – Issue 2

CERSID	OccurredOn	Type	CMEProgramE	ViolationCou	ViolationsRTCon	CMEDat
220	7/17/2023 12:00 AM	Other	UST	0		Approved
220	6/20/2023 12:00 AM	Routine	UST	9		Approved
220	6/15/2022 12:00 AM	Routine	UST	3		Approved
220	6/2/2021 12:00 AM	Routine	HMRRP	0		Approved
220	6/2/2021 12:00 AM	Routine	UST	15		Approved
220	10/28/2019 12:00 AM	Other	UST	0		Approved



Example 2 – Corrective Actions

Issue #1

- Lack of Enforcement as outlined in I&E Plan

Issue #2

- RTC not in CERS

Corrective Action

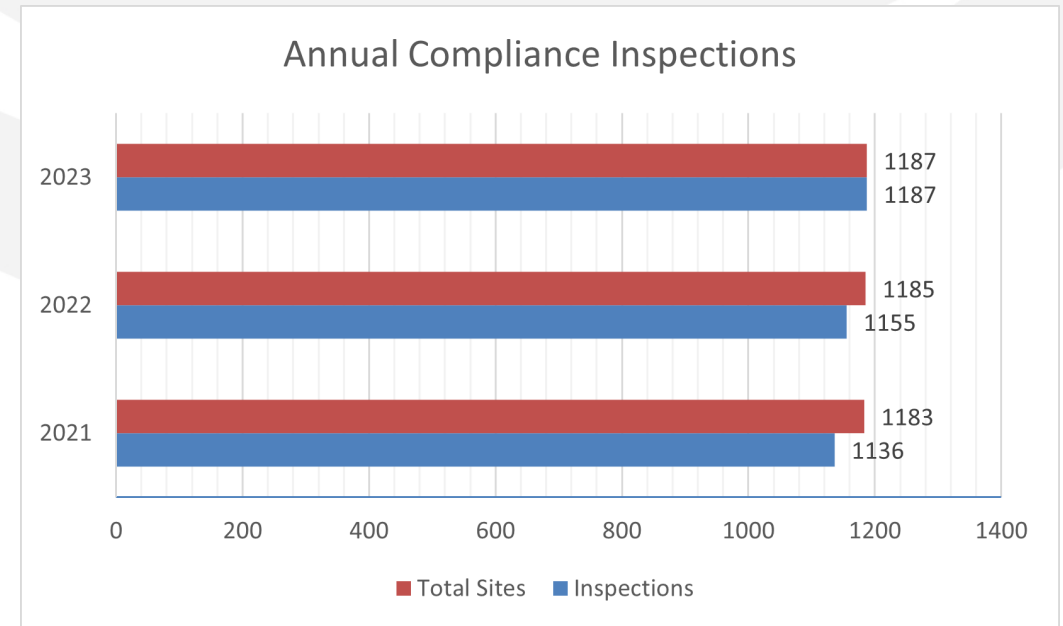
- Revise Training Documents
- Training on Red Tags/Enforcement
- Additional Facility File Review
- CERS Data Review of TCR Criteria

Example 3

Example 3

Annual Compliance Inspections

- 2021: 1136 of 1183 (96%)
- 2022: 1155 of 1185 (97%)
- 2023: 1187 of 1187 (100%)



Example 3

Technical Compliance Rate:

A) Jan – June 2023: 66%

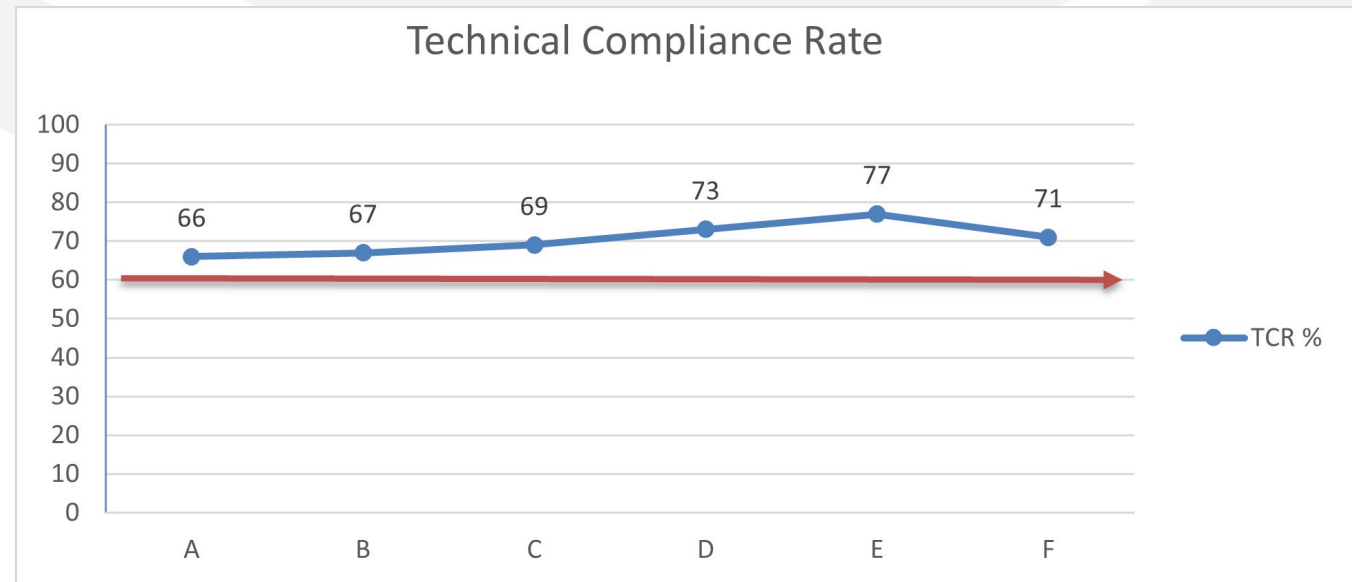
B) Jan – June 2022: 67%

B) July – Dec 2022: 69%

E) Jan – June 2021: 73%

F) July – Dec 2021: 77%

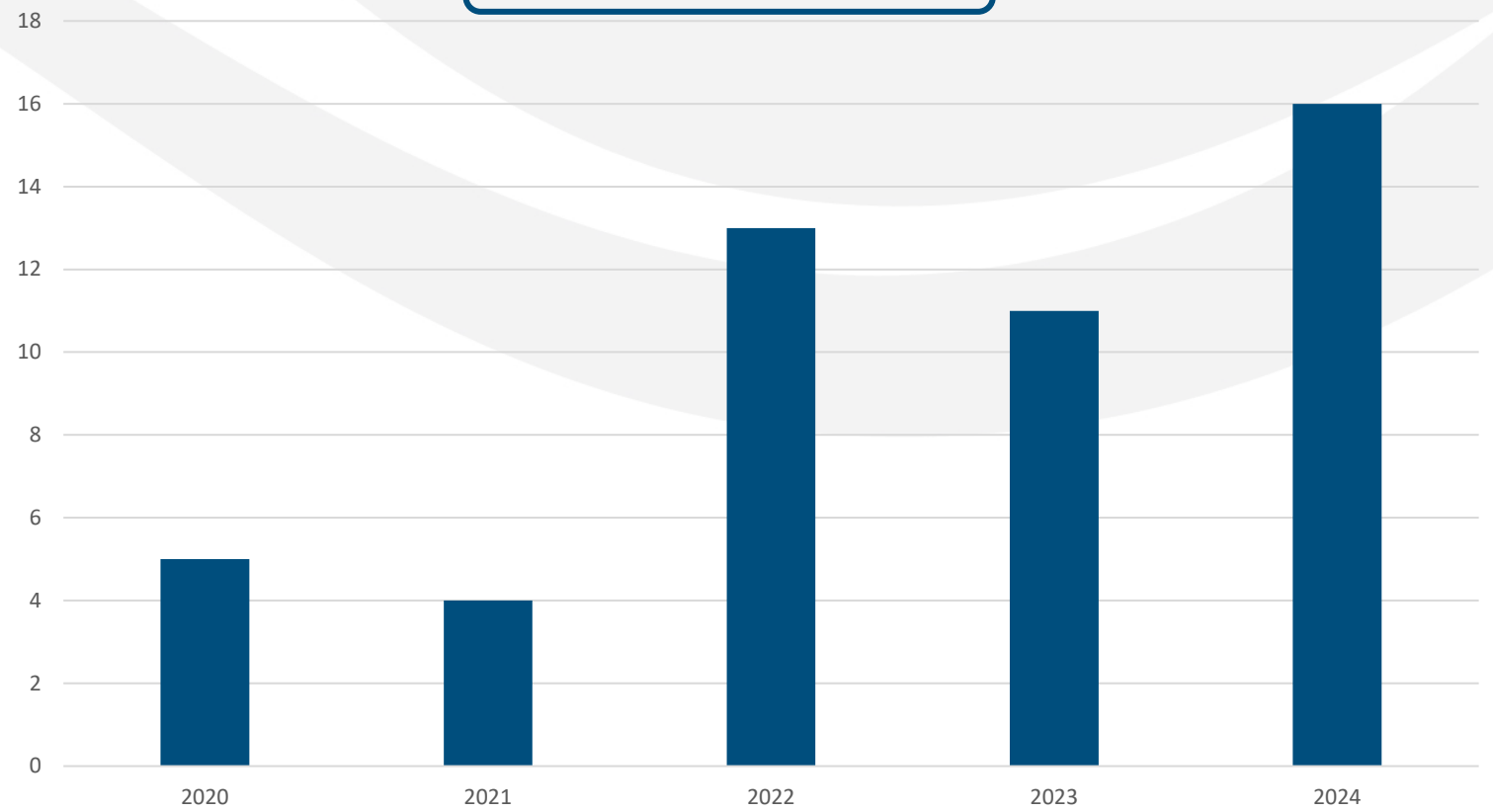
H) July – Dec 2020: 71%



Example 3

Responsible for
7 – 12% of all Red Tags applied
Between 2022 -2024

Red Tags Applied by Year



Example 3 – Corrective Actions

Corrective Action

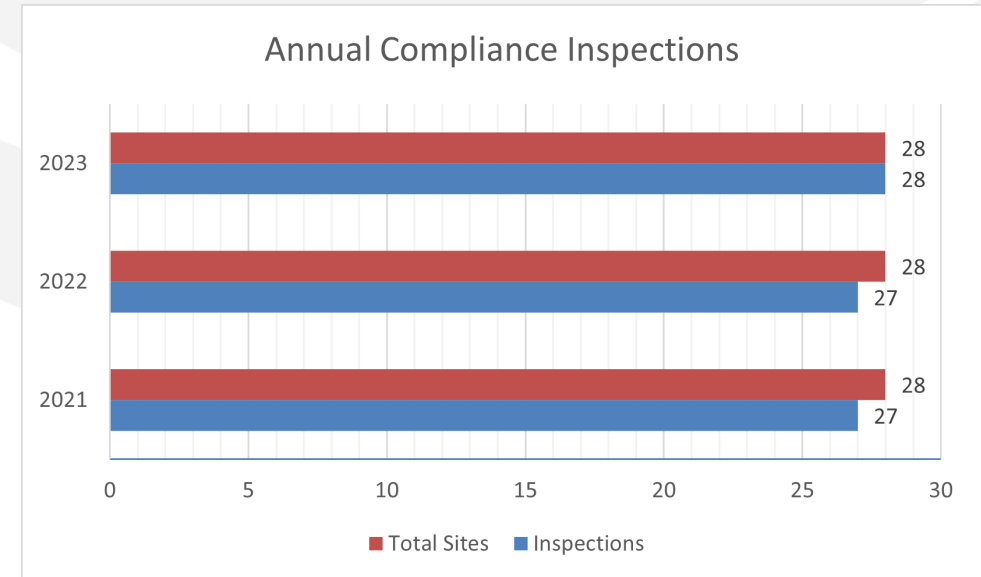
- Keep doing what you're doing

Example 4

Example 4

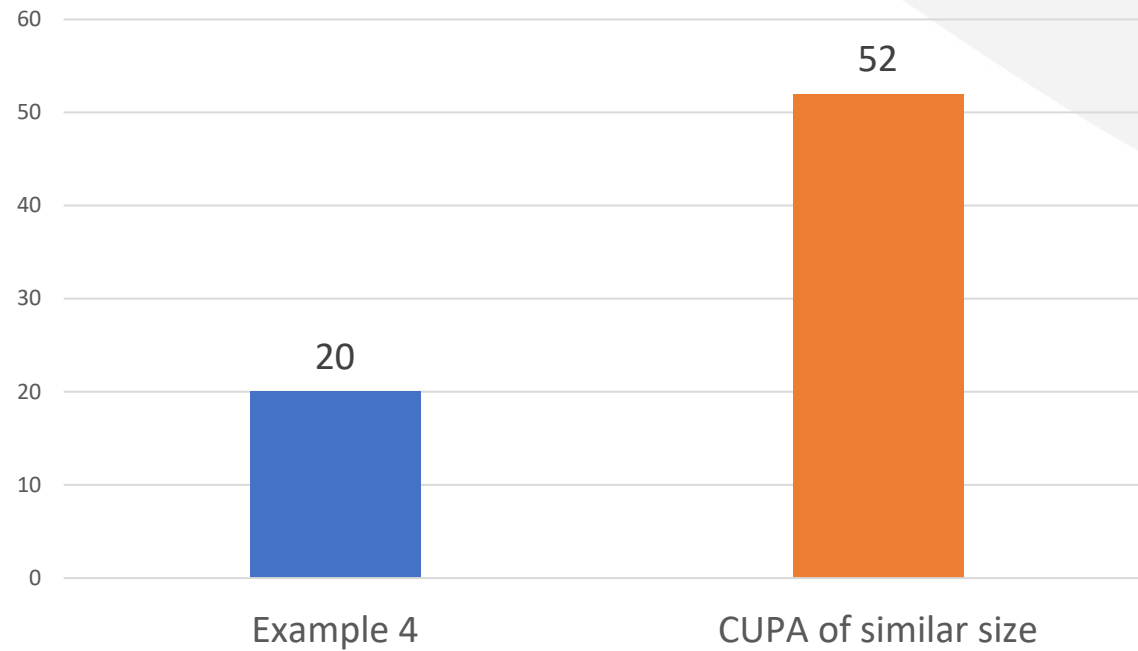
Annual Compliance Inspections

- 2021: 27 of 28 (96%)
- 2022: 27 of 28 (96%)
- 2023: 28 of 28 (100%)

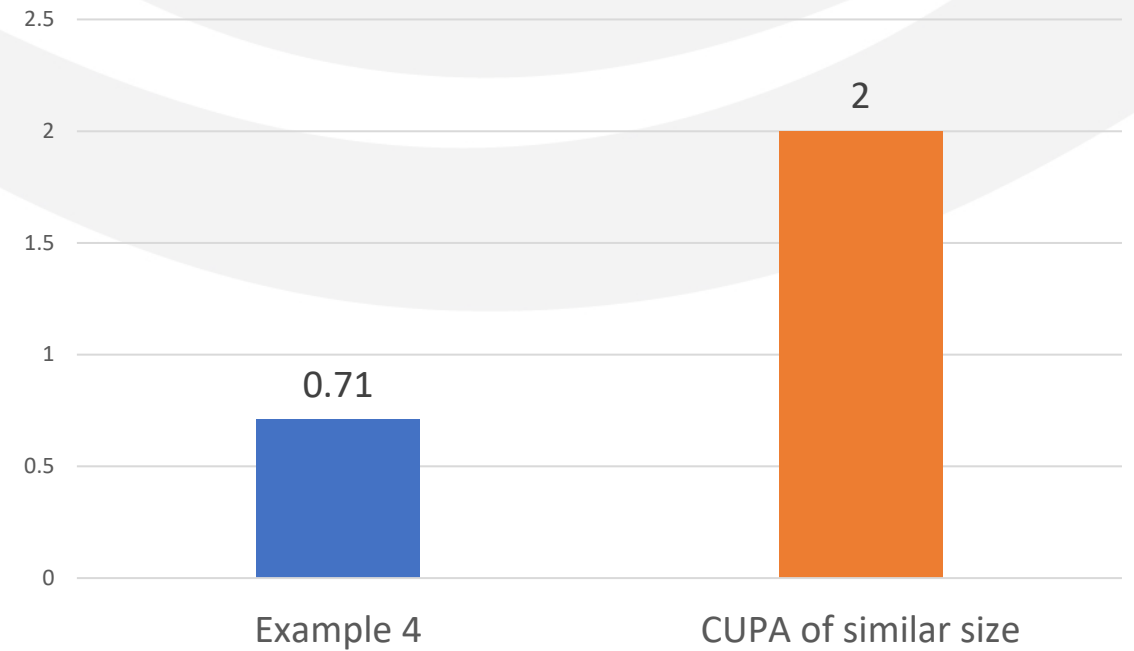


Example 4

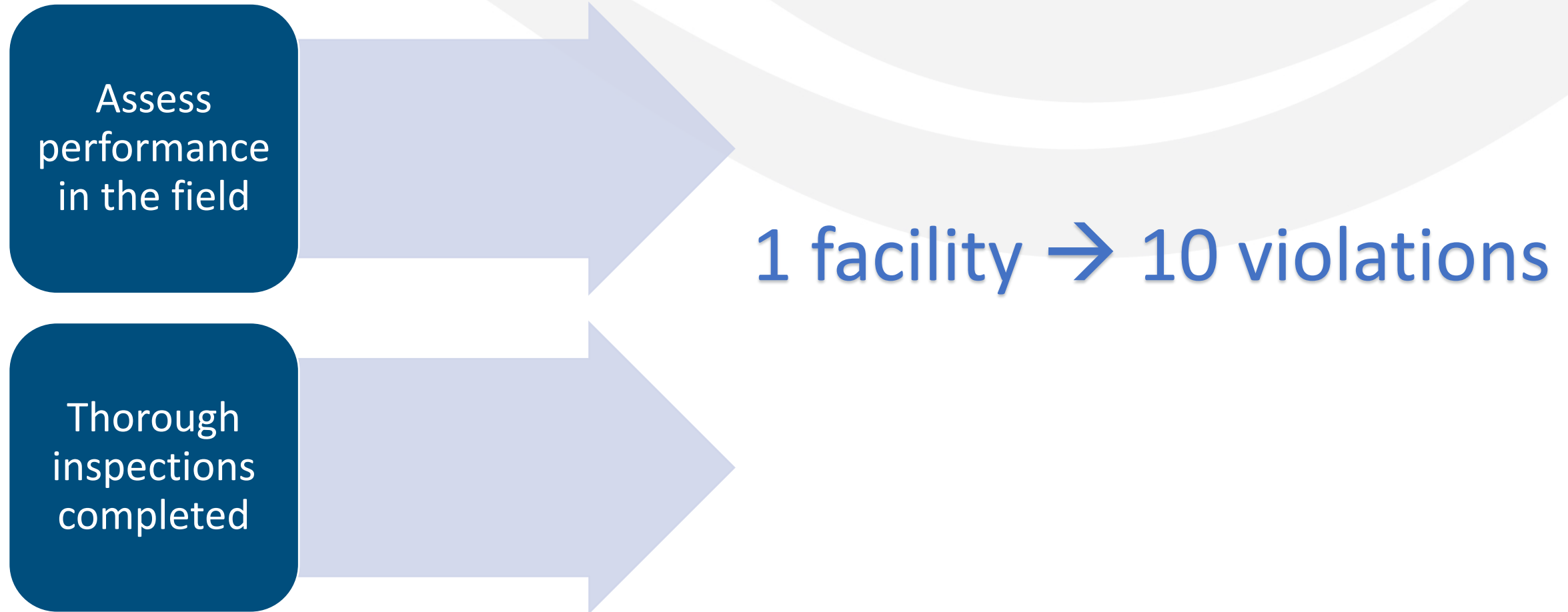
Violation issued over 3.5 years



Violations per Facility

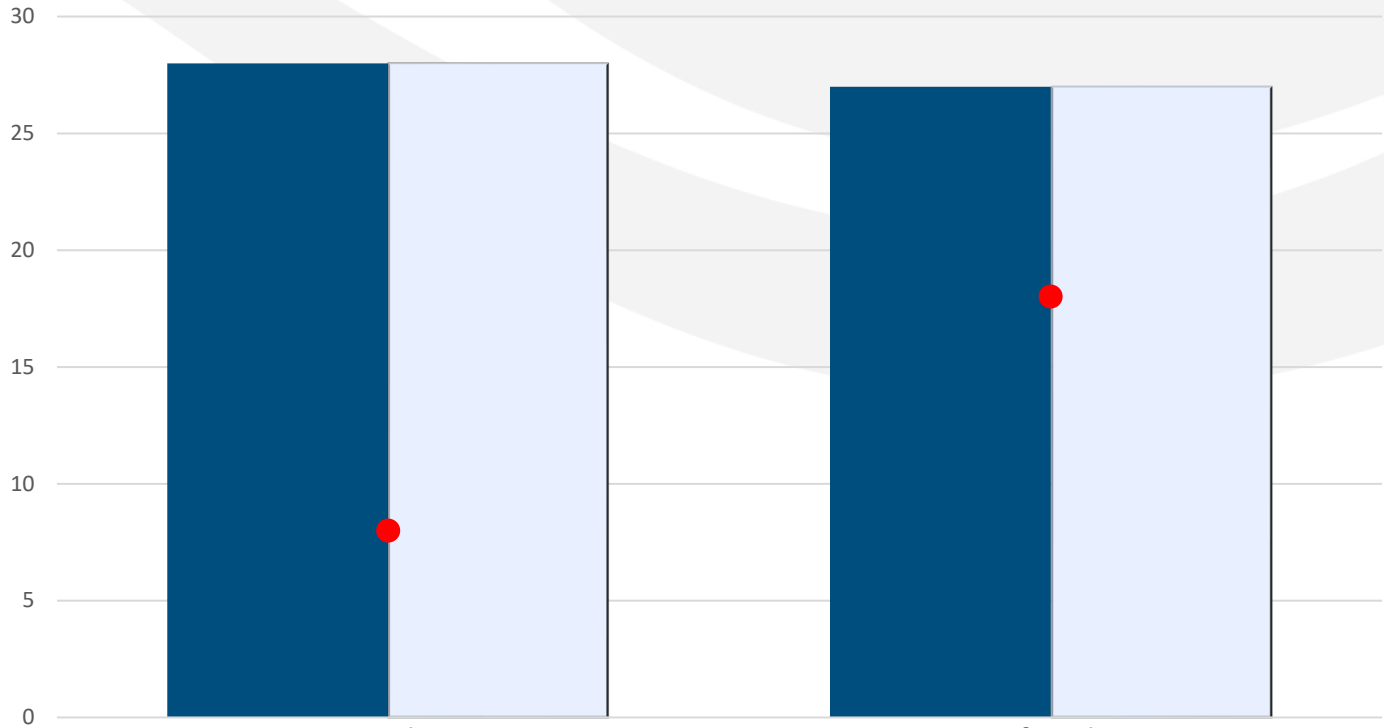


Example 4 – Oversight Inspection



Example 4

TCR Comparison



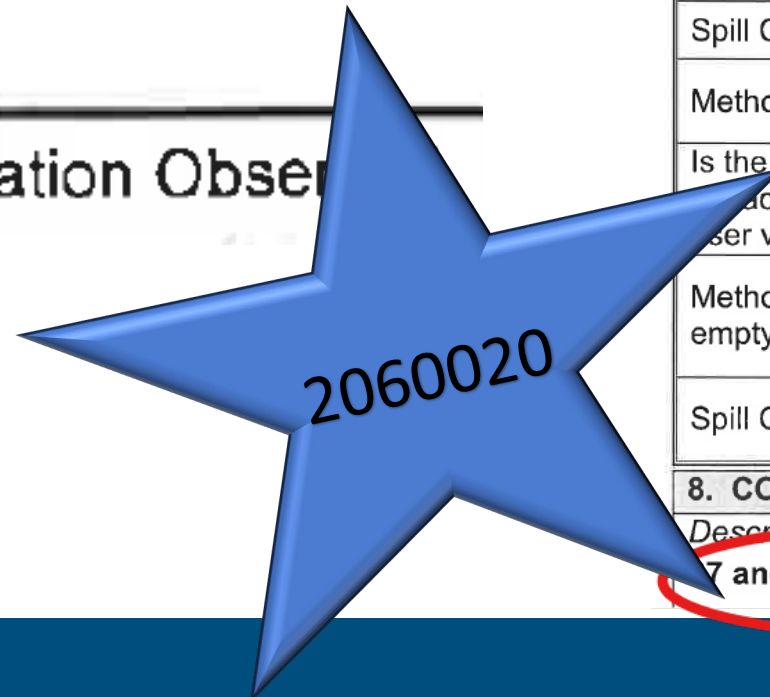
# of Regulated Facilities	28	27
# Routine Inspections	28	27
Total Number of TCR	8	18

Example 4

Spill bucket testing results submitted to the UPA within 30 days of testing

NVO UD NA OUT COS RPT VDG

NVO = No Violation Observed



Tank ID	87	91
Spill Container Manufacturer:	OPW	OPW
Method of Cathodic Protection	<input checked="" type="checkbox"/> Nonmetallic <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Nonmetallic <input type="checkbox"/> Other
Is the spill container minimum capacity five gallons excluding riser volume?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*
Method to keep spill container empty	<input checked="" type="checkbox"/> Drain <input type="checkbox"/> Pump <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Drain <input type="checkbox"/> Pump <input type="checkbox"/> Other
Spill Container Test Results	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Pass <input checked="" type="checkbox"/> Fail

Tank ID		
Spill Container Manufacturer:		
Method of Cathodic Protection	<input type="checkbox"/> Nonmetallic <input type="checkbox"/> Other	<input type="checkbox"/> Nonmetallic <input type="checkbox"/> Other
Is the spill container minimum capacity five gallons excluding riser volume?	<input type="checkbox"/> Yes <input type="checkbox"/> No*	<input type="checkbox"/> Yes <input type="checkbox"/> No*
Method to keep spill container empty	<input type="checkbox"/> Drain <input type="checkbox"/> Pump <input type="checkbox"/> Other	<input type="checkbox"/> Drain <input type="checkbox"/> Pump <input type="checkbox"/> Other
Spill Container Test Results	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail

8. COMMENTS

Describe all answers marked "Other," "No," or "Fail" and each prop

7 and 91 buckets failed

Example 4

24	Leak detection system maintains continuous monitoring that activates an audible and visual alarm
	<input type="checkbox"/> NVO <input type="checkbox"/> UD <input type="checkbox"/> NA <input checked="" type="checkbox"/> OUT <input type="checkbox"/> COS <input type="checkbox"/> RPT <input type="checkbox"/> VDG
Violation Description:	
Failure of the leak detection equipment to have an audible and visual alarm as required. 23 CCR 16 2632(c)(2)(B) 2636(f)(1)	
Violation Comments:	
The Regular gasoline line leak detection test performed during the UST Monitoring Certification inspection failed. made to the inoperable leak detection equipment and retested on or before December 1, 20	

Violation Type Definition

Type Number 2030035

Name Unsafe UST Operation (Priority)

Citations HSC 6.7 25292.1(a)

Program UST Program

Category Operations/Maintenance

UST Performance Measure -



2030025

Example 4

Technical Compliance Rate:

A) July – Dec 2023: **100%**

B) Jan – June 2023: **80%**

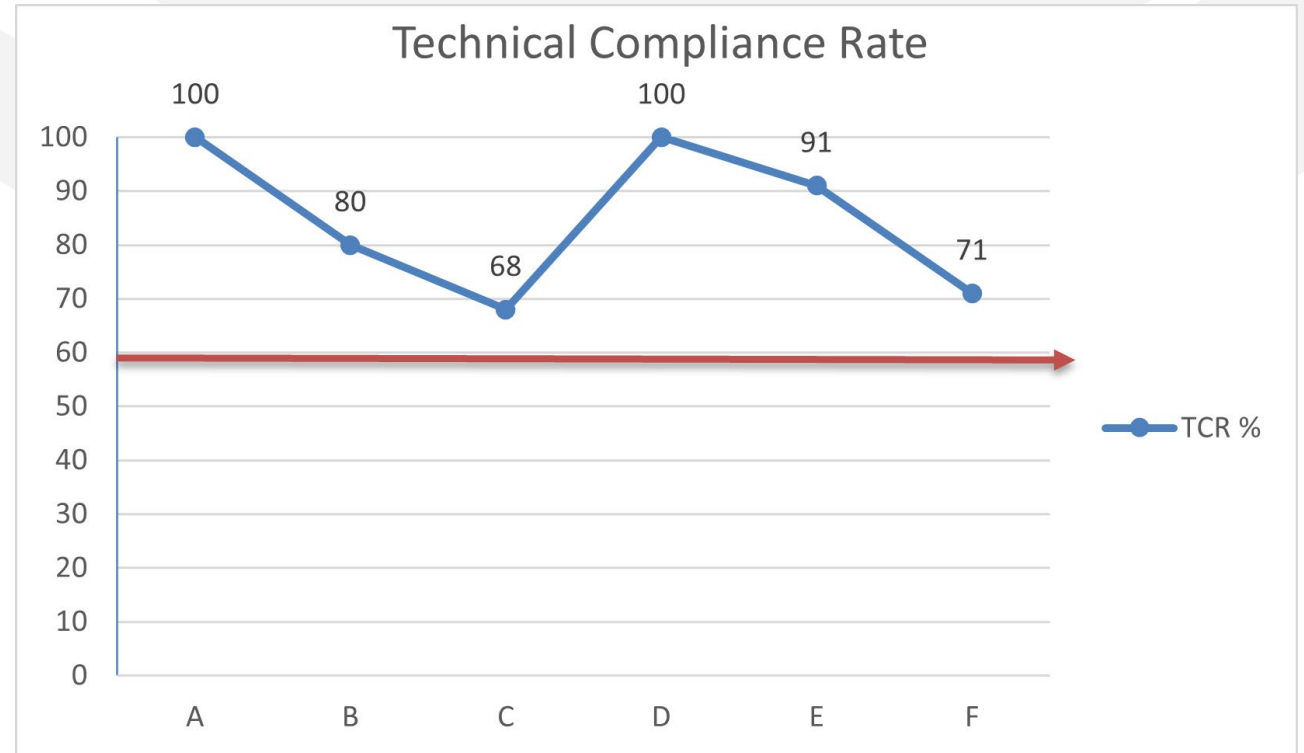
C) July – Dec 2022: 68%

D) Jan – June 2022: **100%**

E) July – Dec 2021: **91%**

F) Jan – June 2021: 71%

[CA Average: 59-61%]

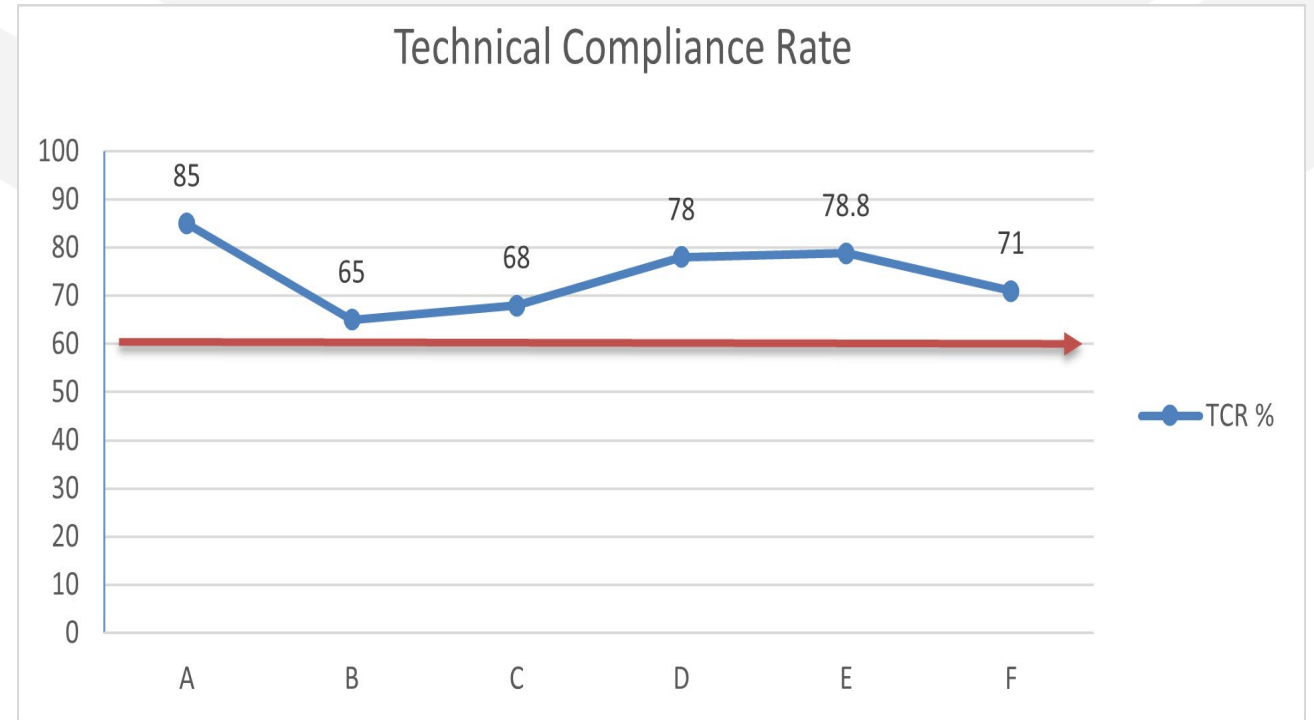


Example 4 – Addition of Missing TCR

Technical Compliance Rate:

- A) July – Dec 2023: **85%**
- B) Jan – June 2023: 65%
- C) July – Dec 2022: 68%
- D) Jan – June 2022: 78%
- E) July – Dec 2021: 79%
- F) Jan – June 2021: 71%

[CA Average: 59-61%]



CUPA Example 4 – Corrective Actions

Issue #1

- Violations not being issued

Issue #2

- Incorrectly citing non-TCR violations

Issue #3

- Abandoned facility inspections - TCR

Corrective Action

- Revise I&E Plan/Applicable Procedure
- Train Staff
- Provide facility records for State Water Board to review
- Field training
- Report 6

Final Thoughts

- Website is your best friend



- Training is available
 - Before, during, or after Evaluation

Contact Information

UST Evaluation Team

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Questions?

