UST 201/301

Andrew Evans - Senior Registered Environmental Health Specialist (Placer County),
Nikki Bandak - Fire and Environmental Inspector Safety Inspector (Santa Fe Springs)

TU-C1

March 25, 2025

27th California Unified Program
Annual Training Conference
March 24 thru 27, 2025

Your speakers:

Nikki Bandak, MS, REHS
Fire and Environmental Safety Inspector
Santa Fe Springs Fire-Rescue

Andrew Evans, MS, REHS
Senior Environmental Health Specialist
Placer County CUPA

Poll 1

Question: Let's see who we have in the audience:

A) Regulator
B) Private Industry
C) Consulting
D) Student

Poll 2

Question: How many years of experience do you have with UST laws/regulations?

A. 0-1
B. 2-5
C. 5-10
D. 10+

Introduction to the class

Intermediate/advanced level routine inspection topics with real world examples:

- CERS review and inspection prep,
- Reviewing the Veeder Root tape from an inspector's perspective,
- Inspection of sumps/UDCs,
- Issues with testing sensors,
- Tampering of VPH systems,
- Issues with spill bucket testing, overfill testing, SB989 testing, and DO reports.
- Selecting the right violation will be addressed along the way.

UST Routine Inspection Prep

File Review:

- Past inspection reports
- Enforcement documents
- Permits/tank plans
- Results from previous testing
- Correspondence

Inspection reports

Additional Comments: Annual Underground Storage Tank (UST) monitoring certification, overfill prevention and Secondary containment testing performed by [redacted] and witnessed by Nikki Bandak of Santa Fe Springs Fire and Rescue.

Service technician certifications verified as follows:
CSLB: [redacted]
ICC: [redacted] exp: 1/2025
VMI: [redacted] exp 6/2024
VR: [redacted] exp 11/28/2025
Omntec: [redacted] 3/3/2024

Alarm history and system setup obtained at beginning of inspection.
Veeder Root TLS 350 Software version number 123.01

At the start of the inspection, all sensors were positioned at the point for earliest leak detection.

UST system consisted of the following:
(1) 10,000-gallon double walled regular unleaded tank.
(1) 10,000-gallon double walled diesel tank.

The following monitoring components were tested, triggering an audible/visual alarm:
(2) VR 420 annular
(2) VR208 for the Fill Sumps
(2) VR 208 in STP Sumps
(1) VR 208 in the Vent Sump
(2) VR 208 in the UDC

(2) mechanical line leak detector was tested and passed at a simulated leak rate of 3.0 gpa at 10 psig.

Spill bucket leakage testing was performed for the diesel tanks. Each bucket held liquid for one hour without any measurable loss.

Emergency fuel shut off and fail safe were demonstrated to be operational.

All monitoring sensors and equipment tested were operable and properly tagged. All sensors were properly placed for earliest leak detection at the end of the inspection.

Overfill protection reported in CERS audio/visual was tested today. This overfill protection method is acceptable for the tank construction and year. Tank system installed in 1991 and includes spill buckets and double walled vent and vapor piping. Overfill Prevention test was last conducted on 12/08/2020 and is next due by 12/31/2023.
Note: The facility is utilizing one audio/visual overfill alarm for both tanks (see violation).

All required UST information have been submitted electronically to the California Environmental Reporting System (CERS).
Maintenance and alarm logs were observed on site.
Designated Operator / Facility Agreement form is current.
Designated Operator Monthly reports were in order, completed properly, and partially signed by operator/owner (See violation).
Employee training has been provided, documented, and available for review. The last employee training that occurred was on 12/2/2022 (see violation).
Financial Responsibility is available on site and dated 1/27/2023.
Monitoring Site and Response Plan are current.
Last monitoring certification was conducted on: 12/22/2022.
Last SB989 testing was conducted on: 12/02/2021 and the next is due by 12/31/2024.
Note: The annular space for the 87 tank was tested today and failed (see violation).

Submit today's monitoring system certification, SB989, overfill prevention and spill container test results to this Division within (30) days.

Enforcement/Outstanding Violations

Administrative Enforcement Order (AOE)

Meeting everything outlined in the AOE?
Paid in full?

Outstanding Violations

Were they ever addressed and not closed?

Are there plans to address them?

Tanks Plans/Permit

Santa Fe Springs Department of Fire-Rescue
11300 GREENSTONE AVE • SANTA FE SPRINGS, CA 90670
(562) 944-9713 • FAX (562) 941-1817 fire@santafesprings.org

PLAN REVIEW/PERMIT APPLICATION

Name of Facility [redacted]
Project Address [redacted] Santa Fe Springs CA., 90670
Project Contact [redacted] Telephone [redacted]
Address [redacted]

Scope of work
Unleaded & Diesel Tanks, Dispensers
& Piping to be Removed

ARCHITECT/CONTRACTOR/ OWNER INFORMATION

Applicant [redacted] Telephone [redacted] Fax
Address [redacted] Email [redacted]
License Class [redacted] License Number [redacted] Expiration Date [redacted]

ARCHITECT/CONTRACTOR/ OWNER DECLARATION

I hereby certify that I have read this application and state that the above information is correct. I agree to comply with all City ordinances and state laws relating to construction, and hereby authorize representatives of this City to enter upon mentioned property for inspection purposes. If I am licensed under provisions of Chapter 9 (commencing with section 7000) of Division 3 of the Business and Professions Code, my license is in full force and effect.

Signature [redacted] Date [redacted]

√	SCOPE OF WORK	FEE	√	SCOPE OF WORK	FEE
	Fire Alarm System			Tent/Air Supported Structure	
	Installation			Compressed Gas System	
	Test			Dust Collection System	
	Final			High Pile Stock	
	Underground and On-Site Hydrant			Rack Installation	
	Thrust Block (Pre-Pour)			Final	
	Hydro			Vents	
	Flush			Industrial Oven	
	Final			LPG Tank	
	Fire Pump House			Oil Well Abandonment/Venting	
	Rough			50 Foot Top Plug	
	Final			Welded Plate	
	Automatic Sprinkler System			Paint Spray/Powder Coat Booth	
	O/H Rough			Soil Venting System	
	O/H Hydro			Excavation	
	Final			Aggregate, Barrier, Piping	
	Automatic Sprinkler System TI			Vent	
	Rough			Final	
	Final			Other	
	Standpipe and Hose Rack			ENVIRONMENTAL PROTECTION DIVISION	
	Rough/Hydro			AST	
	Final		X	UST	
	Wet Chemical/Dry Chemical System			Installation/Removal/Modification	
	New Construction			Number of Tanks	
	TI Structural			Industrial Waste	
	Solar PV Systems			Installation/Closure	
	Residential			Revision/Addendum/Renewal	
	Commercial			Other	
	Other				
				TOTAL DUE	$851.00

PAID

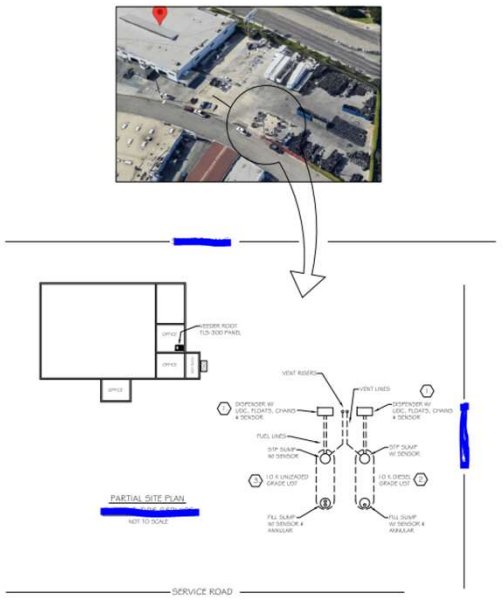
CUSTOMER COPY

GENERAL NOTES:

1. PREPARE AND SECURE AREA AS REQUIRED FOR THE EXECUTION OF THE WORK TO BE COMPLETED.
2. CONTRACTOR SHALL PERFORM ALL REQUIRED INSPECTIONS AND TESTING PER GOVERNING AGENCY REQUIREMENTS.
3. ALL WORK SHALL BE PERFORMED OR SUPERVISED BY AN INDIVIDUAL WHO POSSESSES ALL APPLICABLE VALID I.C.C. & MANUFACTURERS CERTIFICATION.
4. BARRICADING AS NEEDED.
5. ALL EXISTING BUILDINGS, STRUCTURES AND EQUIPMENT SHALL REMAIN EXISTING UNLESS NOTED OTHERWISE.

SCOPE OF WORK:

1. DIESEL & UNLEADED GRADE DISPENSERS TO BE REMOVED. SEE PLOT FOR LOCATION.
   - FUEL TO BE PUMPED OUT OF DISPENSER LINES & BLOWBACK FUEL FROM LINES TO UST.
   - REMOVE BOTH DISPENSERS.
   - REMOVE VENT RISERS AND CANISTER.
   - SAWCUT & BREAKOUT CONCRETE ISLAND .
   - HAND EXCAVATE TO EXPOSE UDC'S.
   - REMOVAL, TRANSPORTATION & DISPOSAL OF OLD DISPENSERS, PIPING, UDC'S AND WASTE RINSATE.
   - DISPENSERS, UDC'S & RELATED PIPING REMOVED TO BE DISPOSED OF W/ CERTIFICATE OF DESTRUCTION.
   - SOIL SAMPLING, ANALYTICAL & REPORTING TO AGENCY TO PERMANENTLY CLOSE.
   - BACKFILL WITH PEA GRAVEL & IMPORT MATERIAL TO OFFSET THE DISPLACEMENT OF THE UST.
2. DIESEL GRADE TANK AND PIPING TO BE REMOVED. SEE PLOT FOR LOCATION.
   - FUEL TO BE PUMPED OUT OF UST TANK & BLOWBACK FUEL FROM LINES TO UST.
   - TRIPLE RINSE OF UST.
   - SAWCUT & BREAKOUT CONCRETE PAD.
   - HAND EXCAVATE TO EXPOSE TANK TOP.
   - REMOVAL, TRANSPORTATION & DISPOSAL OF OLD DIESEL FUEL AND WASTE RINSATE.
   - REMOVE UST & DISPOSE OF TANK W/ CERTIFICATE OF DESTRUCTION.
   - SOIL SAMPLING, ANALYTICAL & REPORTING TO AGENCY TO PERMANENTLY CLOSE UST.
   - REMOVAL & DISPOSING OF EXISTING UST PIPING.
   - BACKFILL WITH PEA GRAVEL & IMPORT MATERIAL TO OFFSET THE DISPLACEMENT OF THE UST.
3. UNLEADED GRADE TANK AND PIPING TO BE REMOVED. SEE PLOT FOR LOCATION.
   - FUEL TO BE PUMPED OUT OF UST TANK & BLOWBACK FUEL FROM LINES TO UST.
   - TRIPLE RINSE OF UST.
   - SAWCUT & BREAKOUT CONCRETE PAD.
   - HAND EXCAVATE TO EXPOSE TANK TOP.
   - REMOVAL, TRANSPORTATION & DISPOSAL OF OLD UNLEADED FUEL AND WASTE RINSATE.
   - REMOVE UST & DISPOSE OF TANK W/ CERTIFICATE OF DESTRUCTION.
   - SOIL SAMPLING, ANALYTICAL & REPORTING TO AGENCY TO PERMANENTLY CLOSE UST.
   - REMOVAL & DISPOSING OF EXISTING UST PIPING.
   - BACKFILL WITH PEA GRAVEL & IMPORT MATERIAL TO OFFSET THE DISPLACEMENT OF THE UST.
4. AFTER COMPLETION OF WORK ALL BARRICADES AND DEBRIS TO BE REMOVED AND SITE RESTORED.



Correspondence

- Emails
- Letters
- Fax
- RTC Documents

Previous Test Results

- Secondary Containment Testing (SB989)- 30 days after testing
- Spill Bucket - 30 days after testing
- Overfill Prevention - 30 days after testing
- Enhance Line Leak Detection- 60 days after testing
- Annual Monitoring Certifications- 30 days after testing

Violations for the different testing

View	Secondary Containment Testing - Reporting	UST Program	Failure to submit a copy of the secondary containment test results on the "Secondary Containment Testing Report Form" to the UPA within 30 days after the test.	2010009	10/1/2018	12/31/2099
View	Spill Container Testing - Reporting	UST Program	Failure to submit a copy of the spill containment test results on the "Spill Container Testing Report Form" to the UPA within 30 days after the test.	2010017	10/1/2018	12/31/2099
View	Overfill Prevention Inspection – Records	UST Program	Failure to submit a copy of the overfill prevention equipment inspection results on the "Overfill Prevention Equipment Inspection Report Form" to the UPA within 30 days after the inspection.	2010018	10/1/2018	12/31/2099
View	Enhanced Leak Detection Testing - Results	UST Program	Failure to submit enhanced leak detection testing results to the State Water Board and the UPA within 60 days of completion of the test.	2010005	11/1/2017	12/31/2099
View	12 Month Monitoring System Certification Submittal	UST Program	Failure to submit the "Monitoring System Certification Form" to the UPA within 30 days of completion of the test.	2030074	10/1/2018	12/31/2099

Annual Monitoring Certification Results

Monitoring System Certification Form

6. SENSOR TESTING RESULTS

*List only sensors tested on date of this certification. List "**Sensor ID**" as labeled in system programming. Additional copies of this page may be attached to accommodate all sensors tested.*

Sensor ID	Sensor Model	Component(s) Monitored	Pass	Fail
1	794380-208	WASTE OIL SUMP	☒	☐
2	794380-420	WASTE OIL ANNULAR	☒	☐
3	794380-208	UNL. PIPE SUMP	☒	☐
4	794380-420	UNL. DSL ANNULAR	☒	☐
5	794380-208	UNL.FILL SUMP	☒	☐
6	794380-208	DSL. FILL SUMP	☒	☐
7	794380-208	UDC	☒	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐
			☐	☐

*Describe all answers marked "No" or "Fail" and proposed remedy in **Section 9**.*
*List all monitoring equipment either replaced or repaired in **Section 9***

LIQUID SENSOR SETUP
- - - - - - - - - - - - - -

L 1:WASTE OIL SUMP
TRI-STATE (SINGLE FLOAT)
CATEGORY : PIPING SUMP

L 2:WASTE OIL ANNULAR
TRI-STATE (SINGLE FLOAT)
CATEGORY : ANNULAR SPACE

L 3:UNL.PIPE SUMP
TRI-STATE (SINGLE FLOAT)
CATEGORY : PIPING SUMP

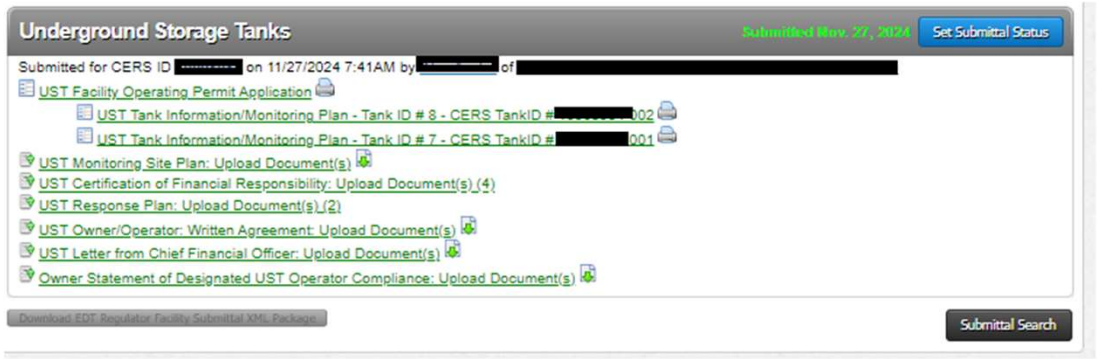
L 4:UNL-DSL ANNULAR
TRI-STATE (SINGLE FLOAT)
CATEGORY : ANNULAR SPACE

L 5:UNL.FILL SUMP
TRI-STATE (SINGLE FLOAT)
CATEGORY : OTHER SENSORS

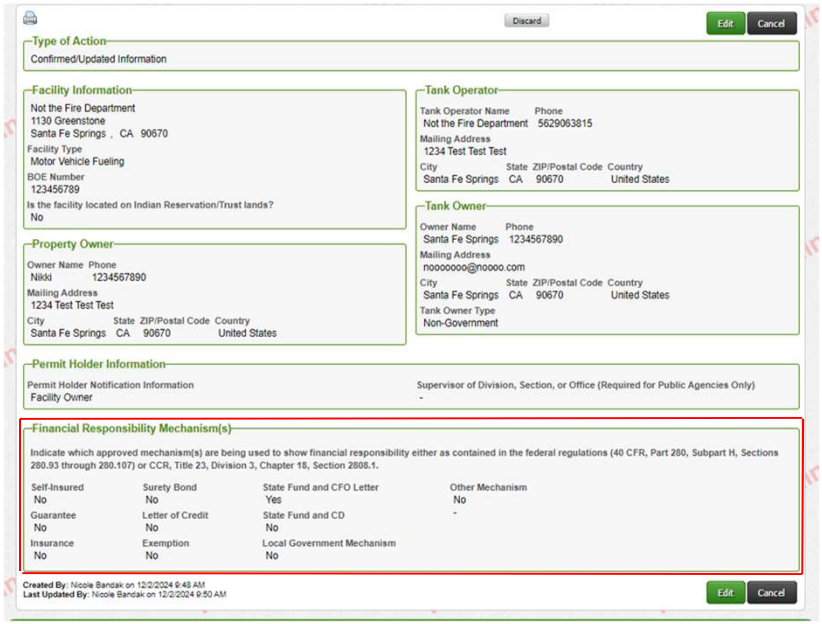
L 6:DSL.FILL SUMP
TRI-STATE (SINGLE FLOAT)
CATEGORY : OTHER SENSORS

L 7:UDC
TRI-STATE (SINGLE FLOAT)
CATEGORY : DISPENSER PAN

California Environmental Reporting System (CERS)



UST Facility Operating Permit Application:



Discard | Edit | Cancel

Type of Action
Confirmed/Updated Information

Facility Information
Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670
Facility Type
Motor Vehicle Fueling
BOE Number
123456789
Is the facility located on Indian Reservation/Trust lands?
No

Property Owner
Owner Name Phone
Nikki 1234567890
Mailing Address
1234 Test Test Test
City State ZIP/Postal Code Country
Santa Fe Springs CA 90670 United States

Tank Operator
Tank Operator Name Phone
Not the Fire Department 5629063815
Mailing Address
1234 Test Test Test
City State ZIP/Postal Code Country
Santa Fe Springs CA 90670 United States

Tank Owner
Owner Name Phone
Santa Fe Springs 1234567890
Mailing Address
nooooooo@noooo.com
City State ZIP/Postal Code Country
Santa Fe Springs CA 90670 United States
Tank Owner Type
Non-Government

Permit Holder Information
Permit Holder Notification Information
Facility Owner
Supervisor of Division, Section, or Office (Required for Public Agencies Only)
-

Financial Responsibility Mechanism(s)
Indicate which approved mechanism(s) are being used to show financial responsibility either as contained in the federal regulations (40 CFR, Part 280, Subpart H, Sections 280.93 through 280.107) or CCR, Title 23, Division 3, Chapter 18, Section 2808.1.

Self-Insured: No	Surety Bond: No	State Fund and CFO Letter: Yes	Other Mechanism: No
Guarantee: No	Letter of Credit: No	State Fund and CD: No	-
Insurance: No	Exemption: No	Local Government Mechanism: No	

Created By: Nicole Bandak on 12/2/2024 9:48 AM
Last Updated By: Nicole Bandak on 12/2/2024 9:50 AM

Edit | Cancel

Poll 3

Situation:
Financial responsibility mechanism is approved, but listed inaccurately on the operating permit application page
What is the correct CERS violation?

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

Or

View	UST Facility and/or Tank Information	UST Program	Failure to submit a complete and accurate application for a permit to operate a UST, or for renewal of the permit.	2010010

UST Facility Operating Permit Application:

Situation:
Financial responsibility mechanism is approved, but listed inaccurately on the operating permit application page
What is the correct CERS violation?

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

Or

View	UST Facility and/or Tank Information	UST Program	Failure to submit a complete and accurate application for a permit to operate a UST, or for renewal of the permit.	2010010

BOE number

Facility Information

Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670

Facility Type
Motor Vehicle Fueling

BOE Number
44032062

Is the facility located on Indian Reservation/Trust lands?
No

Property Owner

Owner Name	Phone
Nikki	1234567890

Mailing Address
1234 Test Test Test

City	State	ZIP/Postal Code	Country
Santa Fe Springs	CA	90670	United States

Tank Operator

Tank Operator Name	Phone
Not the Fire Department	5629063815

Mailing Address
1234 Test Test Test

City	State	ZIP/Postal Code	Country
Santa Fe Springs	CA	90670	United States

Tank Owner

Owner Name	Phone
Santa Fe Springs	1234567890

Mailing Address
nooooooo@noooo.com

City	State	ZIP/Postal Code	Country
Santa Fe Springs	CA	90670	United States

Tank Owner Type
State Agency

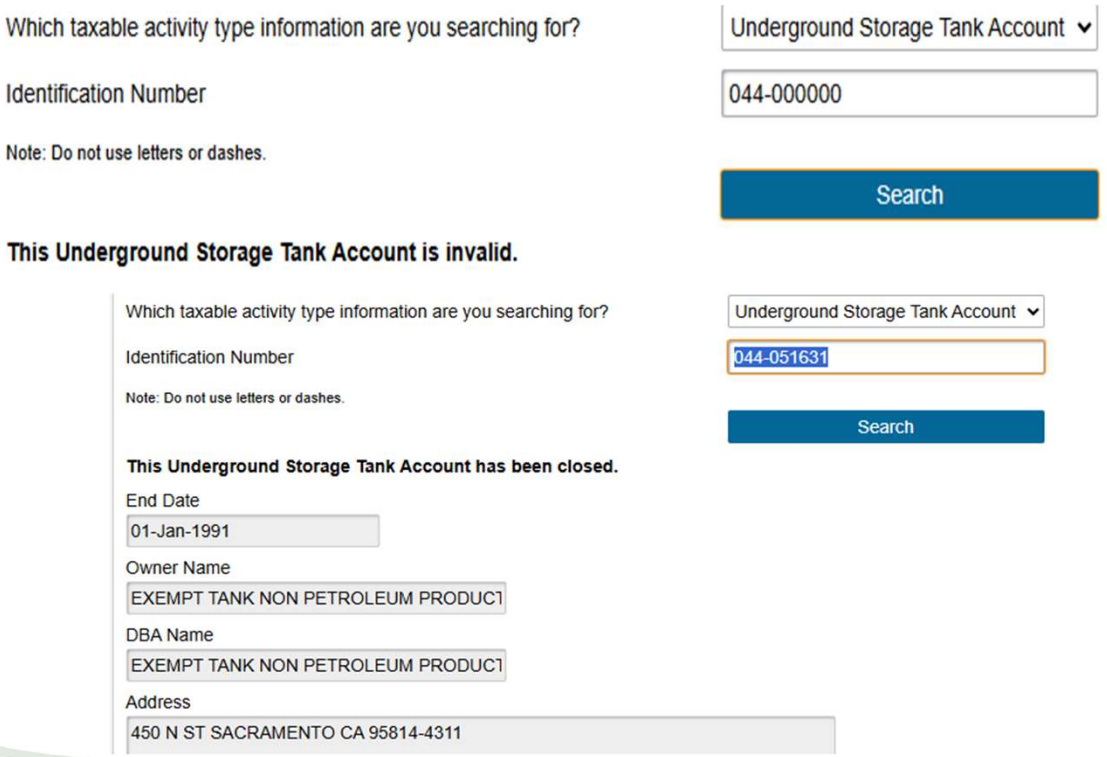
Permit Holder Information

Permit Holder Notification Information	Supervisor of Division, Section, or Office (Required for Public Agencies Only)
Facility Owner	-

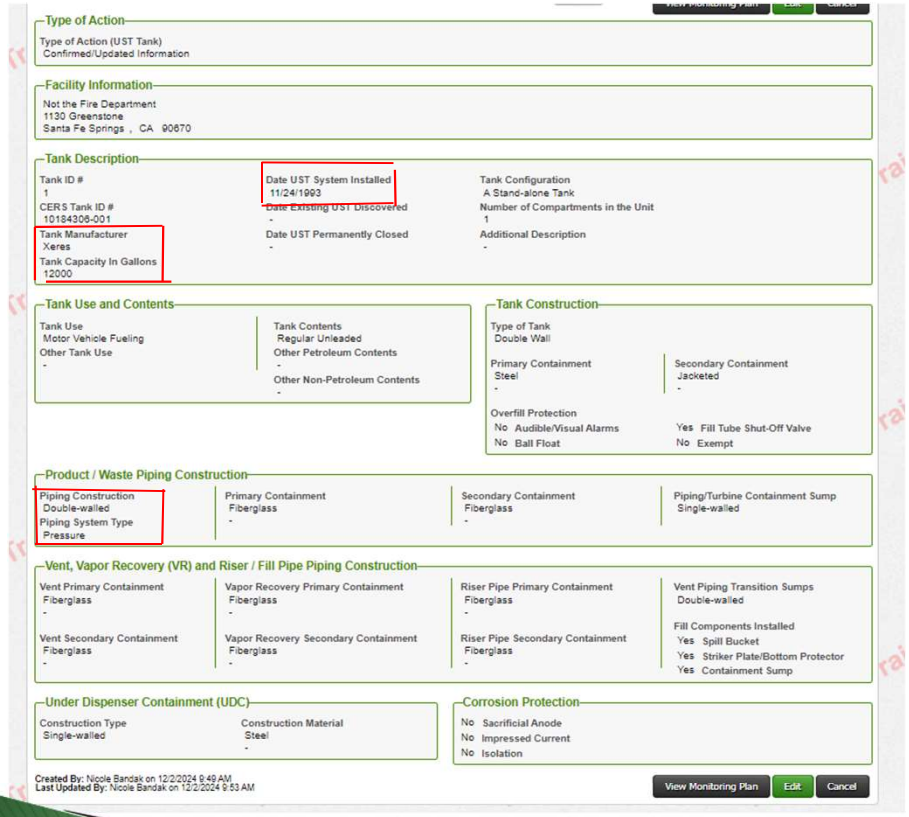
Certain facilities may use a generic BOE number to electronically report these types of UST facilities to CERS or a local CUPA reporting web portal:

- UST facilities where all USTs contain only ***non petroleum*** products: 44051631
  - Note: The previous number 44000000 is no longer valid.
- State owned UST facilities: 44032062
- Federally owned UST facilities: 44032063

Generic BOE


Which taxable activity type information are you searching for?
Underground Storage Tank Account
Identification Number
044-000000
Note: Do not use letters or dashes.
Search
This Underground Storage Tank Account is invalid.
Which taxable activity type information are you searching for?
Underground Storage Tank Account
Identification Number
044-051631
Note: Do not use letters or dashes.
Search
This Underground Storage Tank Account has been closed.
End Date
01-Jan-1991
Owner Name
EXEMPT TANK NON PETROLEUM PRODUCT
DBA Name
EXEMPT TANK NON PETROLEUM PRODUCT
Address
450 N ST SACRAMENTO CA 95814-4311

UST Tank information



Type of Action

Type of Action (UST Tank)
Confirmed/Updated Information

Facility Information

Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670

Tank Description

Tank ID #: 1
CERS Tank ID #: 10184308-001
Tank Manufacturer: Xeres
Tank Capacity In Gallons: 12000
Date UST System Installed: 11/24/1993
Date Existing UST Discovered: -
Date UST Permanently Closed: -
Tank Configuration: A Stand-alone Tank
Number of Compartments in the Unit: 1
Additional Description: -

Tank Use and Contents

Tank Use: Motor Vehicle Fueling
Other Tank Use: -
Tank Contents: Regular Unleaded
Other Petroleum Contents: -
Other Non-Petroleum Contents: -

Tank Construction

Type of Tank: Double Wall
Primary Containment: Steel
Secondary Containment: Jacketed
Overfill Protection: No Audible/Visual Alarms; No Ball Float; Yes Fill Tube Shut-Off Valve; No Exempt

Product / Waste Piping Construction

Piping Construction: Double-walled
Piping System Type: Pressure
Primary Containment: Fiberglass
Secondary Containment: Fiberglass
Piping/Turbine Containment Sump: Single-walled

Vent, Vapor Recovery (VR) and Riser / Fill Pipe Piping Construction

Vent Primary Containment: Fiberglass
Vent Secondary Containment: Fiberglass
Vapor Recovery Primary Containment: Fiberglass
Vapor Recovery Secondary Containment: Fiberglass
Riser Pipe Primary Containment: Fiberglass
Riser Pipe Secondary Containment: Fiberglass
Vent Piping Transition Sumps: Double-walled
Fill Components Installed: Yes Spill Bucket; Yes Striker Plate/Bottom Protector; Yes Containment Sump

Under Dispenser Containment (UDC)

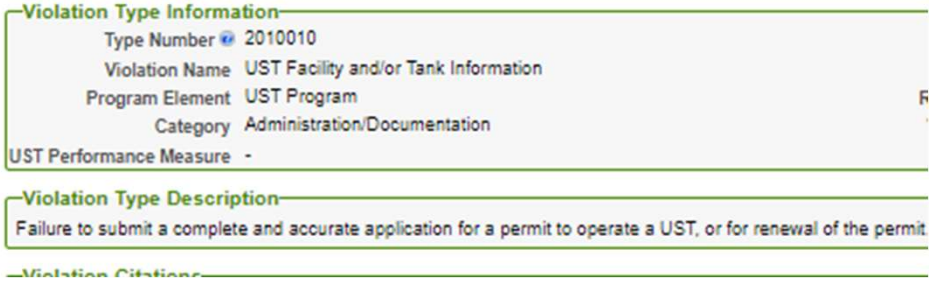
Construction Type: Single-walled
Construction Material: Steel

Corrosion Protection

No Sacrificial Anode
No Impressed Current
No Isolation

Created By: Nicole Bandak on 12/2/2024 9:49 AM
Last Updated By: Nicole Bandak on 12/2/2024 9:53 AM

View Monitoring Plan | Edit | Cancel



Violation Type Information

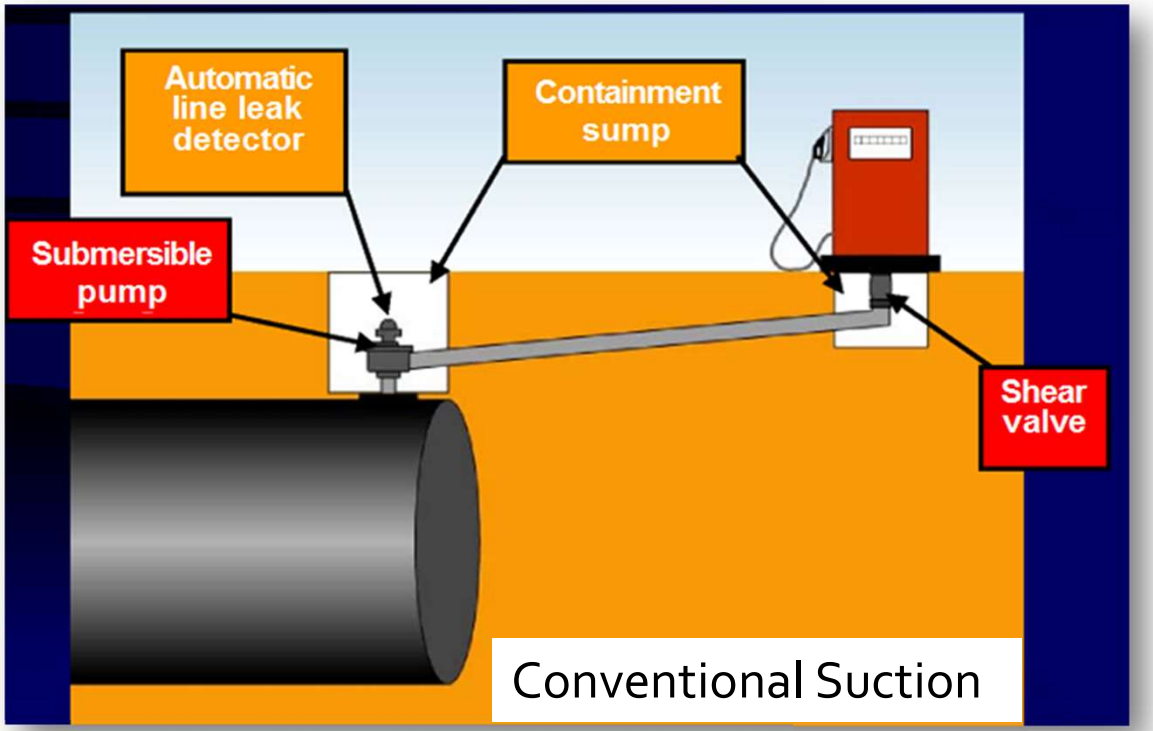
Type Number: 2010010
Violation Name: UST Facility and/or Tank Information
Program Element: UST Program
Category: Administration/Documentation
UST Performance Measure: -

Violation Type Description

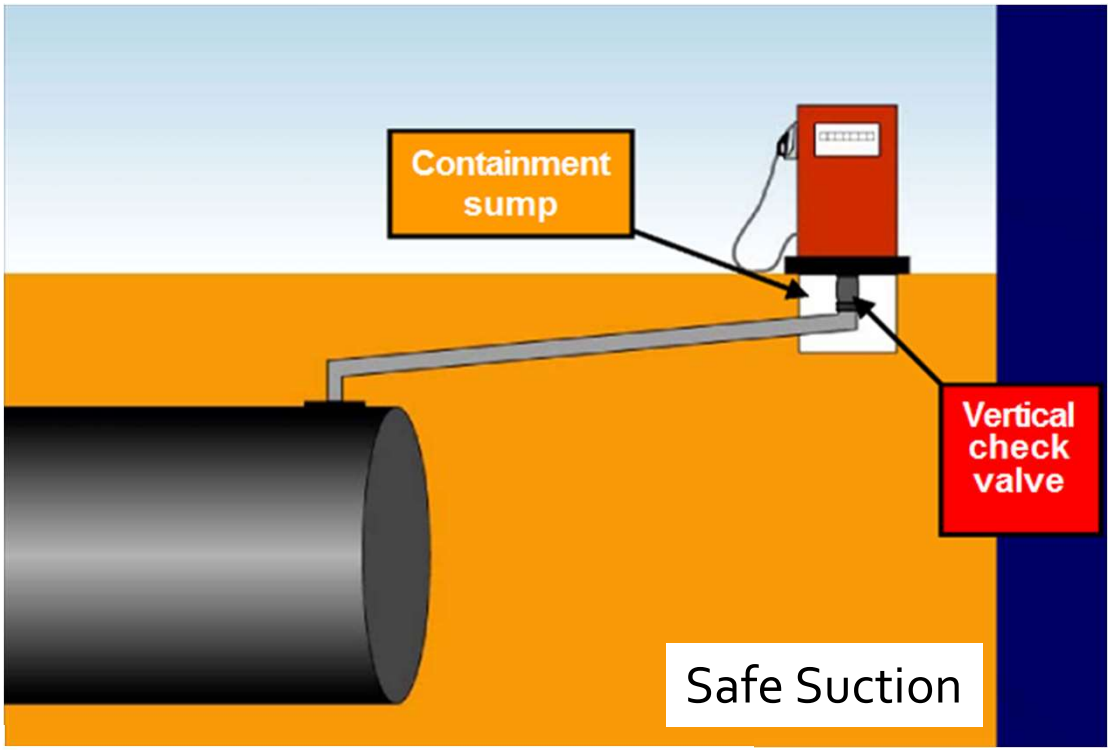
Failure to submit a complete and accurate application for a permit to operate a UST, or for renewal of the permit.

Violation Citations

Conventional Suction vs Safe Suction



Conventional Suction vs Safe Suction



Safe Suction Violation

Violation Type Information

Type Number	2030053	Begin Date	10/1/2018
Violation Name	Single-Walled Safe Suction (USEPA Priority)	End Date	12/31/2099
Program Element	UST Program	RCRA Violation Code	-
Category	Operations/Maintenance	Violation Comments	-
UST Performance Measure	-		

Violation Type Description

Safe Suction piping fails to meet one or more of the following requirements:
1) Below grade piping sloped to drain back into storage tank if the suction is released.
2) Only one check valve on the piping located directly below the suction pump.
3) Inspection method is provided which readily demonstrates compliance.

Violation Citations

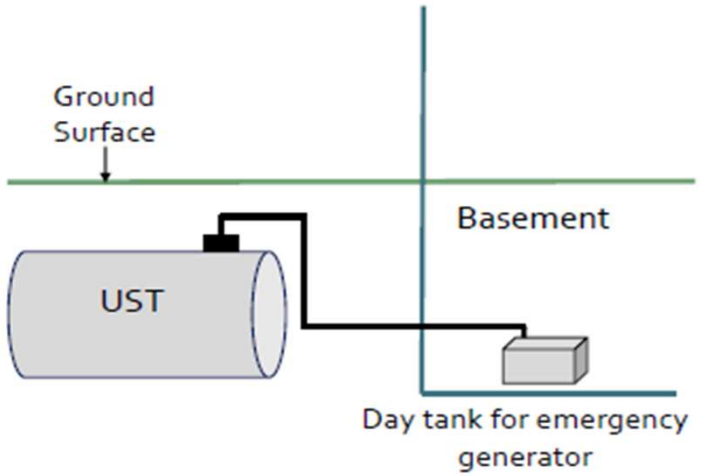
- California Code of Regulations, Title 23, Chapter 16, Section 2636(a)(3)
- California Code of Regulations, Title 23, Chapter 16, Section 2641(b)

Questions on this section?

Poll 4

True or False?

The single-walled conventional suction piping shown here must be upgraded to double-walled piping by January 1, 2026.



TIUGA Piping vs. UST Piping

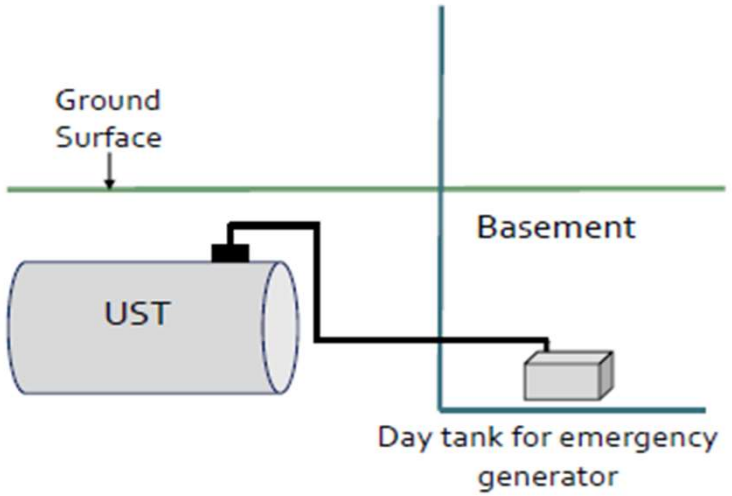
True or False?

The single-walled conventional suction piping shown here must be upgraded to double-walled piping by January 1, 2026.

False!

Piping belongs to the TIUGA!

Not subject to 2026 upgrade

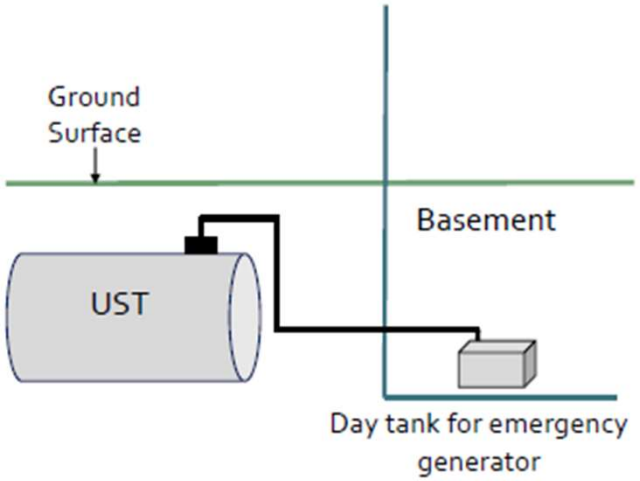


TIUGA Piping vs. UST Piping

Does my SW conventional suction pipe need to be upgraded?

Piping associated with a TIUGA includes liquid product and return piping shared between the TIUGA and the UST ***up to*** the UST tank top fitting.

UST sumps containing liquid product and return piping connections, additional components within the sump, and any other shared TIUGA and UST components, ***other than the TIUGA supply and return pipe and associated pump or turbine***, are part of the UST system and must meet all UST requirements.



CALIFORNIA CUPA FORUM

Questions on this section?

Poll 5

Which one of these tanks is a Xerxes UST?

A) 

B) 

C) 

D) 

1987+ 1988 changes

- Mandatory Financial Responsibility
- Secondary Containment requirements
  - For new and replaced piping
- Clean up Responsibility
- Operator training requirements

July 1, 2003 and July 1, 2004 (Limbo year)

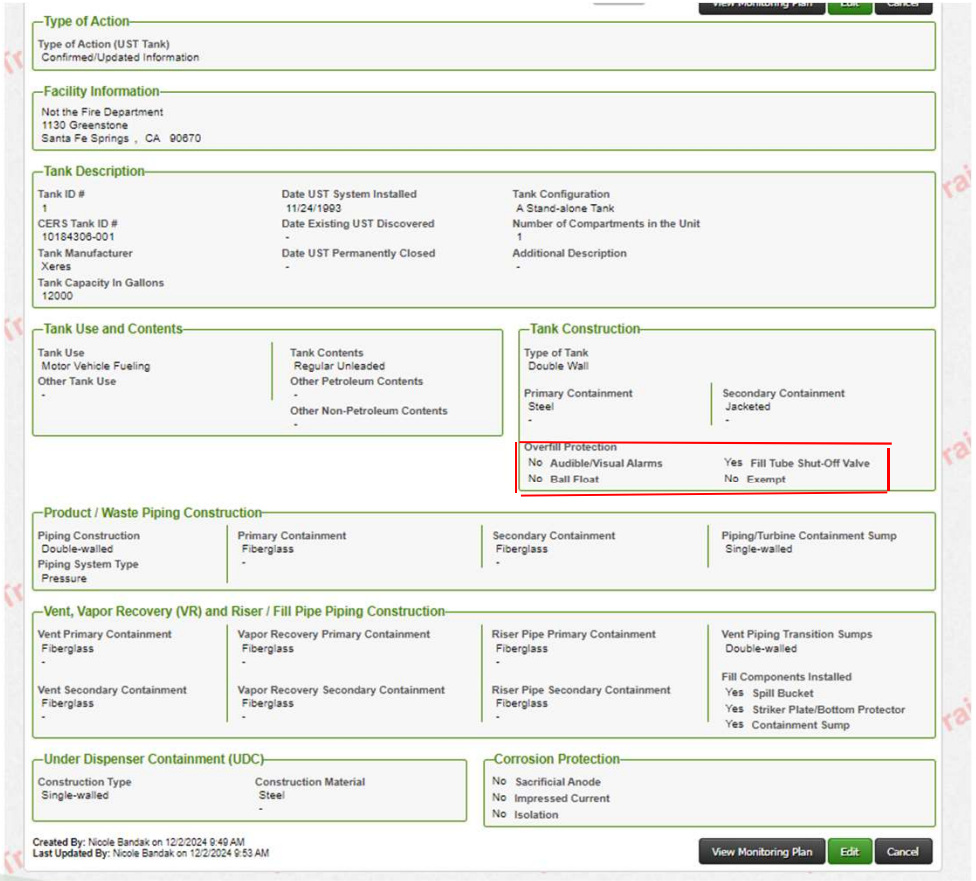
July 1, 2003:

- Product tight which now includes liquid and **vapor**
- No rain water allowed in the sumps
- ELD testing
- Fill, vent and vapor piping are regulated

July 1, 2004

- All previous requirements and…
- Secondary containment must be monitored by vacuum, hydrostatic or pressure.
- No annual line tightness testing on primary piping

UST Tank information



Type of Action

Type of Action (UST Tank)
Confirmed/Updated Information

Facility Information

Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670

Tank Description

Tank ID #: 1
CERS Tank ID #: 10184306-001
Tank Manufacturer: Xeres
Tank Capacity In Gallons: 12000
Date UST System Installed: 11/24/1993
Date Existing UST Discovered: -
Date UST Permanently Closed: -
Tank Configuration: A Stand-alone Tank
Number of Compartments in the Unit: 1
Additional Description: -

Tank Use and Contents

Tank Use: Motor Vehicle Fueling
Other Tank Use: -
Tank Contents: Regular Unleaded
Other Petroleum Contents: -
Other Non-Petroleum Contents: -

Tank Construction

Type of Tank: Double Wall
Primary Containment: Steel
Secondary Containment: Jacketed
Overfill Protection
No Audible/Visual Alarms
No Ball Float
Yes Fill Tube Shut-Off Valve
No Exempt

Product / Waste Piping Construction

Piping Construction: Double-walled
Piping System Type: Pressure
Primary Containment: Fiberglass
Secondary Containment: Fiberglass
Piping/Turbine Containment Sump: Single-walled

Vent, Vapor Recovery (VR) and Riser / Fill Pipe Piping Construction

Vent Primary Containment: Fiberglass
Vent Secondary Containment: Fiberglass
Vapor Recovery Primary Containment: Fiberglass
Vapor Recovery Secondary Containment: Fiberglass
Riser Pipe Primary Containment: Fiberglass
Riser Pipe Secondary Containment: Fiberglass
Vent Piping Transition Sumps: Double-walled
Fill Components Installed
Yes Spill Bucket
Yes Striker Plate/Bottom Protector
Yes Containment Sump

Under Dispenser Containment (UDC)

Construction Type: Single-walled
Construction Material: Steel

Corrosion Protection

No Sacrificial Anode
No Impressed Current
No Isolation

Created By: Nicole Bandak on 12/2/2024 9:49 AM
Last Updated By: Nicole Bandak on 12/2/2024 9:53 AM

View Monitoring Plan | Edit | Cancel

Poll 6

Situation:
Overfill prevention on site is approved, but the mechanism is listed inaccurately on the UST Tank Information page

What is the correct CERS violation?

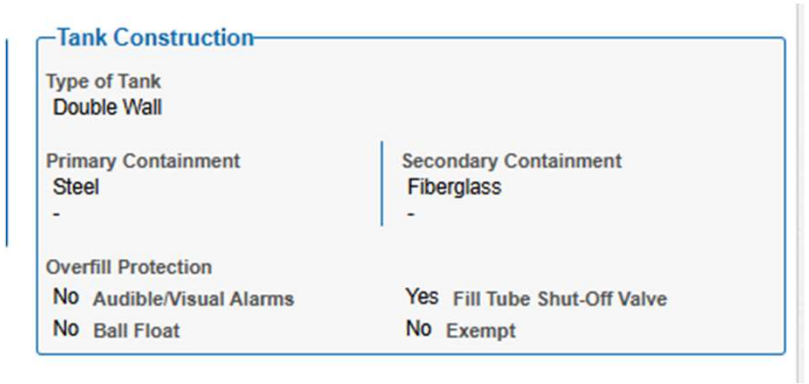
View	Overfill Prevention (USEPATCR 9b) (USEPA Priority)	UST Program	Failure to comply with one or more of the following overfill prevention equipment requirements: 1) Alert the transfer operator when the tank is 90 percent full by restricting the flow into the tank o...	2030036

Or

View	UST Facility and/or Tank Information	UST Program	Failure to submit a complete and accurate application for a permit to operate a UST, or for renewal of the permit.	2010010

Situation:
Overfill prevention on site is approved, but the mechanism is listed inaccurately on the UST Tank Information page

What is the correct CERS violation?

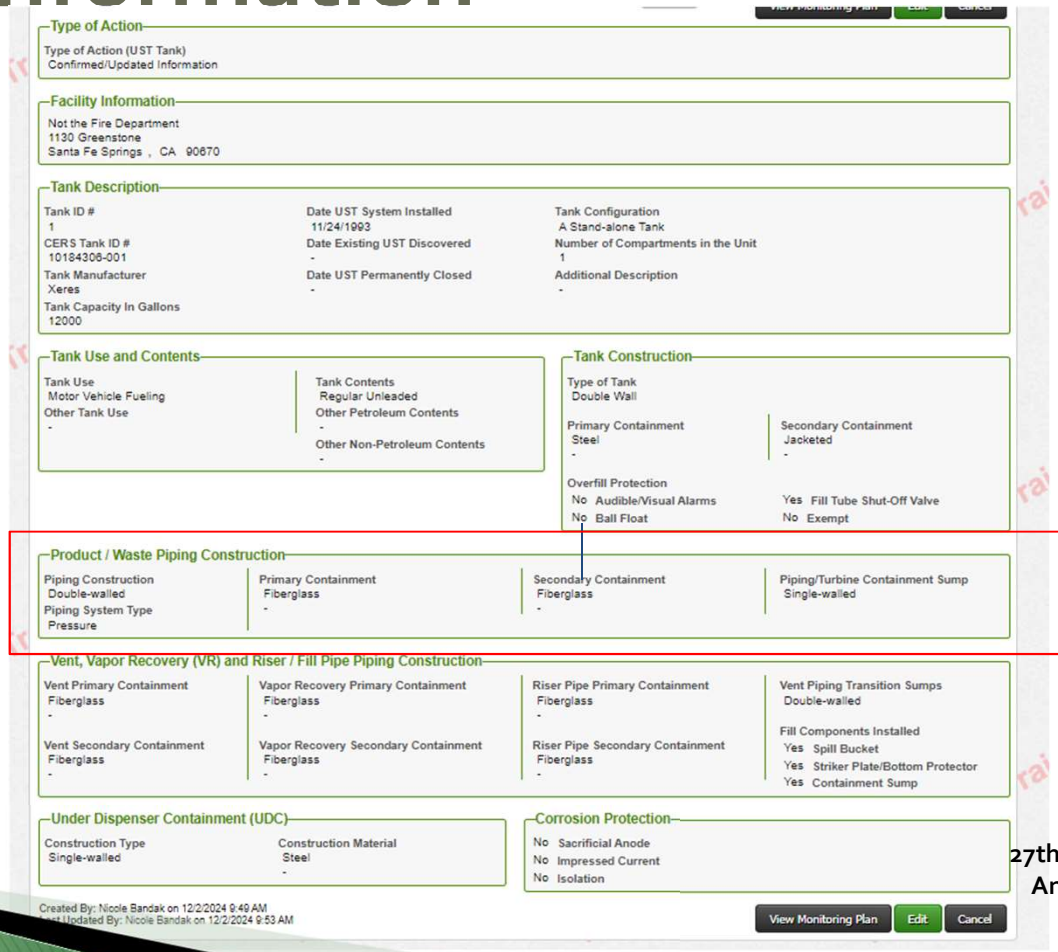


View	Overfill Prevention (USEPATCR 9b) (USEPA Priority)	UST Program	Failure to comply with one or more of the following overfill prevention equipment requirements: 1) Alert the transfer operator when the tank is 90 percent full by restricting the flow into the tank o...	2030036

Or

View	UST Facility and/or Tank Information	UST Program	Failure to submit a complete and accurate application for a permit to operate a UST, or for renewal of the permit.	2010010

UST Tank Information



Type of Action

Type of Action (UST Tank)
Confirmed/Updated Information

Facility Information

Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670

Tank Description

Tank ID # 1	Date UST System Installed 11/24/1993	Tank Configuration A Stand-alone Tank
CERS Tank ID # 10184306-001	Date Existing UST Discovered -	Number of Compartments in the Unit 1
Tank Manufacturer Xeres	Date UST Permanently Closed -	Additional Description -
Tank Capacity In Gallons 12000		

Tank Use and Contents

Tank Use Motor Vehicle Fueling	Tank Contents Regular Unleaded
Other Tank Use -	Other Petroleum Contents -
	Other Non-Petroleum Contents -

Tank Construction

Type of Tank
Double Wall

Primary Containment Steel -	Secondary Containment Jacketed -

Overfill Protection

No Audible/Visual Alarms	Yes Fill Tube Shut-Off Valve
No Ball Float	No Exempt

Product / Waste Piping Construction

Piping Construction Double-walled	Primary Containment Fiberglass -	Secondary Containment Fiberglass -	Piping/Turbine Containment Sump Single-walled
Piping System Type Pressure			

Vent, Vapor Recovery (VR) and Riser / Fill Pipe Piping Construction

Vent Primary Containment Fiberglass -	Vapor Recovery Primary Containment Fiberglass -	Riser Pipe Primary Containment Fiberglass -	Vent Piping Transition Sumps Double-walled
Vent Secondary Containment Fiberglass -	Vapor Recovery Secondary Containment Fiberglass -	Riser Pipe Secondary Containment Fiberglass -	Fill Components Installed Yes Spill Bucket Yes Striker Plate/Bottom Protector Yes Containment Sump

Under Dispenser Containment (UDC)

Construction Type Single-walled	Construction Material Steel -

Corrosion Protection

No Sacrificial Anode
No Impressed Current
No Isolation

Created By: Nicole Bandak on 12/2/2024 9:49 AM
Last Updated By: Nicole Bandak on 12/2/2024 9:53 AM

View Monitoring Plan | Edit | Cancel

Siphon Tank Piping

Situation: Site has a main 87 tank and a syphon 87 tank

Where does the piping for this tank system end?

The suction piping belongs to the syphon tank UST system

How should the syphon tank piping be reported in CERS?

Product / Waste Piping Construction

Piping Construction	Primary Containment	Secondary Containment	Piping/Turbine Containment Sump
Double-walled	Fiberglass	Fiberglass	Single-walled
Piping System Type	-	-	
Conventional Suction			

Auxiliary Tank Piping

Situation: Site has two 87 tanks (main and auxiliary) with manifolded pressurized product piping.

Where does the piping for this UST system end?

How should the auxiliary tank piping be reported in CERS?

We are going to return to this example when we talk about the monitoring plan and LLDs…

Product / Waste Piping Construction

Piping Construction	Primary Containment	Secondary Containment	Piping/Turbine Containment Sump
Double-walled	Fiberglass	Fiberglass	Single-walled
Piping System Type	-	-	
Pressure			

Product/Waste Piping

Situation: Site has a used oil tank with no connected piping.

How should the used oil piping be reported in CERS?

Product / Waste Piping Construction

Piping Construction	Primary Containment	Secondary Containment	Piping/Turbine Containment Sump
Other	None	None	None
Piping System Type	-	-	
Gravity			

Vent, Vapor Recovery (VR) and Riser / Fill Pipe Piping Construction

Vent Primary Containment	Vapor Recovery Primary Containment	Riser Pipe Primary Containment	Vent Piping Transition Sumps
Fiberglass	None	Steel	None
-	-	-	
Vent Secondary Containment	**Vapor Recovery Secondary Containment**	**Riser Pipe Secondary Containment**	**Fill Components Installed**
None	None	None	Yes Spill Bucket
-	-	-	Yes Striker Plate/Bottom Protector
			No Containment Sump

UST Tank Information

Vent, Vapor Recovery (VR) and Riser / Fill Pipe Piping Construction

Vent Primary Containment Fiberglass -	Vapor Recovery Primary Containment Fiberglass -	Riser Pipe Primary Containment Fiberglass -	Vent Piping Transition Sumps Double-walled
Vent Secondary Containment Fiberglass -	Vapor Recovery Secondary Containment Fiberglass -	Riser Pipe Secondary Containment Fiberglass -	Fill Components Installed Yes Spill Bucket Yes Striker Plate/Bottom Protector Yes Containment Sump

Under Dispenser Containment (UDC)

Construction Type Single-walled	Construction Material Steel -

Corrosion Protection

No Sacrificial Anode
No Impressed Current
No Isolation

Tank Monitoring Plan

Facility Information

Not the Fire Department
1130 Greenstone
Santa Fe Springs , CA 90670

Equipment Testing and Preventive Maintenance

Monitoring Equipment Serviced
Annually
-

Monitoring Locations

Site Plot Plan Submitted
Site Plan Previously Submitted

Tank Monitoring is Performed Using the Following Method(s)

Yes Continuous Electronic Tank Monitoring
Secondary Containment System: Dry
Monitor Panel Manufacturer: VR
Monitor Panel Model: VR
Leak Sensor Manufacturer: VR
Leak Sensor Model #: 420

No Automatic Tank Gauging

No Monthly Statistical Inventory Reconciliation

No Weekly Manual Tank Gauge

No Tank Integrity Testing

No Other Monitoring

Pipe Monitoring is Performed Using the Following Method(s)

Yes Continuous Monitoring of Piping Secondary Containment
Piping Secondary Containment: Dry
Panel Manufacturer: VR
Panel Model #: TLS-350
Leak Sensor Manufacturer: VR
Leak Sensor Model: 208
Leak Alarm Triggers Automatic Pump Shutdown: Yes
Failure/Disconnect Triggers Pump Shutdown: Yes

No Mechanical Line Leak Detector Performs 3 GPH Leak Test

Yes Electronic Line Leak Detector Performs 3 GPH Leak Test
ELLD Manufacturer: Veeder Root
ELLD Model: PLLD
ELLD Programmed In-Line Testing: -
0.2 GPH Minimum *Monthly*
0.1 GPH Minimum *Annually*
ELLD Triggers Automatic Pump Shutdown: Yes
ELLD Failure/Disconnect Triggers Automatic Shutdown: Yes

No Pipeline Integrity Testing

No Visual Pipeline Monitoring

No Suction Piping Meets Exemption Criteria

No No Regulated Piping Per Health and Safety Code, Division 20, Chapter 6.7 Is Connected To The Tank System

No Other Pipeline Monitoring

Under Dispenser Containment (UDC) Monitoring

UDC Monitoring: Continuous
-
UDC Panel Manufacturer: VEEDER ROOT
UDC Panel Model #: TLS-350
UDC Leak Sensor Manufacturer: VEEDER ROOT
UDC Leak Sensor Model: 208

Detection of Leak into UDC Triggers Audible and Visual Alarms: Yes
UDC Leak Alarm Triggers Automatic Pump Shutdown: Yes
Failure/Disconnection of UDC Monitoring System Triggers Automatic Pump Shutdown: Yes
UDC Monitoring Stops Flow of Product at Dispenser: No
UDC Construction: Single-walled
UDC Secondary Containment Monitoring: -
Leak Within Secondary Containment of UDC Causes Audible and Visual Alarms: -

Periodic System Testing

No ELD Testing
Yes Secondary Containment Testing
Yes Spill Bucket Testing

Recordkeeping

Yes Alarm Logs
No Visual Inspection Records
No Tank Integrity Testing Results
No SIR Testing Results
No Tank Gauging Results
No ATG Testing Results
No Corrosion Protection Logs
Yes Equipment Maintenance and Calibration Records

Training

Yes Personnel with UST Monitoring Responsibilities are Familiar with Training Documents
Specify Other Training Documents
-
Yes Designated Operator Training

Poll 7

Situation:
The UST monitoring plan page shows the incorrect sensor model # for the annular sensor.

What is the correct CERS violation?

Option #1, Option #2, or do you write both?

View	Monitoring Plan	UST Program	Failure to submit a complete and accurate UST Monitoring Plan.	2010013
View	Monitoring Plan Available	UST Program	Failure to submit and have current UST Monitoring Plan readily accessible at the facility.	2030033

Tank Monitoring Plan

Situation:
The UST monitoring plan page shows the incorrect sensor model # for the annular sensor.

What is the correct CERS violation?

Only write option #1

View	Monitoring Plan	UST Program	Failure to submit a complete and accurate UST Monitoring Plan.	2010013
View	Monitoring Plan Available	UST Program	Failure to submit and have current UST Monitoring Plan readily accessible at the facility.	2030033

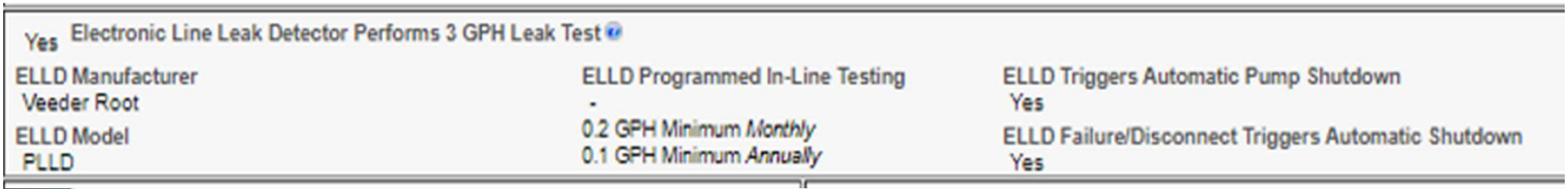
Tank Monitoring Plan

Situation: Site has two 87 tanks (main and auxiliary) with manifolded pressurized product piping. A single PLLD Is present on the main tank turbine only.

How should line leak detection be reported on the auxiliary tank monitoring plan?

The PLLD is monitoring all manifolded piping, list for both tank monitoring plans!

Note: Pressurized product piping without line leak detection will likely be flagged by the state during an audit. Note that as of 1/1/26, VPH no longer requires an LLD.



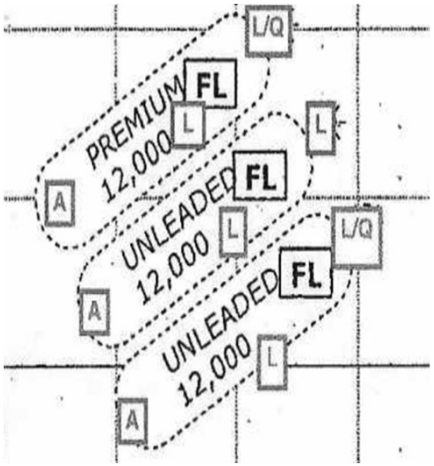
Tank Monitoring Plan

Situation: Site has two 87 tanks (main and auxiliary) with manifolded pressurized product piping. A single PLLD Is present on the main tank turbine only.

How should the single PLLD be reflected if both tanks show the have it?

#1 – Location of PLLD is reflected on the monitoring plan site map (aka plot plan).

#2 – Facility should be directed to provide an additional comment in the monitoring plan.



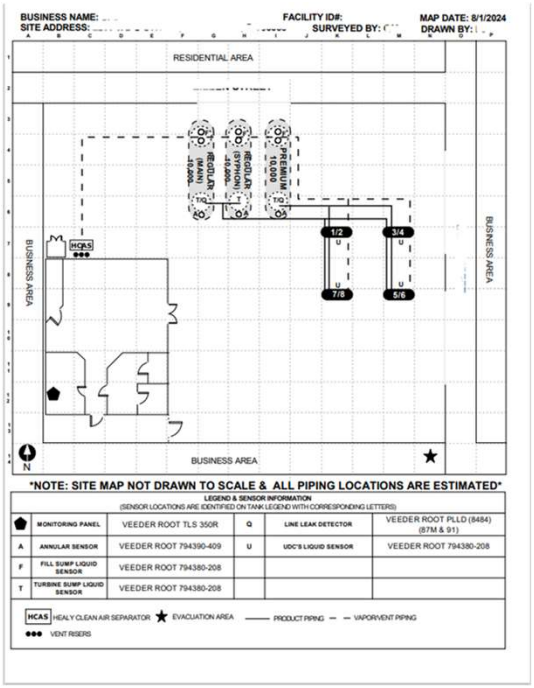
Tank Monitoring Site Plan

Situation:
A pre-2003 Fill Sump Sensor failed during the monitoring certification. What would be the best violation for a failed sensor?

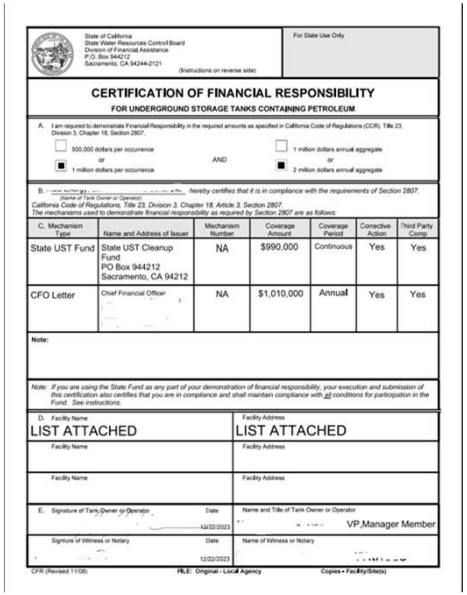
Surprisingly, maybe…

View	Monitoring Plan	UST Program	Failure to submit a complete and accurate UST Monitoring Plan.	2010013	6/1/2016	12/31/2099

Monitoring Site Plan



Certificate of Financial Responsibility



State of California
State Water Resources Control Board
Division of Financial Assistance
P.O. Box 944212
Sacramento, CA 94244-2121
(Instructions on reverse side)

For State Use Only

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A. I am required to demonstrate Financial Responsibility in the required amounts as specified in California Code of Regulations (CCR), Title 23, Division 3, Chapter 18, Section 2807.

☐ 500,000 dollars per occurrence or ■ 1 million dollars per occurrence AND ☐ 1 million dollars annual aggregate or ■ 2 million dollars annual aggregate

B. [redacted] hereby certifies that it is in compliance with the requirements of Section 2807.
(Name of Tank Owner or Operator)
California Code of Regulations, Title 23, Division 3, Chapter 18, Article 3, Section 2807.
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C. Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
State UST Fund	State UST Cleanup Fund PO Box 944212 Sacramento, CA 94212	NA	$990,000	Continuous	Yes	Yes
CFO Letter	Chief Financial Officer [redacted]	NA	$1,010,000	Annual	Yes	Yes

Note:

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance and shall maintain compliance with all conditions for participation in the Fund. See instructions.

D. Facility Name	Facility Address
LIST ATTACHED	LIST ATTACHED
Facility Name	Facility Address
Facility Name	Facility Address

E. Signature of Tank Owner or Operator / Date	Name and Title of Tank Owner or Operator
[redacted] 12/22/2023	VP,Manager Member
Signature of Witness or Notary / Date	Name of Witness or Notary
[redacted] 12/22/2023	[redacted]

CFR (Revised 11/08) FILE: Original - Local Agency Copies - Facility/Site(s)

Violation Type Information

Type Number	2010007	Begin Date	10/1/2018
Violation Name	Financial Responsibility (USEPATCR 11)	End Date	12/31/2099
Program Element	UST Program	RCRA Violation Code	-
Category	Administration/Documentation	Violation Comments	-
UST Performance Measure	Financial Responsibility		

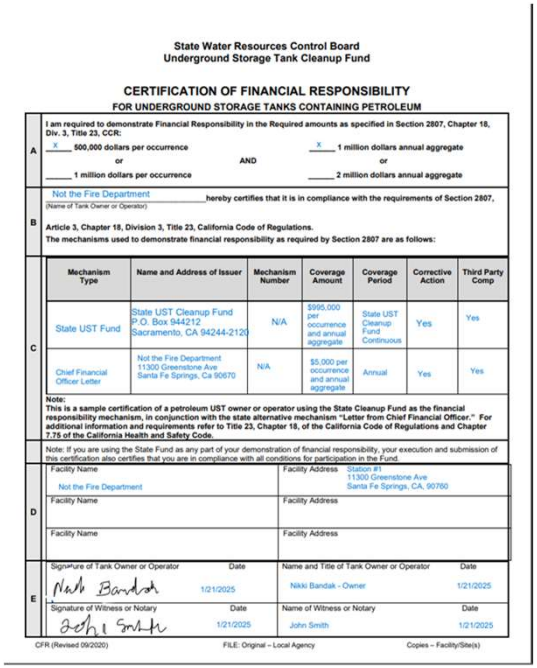
Violation Type Description

Failure to submit and maintain complete and current Certification of Financial Responsibility or other mechanism of financial assurance.

Occurrences and Annual aggregate

- Per occurrence: is the amount needed to be available to respond to one release.
- Annual aggregate: is going to be the among needed to cover all release that might occur in one year.

State Fund w/ Chief Financial Officer Letter



State Water Resources Control Board
Underground Storage Tank Cleanup Fund

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A I am required to demonstrate Financial Responsibility in the Required amounts as specified in Section 2807, Chapter 18, Div. 3, Title 23, CCR:

X 500,000 dollars per occurrence or 1 million dollars per occurrence AND X 1 million dollars annual aggregate or 2 million dollars annual aggregate

B Not the Fire Department (Name of Tank Owner or Operator) hereby certifies that it is in compliance with the requirements of Section 2807, Article 3, Chapter 18, Division 3, Title 23, California Code of Regulations.
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C

Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
State UST Fund	State UST Cleanup Fund P.O. Box 944212 Sacramento, CA 94244-2120	N/A	$995,000 per occurrence and annual aggregate	State UST Cleanup Fund Continuous	Yes	Yes
Chief Financial Officer Letter	Not the Fire Department 11300 Greenstone Ave Santa Fe Springs, Ca 90670	N/A	$5,000 per occurrence and annual aggregate	Annual	Yes	Yes

Note:
This is a sample certification of a petroleum UST owner or operator using the State Cleanup Fund as the financial responsibility mechanism, in conjunction with the state alternative mechanism "Letter from Chief Financial Officer." For additional information and requirements refer to Title 23, Chapter 18, of the California Code of Regulations and Chapter 7.75 of the California Health and Safety Code.

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance with all conditions for participation in the Fund.

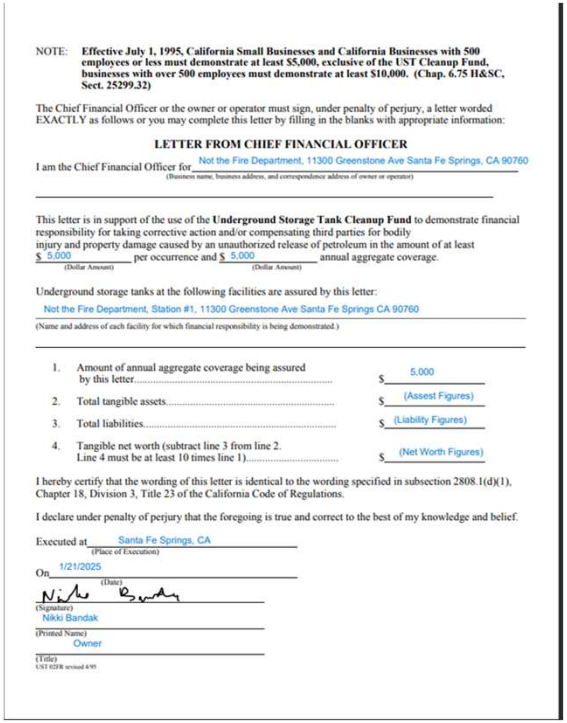
D

Facility Name	Facility Address
Not the Fire Department	Station #1 11300 Greenstone Ave Santa Fe Springs, CA, 90760
Facility Name	Facility Address
Facility Name	Facility Address

E

Signature of Tank Owner or Operator	Date	Name and Title of Tank Owner or Operator	Date
Nikki Bandak	1/21/2025	Nikki Bandak - Owner	1/21/2025
Signature of Witness or Notary	Date	Name of Witness or Notary	Date
John Smith	1/21/2025	John Smith	1/21/2025

CFR (Revised 09/2020) FILE: Original – Local Agency Copies – Facility/Site(s)



NOTE: **Effective July 1, 1995, California Small Businesses and California Businesses with 500 employees or less must demonstrate at least $5,000, exclusive of the UST Cleanup Fund, businesses with over 500 employees must demonstrate at least $10,000. (Chap. 6.75 H&SC, Sect. 25299.32)**

The Chief Financial Officer or the owner or operator must sign, under penalty of perjury, a letter worded EXACTLY as follows or you may complete this letter by filling in the blanks with appropriate information:

LETTER FROM CHIEF FINANCIAL OFFICER

I am the Chief Financial Officer for Not the Fire Department, 11300 Greenstone Ave Santa Fe Springs, CA 90760
(Business name, business address, and correspondence address of owner or operator)

This letter is in support of the use of the **Underground Storage Tank Cleanup Fund** to demonstrate financial responsibility for taking corrective action and/or compensating third parties for bodily injury and property damage caused by an unauthorized release of petroleum in the amount of at least $ 5,000 (Dollar Amount) per occurrence and $ 5,000 (Dollar Amount) annual aggregate coverage.

Underground storage tanks at the following facilities are assured by this letter:
Not the Fire Department, Station #1, 11300 Greenstone Ave Santa Fe Springs CA 90760
(Name and address of each facility for which financial responsibility is being demonstrated.)

1. Amount of annual aggregate coverage being assured by this letter..... $ 5,000
2. Total tangible assets..... $ (Assest Figures)
3. Total liabilities..... $ (Liability Figures)
4. Tangible net worth (subtract line 3 from line 2. Line 4 must be at least 10 times line 1)..... $ (Net Worth Figures)

I hereby certify that the wording of this letter is identical to the wording specified in subsection 2808.1(d)(1), Chapter 18, Division 3, Title 23 of the California Code of Regulations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed at Santa Fe Springs, CA (Place of Execution)
On 1/21/2025 (Date)
(Signature)
Nikki Bandak (Printed Name)
Owner (Title)
UST 02FR revised 4/95

CFO Letter for 2 Million Annual Aggregate Coverage (>100 Tanks)

■ or 1 million dollars per occurrence AND ■ or 2 million dollars annual aggregate

B. _____ *hereby certifies that it is in compliance with the requirements of Section 2807,*
(Name of Tank Owner or Operator)
California Code of Regulations, Title 23, Division 3, Chapter 18, Article 3, Section 2807.
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C. Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
State UST Fund	State UST Cleanup Fund PO Box 944212 Sacramento, CA 94212	NA	$990,000	Continuous	Yes	Yes
CFO Letter		NA	$1,010,000	Annual	Yes	Yes

To qualify, must have at least 10x tangible net worth provided by the CFO letter (10,100,000)

Source: Title 23, Chapter 18, Section 2808.1(c)

CFO Letter for 2 Million Annual Aggregate Coverage (>100 Tanks)

This letter is in support of the use of the **Underground Storage Tank Cleanup Fund** to demonstrate financial responsibility for taking corrective action and/or compensating third parties for bodily injury and property damage caused by an unauthorized release of petroleum in the amount of at least $ 10,000.00 (Dollar Amount) per occurrence and $ 1,010,000.00 (Dollar Amount) annual aggregate coverage.

Underground storage tanks at the following facilities are assured by this letter:

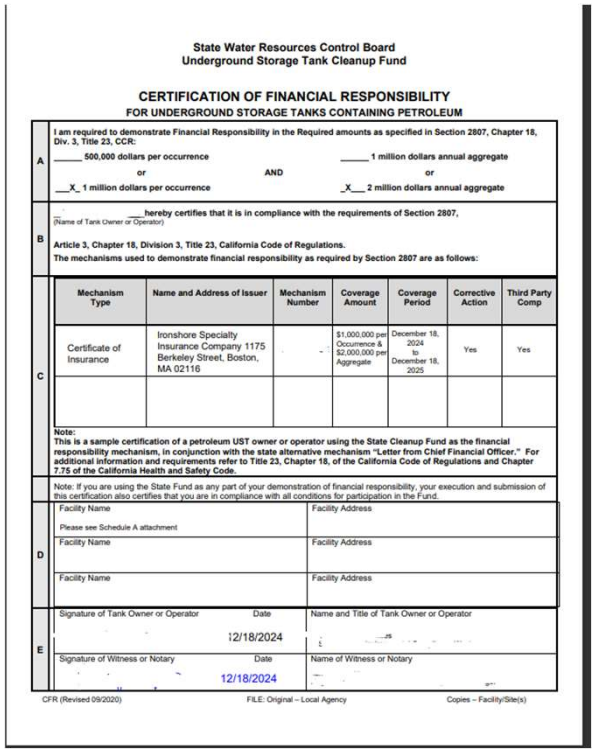
List Attached

(Name and address of each facility for which financial responsibility is being demonstrated.)

To qualify, must have at least 10x tangible net worth provided by the CFO letter (10,100,000)

Source: Title 23, Chapter 18, Section 2808.1(c)

Private Insurance



State Water Resources Control Board
Underground Storage Tank Cleanup Fund

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A

I am required to demonstrate Financial Responsibility in the Required amounts as specified in Section 2807, Chapter 18, Div. 3, Title 23, CCR:

_____ 500,000 dollars per occurrence or ___X_ 1 million dollars per occurrence AND _____1 million dollars annual aggregate or _X___ 2 million dollars annual aggregate

B

___ (Name of Tank Owner or Operator) ___hereby certifies that it is in compliance with the requirements of Section 2807, Article 3, Chapter 18, Division 3, Title 23, California Code of Regulations.

The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C

Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
Certificate of Insurance	Ironshore Specialty Insurance Company 1175 Berkeley Street, Boston, MA 02116	–	$1,000,000 per Occurrence & $2,000,000 per Aggregate	December 18, 2024 to December 18, 2025	Yes	Yes

Note:
This is a sample certification of a petroleum UST owner or operator using the State Cleanup Fund as the financial responsibility mechanism, in conjunction with the state alternative mechanism "Letter from Chief Financial Officer." For additional information and requirements refer to Title 23, Chapter 18, of the California Code of Regulations and Chapter 7.75 of the California Health and Safety Code.

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance with all conditions for participation in the Fund.

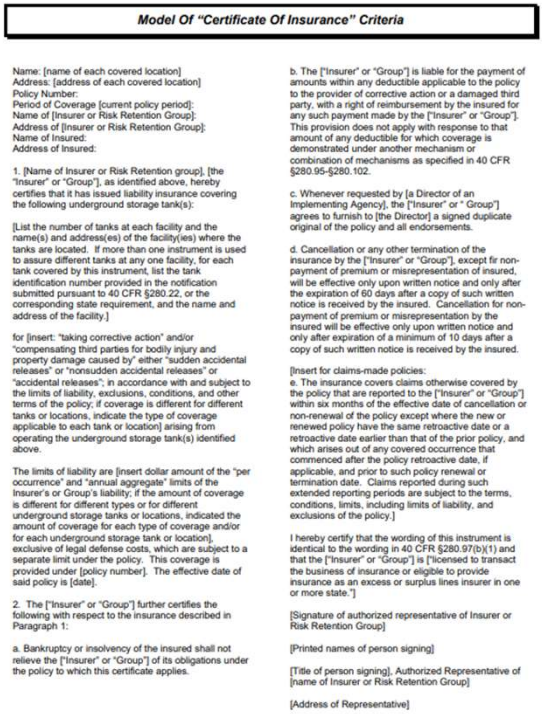
D

Facility Name	Facility Address
Please see Schedule A attachment	
Facility Name	Facility Address
Facility Name	Facility Address

E

Signature of Tank Owner or Operator	Date	Name and Title of Tank Owner or Operator
	12/18/2024	
Signature of Witness or Notary	Date	Name of Witness or Notary
	12/18/2024	

CFR (Revised 09/2020) FILE: Original – Local Agency Copies – Facility/Site(s)



Model Of "Certificate Of Insurance" Criteria

Name: [name of each covered location]
Address: [address of each covered location]
Policy Number:
Period of Coverage [current policy period]:
Name of [Insurer or Risk Retention Group]:
Address of [Insurer or Risk Retention Group]:
Name of Insured:
Address of Insured:

1. [Name of Insurer or Risk Retention group], [the "Insurer" or "Group"], as identified above, hereby certifies that it has issued liability insurance covering the following underground storage tank(s):

[List the number of tanks at each facility and the name(s) and address(es) of the facility(ies) where the tanks are located. If more than one instrument is used to assure different tanks at any one facility, for each tank covered by this instrument, list the tank identification number provided in the notification submitted pursuant to 40 CFR §280.22, or the corresponding state requirement, and the name and address of the facility.]

for [insert: "taking corrective action" and/or "compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "nonsudden accidental releases" or "accidental releases"; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy; if coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location] arising from operating the underground storage tank(s) identified above.

The limits of liability are [insert dollar amount of the "per occurrence" and "annual aggregate" limits of the Insurer's or Group's liability; if the amount of coverage is different for different types or for different underground storage tanks or locations, indicated the amount of coverage for each type of coverage and/or for each underground storage tank or location], exclusive of legal defense costs, which are subject to a separate limit under the policy. This coverage is provided under [policy number]. The effective date of said policy is [date].

2. The ["Insurer" or "Group"] further certifies the following with respect to the insurance described in Paragraph 1:

a. Bankruptcy or insolvency of the insured shall not relieve the ["Insurer" or "Group"] of its obligations under the policy to which this certificate applies.

b. The ["Insurer" or "Group"] is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third party, with a right of reimbursement by the insured for any such payment made by the ["Insurer" or "Group"]. This provision does not apply with response to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR §280.95-§280.102.

c. Whenever requested by [a Director of an Implementing Agency], the ["Insurer" or " Group"] agrees to furnish to [the Director] a signed duplicate original of the policy and all endorsements.

d. Cancellation or any other termination of the insurance by the ["Insurer" or "Group"], except fir non-payment of premium or misrepresentation of insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured. Cancellation for non-payment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of 10 days after a copy of such written notice is received by the insured.

[Insert for claims-made policies:
e. The insurance covers claims otherwise covered by the policy that are reported to the ["Insurer" or "Group"] within six months of the effective date of cancellation or non-renewal of the policy except where the new or renewed policy have the same retroactive date or a retroactive date earlier than that of the prior policy, and which arises out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting periods are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.]

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR §280.97(b)(1) and that the ["Insurer" or "Group"] is ["licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer in one or more state."]

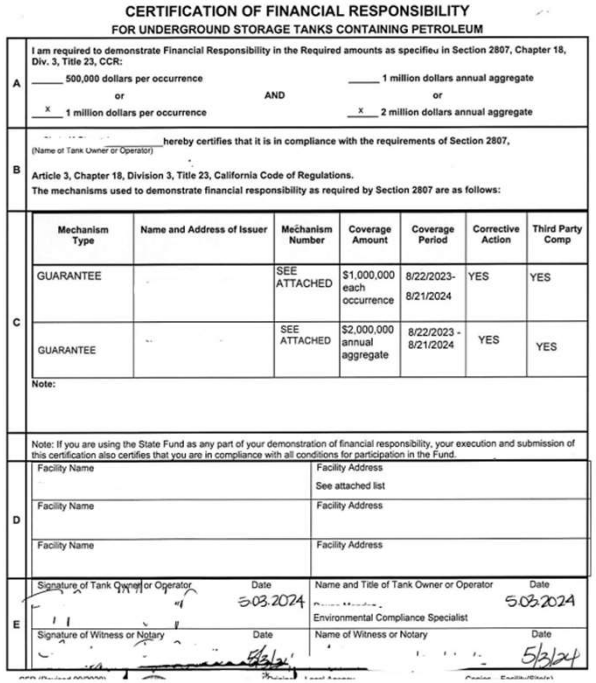
[Signature of authorized representative of Insurer or Risk Retention Group]

[Printed names of person signing]

[Title of person signing], Authorized Representative of [name of Insurer or Risk Retention Group]

[Address of Representative]

Guarantee



CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A. I am required to demonstrate Financial Responsibility in the Required amounts as specified in Section 2807, Chapter 18, Div. 3, Title 23, CCR:

_____ 500,000 dollars per occurrence or _____ 1 million dollars annual aggregate
AND
_____ 1 million dollars per occurrence or _____ 2 million dollars annual aggregate

B. _____ (Name of Tank Owner or Operator) hereby certifies that it is in compliance with the requirements of Section 2807, Article 3, Chapter 18, Division 3, Title 23, California Code of Regulations.
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C.

Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
GUARANTEE		SEE ATTACHED	$1,000,000 each occurrence	8/22/2023-8/21/2024	YES	YES
GUARANTEE		SEE ATTACHED	$2,000,000 annual aggregate	8/22/2023 - 8/21/2024	YES	YES

Note:

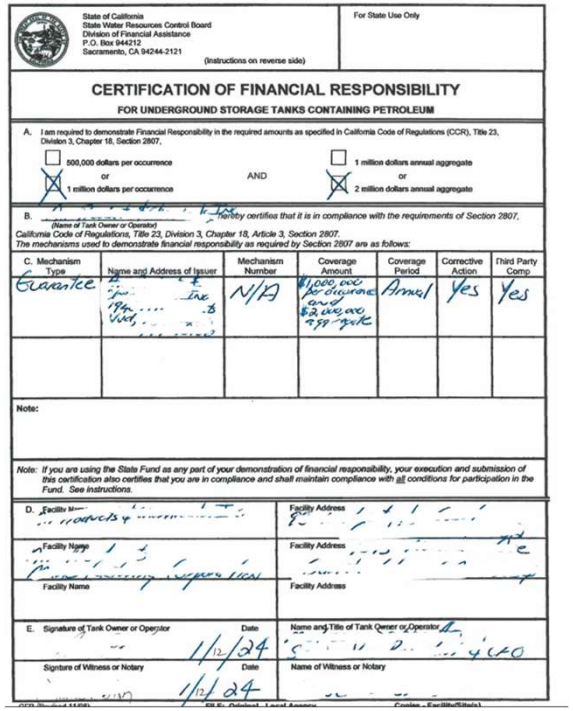
Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance with all conditions for participation in the Fund.

D.

Facility Name	Facility Address
	See attached list
Facility Name	Facility Address
Facility Name	Facility Address

E.

Signature of Tank Owner or Operator	Date	Name and Title of Tank Owner or Operator	Date
	5.03.2024	Environmental Compliance Specialist	5.03.2024
Signature of Witness or Notary	Date	Name of Witness or Notary	Date
	5/3/24		5/3/24



State of California
State Water Resources Control Board
Division of Financial Assistance
P.O. Box 944212
Sacramento, CA 94244-2121
(Instructions on reverse side)

For State Use Only

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A. I am required to demonstrate Financial Responsibility in the required amounts as specified in California Code of Regulations (CCR), Title 23, Division 3, Chapter 18, Section 2807.

☐ 500,000 dollars per occurrence or ☒ 1 million dollars per occurrence
AND
☐ 1 million dollars annual aggregate or ☒ 2 million dollars annual aggregate

B. [redacted] hereby certifies that it is in compliance with the requirements of Section 2807, California Code of Regulations, Title 23, Division 3, Chapter 18, Article 3, Section 2807.
(Name of Tank Owner or Operator)
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C. Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
Guarantee	[redacted]	N/A	$1,000,000 per occurrence and $2,000,000 annual aggregate	Annual	Yes	Yes

Note:

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance and shall maintain compliance with all conditions for participation in the Fund. See instructions.

D.

Facility Name	Facility Address
[redacted]	[redacted]
Facility Name	Facility Address
Facility Name	Facility Address

E.

Signature of Tank Owner or Operator	Date	Name and Title of Tank Owner or Operator	
	1/12/24	[redacted]	
Signature of Witness or Notary	Date	Name of Witness or Notary	
	1/12/24		

CALIFORNIA CUPA FORUM

Surety Bond

State Water Resources Control Board
Underground Storage Tank Cleanup Fund

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A I am required to demonstrate Financial Responsibility in the Required amounts as specified in Section 2807, Chapter 18, Div. 3, Title 23, CCR:

_____ 500,000 dollars per occurrence or ___X___ 1 million dollars per occurrence AND _____ 1 million dollars annual aggregate or ___X___ 2 million dollars annual aggregate

B _____ (Name of Tank Owner or Operator) hereby certifies that it is in compliance with the requirements of Section 2807, Article 3, Chapter 18, Division 3, Title 23, California Code of Regulations.
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C

Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Comp
Surety Bond	Zurich American Insurance Company 1299 Zurich Way Schaumburg, IL 60196	...	...	...	Yes	Yes

Note:
This is a sample certification of a petroleum UST owner or operator using the State Cleanup Fund as the financial responsibility mechanism, in conjunction with the state alternative mechanism "Letter from Chief Financial Officer." For additional information and requirements refer to Title 23, Chapter 18, of the California Code of Regulations and Chapter 7.75 of the California Health and Safety Code.

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance with all conditions for participation in the Fund.

D

Facility Name	Facility Address
Please see Schedule A attachment	
Facility Name	Facility Address
Facility Name	Facility Address

E

Signature of Tank Owner or Operator	Date	Name and Title of Tank Owner or Operator	Date
...	12/30/24	...	12/30/24
Signature of Witness or Notary	Date	Name of Witness or Notary	Date
...	12/30/24	...	12/30/24

CFR (Revised 09/2020) FILE: Original – Local Agency Copies – Facility/Site(s)

ZURICH

Zurich American Insurance Company
1299 Zurich Way, Schaumburg, IL 60196

CONTINUATION CERTIFICATE

For Miscellaneous Term Bonds

... as Principal, and the Zurich American Insurance Company, as Surety in a certain ... 3, with an effective date of the **1st** day of **October 2018**, in the penalty of **Two million and 00/100** Dollars (**$2,000,000.00**), in favor of **California State Water Resources Control Board** do hereby continue said bond in force for the further term of one year beginning on the **1st** day of **January 2025**.

PROVIDED, however, that said bond, as continued hereby, shall be subject to all its terms and conditions, except as herein modified, and that the liability of the said Fidelity and Deposit Company of Maryland under said bond and any and all continuations thereof shall in no event exceed in the aggregate the above named penalty, and that this certificate shall not be valid unless signed by said Principal.

Signed, sealed and dated this **5th** day of **December 2024**

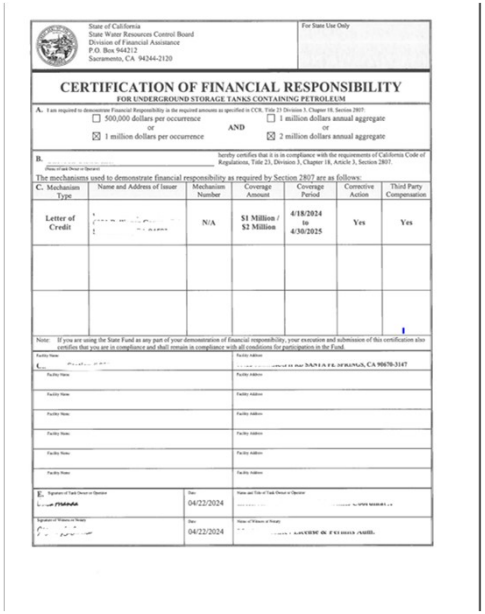
Witness:

... (SEAL)
Principal

... By: ... (SEAL)
Principal

Zurich American Insurance Company

Letter of Credit



State of California
State Water Resources Control Board
Division of Financial Assistance
P.O. Box 944212
Sacramento, CA 94244-2120

For State Use Only

CERTIFICATION OF FINANCIAL RESPONSIBILITY
FOR UNDERGROUND STORAGE TANKS CONTAINING PETROLEUM

A. I am required to demonstrate Financial Responsibility in the required amounts as specified in CCR, Title 23 Division 3, Chapter 18, Section 2807:
☐ 500,000 dollars per occurrence ☐ 1 million dollars annual aggregate
or AND or
☒ 1 million dollars per occurrence ☒ 2 million dollars annual aggregate

B. _____ hereby certifies that it is in compliance with the requirements of California Code of Regulations, Title 23, Division 3, Chapter 18, Article 3, Section 2807.
(Name of Bank Owner or Operator)

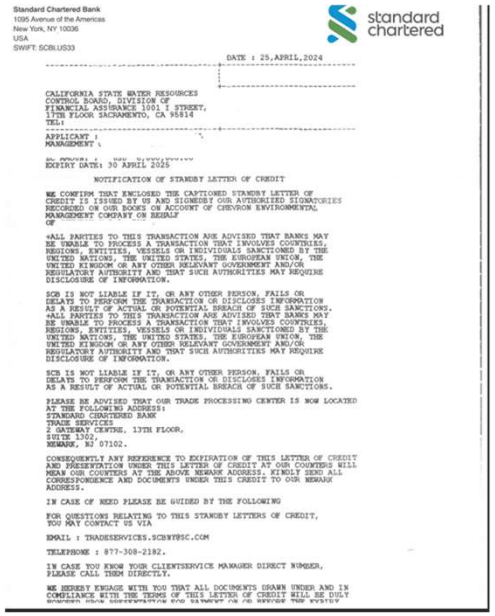
The mechanisms used to demonstrate financial responsibility as required by Section 2807 are as follows:

C. Mechanism Type	Name and Address of Issuer	Mechanism Number	Coverage Amount	Coverage Period	Corrective Action	Third Party Compensation
Letter of Credit	[redacted]	N/A	$1 Million / $2 Million	4/18/2024 to 4/30/2025	Yes	Yes

Note: If you are using the State Fund as any part of your demonstration of financial responsibility, your execution and submission of this certification also certifies that you are in compliance and shall remain in compliance with all conditions for participation in the Fund.

Facility Name	Facility Address
L [redacted]	[redacted] SANTA FE SPRINGS, CA 90670-3147
Facility Name	Facility Address
Facility Name	Facility Address
Facility Name	Facility Address
Facility Name	Facility Address
Facility Name	Facility Address
Facility Name	Facility Address

E. Signature of Bank Owner or Operator: [redacted] Date: 04/22/2024 Name and Title of Bank Owner or Operator: [redacted]
Signature of Witness or Notary: [redacted] Date: 04/22/2024 Name of Witness or Notary: [redacted]



Standard Chartered Bank
1095 Avenue of the Americas
New York, NY 10036
USA
SWIFT: SCBLUS33

standard chartered

DATE : 25.APRIL.2024

CALIFORNIA STATE WATER RESOURCES
CONTROL BOARD, DIVISION OF
FINANCIAL ASSISANCE 1001 I STREET,
17TH FLOOR SACRAMENTO, CA 95814
TEL:

APPLICANT :
MANAGEMENT \

EXPIRY DATE: 30 APRIL 2025

NOTIFICATION OF STANDBY LETTER OF CREDIT

WE CONFIRM THAT ENCLOSED THE CAPTIONED STANDBY LETTER OF CREDIT IS ISSUED BY US AND SIGNEDBY OUR AUTHORIZED SIGNATORIES RECORDED ON OUR BOOKS ON ACCOUNT OF CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY ON BEHALF OF

+ALL PARTIES TO THIS TRANSACTION ARE ADVISED THAT BANKS MAY BE UNABLE TO PROCESS A TRANSACTION THAT INVOLVES COUNTRIES, REGIONS, ENTITIES, VESSELS OR INDIVIDUALS SANCTIONED BY THE UNITED NATIONS, THE UNITED STATES, THE EUROPEAN UNION, THE UNITED KINGDOM OR ANY OTHER RELEVANT GOVERNMENT AND/OR REGULATORY AUTHORITY AND THAT SUCH AUTHORITIES MAY REQUIRE DISCLOSURE OF INFORMATION.

SCB IS NOT LIABLE IF IT, OR ANY OTHER PERSON, FAILS OR DELAYS TO PERFORM THE TRANSACTION OR DISCLOSES INFORMATION AS A RESULT OF ACTUAL OR POTENTIAL BREACH OF SUCH SANCTIONS.
<ALL PARTIES TO THIS TRANSACTION ARE ADVISED THAT BANKS MAY BE UNABLE TO PROCESS A TRANSACTION THAT INVOLVES COUNTRIES, REGIONS, ENTITIES, VESSELS OR INDIVIDUALS SANCTIONED BY THE UNITED NATIONS, THE UNITED STATES, THE EUROPEAN UNION, THE UNITED KINGDOM OR ANY OTHER RELEVANT GOVERNMENT AND/OR REGULATORY AUTHORITY AND THAT SUCH AUTHORITIES MAY REQUIRE DISCLOSURE OF INFORMATION.

SCB IS NOT LIABLE IF IT, OR ANY OTHER PERSON, FAILS OR DELAYS TO PERFORM THE TRANSACTION OR DISCLOSES INFORMATION AS A RESULT OF ACTUAL OR POTENTIAL BREACH OF SUCH SANCTIONS.

PLEASE BE ADVISED THAT OUR TRADE PROCESSING CENTER IS NOW LOCATED AT THE FOLLOWING ADDRESS:
STANDARD CHARTERED BANK
TRADE SERVICES
2 GATEWAY CENTRE, 13TH FLOOR,
SUITE 1302,
NEWARK, NJ 07102.

CONSEQUENTLY ANY REFERENCE TO EXPIRATION OF THIS LETTER OF CREDIT AND PRESENTATION UNDER THIS LETTER OF CREDIT AT OUR COUNTERS WILL MEAN OUR COUNTERS AT THE ABOVE NEWARK ADDRESS. KINDLY SEND ALL CORRESPONDENCE AND DOCUMENTS UNDER THIS CREDIT TO OUR NEWARK ADDRESS.

IN CASE OF NEED PLEASE BE GUIDED BY THE FOLLOWING

FOR QUESTIONS RELATING TO THIS STANDBY LETTERS OF CREDIT, YOU MAY CONTACT US VIA

EMAIL : TRADESERVICES.SCBNY@SC.COM

TELEPHONE : 877-308-2182.

IN CASE YOU KNOW YOUR CLIENTSERVICE MANAGER DIRECT NUMBER, PLEASE CALL THEM DIRECTLY.

WE HEREBY ENGAGE WITH YOU THAT ALL DOCUMENTS DRAWN UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS LETTER OF CREDIT WILL BE DULY

Financial Test of Self-Insurance

Test 1

- Your firm must have a tangible net worth of at least $10 million; and
- Your firm must have a tangible net worth of a least 10 times the amount of aggregate coverage that you are required to demonstrate plus any other liability coverage for which your firm is using the test to demonstrate financial responsibility to EPA; and
- Your firm must file the firm's annual financial statements with the Securities and Exchange Commission (SEC), or annually report the firm's tangible net worth to Dun and Bradstreet and receive a rating of 4A or 5A. Utilities may file financial statements with the Energy Information Administration or the Rural Utilities Service; and
- Your firm must have audited financial statements that do not include an adverse auditor's opinion or disclaimer of opinion.

Test 2

- Your firm must have a tangible net worth of at least $10 million; and
- Your firm must have a tangible net worth of at least 6 times the amount of aggregate coverage that you are required to demonstrate; and
- Have U.S. assets that are at least 90 percent of total assets or at least 6 times the required aggregate amount; and
- Have net working capital at least 6 times the required aggregate amount, or a bond rating AAA, AA, A, or BBB from Standard and Poor's, or Aaa, Aa, A, or Baa from Moody's; and
- Your firm must have audited financial statements that do not include an adverse auditor's opinion or disclaimer of opinion.

Trust Fund

Financial Responsibility example

Name: [name of each covered location]
Address: [address of each covered location]
Policy Number:
Period of Coverage [current policy period]:
Name of [Insurer or Risk Retention Group]:
Address of [Insurer or Risk Retention Group]:
Name of Insured:
Address of Insured:

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following underground storage tank(s):

[List the number of tanks at each facility and the name(s) and address(es) of the facility(ies) where the tanks are located. If more than one instrument is used to assure different tanks at any one facility, for each tank covered by this instrument, list the tank identification number provided in the notification submitted pursuant to 40 CFR 280.22, or the corresponding state requirement, and the name and address of the facility.] for [insert: "taking corrective action" and/or "compensating third parties for bodily injury and property damage caused by" either "sudden accidental releases" or "nonsudden accidental releases" or "accidental release"; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the policy; if coverage is different for different tanks or locations, indicate the type of coverage applicable to each tank or location] arising from operating the underground storage tank(s) identified above.

The limits of liability are [insert the dollar amount of the "per occurrence" and "annual aggregate" limits of the Insurer's or Group's liability; if the amount of coverage is different for different types of coverage or for different underground storage tanks or locations, indicate the amount of coverage for each type of coverage and/or for each underground storage tank or location], exclusive of legal defense costs, which are subject to a separate limit under the policy. This coverage is provided under [policy number]. The effective date of said policy is [date].

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsection (a) through (e):

a. Bankruptcy or insolvency of the insured shall not relieve the ["Insurer" or "Group"] of its obligations under the policy to which this endorsement is attached.

b. The ["Insurer" or "Group"] is liable for the payment of amounts within any deductible applicable to the policy to the provider of corrective action or a damaged third party, with a right of reimbursement by the insured for any such payment made by the ["Insurer" or "Group"]. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95-280.102 and 280.104-280.107.

c. Whenever requested by [a Director of an Implementing Agency], the ["Insurer" or "Group"] agrees to furnish to [the Director] a signed duplicate original of the policy and all endorsements.

d. Cancellation or any other termination of the insurance by the ["Insurer" or "Group"], except for non-payment of premium or misrepresentation by the insured, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the insured. Cancellation for non-payment of premium or misrepresentation by the insured will be effective only upon written notice and only after expiration of a minimum of 10 days after a copy of such written notice is received by the insured.

[Insert for claims-made policies:

e. The insurance covers claims otherwise covered by the policy that are reported to the ["Insurer" or "Group"] within six months of the effective date of the cancellation or non-renewal of the policy except where the new or renewed policy has the some retroactive date or a retroactive date earlier than that of the prior policy, and which arise out of any covered occurrence that commenced after the policy retroactive date, if applicable, and prior to such policy renewal or termination date. Claims reported during such extended reporting period are subject to the terms, conditions, limits, including limits of liability, and exclusions of the policy.]

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97(b)(1) and that the ["Insurer" or "Group"] is ["licensed to transact the business of insurance or eligible to provide insurance as an excess or surplus lines insurer in one or more states".]

[Signature of authorized representative of Insurer or Risk Retention Group]

[Printed name of person signing]

[Title of person signing], Authorized Representative of [name of Insurer of Risk Retention Group]

[Address of Representative]

Response Plan

UNDERGROUND STORAGE TANK
RESPONSE PLAN – PAGE 1
(One form per facility)

TYPE OF ACTION: ☐ 1. NEW PLAN ☐ 2. CHANGE OF INFORMATION

I. FACILITY INFORMATION

FACILITY ID # *(Agency Use Only)*:
BUSINESS NAME (Same as FACILITY NAME):
BUSINESS SITE ADDRESS | CITY

II. SPILL CONTROL AND CLEANUP METHODS

This plan addresses unauthorized releases from UST systems and supplements the emergency response plans and procedures in the facility's Hazardous Materials Business Plan.

- If safe to do so, facility personnel will take immediate measures to control or stop any release (e.g., activate pump shut-off, etc.) and, if necessary, safely remove remaining hazardous material from the UST system.
- Any release to secondary containment will be pumped or otherwise removed within a time consistent with the ability of the secondary containment system to contain the hazardous material, but not greater than 30 calendar days, or sooner if required by the local agency. Recovered hazardous materials, unless still suitable for their intended use, will be managed as hazardous waste.
- Absorbent material will be used to contain and clean up manageable spills of hazardous materials. Absorbent material which has become too saturated to be effective or which is no longer intended for use will be managed as hazardous waste unless a waste determination in accordance with 22 CCR §66262.11 finds that it is non-hazardous. Used absorbent material, reusable or waste, will be stored in a properly labeled and sealed container. Waste material shall be disposed appropriately.
- Facility personnel will determine whether any water removed from secondary containment systems, or from clean-up activity, has been in contact with any hazardous material. If the water is contaminated, it will be managed as hazardous waste unless a waste determination in accordance with 22 CCR §66262.11 finds that it is non-hazardous. If the water has a petroleum sheen (i.e., rainbow colors), it is contaminated. A thick floating petroleum layer may not necessarily display rainbow colors. Water (hazardous or non-hazardous) from sumps, spill containers, etc. will not be disposed to storm water systems.
- We will review secondary containment systems for possible deterioration if any of the following conditions occur:
  1. Hazardous material in contact with secondary containment is not compatible with the material used for secondary containment;
  2. Secondary containment is prone to damage from any equipment used to remove or clean up hazardous material collected in secondary containment;
  3. Hazardous material, other than the product/waste stored in the primary containment system, is placed inside secondary containment to treat or neutralize released product/waste, and the added material or resulting material from such a combination is not compatible with secondary containment.

III. SPILL CONTROL AND CLEAN-UP EQUIPMENT

PERIODIC MAINTENANCE: Spill control and clean-up equipment kept permanently on-site is listed in the facility's Hazardous Materials Business Plan. This equipment is inspected at least monthly, and after each use, supplies are replenished as needed. Defective equipment is repaired or replaced as necessary.

EQUIPMENT NOT PERMANENTLY ON-SITE, BUT AVAILABLE FOR USE IF NEEDED: *(Complete only if applicable)*

EQUIPMENT	LOCATION	AVAILABILITY
R19.	R20.	R21.
R22.	R23.	R24.
R25.	R26.	R27.
R28.	R29.	R30.
R31.	R32.	R33.

IV. RESPONSIBLE PERSONS

THE FOLLOWING PERSON(S) IS/ARE RESPONSIBLE FOR AUTHORIZING ANY WORK NECESSARY UNDER THIS RESPONSE PLAN:

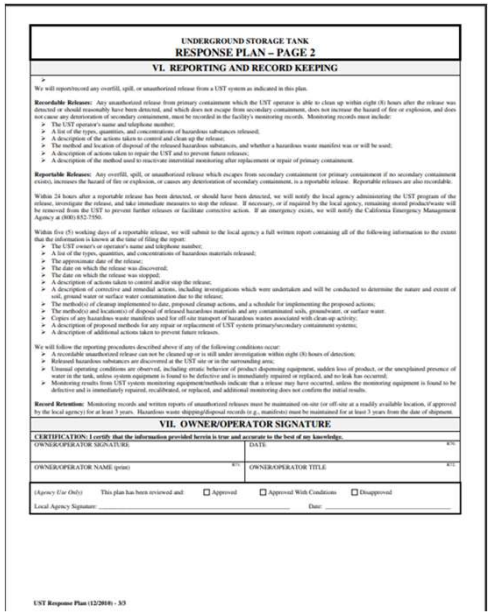
NAME	TITLE
R34.	R35.
R36.	R37.
R38.	R39.
R40.	R41.

V. MONITORING INDICATORS

IF MONITORING INDICATES A POSSIBLE UNAUTHORIZED RELEASE, STEPS TO VERIFY THE RELEASE WILL BE MADE AS FOLLOWS:
☐ Additional system testing or data collection ☐ Inspection by qualified persons ☐ Recalibration of equipment
Other:

R60.

UST Response Plan (12/2010) - 1/3



UNDERGROUND STORAGE TANK
RESPONSE PLAN – PAGE 2

VI. REPORTING AND RECORD KEEPING

We will report/record any overfill, spill, or unauthorized release from a UST system as indicated in this plan.

Recordable Releases: Any unauthorized release from primary containment which the UST operator is able to clean up within eight (8) hours after the release was detected or should reasonably have been detected, and which does not escape from secondary containment, does not increase the hazard of fire or explosion, and does not cause any deterioration of secondary containment, must be recorded in the facility's monitoring records. Monitoring records must include:

- The UST operator's name and telephone number;
- A list of the types, quantities, and concentrations of hazardous substances released;
- A description of the actions taken to control and clean up the release;
- The method and location of disposal of the released hazardous substances, and whether a hazardous waste manifest was or will be used;
- A description of actions taken to repair the UST and to prevent future releases;
- A description of the method used to reactivate interstitial monitoring after replacement or repair of primary containment.

Reportable Releases: Any overfill, spill, or unauthorized release which escapes from secondary containment (or primary containment if no secondary containment exists), increases the hazard of fire or explosion, or causes any deterioration of secondary containment, is a reportable release. Reportable releases are also recordable.

Within 24 hours after a reportable release has been detected, or should have been detected, we will notify the local agency administering the UST program of the release, investigate the release, and take immediate measures to stop the release. If necessary, or if required by the local agency, remaining stored product/waste will be removed from the UST to prevent further releases or facilitate corrective action. If an emergency exists, we will notify the California Emergency Management Agency at (800) 852-7550.

Within five (5) working days of a reportable release, we will submit to the local agency a full written report containing all of the following information to the extent that the information is known at the time of filing the report:

- The UST owner's or operator's name and telephone number;
- A list of the types, quantities, and concentrations of hazardous materials released;
- The approximate date of the release;
- The date on which the release was discovered;
- The date on which the release was stopped;
- A description of actions taken to control and/or stop the release;
- A description of corrective and remedial actions, including investigations which were undertaken and will be conducted to determine the nature and extent of soil, ground water or surface water contamination due to the release;
- The method(s) of cleanup implemented to date, proposed cleanup actions, and a schedule for implementing the proposed actions;
- The method(s) and location(s) of disposal of released hazardous materials and any contaminated soils, groundwater, or surface water.
- Copies of any hazardous waste manifests used for off-site transport of hazardous wastes associated with clean-up activity;
- A description of proposed methods for any repair or replacement of UST system primary/secondary containment systems;
- A description of additional actions taken to prevent future releases.

We will follow the reporting procedures described above if any of the following conditions occur:

- A recordable unauthorized release can not be cleaned up or is still under investigation within eight (8) hours of detection;
- Released hazardous substances are discovered at the UST site or in the surrounding area;
- Unusual operating conditions are observed, including erratic behavior of product dispensing equipment, sudden loss of product, or the unexplained presence of water in the tank, unless system equipment is found to be defective and is immediately repaired or replaced, and no leak has occurred;
- Monitoring results from UST system monitoring equipment/methods indicate that a release may have occurred, unless the monitoring equipment is found to be defective and is immediately repaired, recalibrated, or replaced, and additional monitoring does not confirm the initial results.

Record Retention: Monitoring records and written reports of unauthorized releases must be maintained on-site (or off-site at a readily available location, if approved by the local agency) for at least 3 years. Hazardous waste shipping/disposal records (e.g., manifests) must be maintained for at least 3 years from the date of shipment.

VII. OWNER/OPERATOR SIGNATURE

CERTIFICATION: I certify that the information provided herein is true and accurate to the best of my knowledge.

OWNER/OPERATOR SIGNATURE	DATE: R70.
OWNER/OPERATOR NAME (print): R71.	OWNER/OPERATOR TITLE: R72.

(Agency Use Only) This plan has been reviewed and: ☐ Approved ☐ Approved With Conditions ☐ Disapproved

Local Agency Signature: _____ Date: _____

UST Response Plan (12/2010) - 3/3

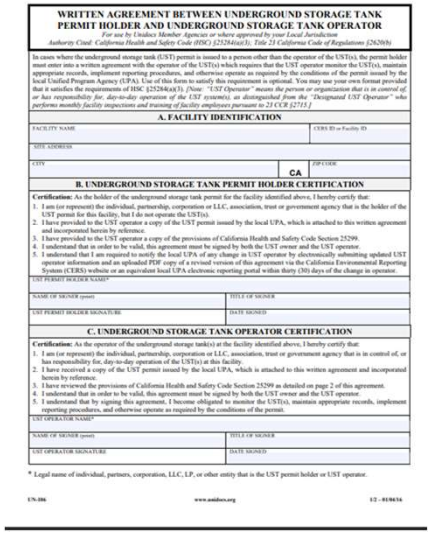
-Violation Type Information-

Type Number	2010014
Violation Name	Response Plan
Program Element	UST Program
Category	Administration/Documentation
IST Performance Measure	-

-Violation Type Description-

Failure to submit a complete and accurate UST Response Plan.

UST owner/operator agreement



WRITTEN AGREEMENT BETWEEN UNDERGROUND STORAGE TANK PERMIT HOLDER AND UNDERGROUND STORAGE TANK OPERATOR

For use by Unidocs Member Agencies or where approved by your Local Jurisdiction

Authority Cited: California Health and Safety Code (HSC) §25284(a)(3); Title 23 California Code of Regulations §2628(b)

In cases where the underground storage tank (UST) permit is issued to a person other than the operator of the UST(s), the permit holder must enter into a written agreement with the operator of the UST(s) which requires that the UST operator monitor the UST(s), maintain appropriate records, implement reporting procedures, and otherwise operate as required by the conditions of the permit issued by the local Unified Program Agency (UPA). Use of this form to satisfy this requirement is optional. You may use your own format provided that it satisfies the requirements of HSC §25284(a)(3). *[Note: "UST Operator" means the person or organization that is in control of, or has responsibility for, day-to-day operation of the UST system(s), as distinguished from the "Designated UST Operator" who performs monthly facility inspections and training of facility employees pursuant to 23 CCR §2715.]*

A. FACILITY IDENTIFICATION

FACILITY NAME | CERS ID or Facility ID

SITE ADDRESS

CITY | CA | ZIP CODE

B. UNDERGROUND STORAGE TANK PERMIT HOLDER CERTIFICATION

Certification: As the holder of the underground storage tank permit for the facility identified above, I hereby certify that:

1. I am (or represent) the individual, partnership, corporation or LLC, association, trust or government agency that is the holder of the UST permit for this facility, but I do not operate the UST(s).
2. I have provided to the UST operator a copy of the UST permit issued by the local UPA, which is attached to this written agreement and incorporated herein by reference.
3. I have provided to the UST operator a copy of the provisions of California Health and Safety Code Section 25299.
4. I understand that in order to be valid, this agreement must be signed by both the UST owner and the UST operator.
5. I understand that I am required to notify the local UPA of any change in UST operator by electronically submitting updated UST operator information and an uploaded PDF copy of a revised version of this agreement via the California Environmental Reporting System (CERS) website or an equivalent local UPA electronic reporting portal within thirty (30) days of the change in operator.

UST PERMIT HOLDER NAME*

NAME OF SIGNER (print) | TITLE OF SIGNER

UST PERMIT HOLDER SIGNATURE | DATE SIGNED

C. UNDERGROUND STORAGE TANK OPERATOR CERTIFICATION

Certification: As the operator of the underground storage tank(s) at the facility identified above, I hereby certify that:

1. I am (or represent) the individual, partnership, corporation or LLC, association, trust or government agency that is in control of, or has responsibility for, day-to-day operation of the UST(s) at this facility.
2. I have received a copy of the UST permit issued by the local UPA, which is attached to this written agreement and incorporated herein by reference.
3. I have reviewed the provisions of California Health and Safety Code Section 25299 as detailed on page 2 of this agreement.
4. I understand that in order to be valid, this agreement must be signed by both the UST owner and the UST operator.
5. I understand that by signing this agreement, I become obligated to monitor the UST(s), maintain appropriate records, implement reporting procedures, and otherwise operate as required by the conditions of the permit.

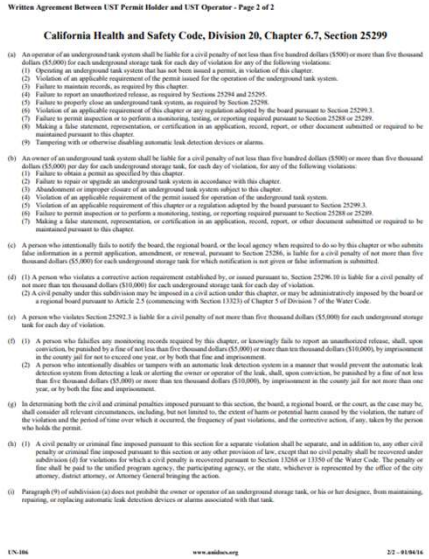
UST OPERATOR NAME*

NAME OF SIGNER (print) | TITLE OF SIGNER

UST OPERATOR SIGNATURE | DATE SIGNED

* Legal name of individual, partners, corporation, LLC, LP, or other entity that is the UST permit holder or UST operator.

UN-106 www.unidocs.org 1/2 – 01/04/16



Written Agreement Between UST Permit Holder and UST Operator - Page 2 of 2

California Health and Safety Code, Division 20, Chapter 6.7, Section 25299

(a) An operator of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars ($500) or more than five thousand dollars ($5,000) for each underground storage tank for each day of violation for any of the following violations:
(1) Operating an underground tank system that has not been issued a permit, in violation of this chapter.
(2) Violation of an applicable requirement of the permit issued for the operation of the underground tank system.
(3) Failure to maintain records, as required by this chapter.
(4) Failure to report an unauthorized release, as required by Sections 25294 and 25295.
(5) Failure to properly close an underground tank system, as required by Section 25298.
(6) Violation of an applicable requirement of this chapter or any regulation adopted by the board pursuant to Section 25299.3.
(7) Failure to permit inspection or to perform a monitoring, testing, or reporting required pursuant to Section 25288 or 25289.
(8) Making a false statement, representation, or certification in an application, record, report, or other document submitted or required to be maintained pursuant to this chapter.
(9) Tampering with or otherwise disabling automatic leak detection devices or alarms.

(b) An owner of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars ($500) or more than five thousand dollars ($5,000) per day for each underground storage tank, for each day of violation, for any of the following violations:
(1) Failure to obtain a permit as specified by this chapter.
(2) Failure to repair or upgrade an underground tank system in accordance with this chapter.
(3) Abandonment or improper closure of an underground tank system subject to this chapter.
(4) Violation of an applicable requirement of the permit issued for operation of the underground tank system.
(5) Violation of an applicable requirement of this chapter or a regulation adopted by the board pursuant to Section 25299.3.
(6) Failure to permit inspection or to perform a monitoring, testing, or reporting required pursuant to Section 25288 or 25289.
(7) Making a false statement, representation, or certification in an application, record, report, or other document submitted or required to be maintained pursuant to this chapter.

(c) A person who intentionally fails to notify the board, the regional board, or the local agency when required to do so by this chapter or who submits false information in a permit application, amendment, or renewal, pursuant to Section 25286, is liable for a civil penalty of not more than five thousand dollars ($5,000) for each underground storage tank for which notification is not given or false information is submitted.

(d) (1) A person who violates a corrective action requirement established by, or issued pursuant to, Section 25296.10 is liable for a civil penalty of not more than ten thousand dollars ($10,000) for each underground storage tank for each day of violation.
(2) A civil penalty under this subdivision may be imposed in a civil action under this chapter, or may be administratively imposed by the board or a regional board pursuant to Article 2.5 (commencing with Section 13323) of Chapter 5 of Division 7 of the Water Code.

(e) A person who violates Section 25292.3 is liable for a civil penalty of not more than five thousand dollars ($5,000) for each underground storage tank for each day of violation.

(f) (1) A person who falsifies any monitoring records required by this chapter, or knowingly fails to report an unauthorized release, shall, upon conviction, be punished by a fine of not less than five thousand dollars ($5,000) or more than ten thousand dollars ($10,000), by imprisonment in the county jail for not to exceed one year, or by both that fine and imprisonment.
(2) A person who intentionally disables or tampers with an automatic leak detection system in a manner that would prevent the automatic leak detection system from detecting a leak or alerting the owner or operator of the leak, shall, upon conviction, be punished by a fine of not less than five thousand dollars ($5,000) or more than ten thousand dollars ($10,000), by imprisonment in the county jail for not more than one year, or by both the fine and imprisonment.

(g) In determining both the civil and criminal penalties imposed pursuant to this section, the board, a regional board, or the court, as the case may be, shall consider all relevant circumstances, including, but not limited to, the extent of harm or potential harm caused by the violation, the nature of the violation and the period of time over which it occurred, the frequency of past violations, and the corrective action, if any, taken by the person who holds the permit.

(h) (1) A civil penalty or criminal fine imposed pursuant to this section for a separate violation shall be separate, and in addition to, any other civil penalty or criminal fine imposed pursuant to this section or any other provision of law, except that no civil penalty shall be recovered under subdivision (d) for violations for which a civil penalty is recovered pursuant to Section 13268 or 13350 of the Water Code. The penalty or fine shall be paid to the unified program agency, the participating agency, or the state, whichever is represented by the office of the city attorney, district attorney, or Attorney General bringing the action.

(i) Paragraph (9) of subdivision (a) does not prohibit the owner or operator of an underground storage tank, or his or her designee, from maintaining, repairing, or replacing automatic leak detection devices or alarms associated with that tank.

UN-106 www.unidocs.org 2/2 – 01/04/16

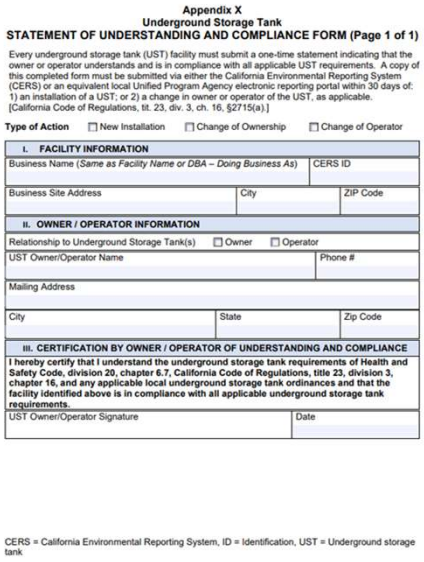
Violation Type Information

Type Number	2030037
Violation Name	Agreement Between UST Permit Holder and UST Operator (Owner/Operator Agreement)
Program Element	UST Program
Category	Operations/Maintenance
UST Performance Measure	-

Violation Type Description

Failure to implement or maintain a written agreement between the UST owner and operator.

Statement of Understanding and Compliance



Appendix X
Underground Storage Tank
STATEMENT OF UNDERSTANDING AND COMPLIANCE FORM (Page 1 of 1)

Every underground storage tank (UST) facility must submit a one-time statement indicating that the owner or operator understands and is in compliance with all applicable UST requirements. A copy of this completed form must be submitted via either the California Environmental Reporting System (CERS) or an equivalent local Unified Program Agency electronic reporting portal within 30 days of: 1) an installation of a UST; or 2) a change in owner or operator of the UST, as applicable. [California Code of Regulations, tit. 23, div. 3, ch. 16, §2715(a).]

Type of Action ☐ New Installation ☐ Change of Ownership ☐ Change of Operator

I. FACILITY INFORMATION		
Business Name (*Same as Facility Name or DBA – Doing Business As*)		CERS ID
Business Site Address	City	ZIP Code
II. OWNER / OPERATOR INFORMATION		
Relationship to Underground Storage Tank(s) ☐ Owner ☐ Operator		
UST Owner/Operator Name		Phone #
Mailing Address		
City	State	Zip Code
III. CERTIFICATION BY OWNER / OPERATOR OF UNDERSTANDING AND COMPLIANCE		
I hereby certify that I understand the underground storage tank requirements of Health and Safety Code, division 20, chapter 6.7, California Code of Regulations, title 23, division 3, chapter 16, and any applicable local underground storage tank ordinances and that the facility identified above is in compliance with all applicable underground storage tank requirements.		
UST Owner/Operator Signature		Date

CERS = California Environmental Reporting System, ID = Identification, UST = Underground storage tank

Violation Type Information

Type Number	2010016
Violation Name	Owner/Operator Statement of Understanding and Compliance (USEPATCR 10)
Program Element	UST Program
Category	Administration/Documentation
UST Performance Measure	Designated Operator Training

Violation Type Description

Failure to submit the "Underground Storage Tank Statement of Understanding and Compliance Form."

Old-Statement of Understanding and Compliance

Owner Statements of Designated Underground Storage Tank (UST) Operator and Understanding of and Compliance with UST Requirements

Facility Name:	Facility ID: 4____
Facility Address: SANTA FE SPRINGS, CA 90670	Reason for Submitting this Form (Check One) ■ Change of Designated Operator □ Updated Certificate Expiration Date
Facility Phone #:	

Designated UST Operator(s) for this Facility

PRIMARY

Designated Operator's Name:	Relation to the UST Facility (Check One)
Business Name (If different from above):	□ Owner □ Operator □ Employee
Designated Operator's Phone #:	□ Service Technician ■ Third-Party
International Code Council Certification #:	Expiration Date: 1/21/2016

ALTERNATE 1

Designated Operator's Name: *refer to backup document*	Relation to the UST Facility (Check One)
Business Name (If different from above): *refer to backup document*	□ Owner □ Operator □ Employee
Designated Operator's Phone #: *refer to backup document*	□ Service Technician ■ Third-Party
International Code Council Certification #: *refer to backup document*	Expiration Date: *refer to backup document*

ALTERNATE 2

Designated Operator's Name: *refer to backup document*	Relation to the UST Facility (Check One)
Business Name (If different from above): *refer to backup document*	□ Owner □ Operator □ Employee
Designated Operator's Phone #: *refer to backup document*	□ Service Technician ■ Third-Party
International Code Council Certification #: *refer to backup document*	Expiration Date: *refer to backup document*

I certify that, for the facility indicated at the top of this page, the individual(s) listed above will serve as Designated UST Operator(s). The individual(s) will conduct and document monthly facility inspections and annual facility employee training, in accordance with California Code of Regulations, title 23, section 2715(c) - (f).

Furthermore, I understand and am in compliance with the requirements (statutes, regulations, and local ordinances) applicable to underground storage tanks.

Name of Tank Owner (print). ___

Signature of Tank Owner: _____

Date: _____ Owner's Phone #: _____

NOTE: 1) SUBMIT THIS COMPLETED FORM TO THE LOCAL AGENCY (NOT THE STATE WATER RESOURCES CONTROL BOARD) BY JANUARY 1, 2005. THE LOCAL AGENCY LIST IS AVAILABLE AT: www.waterboards.ca.gov/ust/contacts/cupa_agys.html.

2) NOTIFY THE LOCAL AGENCY OF ANY CHANGES TO THIS INFORMATION WITHIN 30 DAYS OF THE CHANGE.

Questions on this section?

The Start of the Inspection – Obtaining Consent

You wrote down the cashier's name….

Why is that important for records review?

Training Records

Answer: To cross reference when reviewing employee training records!

Potential violations:
At least one facility employee must be present who has been trained by the D.O.

Training must be provided **BEFORE** the individual performs the duties of a facility employee?

Training Records

Situation:

We are shown employee training certificates with the same 4 people trained every December.

Are we all good?

Training Records

Maybe, maybe not… What questions should you be asking?

How many employees do you have?

Have there been any recent new hires?

Is one training a year sufficient?

Only if staffing never changes

Poll 7

Question:
The facility owner regularly works at the station along with other employees. Is the facility owner required to be trained initially and every 12 months by the DO?

a) Yes

a) No

Training Records

Question:
The facility owner regularly works at the station along with other employees. Is the facility owner required to be trained initially and every 12 months by the DO?

No

The facility owner does not fall under the definition of a facility employee.

Title 23: "**Facility employee**" means an individual who is **employed** on-site at an underground storage tank facility….

Training Records

Let's reframe that question:
The facility owner regularly works at the station **alone**. Is the facility owner required to be trained initially and every 12 months by the DO?

Training Records

Let's reframe that question:
The facility owner regularly works at the station alone. Is the facility owner required to be trained initially and every 12 months by the DO?

Yes, but why?

Unless the site is an approved unstaffed facility, there must always be a facility employee present that has current training.

If the owner is the only person at the site, they are fulfilling the role of a facility employee. Therefore, they must receive training to satisfy the requirement.

The Start of the Inspection – Check Monitoring Panel

Go and look at the Veeder Root

Does it say - All Functions Normal?

What if you saw - **Setup Data Warning**?
(Sensor Issue)

Hint: It is the opposite of a Sensor Out alarm

What if you saw - **System Data Warning**?
(ECU/Module Issue)

Tampering Case Study – Setup Data Warning

Routine inspection conducted on February 26, 2020

Upon arrival, the monitoring panel was reading "Setup Data Warning"

L3 91 annular sensor had been x'd out

When the sensor was reprogrammed, it went immediately into alarm

Sensor later diagnosed as faulty, won't come out of alarm

Tampering Case Study – Setup Data Warning

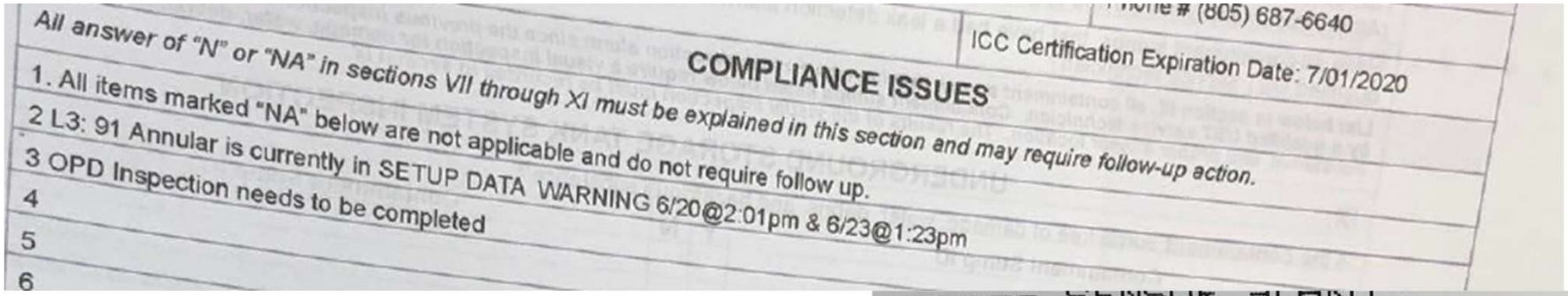
Review of alarm history tapes and DO reports showed that the sensor had been x'd out for 8 months between June 23, 2019 and February 20, 2020

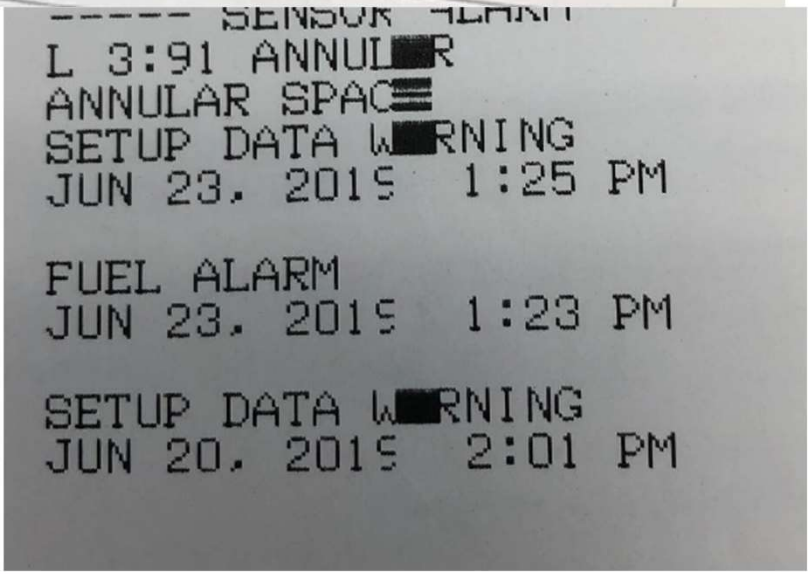
Facility did not have a DO between June - November 2019

The issue was documented on monthly DO reports starting December 2019

Let's look at some of the DO reports and alarm histories…

Tampering Case Study – Setup Data Warning



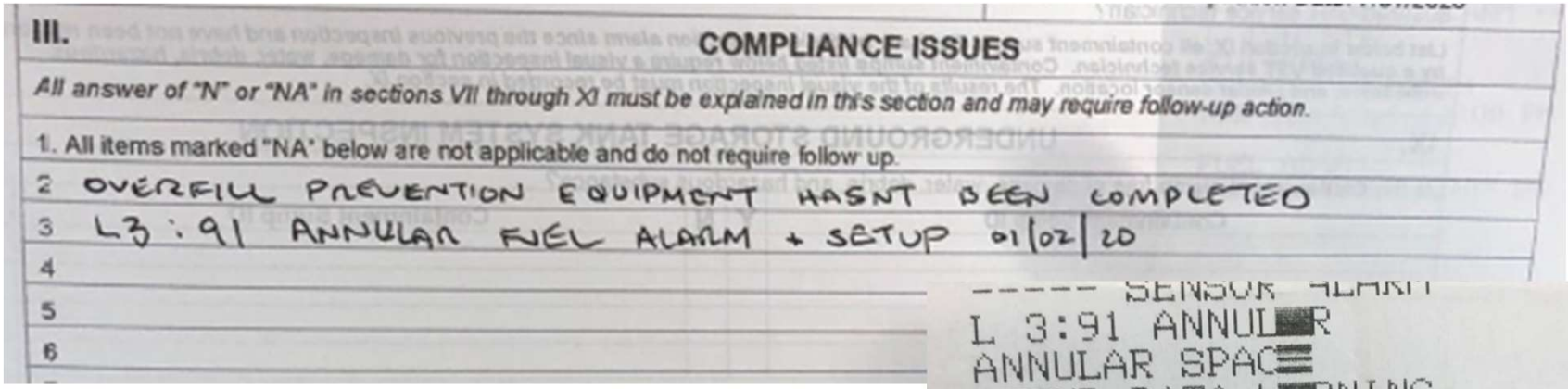


December 6, 2019

Notes:
Xing out a sensor = setup data warning alarm
Re-entering a sensor in alarm = Fuel alarm

CALIFORNIA CUPA FORUM

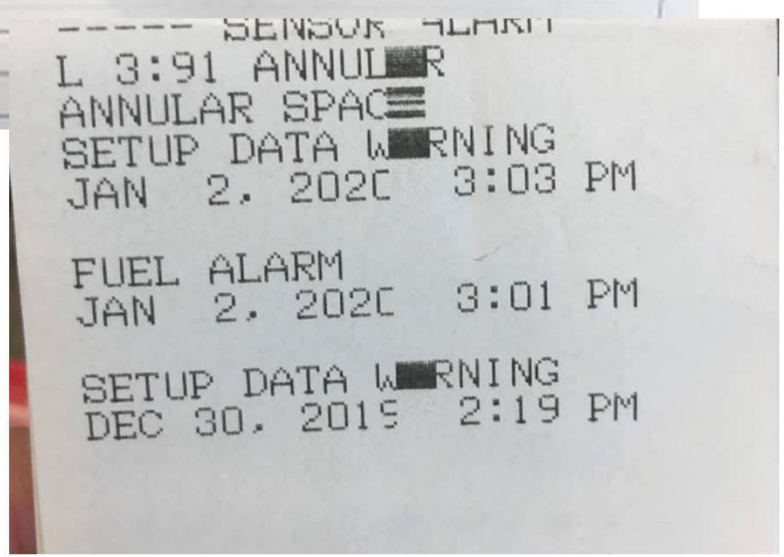
Tampering Case Study – Setup Data Warning



III. COMPLIANCE ISSUES

All answer of "N" or "NA" in sections VII through XI must be explained in this section and may require follow-up action.

1. All items marked "NA" below are not applicable and do not require follow up.
2. OVERFILL PREVENTION EQUIPMENT HASNT BEEN COMPLETED
3. L3:91 ANNULAR FUEL ALARM + SETUP 01/02/20
4.
5.
6.

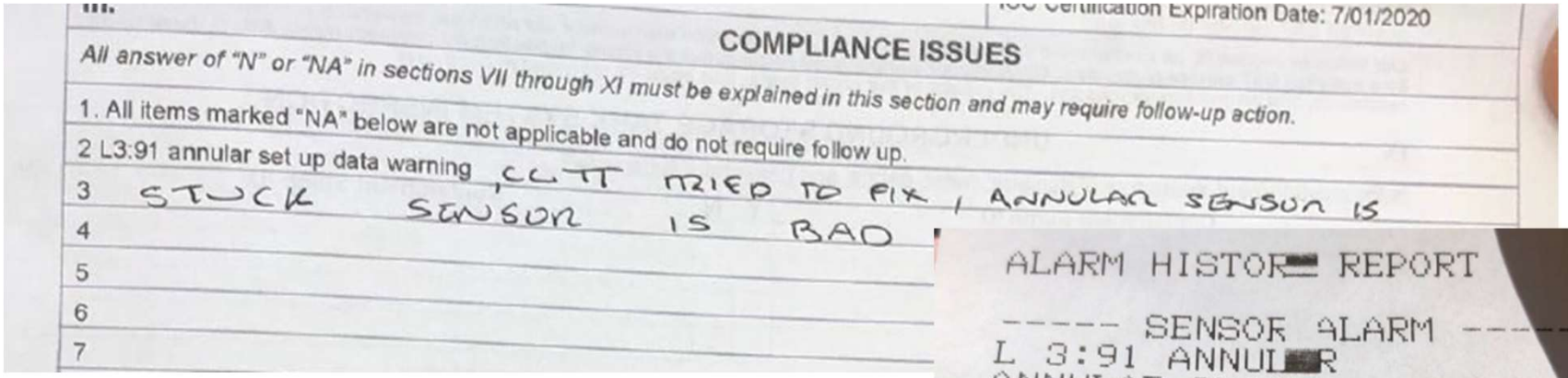


January 2, 2020

Notes:
Xing out a sensor = setup data warning alarm
Re-entering a sensor in alarm = Fuel alarm

CALIFORNIA CUPA FORUM

Tampering Case Study – Setup Data Warning



III.

Certification Expiration Date: 7/01/2020

COMPLIANCE ISSUES

All answer of "N" or "NA" in sections VII through XI must be explained in this section and may require follow-up action.

1. All items marked "NA" below are not applicable and do not require follow up.
2. L3:91 annular set up data warning, CUTT TRIED TO FIX, ANNULAR SENSOR IS
3. STUCK SENSOR IS BAD
4.
5.
6.
7.

ALARM HISTOR REPORT

----- SENSOR ALARM -----
L 3:91 ANNUL R
ANNULAR SPAC
FUEL ALARM
FEB 26. 202C 8:35 AM

SETUP DATA W RNING
JAN 30. 202C 2:01 PM

FUEL ALARM
JAN 30. 202C 1:58 PM

January 30, 2020

Notes:
Xing out a sensor = setup data warning alarm
Re-entering a sensor in alarm = Fuel alarm

CALIFORNIA CUPA FORUM

Tampering Case Study – Setup Data Warning

Issue resolutions:

Site was later red tagged

ICC Service Technician confirmed sensor was faulty and required replacement.

Site was prosecuted by the District Attorney for:
- Tampering with leak detection
- Failure to maintain continuous leak detection
- Failure to have DO visual inspections
- Failure to train employees

Settled for $100,000

The Start of the Inspection – Check Certs

Are you checking for a contractor's license (CSLB)?

- While rare, licenses can expire

What's the difference between CSLB and a Tank Tester License?

- Tank tester is limited by cost of work - $500
- How much does a monitoring cert cost? SB989? Overfill?

The Start of the Inspection – Check Certs

How to check

CSLB - CSLB Website

Tank Tester License – LG 105

The Start of the Inspection – Check Certs

ICC Installer/Retrofitter vs. Service Technician – (LG 167-2)

ICC Service Technician:

- Work associated with release detection and monitoring equipment
  - Periodic testing – Mon. Certs., Spill Bucket, Overfill, SB989

- Can repair/replace equipment **within sumps and UDCs**:

  - Spill buckets, overfill, flexible connectors, internal sump penetrations, etc.

Poll 8

Question:
Can an ICC Service Technician replace a direct bury spill bucket?

a) Yes

a) No

The Start of the Inspection – Check Certs

Question:
Can an ICC Service Technician replace a direct bury spill bucket?

No

LG 167-2 Scope of an ICC Service Technician
Repairs or maintenance work on operating UST systems may be conducted by a UST Service Technician, provided the work can be **accomplished without breaking surface materials (concrete or asphalt) or excavation**, as excavation or backfilling **must be conducted by a UST Installer**.

The Start of the Inspection – Check Certs

ICC Installer/Retrofitter vs. Service Technician – (LG 167-2)

ICC Installer/Retrofitter:

- Work associated with the installation of UST equipment, including work requiring excavation or backfilling…

- Also, UST Installers can install or replace equipment **within sumps and UDCs:**
    - Spill buckets, overfill, flexible connectors, internal sump penetrations, etc.
    - **Excludes release detection and monitoring equipment**

Poll 9

Question:
Can an ICC Installer/Retrofitter install and test a spill bucket or overfill device in a sump?

a) Yes

a) No

The Start of the Inspection – Check Certs

Question:
Can an ICC Installer/Retrofitter install and **test** a spill bucket or overfill device in a sump?

Tricky question, no!

They can install it, but they can't test it…..Why? It isn't in LG 167-2

2637.1(c) - Spill container tests shall be performed by a **service technician**…

2637.2(c) - Overfill inspections shall be performed by a **service technician**….

2637(e): Secondary containment tests shall be performed by a **service technician**

The Start of the Inspection – Check Certs

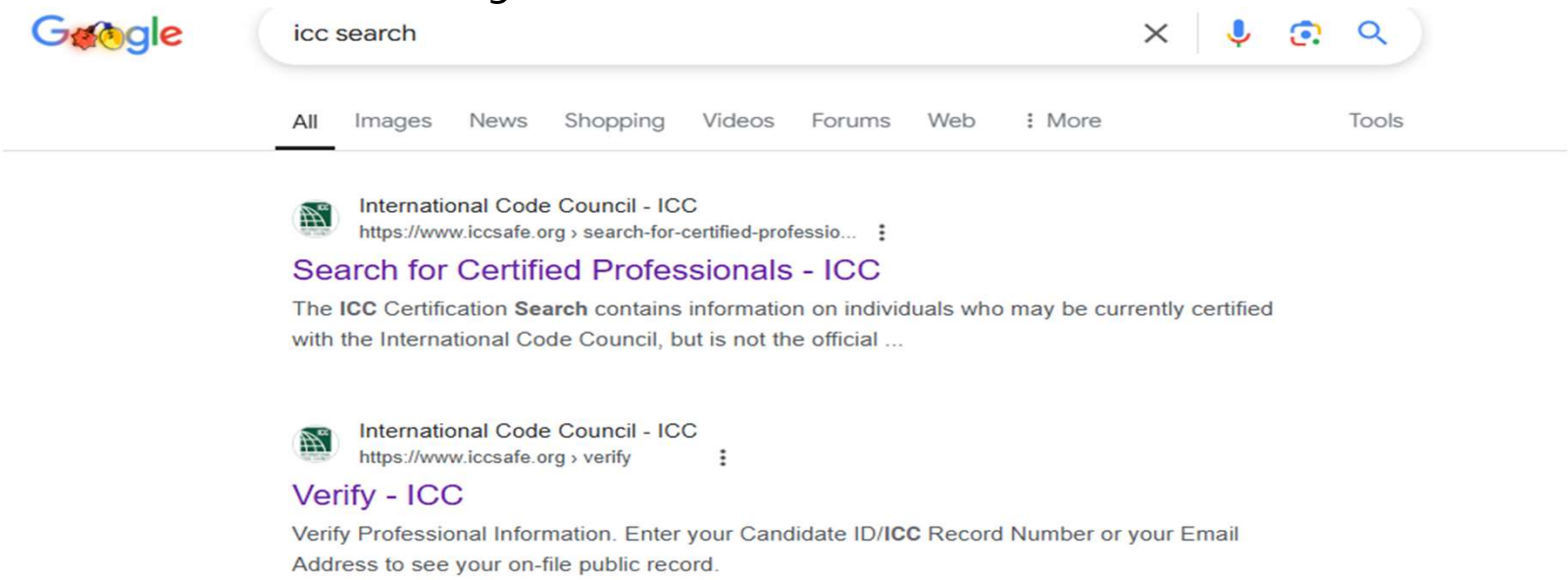
Question:
Can an ICC Installer/Retrofitter install and **test** a spill bucket or overfill device in a sump?

When would this even come up?

Scenario #1: Technician holds both certifications, but one expires
Scenario #2: Plan check - You didn't verify contractor has both certs when needed!
SB989 re-testing post repair
Direct bury spill bucket re-testing post repair

The Start of the Inspection – Check Certs

Checking technician certifications
ICC Certifications – Checking in the field



The Start of the Inspection – Check Certs

Manufacturer certifications

23 CCR 2715(f)(3): Renew all training and certifications issued by the manufacturer, through completion of a manufacturer's refresher course, at the time interval recommended by the manufacturer, **or every 36 months, whichever is shorter.**

LG 167-2: Current UST Installers or Service Technicians performing UST work may not combine licenses and training certifications with other on-site individuals to meet the above requirements.

Example: UST Service Technician with expired Veeder Root cert. Helper technician onsite not ICC certified but does have active Veeder Root cert…

Not allowed

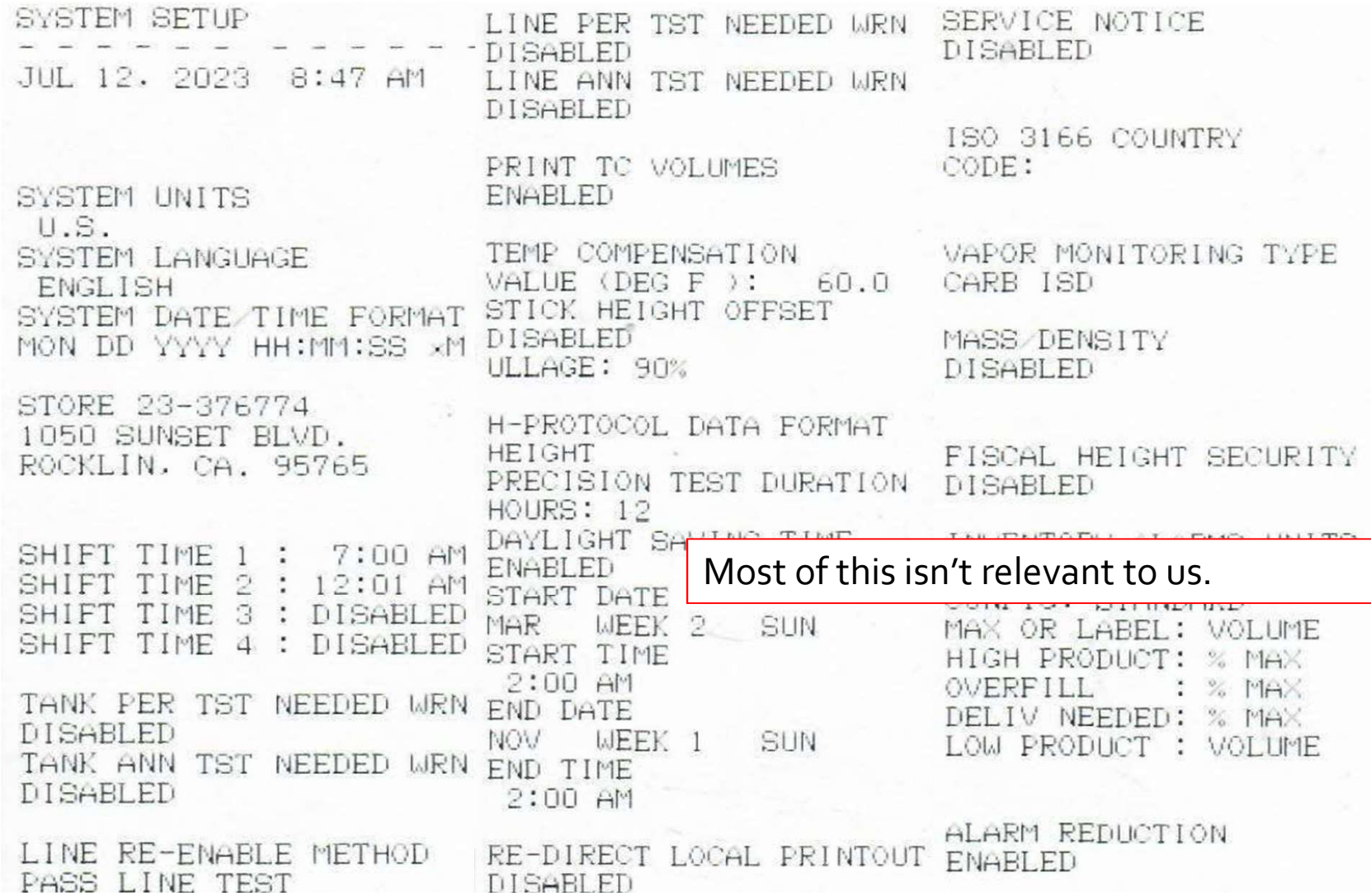
The Start of the Inspection

Reviewing Setup and Alarm History (TLS 350)

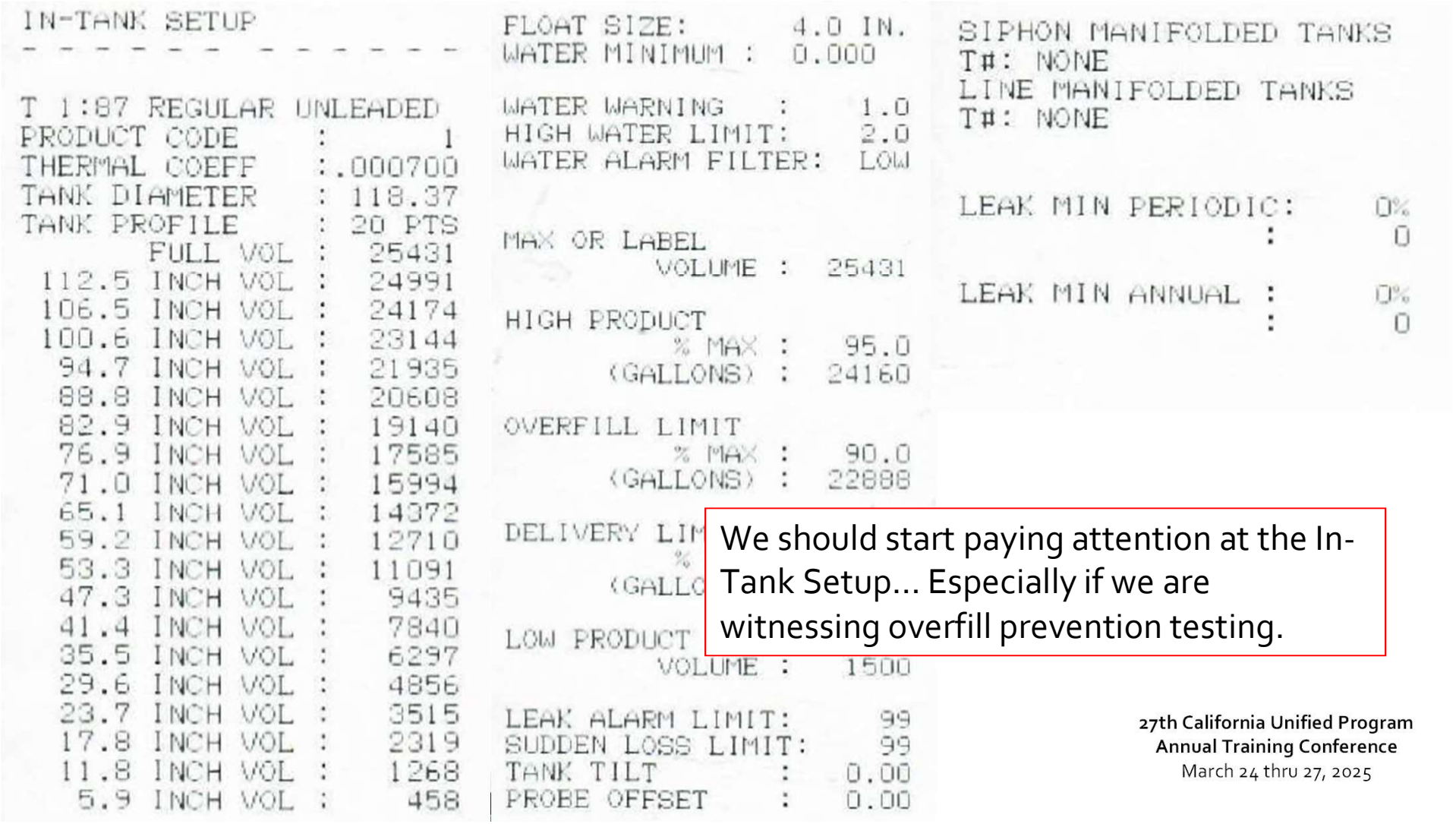
The Start of the Inspection – TLS 350 Tape

Tape Symbols

- T – Tanks
- L – Liquid Sensors
- Q – Electronic Line Leak Detectors (PLLD)
  - Q setup controls programming for PLLD
  - Provides the turbine shutdown pathway
- R – Relays
  - Provides turbine shutdown when MLLDs are present
- S – Smart Sensors



Most of this isn't relevant to us.



IN-TANK SETUP

T 1:87 REGULAR UNLEADED

PRODUCT CODE	1
THERMAL COEFF	.000700
TANK DIAMETER	118.37
TANK PROFILE	20 PTS
FULL VOL	25431
112.5 INCH VOL	24991
106.5 INCH VOL	24174
100.6 INCH VOL	23144
94.7 INCH VOL	21935
88.8 INCH VOL	20608
82.9 INCH VOL	19140
76.9 INCH VOL	17585
71.0 INCH VOL	15994
65.1 INCH VOL	14372
59.2 INCH VOL	12710
53.3 INCH VOL	11091
47.3 INCH VOL	9435
41.4 INCH VOL	7840
35.5 INCH VOL	6297
29.6 INCH VOL	4856
23.7 INCH VOL	3515
17.8 INCH VOL	2319
11.8 INCH VOL	1268
5.9 INCH VOL	458

FLOAT SIZE:	4.0 IN.
WATER MINIMUM :	0.000
WATER WARNING :	1.0
HIGH WATER LIMIT:	2.0
WATER ALARM FILTER:	LOW

MAX OR LABEL

VOLUME :	25431

HIGH PRODUCT

% MAX :	95.0
(GALLONS) :	24160

OVERFILL LIMIT

% MAX :	90.0
(GALLONS) :	22888

DELIVERY LIM

%

(GALLO

LOW PRODUCT

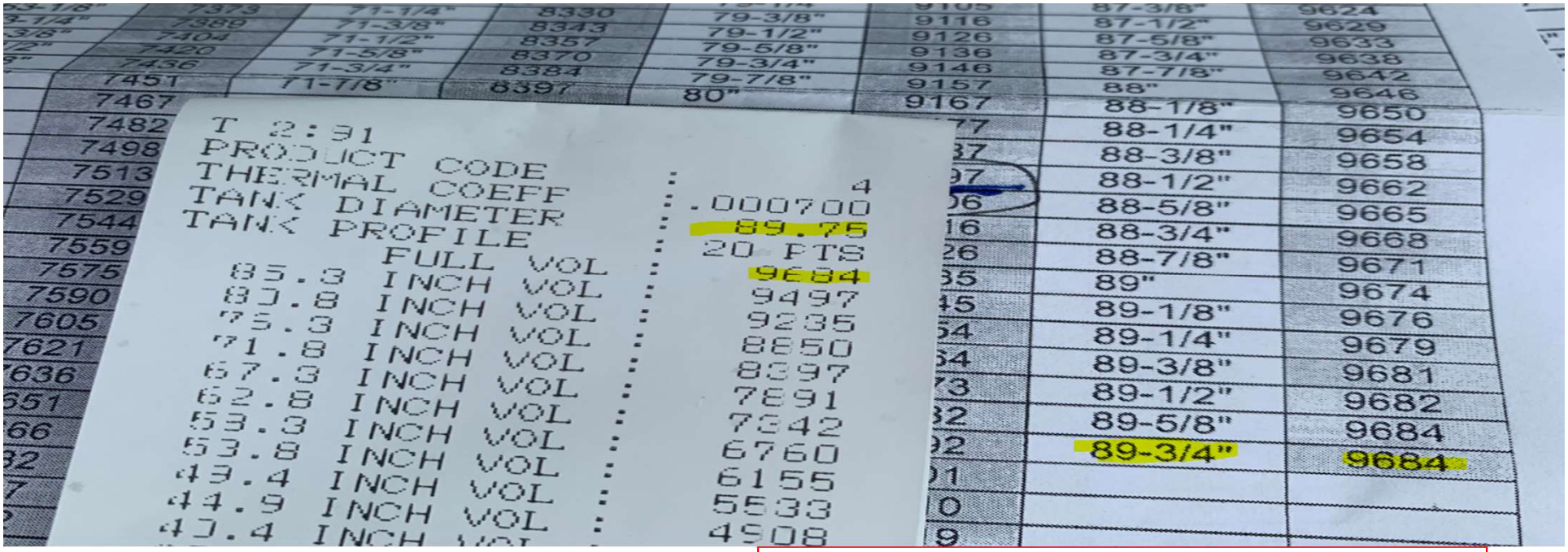
VOLUME :	1500

LEAK ALARM LIMIT:	99
SUDDEN LOSS LIMIT:	99
TANK TILT :	0.00
PROBE OFFSET :	0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC:	0%
:	0
LEAK MIN ANNUAL :	0%
:	0

We should start paying attention at the In-Tank Setup… Especially if we are witnessing overfill prevention testing.



Example: Comparing VR tape to tank chart during triennial overfill testing

Why is the PLLD failing to detect the leak?

- Most likely reason - Air in the line
- (91/Diesel) – Less Dispensing
- Defective/clogged siphon jet valves
- Other reasons…

If none of the above,

Veeder Root Trouble Shooting Guide
If PLLD fails to detect leak, increase programmed pipe length by 10 percent at a time and retest.

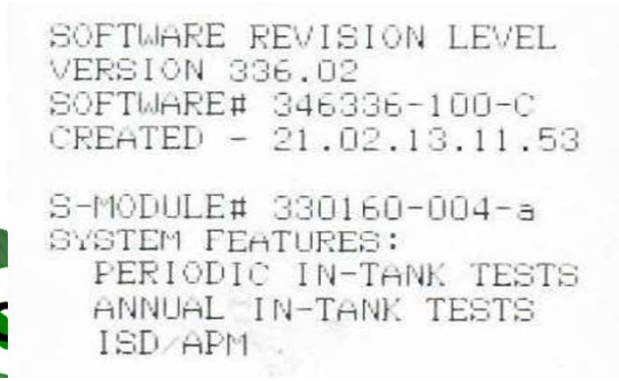
Moral of Story: Don't get too caught up on length of pipe. It should be accurate, but perhaps true pipe length isn't known.

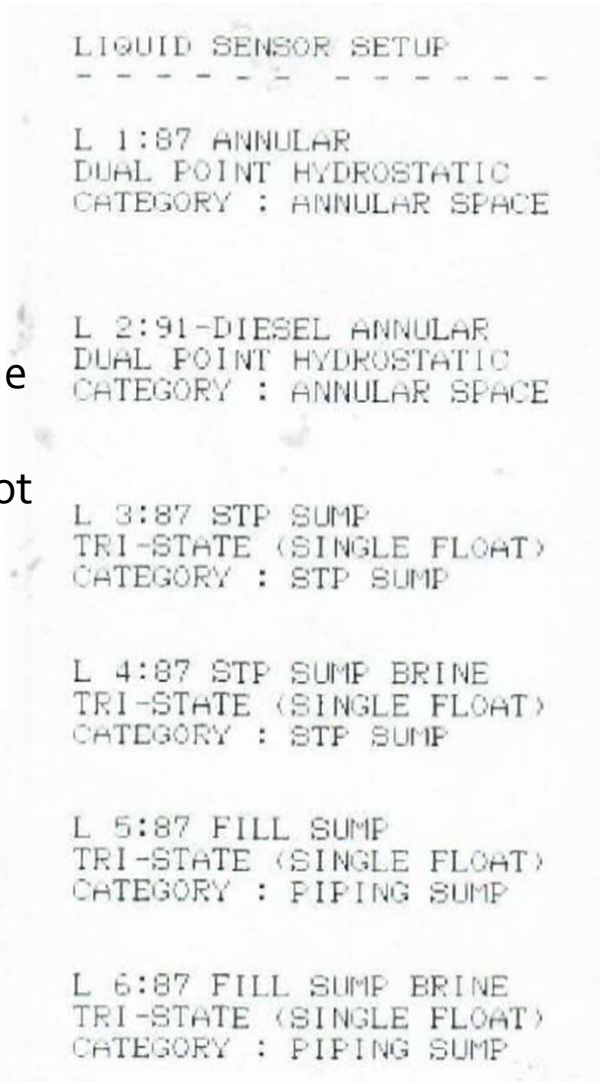
Check the software version #

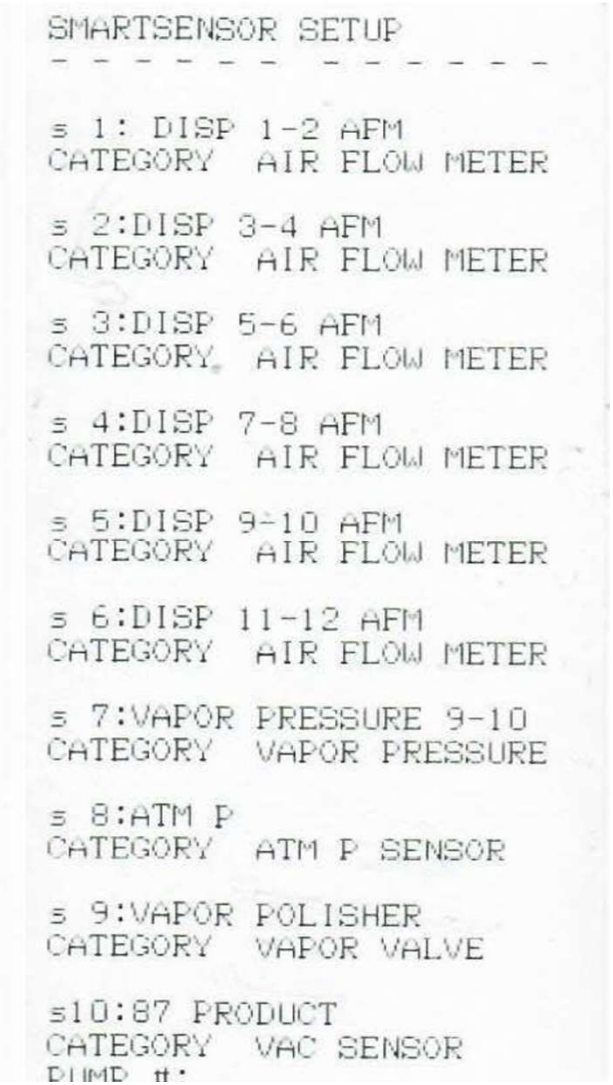
Software upgrade = cold start

ISD upgrade = software upgrade

Every site has smart sensors, not just VPH.





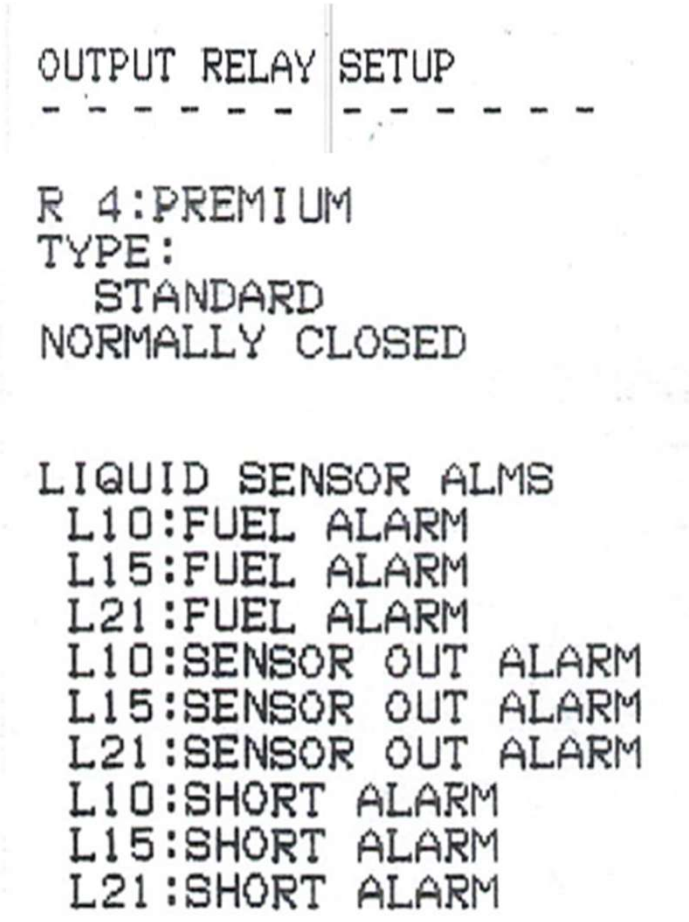


Output Relay Setup (MLLD)

For MLLDs, shutdown occurs through the Relay

Every alarm listed here will shutdown

Downside of MLLD: Shutdown not reflected on Veeder Root alarm history



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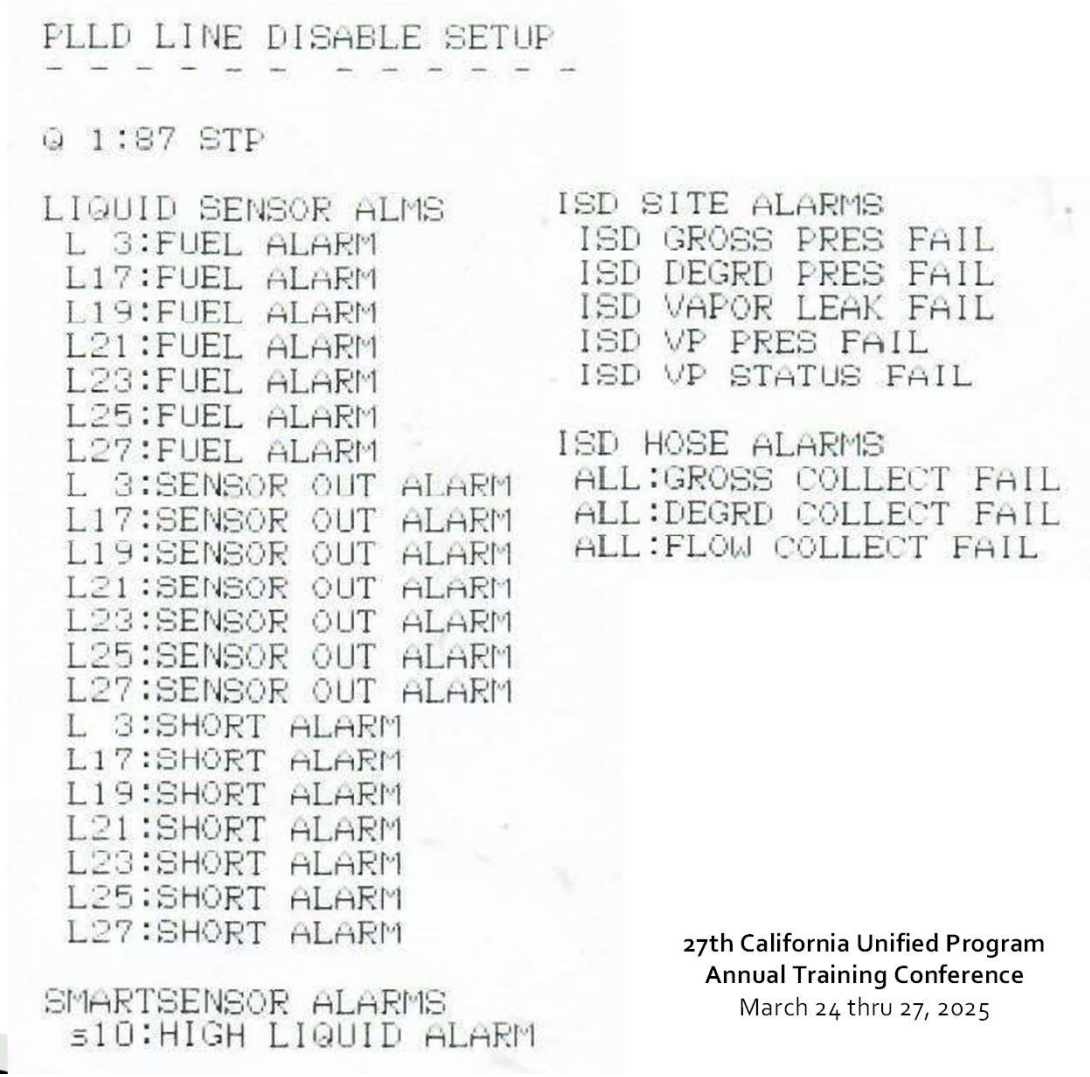
Line Disable Setup (PLLD)
For PLLDs, shutdown occurs through the Q

Every alarm listed here will shutdown

Benefit of PLLD: Veeder Root alarm history tape will show shutdowns

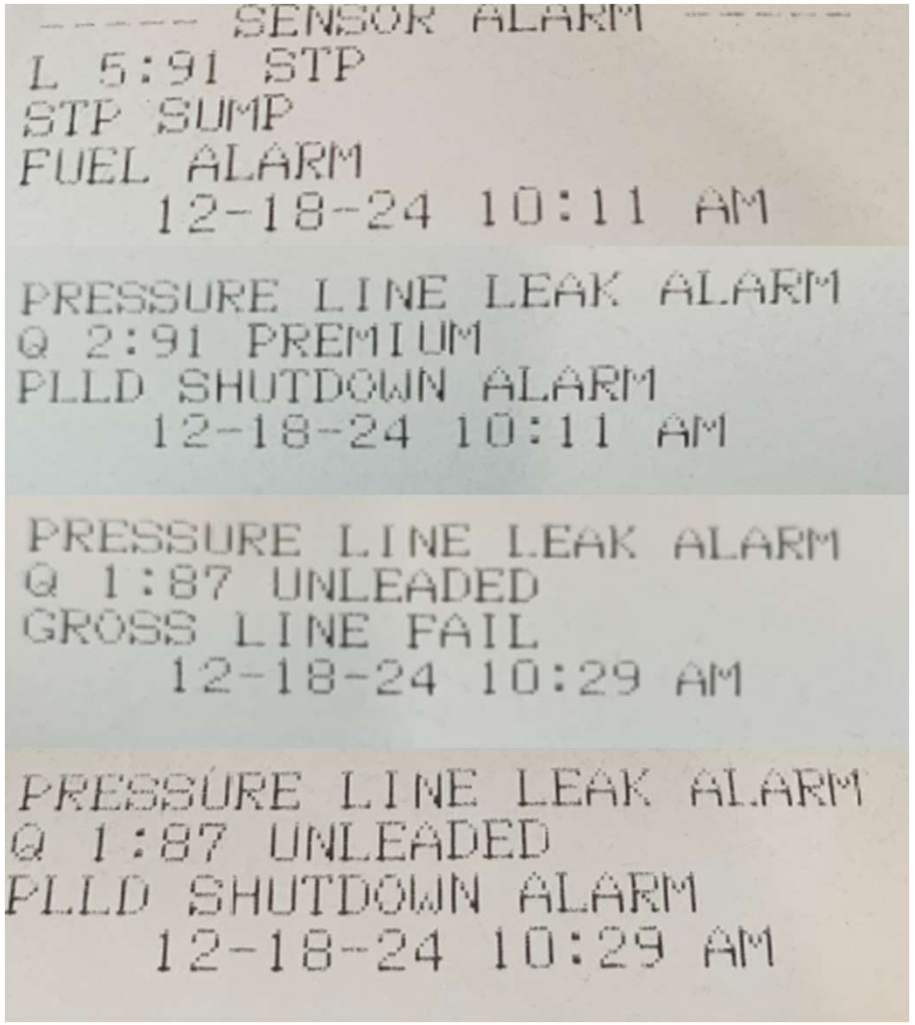
Shows as PLLD Shutdown Alarm

Note: Shutdowns for ISD



Line Disable Setup (PLLD)

Alarm history tape will read:
PLLD Shutdown Alarm



PLLD Alarm History Report

Which Q alarms matter?

PRESSURE LINE LEAK ALARM HISTORY REPORT

Q 1:87 STP

JUL 12, 2023 12:12 PM	PLLD SHUTDOWN ALARM
JUL 12, 2023 12:12 PM	GROSS LINE FAIL
JUL 12, 2023 11:39 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:31 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:30 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:29 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:29 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:28 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:27 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:22 AM	PLLD SHUTDOWN ALARM

PLLD Alarm History Report

Which Q alarms matter?

Only the gross line fail!

PLLD Shutdown Alarm means a shutdown occurred…. Nothing else.

What else would trigger a PLLD shutdown alarm?

ISD

Perhaps it isn't release detection related…

PRESSURE LINE LEAK ALARM HISTORY REPORT

Q 1:87 STP

JUL 12, 2023 12:12 PM	PLLD SHUTDOWN ALARM
JUL 12, 2023 12:12 PM	GROSS LINE FAIL
JUL 12, 2023 11:39 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:31 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:30 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:29 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:29 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:28 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:27 AM	PLLD SHUTDOWN ALARM
JUL 12, 2023 11:22 AM	PLLD SHUTDOWN ALARM

Why does this matter?

8. RELEASE DETECTION ALARM HISTORY			
Attach a copy of the alarm history report/log to this report.	Yes	No	NA
Is the monitoring system powered on and in proper operating mode?	☐	☐	
Has each alarm since the previous inspection been responded to appropriately? *(Attach documentation verifying appropriate service to this report.)*	☐	☐	☐
Have all containment sumps, that have had an alarm since the previous designated UST operator inspection report, been responded to by a qualified service technician?	☐	☐	☐

Title 23 Language:

CALIFORNIA CODES OF REGULATIONS SECTIONS 2610 – 2728

(2) Review of the release detection alarm history since the previous visual inspection required by subdivision (a) above, to verify that each alarm condition was documented and responded to appropriately;

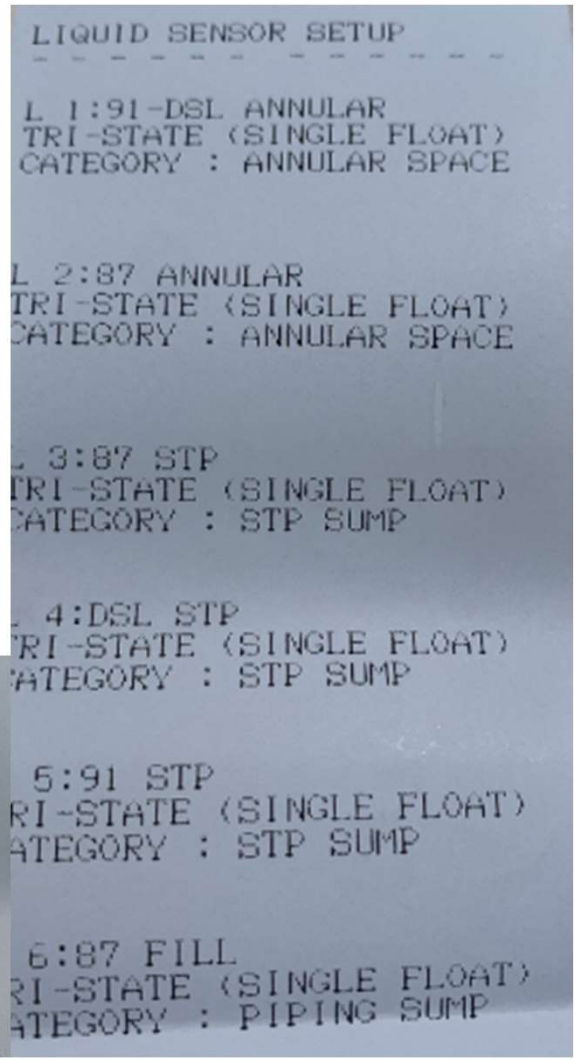
Liquid Sensor Setup vs. Alarm History Report

Liquid Sensor Setup – One button prints all

vs.

Alarm History Report – Must select and press print on each sensor alarm history

Don't assume that all sensors are on your alarm history!



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Questions on this section?

BREAK TIME!

10 MINUTES?

The first look inside of Sumps and UDC

27th California Unified Program
Annual Training Conference
March 24 thru 27, 2025

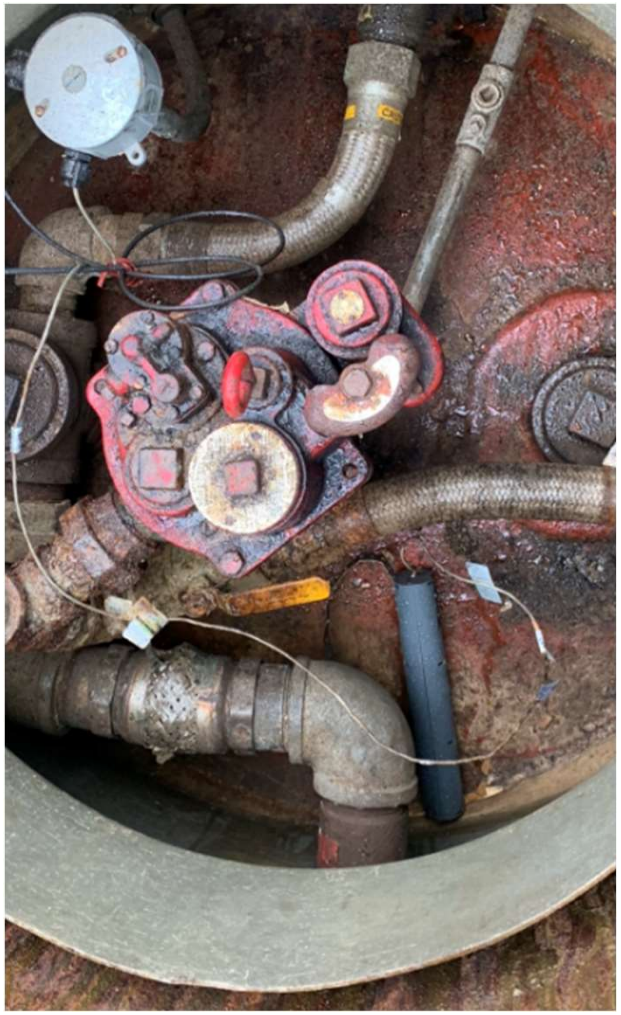
Violation: Monitoring Equipment CERS Violation #2030043

Example #1: Veeder Root Sensor is laying on its side

Veeder Root operating manual requires the sensor to be maintained in a true vertical position

Correct Violation:

View	Monitoring Equipment (USEPATCR 9d) (USEPA Priority)	
Failure of the leak detection equipment to be installed, calibrated, operated, and/or maintained in accordance with manufacturer's instructions.		2030043



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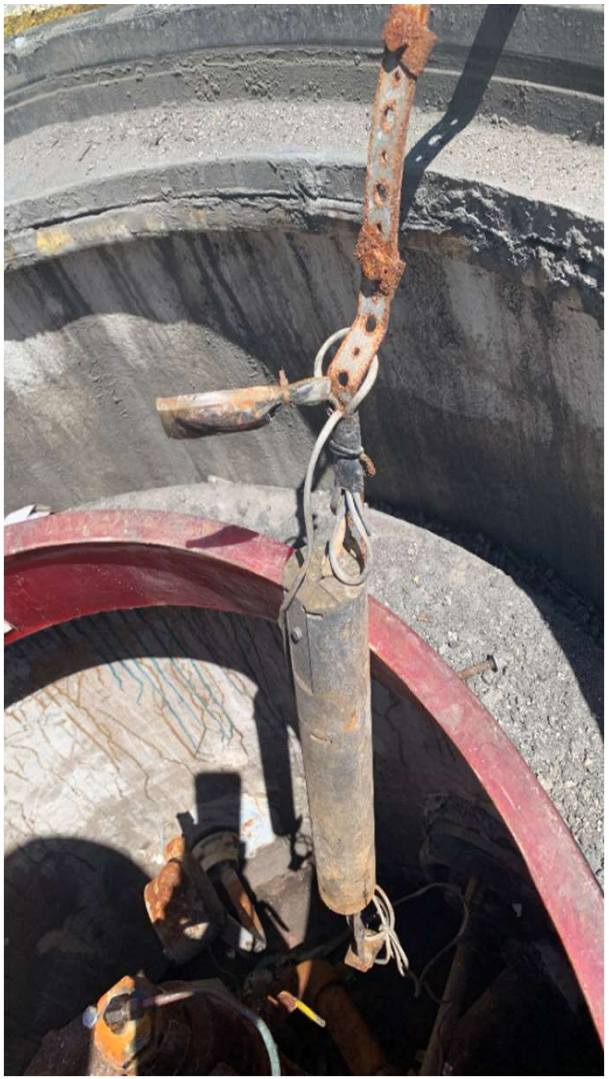
Violation: Monitoring Equipment CERS Violation #2030043

Example #2: Veeder Root Sensor wire splice not located within a junction box per Veeder Root installation manual

Correct Violation:

View	Monitoring Equipment (USEPATCR 9d) (USEPA Priority)	
Failure of the leak detection equipment to be installed, calibrated, operated, and/or maintained in accordance with manufacturer's instructions.		2030043



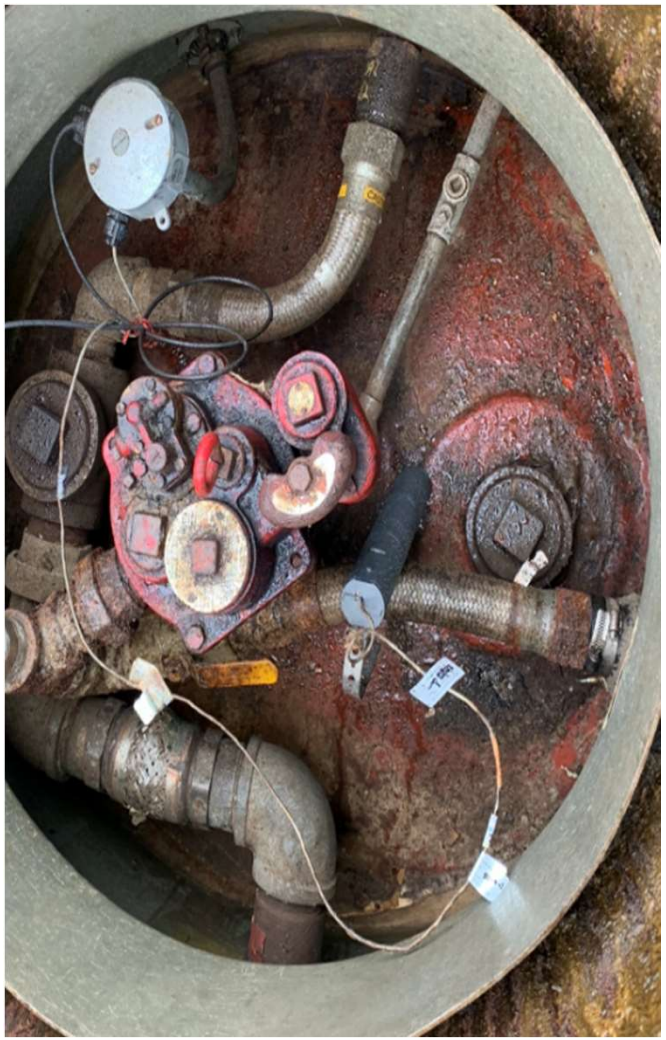
Violation: Improper Monitoring CERS Violation #2060015

Example: Veeder Root Sensor is positioned on top of the tank, which does not provide for earliest leak detection

Could you call this tampering? Maybe, but it's hard to say that.

Correct Violation:

View	Improper Monitoring (USEPATCR 9d) (USEPA Priority)	
Failure of leak detection equipment to be installed, maintained and located such that the equipment is capable of detecting a leak at the earliest possible opportunity.		2060015



Boots on Secondary Containment

Issue: Secondary containment test boot is positioned on and tight. Upon inspection, schrader valve is still installed.

Correct Violation:

View	Piping Obstruction (USEPATCR 9d) (USEPA Priority)	
Failure to maintain secondarily contained piping to allow liquid to flow into the sump in the event of a leak (i.e., failure to remove test boot).		2030040

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VPH Hydrostatic Monitoring

Check monitoring fluid for proper color and consistency

Fluids from different manufacturers are not compatible! Mixing can cause a gel to form

Only a certified UST Service Technician can adjust monitoring fluid

Colors by Manufacturer:

Blue: Xerxes (Brine - Calcium Chloride)
Pink: S. Bravo (Propylene Glycol)
Green: Containment Solutions (NOV)
(Brine - Calcium Chloride)

Testing of sensors

Do not:

- Tap the sensors before testing
- Flip the box
- Throw water at the float and chains
- Be afraid to ask questions

Do (Depending on your Agency Policies):

- Verify if the correct sensor is installed
- Ensure that the sensors are tested per manufacturer's specifications
- Verify shutdown if required.
- Verify sensor placement

Poll 10

Question: Why do we verify shutdown, failsafe, and sensor out?

a) Gets them out of ELD testing

a) Gets them out of secondary containment testing at VPH sites

a) Gets them out of annual line tightness testing

a) It is always required

Shutdown, Failsafe, Sensor Out.

- Title 23 does not require:
  - sensor out,
  - failsafe or
  - shutdown.

So why do we see it?

- Get out of Annual Line Testing

Stuck Relay

- Sensor programed for shut down but doesn't?
  - Relay could be stuck
    - Is that a problem?
      - Yes!
- Red Tag?
  - Maybe…

Annular Sensor Testing

Situation: The technician removes the Veeder Root 407 wrap around sensor from the tank, then places it in water to test. You walk inside and confirm that one fuel alarm occurred related to the test.

Is this a pass?

Annular Sensor Testing

Situation: The technician removes the Veeder Root 407 wrap around sensor from the tank, then places it in water to test. You walk inside and confirm that one fuel alarm occurred related to the test.

Is this a pass?

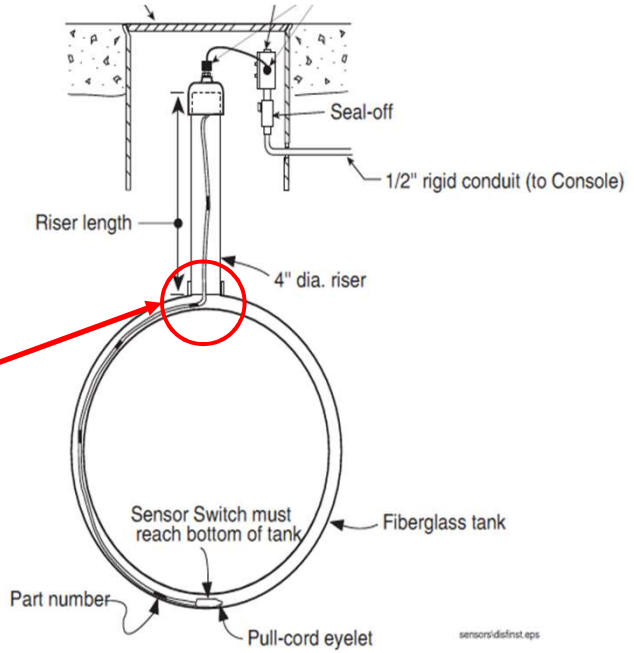
Maybe not! Why?

Annular Sensor Testing

Wrap around sensors **should alarm twice** during a test!

First alarm – Occurs when the sensor is removed from tank (Upside down at top)

Second alarm – Technician should pause and clear the first alarm, then dip in water for the true test



If you only saw one alarm, it might have only been the first one

Technician either did not wait to clear first alarm, or the sensor doesn't work in liquid

Annular Sensor Testing

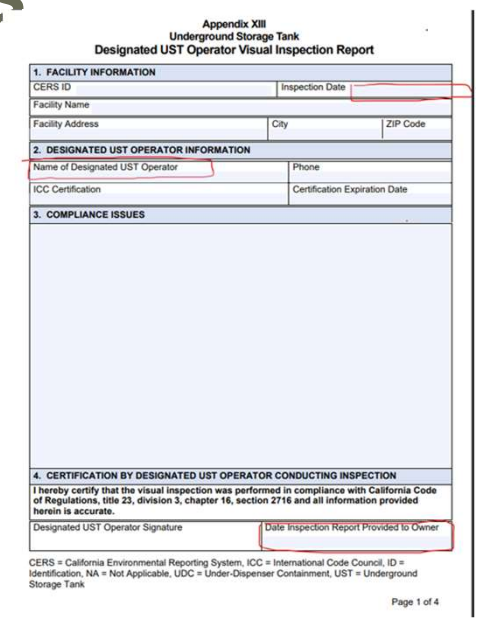
Make sure you are checking that annular sensors are returned to the lowest point for earliest leak detection

Ask the technician to verify that it is resting on the bottom

You should see/feel slack in the wire, even if it is just a little bit

Example: Picture here depicts a VR-420 annular sensor that is a few feet too short

Designated Operator Visual Inspection Reports



Appendix XIII
Underground Storage Tank
Designated UST Operator Visual Inspection Report

1. FACILITY INFORMATION

CERS ID	Inspection Date	
Facility Name		
Facility Address	City	ZIP Code

2. DESIGNATED UST OPERATOR INFORMATION

Name of Designated UST Operator	Phone
ICC Certification	Certification Expiration Date

3. COMPLIANCE ISSUES

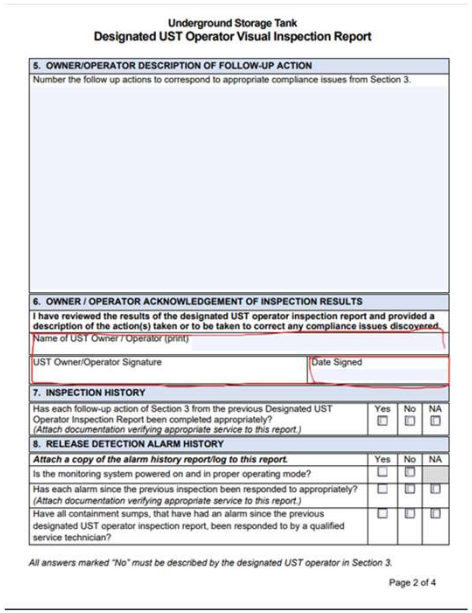
4. CERTIFICATION BY DESIGNATED UST OPERATOR CONDUCTING INSPECTION

I hereby certify that the visual inspection was performed in compliance with California Code of Regulations, title 23, division 3, chapter 16, section 2716 and all information provided herein is accurate.

Designated UST Operator Signature	Date Inspection Report Provided to Owner

CERS = California Environmental Reporting System, ICC = International Code Council, ID = Identification, NA = Not Applicable, UDC = Under-Dispenser Containment, UST = Underground Storage Tank

Page 1 of 4



Underground Storage Tank
Designated UST Operator Visual Inspection Report

5. OWNER/OPERATOR DESCRIPTION OF FOLLOW-UP ACTION

Number the follow up actions to correspond to appropriate compliance issues from Section 3.

6. OWNER / OPERATOR ACKNOWLEDGEMENT OF INSPECTION RESULTS

I have reviewed the results of the designated UST operator inspection report and provided a description of the action(s) taken or to be taken to correct any compliance issues discovered.

Name of UST Owner / Operator (print)	
UST Owner/Operator Signature	Date Signed

7. INSPECTION HISTORY

	Yes	No	NA
Has each follow-up action of Section 3 from the previous Designated UST Operator Inspection Report been completed appropriately? *(Attach documentation verifying appropriate service to this report.)*	☐	☐	☐

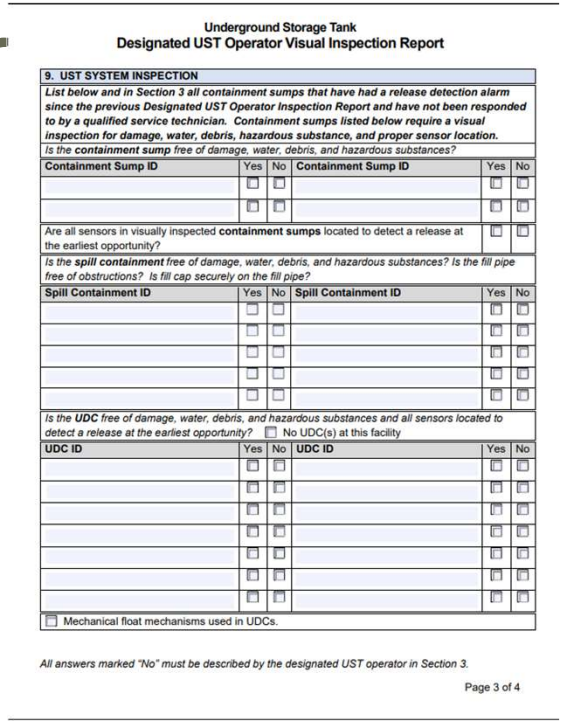
8. RELEASE DETECTION ALARM HISTORY

Attach a copy of the alarm history report/log to this report.	Yes	No	NA
Is the monitoring system powered on and in proper operating mode?	☐	☐	
Has each alarm since the previous inspection been responded to appropriately? *(Attach documentation verifying appropriate service to this report.)*	☐	☐	☐
Have all containment sumps, that have had an alarm since the previous designated UST operator inspection report, been responded to by a qualified service technician?	☐	☐	☐

All answers marked "No" must be described by the designated UST operator in Section 3.

Page 2 of 4

Designated Operator Visual Inspection Repor



Underground Storage Tank
Designated UST Operator Visual Inspection Report

9. UST SYSTEM INSPECTION

List below and in Section 3 all containment sumps that have had a release detection alarm since the previous Designated UST Operator Inspection Report and have not been responded to by a qualified service technician. Containment sumps listed below require a visual inspection for damage, water, debris, hazardous substance, and proper sensor location.

*Is the **containment sump** free of damage, water, debris, and hazardous substances?*

Containment Sump ID	Yes	No	Containment Sump ID	Yes	No
	☐	☐		☐	☐
	☐	☐		☐	☐

Are all sensors in visually inspected **containment sumps** located to detect a release at the earliest opportunity? ☐ Yes ☐ No

*Is the **spill containment** free of damage, water, debris, and hazardous substances? Is the fill pipe free of obstructions? Is fill cap securely on the fill pipe?*

Spill Containment ID	Yes	No	Spill Containment ID	Yes	No
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐

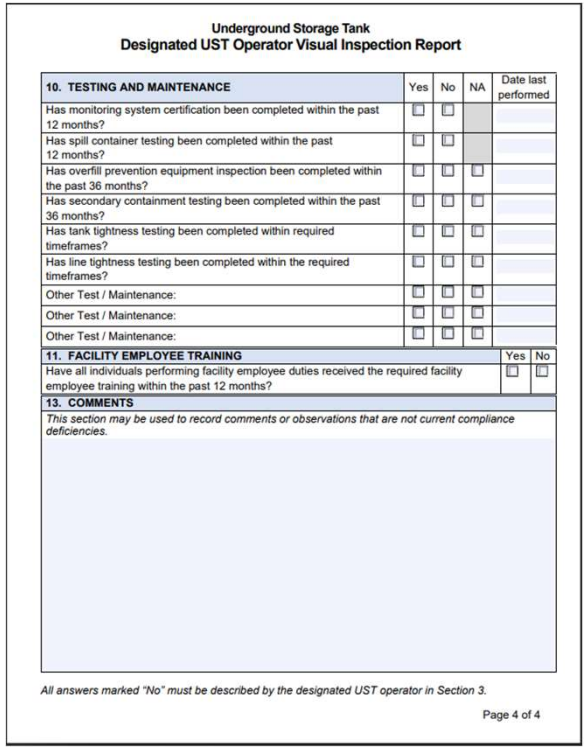
*Is the **UDC** free of damage, water, debris, and hazardous substances and all sensors located to detect a release at the earliest opportunity?* ☐ No UDC(s) at this facility

UDC ID	Yes	No	UDC ID	Yes	No
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐
	☐	☐		☐	☐

☐ Mechanical float mechanisms used in UDCs.

All answers marked "No" must be described by the designated UST operator in Section 3.

Page 3 of 4



Underground Storage Tank
Designated UST Operator Visual Inspection Report

10. TESTING AND MAINTENANCE	Yes	No	NA	Date last performed
Has monitoring system certification been completed within the past 12 months?	☐	☐		
Has spill container testing been completed within the past 12 months?	☐	☐		
Has overfill prevention equipment inspection been completed within the past 36 months?	☐	☐	☐	
Has secondary containment testing been completed within the past 36 months?	☐	☐	☐	
Has tank tightness testing been completed within required timeframes?	☐	☐	☐	
Has line tightness testing been completed within the required timeframes?	☐	☐	☐	
Other Test / Maintenance:	☐	☐	☐	
Other Test / Maintenance:	☐	☐	☐	
Other Test / Maintenance:	☐	☐	☐	

11. FACILITY EMPLOYEE TRAINING	Yes	No
Have all individuals performing facility employee duties received the required facility employee training within the past 12 months?	☐	☐

13. COMMENTS

This section may be used to record comments or observations that are not current compliance deficiencies.

All answers marked "No" must be described by the designated UST operator in Section 3.

Page 4 of 4

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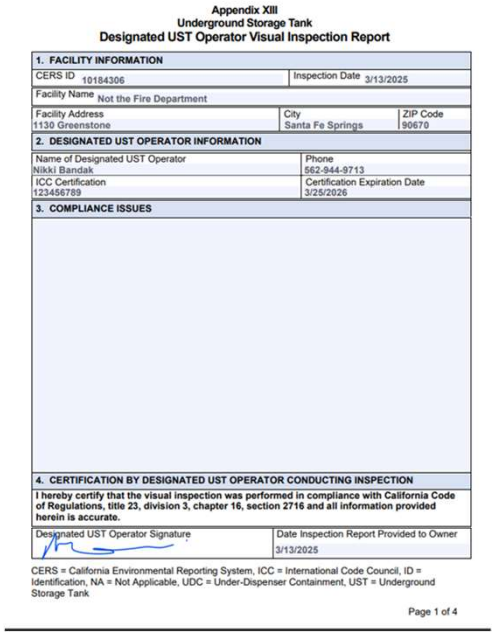
27th California Unified Program Annual Training Conference
March 24 thru 27, 2025

Pre-dated Designated Operator Visual Inspection Reports



Appendix XIII
Underground Storage Tank
Designated UST Operator Visual Inspection Report

1. FACILITY INFORMATION

CERS ID 10184306		Inspection Date 3/13/2025
Facility Name Not the Fire Department		
Facility Address 1130 Greenstone	City Santa Fe Springs	ZIP Code 90670

2. DESIGNATED UST OPERATOR INFORMATION

Name of Designated UST Operator Nikki Bandak	Phone 562-944-9713
ICC Certification 123456789	Certification Expiration Date 3/25/2026

3. COMPLIANCE ISSUES

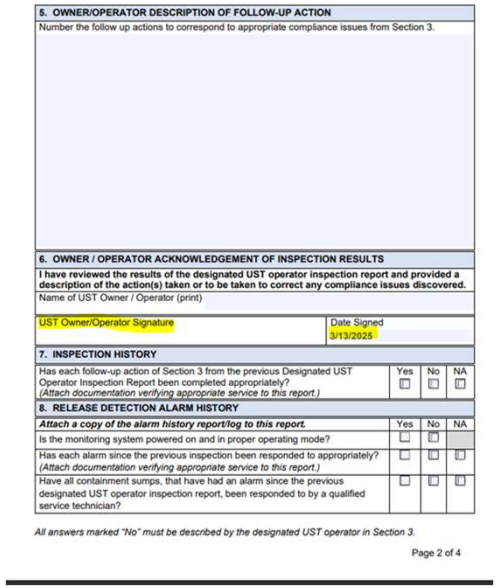
4. CERTIFICATION BY DESIGNATED UST OPERATOR CONDUCTING INSPECTION

I hereby certify that the visual inspection was performed in compliance with California Code of Regulations, title 23, division 3, chapter 16, section 2716 and all information provided herein is accurate.

Designated UST Operator Signature	Date Inspection Report Provided to Owner 3/13/2025

CERS = California Environmental Reporting System, ICC = International Code Council, ID = Identification, NA = Not Applicable, UDC = Under-Dispenser Containment, UST = Underground Storage Tank

Page 1 of 4



Underground Storage Tank
Designated UST Operator Visual Inspection Report

5. OWNER/OPERATOR DESCRIPTION OF FOLLOW-UP ACTION

Number the follow up actions to correspond to appropriate compliance issues from Section 3.

6. OWNER / OPERATOR ACKNOWLEDGEMENT OF INSPECTION RESULTS

I have reviewed the results of the designated UST operator inspection report and provided a description of the action(s) taken or to be taken to correct any compliance issues discovered.

Name of UST Owner / Operator (print)

UST Owner/Operator Signature	Date Signed 3/13/2025

7. INSPECTION HISTORY

	Yes	No	NA
Has each follow-up action of Section 3 from the previous Designated UST Operator Inspection Report been completed appropriately? *(Attach documentation verifying appropriate service to this report.)*	☐	☐	☐

8. RELEASE DETECTION ALARM HISTORY

Attach a copy of the alarm history report/log to this report.	Yes	No	NA
Is the monitoring system powered on and in proper operating mode?	☐	☐	
Has each alarm since the previous inspection been responded to appropriately? *(Attach documentation verifying appropriate service to this report.)*	☐	☐	☐
Have all containment sumps, that have had an alarm since the previous designated UST operator inspection report, been responded to by a qualified service technician?	☐	☐	☐

All answers marked "No" must be described by the designated UST operator in Section 3.

Page 2 of 4

Questions on this section?

VPH Tampering Case Study

UST Monitoring

- Install date: 11/20/2004
- USTs: Brine Filled Annular (VR-304)
- Tank Top Sumps: Vacuum Monitored
- Piping: Vacuum Monitored
- UDCs: Vacuum Monitored

VPH Tampering Case Study

Vacuum Sensor Zones

S1: Diesel STP and fill sumps
S2: Diesel vent line
S3: Diesel product line and 1/2 & 5/6 UDCs
S4: 87 STP and fill sumps
S5: 87 vent and vapor recovery lines
S6: 87 product line and 3/4 & 7/8 UDCs
S7: 91 STP and fill sumps
S8: 91 vent line
S9: 91 product line and UDCs 9/10 & 11/12

VPH Tampering Case Study

Vacuum Sensor Zones

S1: Diesel STP and fill sumps

S2: Diesel vent line

S3: Diesel product line and 1/2 & 5/6 UDCs

S4: 87 STP and fill sumps

S5: 87 vent and vapor recovery lines

S6: 87 product line and 3/4 & 7/8 UDCs

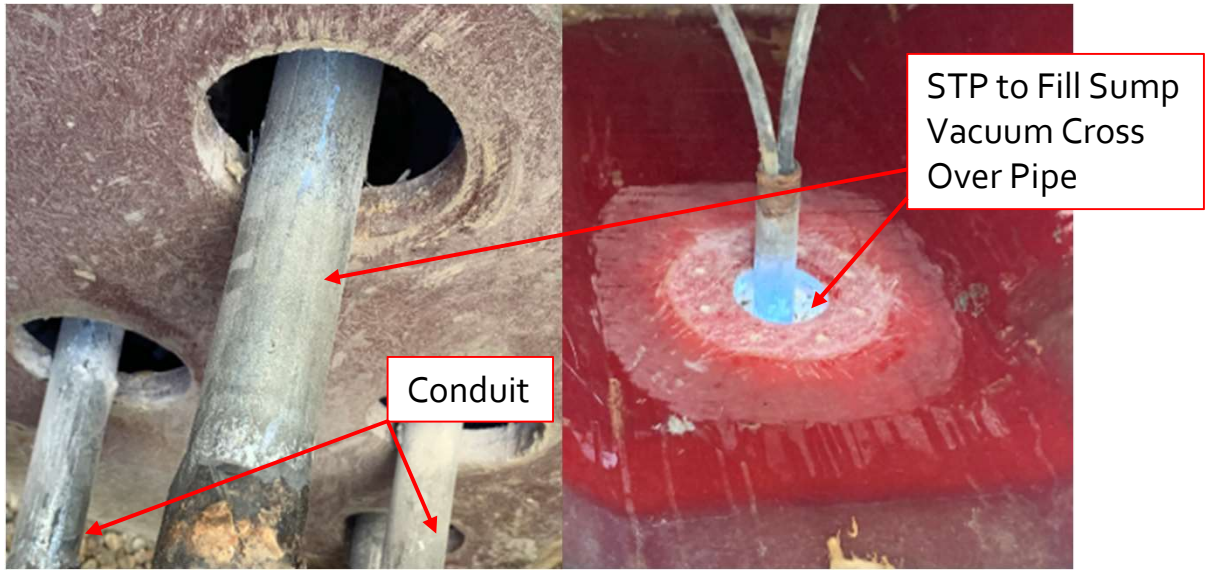
S7: 91 STP and fill sumps

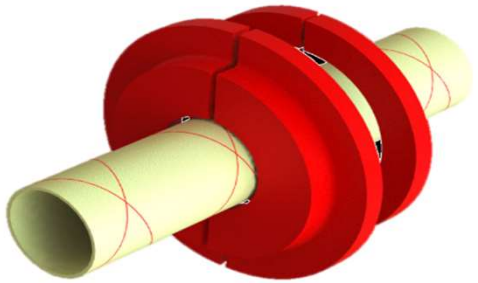
S8: 91 vent line

S9: 91 product line and UDCs 9/10 & 11/12

Problem Zones

Let's Step Back and Discuss Penetrations

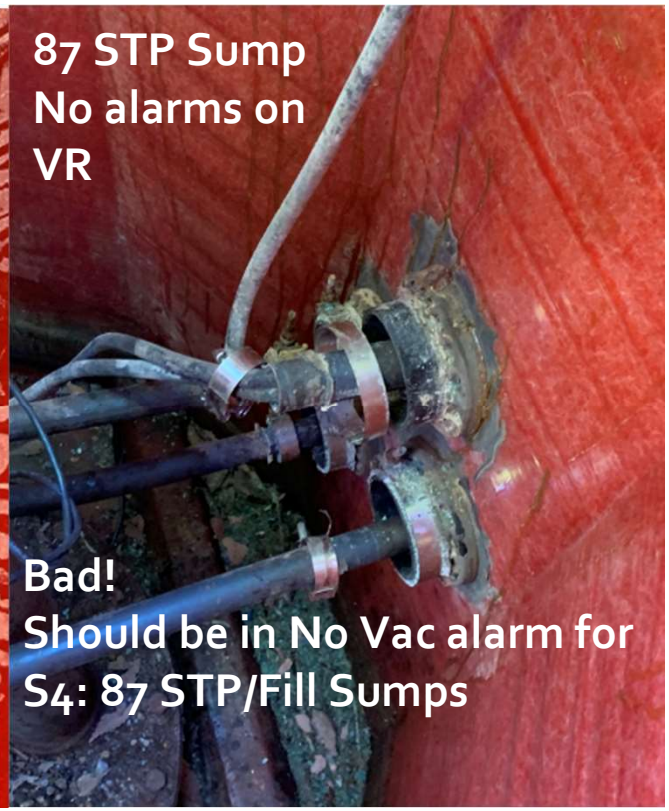




Site installed in 2004…SW steel vacuum cross over piping shown is not to current standards

STP Sump Observations

Fill sumps were also deteriorated, didn't get pics.



87 STP and Fill Sumps – Should be in Alarm

87 STP - View from above

Always trace the vacuum lines!

Peek into hard to see locations!

87 STP and Fill Sumps – Should be in Alarm

87 STP sump

Pictures taken leaning into sump

No vac alarm triggered after removing zip tie

Let's Step Back and Discuss Vacuum Sensors

Vac Sensors monitor for loss of vacuum and presence of fluid.

Diesel STP and Fill Sumps – Should be in Alarm

Diesel STP Sump – View from above

Always trace the vacuum lines!

Peek into hard to see locations!

Diesel STP and Fill Sumps – Should be in Alarm

No issue with vacuum lines attaching to sump wall this time.

But what is wrong with this ball valve?

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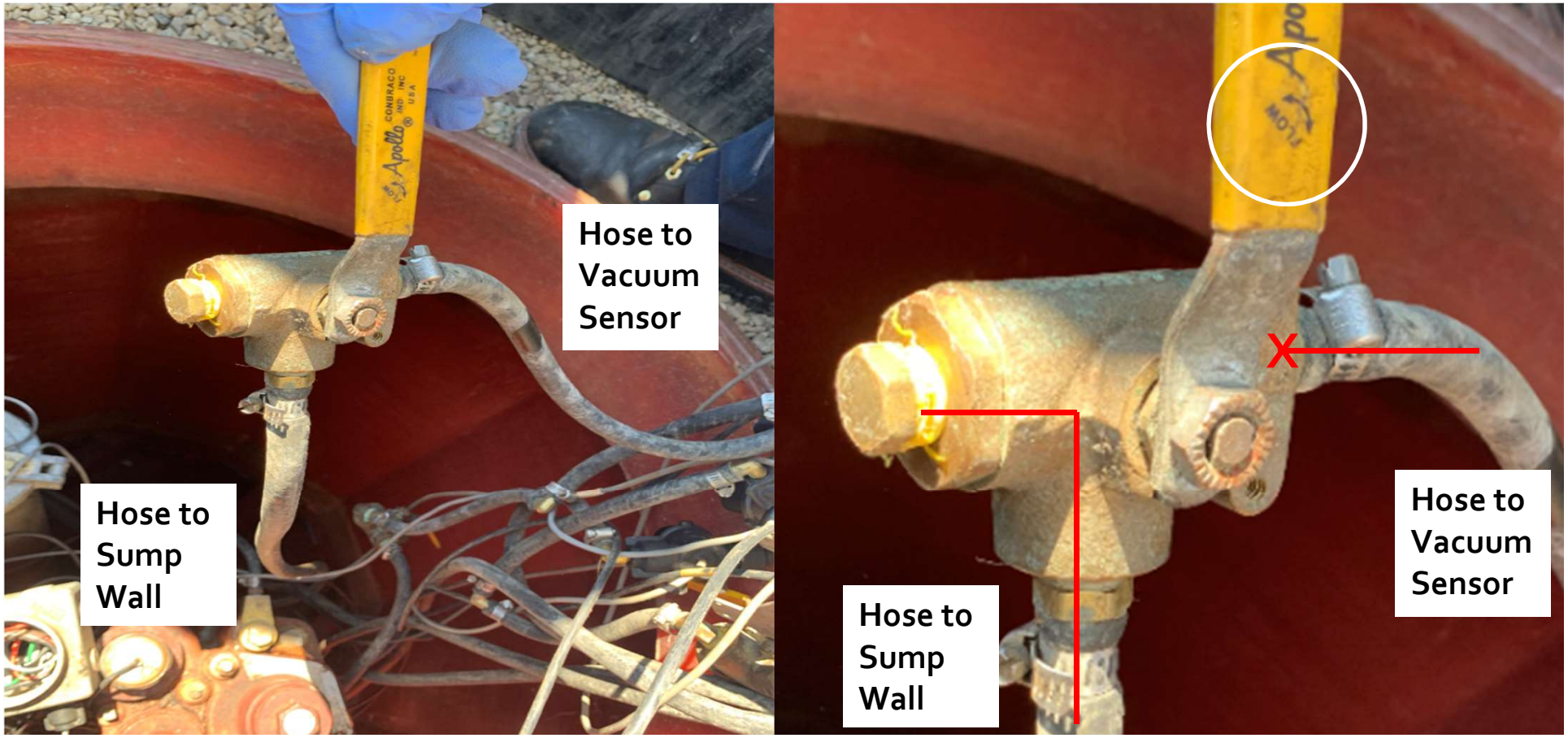
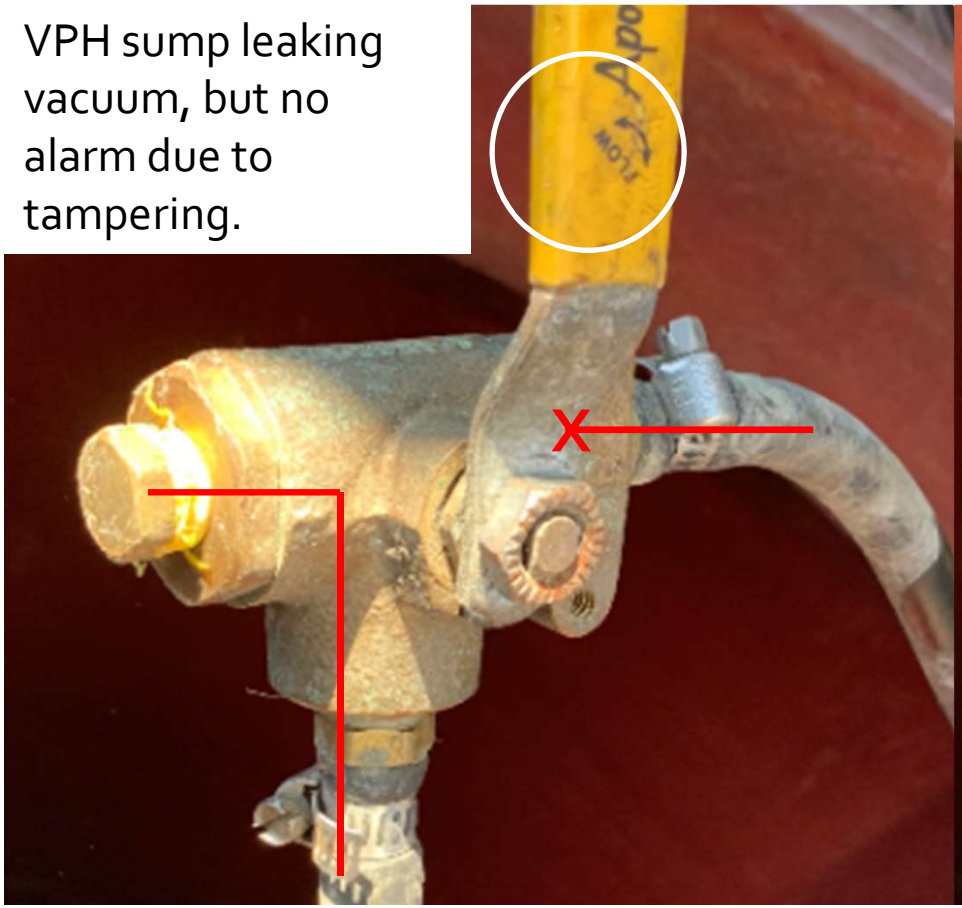
Diesel STP and Fill Sumps – Should be in Alarm

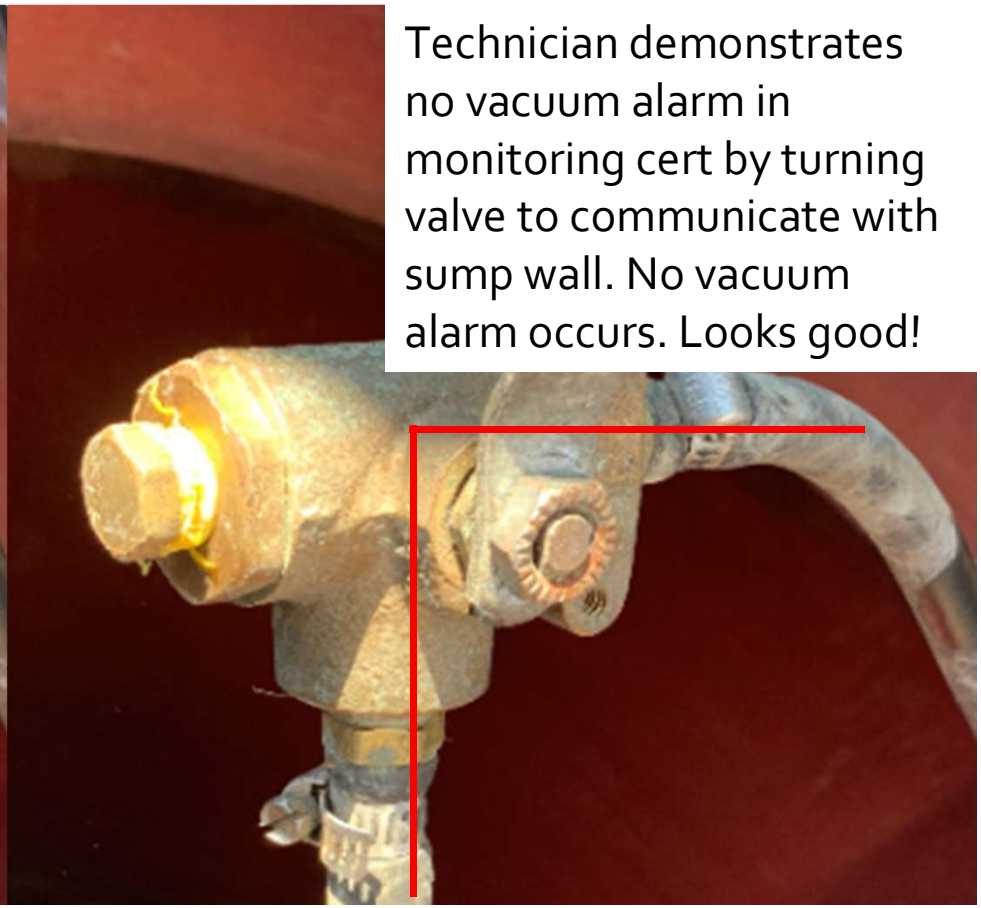


False Passing Test Possible During Mon. Cert.

VPH sump leaking vacuum, but no alarm due to tampering.



Technician demonstrates no vacuum alarm in monitoring cert by turning valve to communicate with sump wall. No vacuum alarm occurs. Looks good!

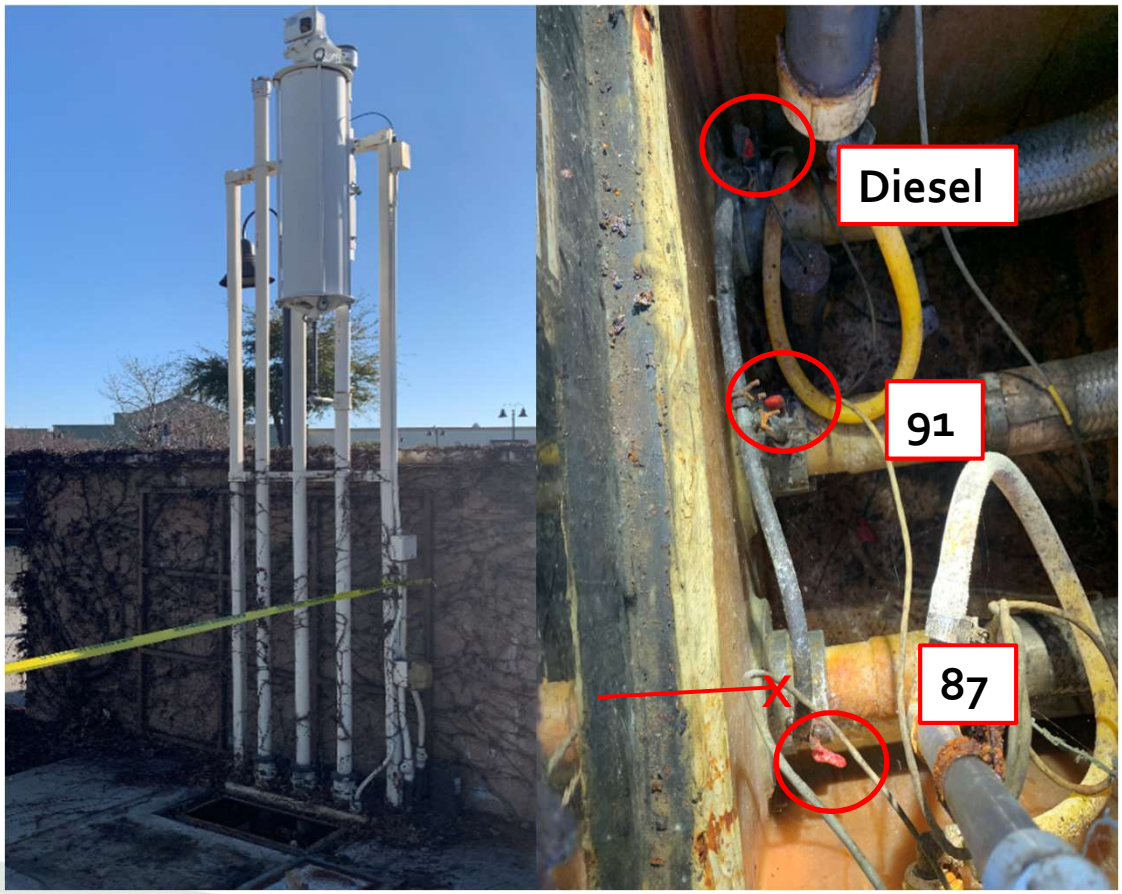


Another VPH Case Study – Vent Piping

All vent piping secondaries are monitored under one zone coming from the 87 turbine

Ball valve on 87 cross over vacuum hose was found closed

Tampering – Site is not monitoring the 91 and Diesel vent secondary lines



Overfill Prevention

Overfill Prevention – Veeder Root A/V Alarm

A single Veeder Root A/V Alarm box cannot be used with multiple tanks…. Why?

(Clarified in LG Letter 150-3)

Second tank cannot alarm until the first tank comes out of alarm

Single alarm unit only ok for single tank site

Overfill Prevention – Veeder Root A/V Alarm

Some sites have installed multiple Veeder Root A/V alarm boxes with success.

Other manufacturers are addressing the issue as well (Omntec)

Overfill Prevention – Veeder Root A/V Alarm

Remember: Overfill is a topic of your routine inspection, even if you are not at a triennial test!

What can you check annually for an A/V alarm?

Why not go push the test button on the A/V alarm?

Audible alarm functional?

Visual light bulb functional?

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Overfill Prevention – Flappers

"Overfill Prevention Valve" aka "Flapper Valve"

A device installed in a tank's drop tube to provide positive shut-off flow into the tank at a pre-set point.

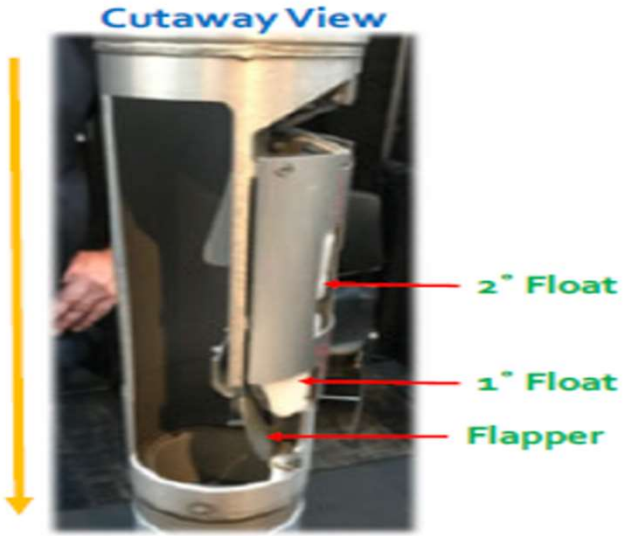
Many flappers are two-stage

Stage #1 – Restricts flow

Stage #2 – Positive "complete" Shut-Off

However, only mark **"Shut Off Flow"** on test results

OPE response when activated? – think end outcome



6. OVERFILL PREVENTION EQUIPMENT DETAILS	
Tank ID *(one OPE per column)*	Regular
Are both vent and tank riser piping secondarily contained?	☑ Yes ☐ No
OPE Model	OPW 71SO
What is the OPE response when activated? *(Check all that apply.)*	☑ Shut off Flow ☐ Restricts Flow ☐ Audible Alarm ☐ Visual Alarm

Flappers by Manufacturer

Franklin Fueling

Emco Wheaton

OPW

Flapper Measurements

We are not going to talk about flapper measurements in this class

However, let's discuss some issues that may come up for you

Issues with Fiberglass Tank Measurements

Differences in Manufacturing

Xerxes:

- External mold spins as fiberglass is sprayed on the inside
- Imperfect internal roundness
- Measurements can differ from tank chart

Containment Solutions (NOV)

- Internal mold spins as fiberglass is sprayed/rolled on the outside
- Consistent internal roundness
- Better match to tank chart

Issues with Fiberglass Tank Measurements

Hooking the top of the tank with tape measure is not always accurate!

- Threaded ports are inset into the tank
- Degree of inset can vary by manufacturer
- 1 - 3 inches possible
- Not an issue with steel tanks

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Issues with Fiberglass Tank Measurements

Tank Configuration (Compartmented fiberglass tank)

You cannot use a standard tank chart for the end tank!
Not an issue with steel tanks, they are always flat on the ends…

Issues with Fiberglass Tank Measurements

Chose the right tank chart – Standard vs. end tank

XERXES®
a ZCL company
www.xerxes.com

Calibration Chart

20,000 Gallon - 10' Diameter Double-Wall END Tank
For Use with Multicompartment Tanks

DIPSTICK		DIPSTICK		DIPSTICK		DIPSTICK		DIPSTICK		DIPSTICK		DIPSTICK	

VS.

XERXES®
www.xerxes.com

Calibration Chart

20,000 Gallon - 10' Diameter Double-Wall Tank

DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS	DIPSTICK READING	GALLONS

Issues with Fiberglass Tank Measurements

Key Take Aways

- Tank charts are still important
- Fiberglass tanks may not match the tank chart as well as steel tanks
- Setting flapper to activate at 95% is at your own risk

Issues with Ball Floats

- Can no longer be installed or repaired
- However, if still present, can interfere with flapper activation
- Many older tanks had ball floats installed at 90%
- Therefore, you should be checking during a flapper inspection

Issues with Ball Floats

OPE Model	
What is the OPE response when activated? *(Check all that apply.)*	☐ Shut off Flow ☐ Restricts Flow ☐ Audible Alarm ☐ Visual Alarm
Are flow restrictors installed on vent piping that may interfere with the OPE operation?	☐ Yes* ☐ No

- Prior records of ball float status can be vague
- Can you rely on prior test results saying "no"?
  - **Maybe, maybe not…**
- Two common interpretations of this question on the state form:
  - No = a ball float is not present
  - No = the installed ball float will not interfere

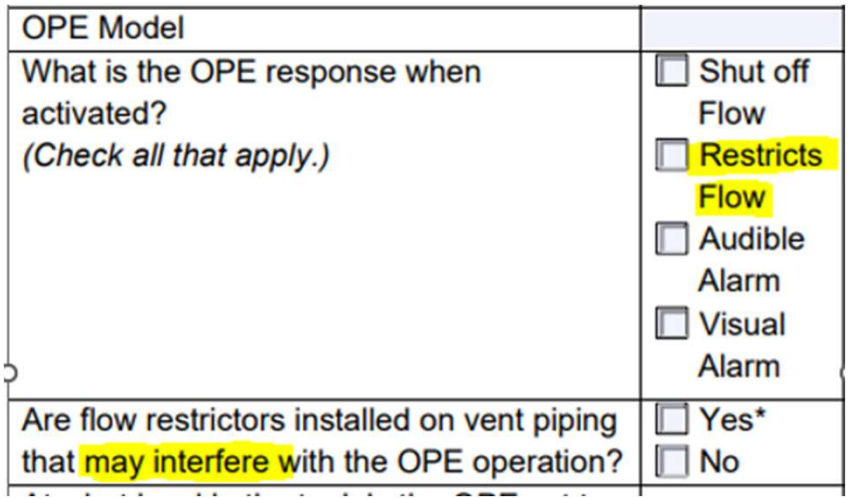
Are prior technician measurements ever wrong? **Yes**
What other UST tests allow prior information to count in lieu of verifying again?
None

Issues with Ball Floats

UST Program Update August 2024

- Service Technician "no" answer on a prior record is acceptable, no further action is "required" by UPA

- But, the UPA has authority to request reinspection of a ball float



OPE Model	
What is the OPE response when activated? *(Check all that apply.)*	☐ Shut off Flow ☐ Restricts Flow ☐ Audible Alarm ☐ Visual Alarm
Are flow restrictors installed on vent piping that may interfere with the OPE operation?	☐ Yes* ☐ No

- Caveat - Reason for reinspection must outweigh the associated burden and cost
  → Some ball floats are hard to get to, but most are easy!

Where are Ball Floats Located?

There may be more than one!

Striker Plates vs. Bottom Protectors

Striker plates are required under all tank openings that can be used for manual dip-sticking. A drop tube-mounted bottom protector may fulfill this requirement.

- CERS isn't a great resource for striker vs. bottom protector
- Some tanks may have lost the bottom protector in the flapper upgrades post 2018

6111-1400

Fill Components Installed	
Yes	Spill Bucket
Yes	Striker Plate/Bottom Protector
Yes	Containment Sump

Striker Plates in Fiberglass Tanks (UL1316)

- 1973 – 1977 – An available option, nothing required it.
- 1977 – One striker plate common under one opening destined to be the fill port.
  - Onsite install changes can result in loss of the striker plate.
- 1983 – UL1316 was revised to require one striker plate under each opening, or one opening that was so marked.
  - Onsite install changes can result in loss of the striker plate.
- 1986 – All fiberglass tanks were manufactured with striker plates under all openings.

Striker Plates in Steel Tanks

- UL 58 didn't require striker plates until August 1990, with one striker plate under each opening, or one opening that was so marked.
  - Onsite install changes can result in loss of the striker plate.

- Note: STI sti-P3 and ACT-100 tanks were more stringent than UL-58. Striker plates were required by 1987 under each opening for tank diameters 64 inches or larger.

FIBERGLASS TANK & PIPE INSTITUTE

UST Deflection and Striker Plates Past and Present

Sullivan (Sully) D. Curran P.E., Former Executive Director

CALIFORNIA CUPA FORUM

How do you Verify?

Fiberglass tanks

- You can use a magnet.

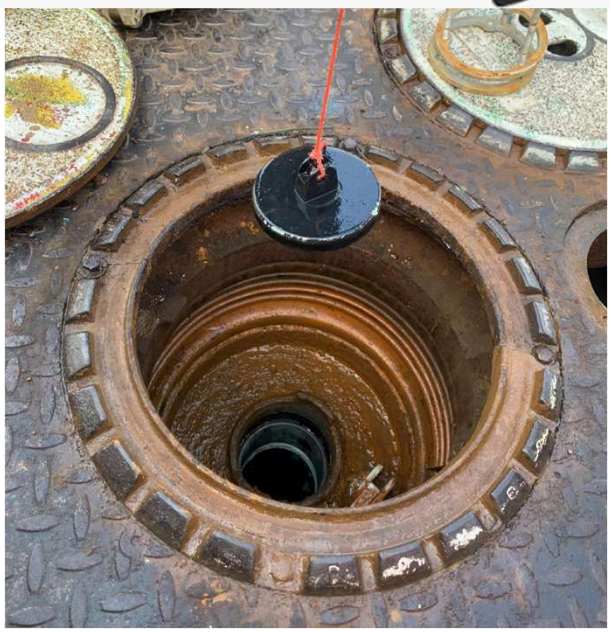
Steel tanks

- Use a gauge stick to sweep the bottom of the tank

Summary - Striker questionable for:

- Fiberglass tanks older than 1986
- Steel tanks older than 1990
- STI-P3 or ACT-100 older than 1987

Careful: Some tanks newer than 1990 may have lost the striker under the fill during install.



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Spill Buckets Issues

OPW

CNI

Franklin Fueling
Phil-Tite

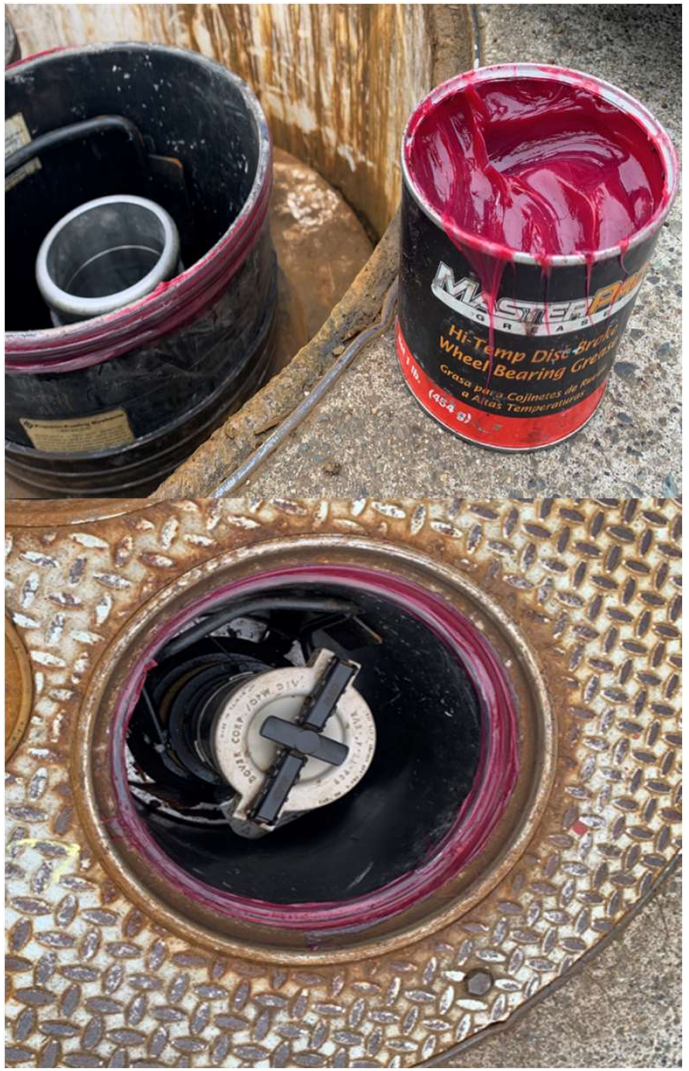
Franklin Fueling PhilTite

The Grease Method of Passing is not allowed

Grease may be used when reinstalling the sump lid to prevent damage to the gasket

All excess must be wiped clean!

Intentionally applying grease is not a valid test



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VPH Water Intrusion

Situation:
Water is repeatedly found present in VPH fill sumps year after year. The technician removes the water during the inspection. Inspector closes the violation as corrected onsite each year.

Issue:
Is the inspector checking to see if something is fixable?

VPH Water Intrusion

Let's look at ways that water gets into sumps…

First line of defense: Sump lid seals

Second line of defense: Pea gravel drainage

Water will enter sump if:

a) Sump lid seals are damaged

+

b) Pea gravel drains but tank pit is full of water

or

c) Pea gravel doesn't drain due to dirt/debris

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VPH Water Intrusion

Violation: Substantial liquid found in 87 STP Sump at VPH site

(1) Sump lid seal damaged. Sump rim seal was found laying inside of sump
(2) Pea gravel has lots of dirt and debris preventing drainage
(3) Pea gravel level is too high relative to the sump rim

Corrective actions?

(1) Replace sump lid seal
(2) Reinstall or replace sump rim seal
(3) Provide freely draining pea gravel
(4) Adjust level of pea gravel

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VPH Water Intrusion

FFS PhilTite buckets

Missing or damaged upper gaskets won't just fail a spill bucket test, they can also let rainwater into your sump

This will likely be fixed during your inspection for a fill bucket

However,
What about the missing or damaged **vapor** spill bucket gasket??

VPH Water Intrusion

FFS PhilTite buckets

Should have a shroud present around bucket in case the upper gasket seal fails

Is shroud present?
Is shroud in good condition?

Are there any cracks in your sump top hat?

Again, muddy backfill here…

Poll 11

A direct bury spill bucket fails testing. The technician doesn't see any liquid entering the tank through the drop tube from the drain valve. Spill bucket deemed to have failed, requires replacement.

What violation option would you choose?

A) Class II violation, 30 days to correct
B) Class II violation, 7 days to correct
C) Class I violation, issue 7-day red tag notice
D) Class I violation, red tag applied immediately

Direct Bury Bucket Failure

A direct bury spill bucket fails testing. The technician doesn't see any liquid entering the tank through the drop tube from the drain valve. Spill bucket deemed to have failed, requires replacement.

What violation option would you choose?

A) Class II violation, 30 days to correct
B) Class II violation, 7 days to correct
C) Class I violation, issue 7-day red tag notice
D) Class I violation, red tag applied immediately (Maybe!)

Direct Bury Bucket Failure

2717(a) Significant Violation

(1) A violation that is causing or threatens to cause a liquid release….
….including, but not limited to… **Failure of a required spill containment structure**, where the failure is causing or threatens to cause a release to the environment due to a spill or an overfill.

2717.1 Affixing Red Tags

(a) Upon the discovery of a significant violation that poses an imminent threat to human health or safety or the environment, the local agency may immediately affix a red tag…

Used Oil Release From Direct Bury Spill Bucket Identified During Closure

DW Fiberglass tank – Permanent Closure, no signs of leaking from tank
Substantial used oil found in tank pit, **that isn't ground water!**
Source - Direct bury spill bucket

Used Oil Release From Direct Bury Spill Bucket Identified During Closure

Actual cause of release – Old open drain valve assembly found still attached to riser!
Oil entered backfill every time tank was overfilled…

SB989 – Flexible Piping

- Flexible piping has no buried connections
- Therefore, UDCs are connected in series
- Piping transitions to single walled inside each UDC to service the dispenser
- Therefore, each UDC represents a break in secondary piping communication

Flex vs. Fiberglass

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SB989 – Flexible Piping

- How do you test the full length of flexible secondary piping with one pressure gauge at the turbine sump?

- Jumper hoses must be installed in each UDC
  - Connecting secondary piping (entry) to secondary piping (exit)

- Inspector should verify this prior to starting the test

SB989 – Flexible Piping

An ICC Service Technician has pressurized to 5psi on the gauge, and it is holding steady.

What is the issue with this picture?

SB989 – Flexible Piping

Issue:
The test boot is not positioned on the secondary piping at all (dark blue)

The secondary containment is not being tested

SB989 – Flexible Piping

Same site, different sump.

Test boot is on in the correct location.

What if the test boot band clamp was too tight?

Communication can be lost!

SB989 – Flexible Piping

How many locations are there where a test boot band clamp can cause a loss of communication?

Test boot in the turbine sump

+

Two test boots in each UDC (jumper connections)

If site has 6 UDCs, there are 13 test boots that can cut off communication and void the test

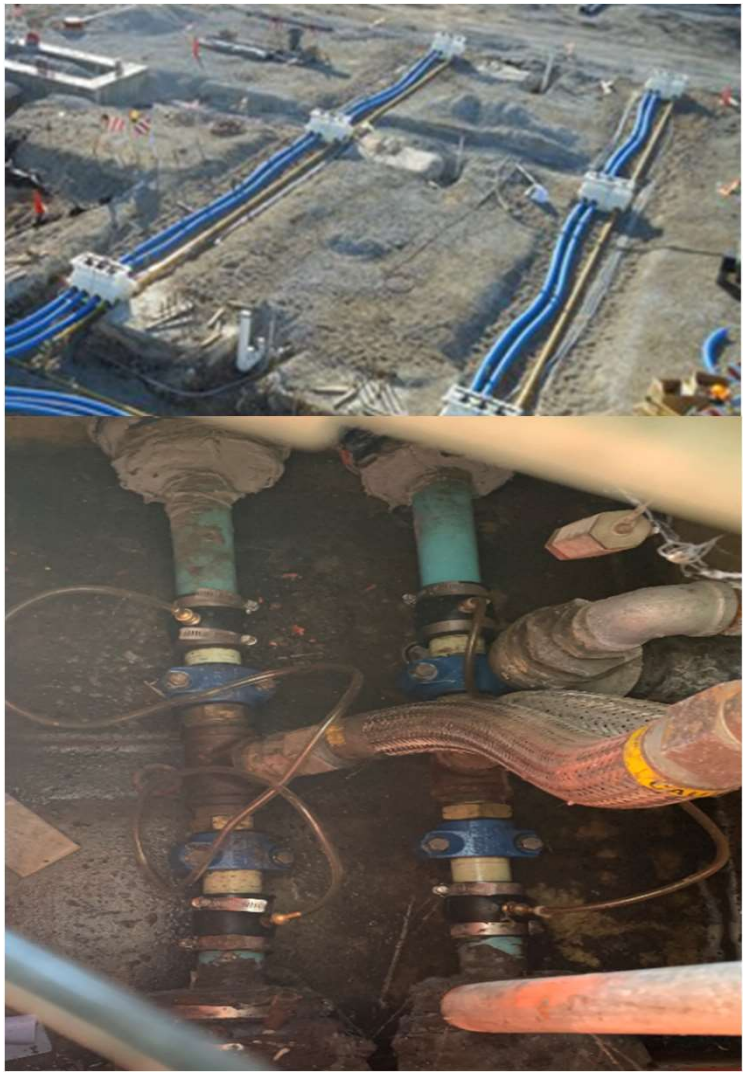
SB989 – Flexible Piping

How do we verify no issues with communication?

- The technician must release the pressure at the farthest UDC.

After testing

- Inspector must verify that all jumper lines are removed to restore leak detection



SB989 – Goop Jobs

Common issue with Icon Penetrations

Scenario: Sump fails SB989 testing

Rather than replacing the leaking penetrations, technician applies copious amounts of Silkaflex or similar sealant to pass (e.g. Bostik).

Issues:

1) Silkaflex is not compatible with fuel
2) Silkaflex use is not per Icon manufacturer specifications

SB989 – Goop Jobs

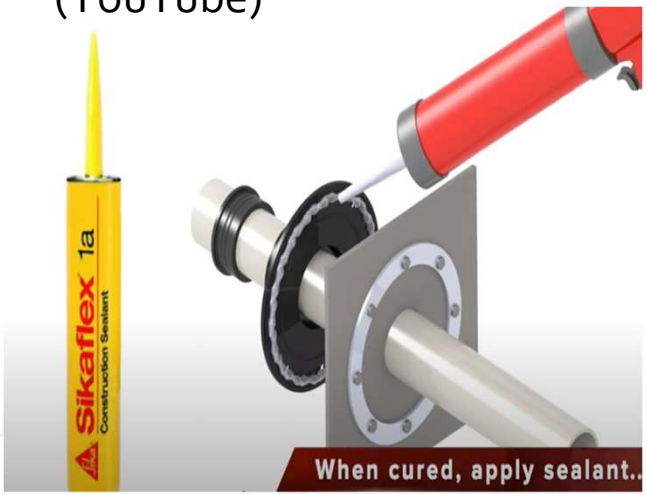
It isn't that Silkaflex is being used

Silkaflex is used in the installation of Icon split repair fittings, but it is **only applied to the rear face** of the penetration to ensure a proper seal with the wall

ICON CONTAINMENT SOLUTIONS
SIMPLE • PROVEN • PERMANENT

Part Number	Part Description
IAC FASTFUSE	Icon FastFuse SplitRepair Fitting Bonding Solvent, 4oz Can
IAC SIKA10	Sikaflex-1a SplitRepair Fitting Gasket Sealant, 10oz Tube

Installation Tutorial (YouTube)



SB989 – Goop Jobs

This was at a final construction inspection….these are new penetrations!

Why would you need to goop brand new penetrations??
Issue #1 – Trying to make it work with the wrong part
- Icon makes a ton of products, in a ton of sizes.

Issue #2 - Uneven sump wall surfaces hindering a good seal

Issue #3 – Inaccessibility in UDCs for proper install

You may need to remove the dispenser to properly install Icon penetrations in UDCs

SB989 – ~~Goop Job~~ Nice Job

Picture here is from a final permit inspection

All penetrations were replaced in a cramped UDC

Dispenser was removed to facilitate Icon penetration Installation

Sealant was only applied to rear of fitting, excess wiped.

Everything looks great!

SB989 – ~~Goop Job~~ Nice Job

What happened with this site? – Permitted replacement of Icon penetrations

SB989 – Annular Testing Changes to PEI 1200

PEI 1200 changed in 2017 for steel tanks

Current standard: vacuum shall be set to 10 inches Hg for all tanks regardless of material type

Issue: You still see technicians testing steel tanks at 6-7 inches vacuum

Also, note the duration requirement for 20k and larger tanks

PEI/RP1200-12

TABLE 4-1. Test Parameters			
Tank Type	**Vacuum, inches Hg**	**Capacity, gallons**	**Duration, hours**
Fiberglass	10	< 20,000	1
		20,000+	2
Steel	6	< 20,000	1
		20,000+	2

PEI/RP1200-19 (Current)

TABLE 4-1		
Vacuum, inches Hg	**Capacity, gallons**	**Duration, hours**
10	<20,000	1
	20,000+	2

Poll 12

Situation

You receive SB989 test results from last month that showed a failure at the 1/2 and 3/4 UDCs. Later in the report, the technician comments, "torn test boots in UDCs, must replace and retest."

Question

Should the inspector write a violation for failed secondary containment?

a) Yes

a) No

SB989 – Test Boots

Situation

You receive SB989 test results from last month that showed a failure at the 1/2 and 3/4 UDCs. Later in the report, the technician comments, "torn test boots in UDCs, must replace and retest."

Question

Should the inspector write a violation for failed secondary containment?

a) Yes

a) **No**
Test boots are test equipment, they are not a part of regulated secondary containment

UST Program Update
June 2019

Issuing Violations Consistent with Underground Storage Tank Regulations

The State Water Resources Control Board (State Water Board) has the responsibility to ensure requirements of California Code of Regulations, title 23, division 3, chapter 16 Underground Storage Tank (UST Regulations) and Health and Safety Code, division 20, chapter 6.7 (H&SC) are implemented consistently statewide, including issuing notices of violations. When UST Regulations and H&SC are implemented by a Unified Program Agency (UPA) inconsistently and violations are issued inappropriately, the State Water Board receives negative feedback from UST stakeholders. The primary purpose of the UST program is to ensure that UST systems comply with design and construction standards and are monitored, tested, inspected, and operated in a safe condition in accordance with applicable UST requirements. Violations may not be issued for equipment and activities that are not specifically required to comply with design, construction, monitoring, testing, and inspection requirements. For example, UPAs cannot issue a violation for not complying with secondary containment construction requirements for damaged secondary containment test boots because secondary containment test boots are not required to comply with design and construction requirements (UST Regulations, § 2630(c).). As another example, UPAs cannot issue a violation for not complying with designated UST operator inspection requirements for overfill prevention alarms that do not have an appropriate response documented because overfill alarms are not leak detection alarms (UST Regulations, Appendix XIII, § VIII.).

SB989 – Test Boots

Same Situation

You receive SB989 test results from last month that showed a failure at the 1/2 and 3/4 UDCs. Later in the report, the technician comments, "Torn test boots in UDCs, must replace and retest."

Is there a violation?

SB989 – Test Boots

Same Situation

You receive SB989 test results from last month that showed a failure at the 1/2 and 3/4 UDCs. Later in the report, the technician comments, "Torn test boots in UDCs, must replace and retest."

Is there a violation? **Yes!**

What is it the violation?

SB989 – Test Boots

Same Situation

You receive SB989 test results from **last month** that showed a failure at the 1/2 and 3/4 UDCs. Later in the report, the technician comments, "Torn test boots in UDCs, must replace and retest."

Is there a violation? **Yes!**

What is it the violation? **Failure to complete testing within the due month.**

SB989 – Test Boots

Let's consider this topic another way:

If your VMI LDT890 test box for testing line leak detectors was faulty, should that result in a failure of the line leak detector?

<u>In other words</u>
Faulty test boots causing failed secondary tests
vs.
Faulty VMI LDT890 causing failed line leak detectors

No, neither are a test failure

Poll 13

Situation

You are present onsite during an SB989 on January 10th. Torn test boots are preventing the 87 regular product secondary containment from holding a steady 5psi.

Question:

Is there a violation?

a) Yes

a) No

SB989 – Test Boots

Situation

You are present onsite during an SB989 on January 10th. Torn test boots are preventing the 87 regular product secondary containment from holding a steady 5psi.

Question:

Is there a violation?

No

Facility has until the end of the calendar due month to complete all testing
Failure to return would result in a violation for late testing

SB989 – Test Boots

Situation

Inspector receives test results documenting a failure due to torn test boots.

Inspector was present during the test and did not write up any failures or violations, since the site had two more weeks to complete testing within the due month.

Issue: Technician's test results and inspector's report differ regarding outcome of testing

SB989 – Test Boots

Is there a solution? Maybe, maybe not…

Inspector should ask that the technician results be revised

But,

Inspectors have limited authority over how a technician completes their results

If the technician refuses to change the test outcome, the discrepancy is not really an issue so long as the inspector's report and comments are accurate and clear, and in line with regulations and state guidance

Any Questions?

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