What To Expect At An APSA Inspection: 101

M-G1

March 24, 2025

Amanda Liu – Los Angeles County Fire
Erik Cheng – Los Angeles County Fire
Justin Tao – Los Angeles County Fire

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

Overview

- Brief History of SPCC Rule
- Introduction to APSA
- Inspection Process
- CERS
- Common Violations
- Inspection Data

Slido Question (Ice Breaker)

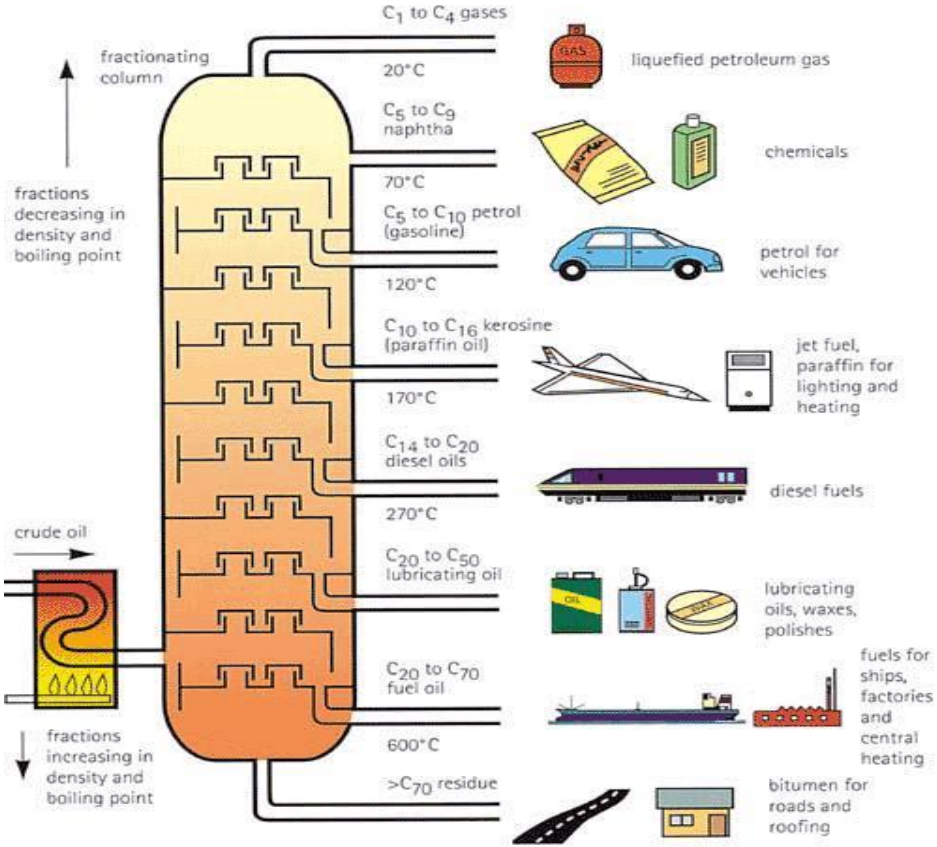
What is APSA?

A) Ticker Symbol for new cryptocurrency

B) American Political Science Association

C) Aboveground Petroleum Storage Act

D) I don't know


C_1 to C_4 gases
fractionating column
20°C
liquefied petroleum gas
C_5 to C_9 naphtha
chemicals
70°C
fractions decreasing in density and boiling point
C_5 to C_{10} petrol (gasoline)
petrol for vehicles
120°C
C_{10} to C_{16} kerosine (paraffin oil)
jet fuel, paraffin for lighting and heating
170°C
C_{14} to C_{20} diesel oils
diesel fuels
270°C
crude oil
C_{20} to C_{50} lubricating oil
lubricating oils, waxes, polishes
C_{20} to C_{70} fuel oil
fuels for ships, factories and central heating
fractions increasing in density and boiling point
600°C
>C_{70} residue
bitumen for roads and roofing

Environmental Impact

Clean up

40 CFR 112: Federal SPCC Rule

- Came into effect in January 1974
- Scope of SPCC rule apply to specific non-transportation related facilities
  - Reasonably expected to discharge oil into navigable waters, and
  - Greater than 1,320 gal (only containers with capacity of 55 gal or more), or
  - Have total underground storage capacity greater than 42,000 gal

SPCC Plans and Rules

- APSA references federal standards for SPCC plan
- Must prepare and implement a site-specific SPCC plan
  - Operating, inspection, and testing procedures
  - Containment and control measures
  - Countermeasures and clean up measures

40 CFR 112 Breakdown

- Subpart A – 112.1 – 112.7
  - Applicability, definitions, and general requirements
- Subpart B – 112.8 – 112.11
  - Petroleum oil at on-shore and non-oil production facilities
- Subpart C – 112.12 (not part of APSA)
  - Requirements for animal fats and vegetable oils
- Subpart D – 112.20
  - Facility Response Plan

40 CFR 112 APSA Relevant Sections

- 112.1 – General Applicability
- 112.2 – Definitions
- 112.3 – Requirements to prepare and implement SPCC Plan
- 112.4 – Amendment of SPCC Plan by EPA
- 112.5 – Amendment of SPCC Plan by Owner

40 CFR 112 APSA Relevant Sections

- 112.6 – Qualified Facility Plan Requirements
- 112.7 – General Requirements for SPCC
- 112.8 – SPCC Plan requirements for onshore facilities
- 112.20(e) – Substantial Harm Criteria

APSA - History

- Under 1989 law, State Water Board and Regional Water Board responsibility for administration
- Due to 2002-2003 financial crisis, responsibilities were shifted and in 2008 AB 1130 transferred responsibilities to UPAs
- Effective 2013 AB 1566 authorized OSFM as the oversight agency for APSA

Assembly Bill 1130

- Facilities with storage capacity of 1,320 gal or more of petroleum to prepare implement SPCC plan
- Inspections at facilities with storage capacity of greater than or equal to 10,000 gal of petroleum every 3 years
- Require inspectors to complete an AST training program

Assembly Bill 2902

- CHSC 25270.2
- SPCC plan require for facilities with less than 1,320 gal storage capacity and one or more Tank in an Underground Area (TIUGA)
- Tank facility with less than 1,320 gal of petroleum may use qualified SPCC template or prepare a full SPCC plan

Federal

- US EPA
- Oil in general including non-petroleum oil
- Only applies near navigable waters
- Greater than 1,320 gal

State (APSA)

- Local CUPA Agency
- Petroleum oil
- Location does not matter
- Greater than or equal to 1,320 gal

APSA Regulated Facilities and Requirements

- Facility has a storage capacity of 1,320 gal or more of petroleum
- One or more tanks meet definition of Tank in Underground Area
- File annual tank facility statement or HMBP electronically to CERS
- Prepare and implement an SPCC plan

Types of SPCC Plans

Qualified Tank Facilities

- Allowed to complete a simplified SPCC Plan
- Tier I or II SPCC Plan Template depending on size of largest tank
- No engineer certification required (certain restrictions)
- Can be completed by facility owner

Non-Qualified Tank Facilities

- Must complete a FULL SPCC Plan
- Facility capacity of MORE than 10,000 gallons
- Require Professional Engineer Certification
- California P.E. license and *Type* of P.E. not specified in SPCC rule. May be from any discipline.

What is a "Major Spill" per SPCC?

**Major spill* *is defined as CFR112.3(g)(2):*

Within 3-years prior to plan certification date (this is a ONE-TIME snap-shot)*:*

1. *A single discharge of oil exceeding 1,000 gallons*
2. *TWO discharges within*

any 12-month period

each exceeding 42 gallons

(1 barrel)

(SPILL DOES NOT INCLUDE NATURAL DISASTERS, ACTS OF WAR, OR TERRORISM)

Qualified Tank Facility SPCC Plan

Tier I Plan Template

- No engineer certification required
- No Major Spills
- ≤10,000 gallons total facility capacity

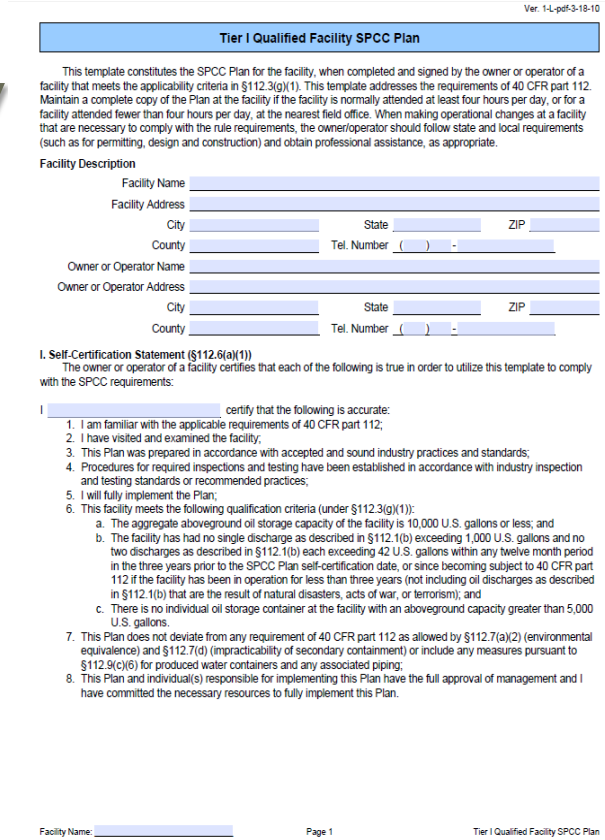
Tier II Plan Template

- No engineer certification required
- No Major Spills
- ≤10,000 gallons total facility capacity

Qualified Tier I tank facility

- Largest tank ≤ 5,000 gallons
- May use the US EPA SPCC Tier I Plan Template
- No site map required when using template from 40 CFR Part 112, Appendix G

** Cannot determine secondary containment to be impracticable nor an environmentally equivalent measure without a Professional Engineer Certification*



Ver. 1-L-pdf-3-18-10

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name
Facility Address
City State ZIP
County Tel. Number ( ) -
Owner or Operator Name
Owner or Operator Address
City State ZIP
County Tel. Number ( ) -

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
   a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
   b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
   c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

Facility Name: Page 1 Tier I Qualified Facility SPCC Plan

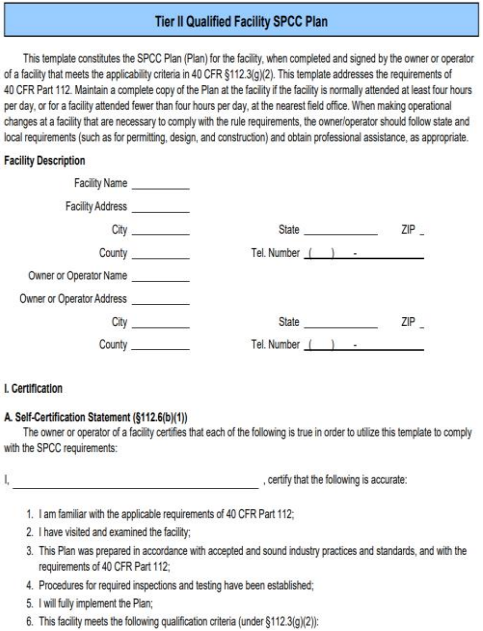
CALIFORNIA CUPA FORUM

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

Qualified Tier II Tank Facility

- Largest Tank greater than 5,000 gallons
- May use Tier II template developed by the OSFM

**Cannot determine secondary containment to be impracticable nor an environmentally equivalent measure without a Professional Engineer Certification.*



Tier II Qualified Facility SPCC Plan

This template constitutes the SPCC Plan (Plan) for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in 40 CFR §112.3(g)(2). This template addresses the requirements of 40 CFR Part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design, and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name _____

Facility Address _____

City _____ State _____ ZIP _

County _____ Tel. Number ( ) -

Owner or Operator Name _____

Owner or Operator Address _____

City _____ State _____ ZIP _

County _____ Tel. Number ( ) -

I. Certification

A. Self-Certification Statement (§112.6(b)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I, _____, certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR Part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards, and with the requirements of 40 CFR Part 112;
4. Procedures for required inspections and testing have been established;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(2)):

Department of Forestry & Fire Protection
Office of the State Fire Marshal
GUIDANCE FOR
TIER II QUALIFIED FACILITY SPCC PLAN TEMPLATE

Disclaimer

This Spill Prevention, Control, and Countermeasure (SPCC) Plan template for Tier II qualified facilities has been prepared by the Department of Forestry & Fire Protection (CAL FIRE) – Office of the State Fire Marshal. It is intended to serve as guidance to assist in preparing an SPCC Plan (Plan) for Tier II qualified facilities meeting the applicability criteria of Title 40 Code of Federal Regulations (40 CFR) §112.3(g)(2). This template guidance document (template) is based on the Tier II Qualified Facility SPCC Plan template originally developed by the CalCUPA Forum Board's Aboveground Petroleum Storage Act (APSA) Working Group. The template is modeled after the United States Environmental Protection Agency (US EPA) Tier I Qualified Facility SPCC Plan template found in 40 CFR Part 112 Appendix G, but has been modified to incorporate the 40 CFR §112.6(b) requirements for Tier II qualified facilities.

The use of this template guidance document is optional. This template as a whole or any specific element of this template does not replace or substitute for any statutory or regulatory provision, nor is the template a regulation itself. In the event of a conflict between this template or any element and any statute or regulation, this template would not be controlling. Furthermore, nothing in this template guidance document should be considered legal advice nor be considered a substitute for seeking legal guidance with regards to the compliance for any statutory or regulatory provision. Thus, it does not impose legally binding requirements on the State, Unified Program Agencies, or the regulated community, and might not apply to a particular facility or situation based upon certain circumstances. If your SPCC Plan deviates from this template, you will need to ensure that it meets all of the required 40 CFR Part 112 elements and requirements applicable to a Tier II qualified facility.

Proper completion of this template is only one element of a tank facility's compliance with 40 CFR Part 112 and the Aboveground Petroleum Storage Act (California Health and Safety Code [HSC] Chapter 6.67). Facilities are reminded that, in addition to preparing the written SPCC Plan, the applicable requirements of the 40 CFR Part 112 SPCC rule and HSC Chapter 6.67 must be implemented at the facility, including implementation of the written Plan.

More information about SPCC requirements can be found at: http://www.epa.gov/emergencies/content/spcc/. If you have any concerns about meeting the requirements of a Tier II Qualified Facility SPCC Plan, contact your Unified Program Agency for assistance or clarification.

Instructions to Complete this Template

This guidance is intended to help the owner or operator of a Tier II qualified facility develop a self-certified SPCC Plan using this template.[1] This template also allows for a professional engineer (PE) to review and certify certain sections, if applicable, such as alternative measures of environmental equivalence, impracticability determinations of secondary containment and alternative measures, or alternative procedures, for produced water containers. To use this template, your facility must meet all of the applicability criteria of a Tier II qualified facility listed under 40 CFR §112.3(g)(2) of the SPCC rule.

A Tier II qualified facility is one that has had no single discharge as described in 40 CFR §112.1(b) exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR Part 112 if the facility has been in operation for less than three years (other than discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism). In addition, the facility has an individual aboveground oil container greater than 5,000 gallons and has an aggregate aboveground oil storage capacity of 10,000 U.S. gallons or less.

This template provides every SPCC rule requirement necessary for a Tier II qualified facility, which you must address and implement. This template guidance document is based on the US EPA SPCC Plan template for Tier I qualified facilities. You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location in your Plan where you address each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR Part 112.

[1] Please note that the use of this template is not mandatory for a Tier II qualified facility. You may also meet the SPCC Plan requirements by preparing a satisfactory self-certified Tier II Qualified Facility SPCC Plan or preparing a satisfactory SPCC Plan that is certified by a Professional Engineer. Further information on the requirements of these methods can be found in 40 CFR Part 112.6(b)(2). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR Part 112 requirements.

Exempted Tanks – HSC 25270.2(a)

- Pressure vessel or boiler
- Hazwaste tank under permit with DTSC or PBR authorization from UPA
- Aboveground oil production tank
- Oil-filled electrical equipment
- Tanks regulated as a UST
- Transportation-related tank facility
- Tank or tank facility located on and operated by a farm exempt from federal SPCC requirements
- TIUGA less than 55 gal

Slido Question 1

Is Biodiesel subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 1

Slido Question 2

Is Liquified Petroleum Gas (LPG) subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 2

Slido Question 3

Is Hot Mix Asphalt subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 3

Slido Question 4

Is Grease subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 4

Slido Question 5

Is Machining Coolant subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 5

Slido Question 6

Is Mineral Oil subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 6

Slido Question 7

Is Synthetic Oil subject to APSA requirements?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 7

Slido Question 8

A facility has total 10K gallon of petroleum products and each AST has a 5K capacity. What type of SPCC plan should the operator prepare?

A) Tier I

B) Tier II

C) Non-Qualified

Slido Question 8

Slido Question 9

A warehouse that is located adjacent to the river, stores about 100 X 275 gallon tote of vegetable oil. In addition, there is a 200 gallon AST diesel generator and 1K AST of diesel fueling station on site. Does this facility require a SPCC plan? Does this facility fall under APSA?

A) No, No

B) Yes, Yes

C) Yes, No

D) No, Yes

Slido Question 9

Slido Question 10

Are these tanks regulated under APSA?

A) Yes

B) No

C) I don't know

Slido Question 10

Slido Question 11

Can an UST be repurposed into an AST?

A) Yes
B) No
C) It depends
D) I don't know

Slido Question 11

SPCC Plan

- Purpose is to prevent and respond to petroleum spills
- Provide basic information about the facility
- Complete review and evaluation of plan every 5 years
- Technical vs Administrative amendment

Tank Inspections and Testing

- Conduct inspections and tests in accordance to written procedures
- Inspections and testing requirements determined by owner/operator and/or certifying PE
- Common industry standards are STI SP001 and API 653
- Records of inspections and tests kept for minimum of 3 years

STI SP001 Tank Categories

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- **After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** *If "No", identify tank and describe leak and actions taken.*	◻ Yes ◻ No	
2	Is the tank liquid level gauge legible and in good working condition?	◻ Yes ◻ No ◻ N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	◻ Yes ◻ No	

4	Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 8.10 and 8.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	◻ Yes ◻ No ◻ N/A	Saved to this PC
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	◻ Yes ◻ No ◻ N/A	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	◻ Yes ◻ No ◻ N/A	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	◻ Yes ◻ No ◻ N/A	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	◻ Yes ◻ No ◻ N/A	
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	◻ Yes ◻ No ◻ N/A	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identify location and describe leak.*	◻ Yes ◻ No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	◻ Yes ◻ No ◻ N/A	
	Containment (Diking/Impounding)		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	◻ Yes ◻ No ◻ N/A	
13	Are dike drain valves closed and in good working condition?	◻ Yes ◻ No ◻ N/A	
14	Are containment egress pathways clear and any gates/doors operable?	◻ Yes ◻ No ◻ N/A	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	◻ Yes ◻ No ◻ N/A	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	◻ Yes ◻ No ◻ N/A	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	◻ Yes ◻ No ◻ N/A	
	Other Conditions		
18	Is the system free of any other conditions that need to be addressed for continued safe operation?	◻ Yes ◻ No	

Oil Lubrication and Fuel Tanks

Mobile Refuelers

- May or may not be subject to APSA based off of operations

TIUGA

- Must allow for direct viewing of exterior of tank to check for leaks
- Direct viewing not required for double-walled tanks
- Older tank systems may not meet TIUGA requirements

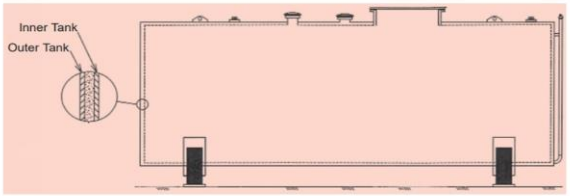
Generator Systems

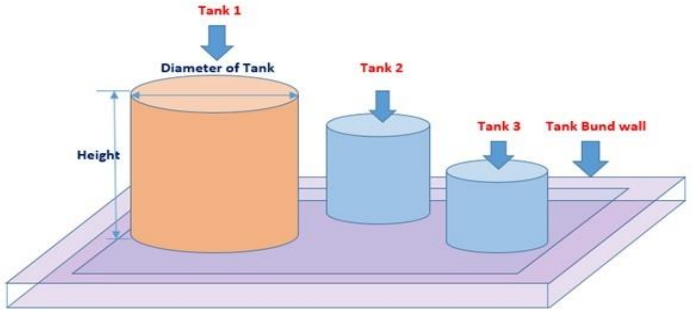
Secondary Containment

- Provides line of defense in the event of failure of primary containment
- Can be accomplished via sized and general containment

Sized Secondary Containment

- Address potential of discharges at oil handling and storage areas
- Requirement for bulk storage tanks and containers
- Contain largest singe oil container plus sufficient freeboard





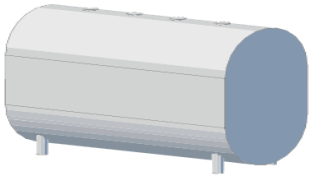
General Secondary Containment

- Address most likely oil discharges from all regulated parts of facility
- Areas or containers such as mobile refuelers

Overfill Prevention

- Implementation to avoid discharges
- In person monitoring of filling process
- Alarms with audible or visual signal
- Shut off valves to stop flow

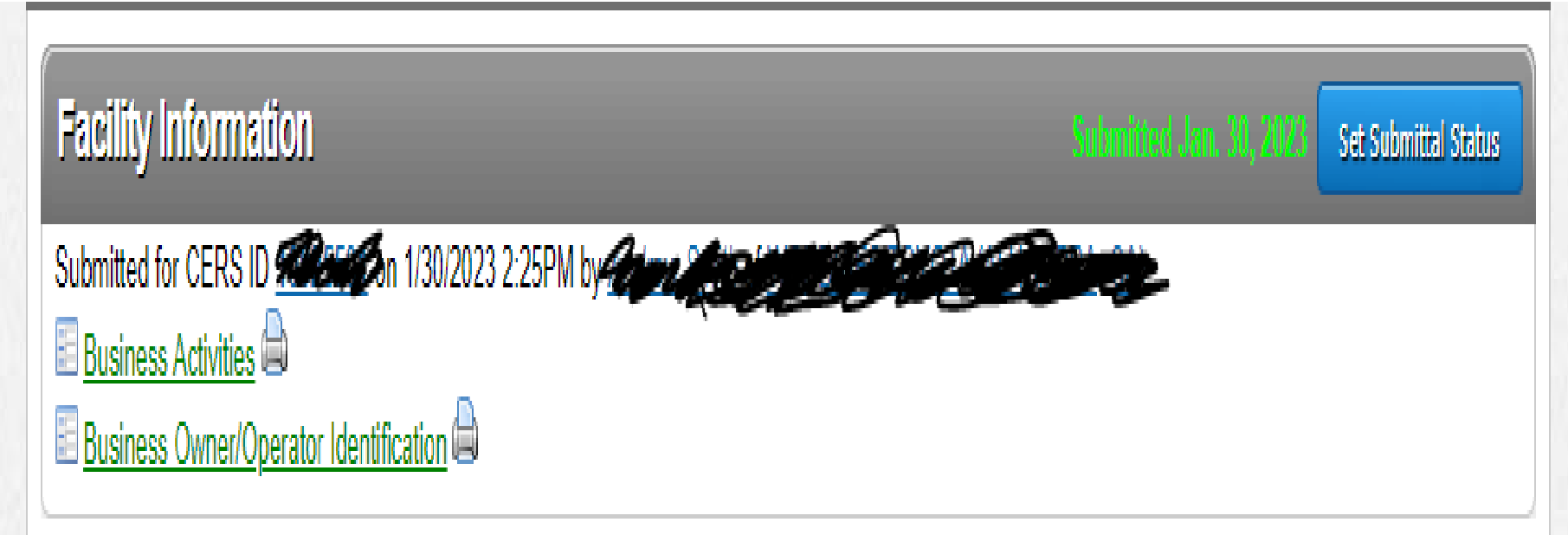
275 Gallon (Vertical)
Oil Tank Level Chart



Length: 60 Inches
Width: 27 Inches
Height: 44 Inches

Inches	Gallons	Inches	Gallons	Inches	Gallons
1"	2	16"	94	31"	201
2"	5	17"	101	32"	209
3"	9	18"	108	33"	216
4"	14	19"	115	34"	223
5"	19	20"	123	35"	230
6"	25	21"	130	36"	236
7"	31	22"	137	37"	243
8"	37	23"	144	38"	249
9"	44	24"	151	39"	254
10"	51	25"	158	40"	260
11"	58	26"	166	41"	265
12"	65	27"	173	42"	269
13"	72	28"	180	43"	272
14"	80	29"	187	44"	275
15"	87	30"	194	-	-

CERS – Facility Section



CERS – Facility Section

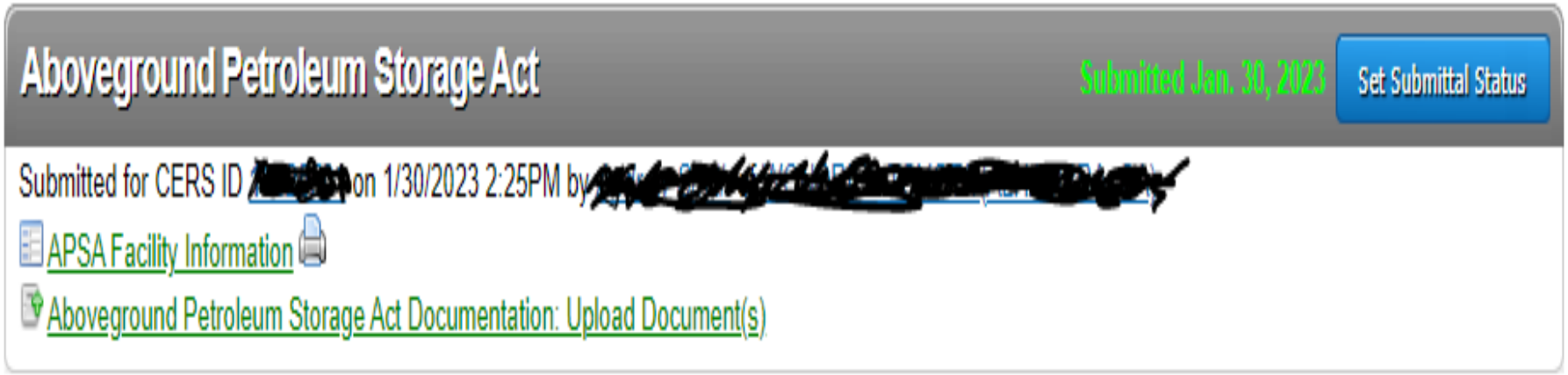
Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND:

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes

CERS – APSA Section



CERS – APSA Section

Facility Information

Conditionally Exempt

No

Total Aboveground Storage Capacity of Petroleum

1712

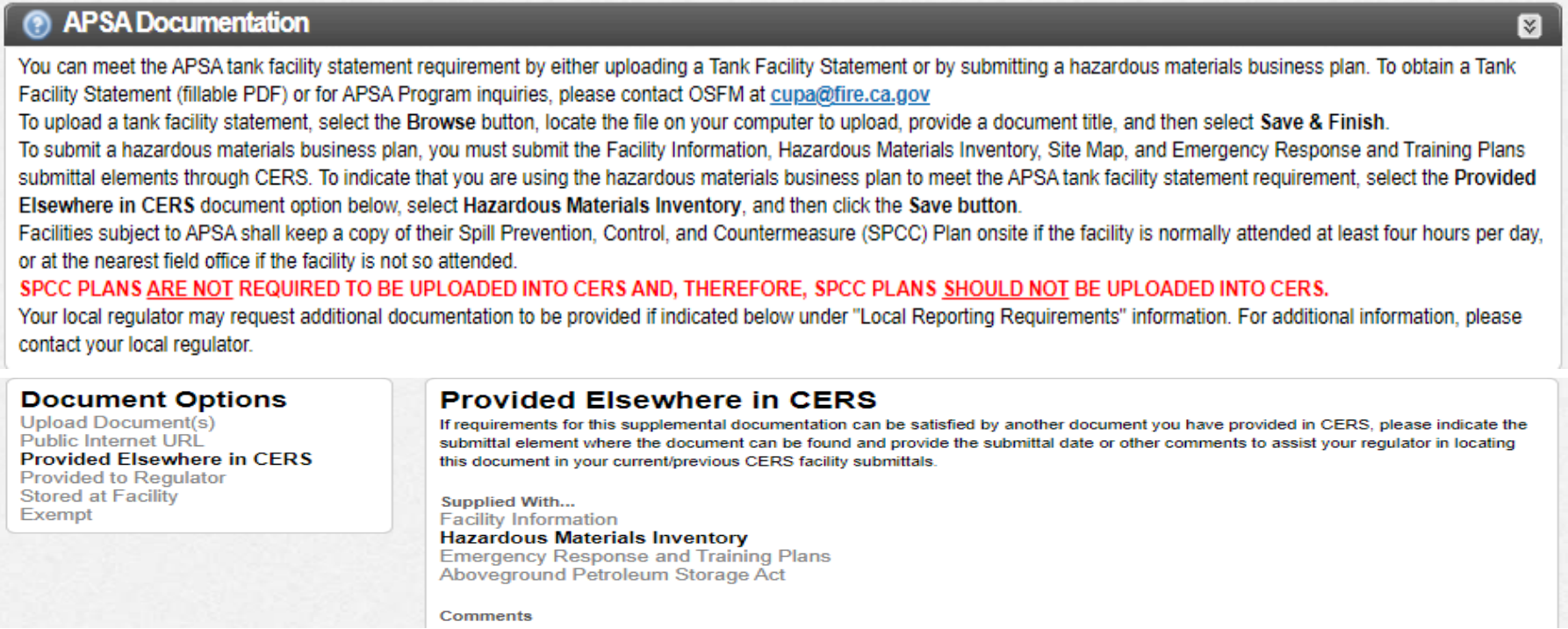
Number of Tanks in Underground Area(s)

0

Date of SPCC Plan Certification or Date of 5-Year Review

7/10/2020

CERS – APSA Section



ABOVEGROUND PETROLEUM STORAGE ACT: TANK FACILITY STATEMENT

I. IDENTIFICATION

FACILITY NAME (Same as BUSINESS NAME or DBA – Doing Business As):
_____

FACILITY PHONE: _____

FACILITY ADDRESS: _____

FACILITY CITY: _____STATE: CA ZIP CODE:_____

CONTACT NAME:_____

CONTACT PHONE:_____

II. TOTAL FACILITY STORAGE CAPACITY

Tank facility's total aboveground petroleum storage capacity (in gallons) for all tanks and containers, including tanks in an underground area, with a shell capacity ***greater than or equal to*** 55 gallons (see instructions for details):

_____ gallons

III. TANK AND CONTAINER DETAILS

Details of each aboveground petroleum storage tank or container ***greater than*** 10,000 gallons in shell capacity (attach additional forms if needed)

Tank 1:

Tank or Container ID Number: _____

Contents (Gas, Diesel, etc.): _____

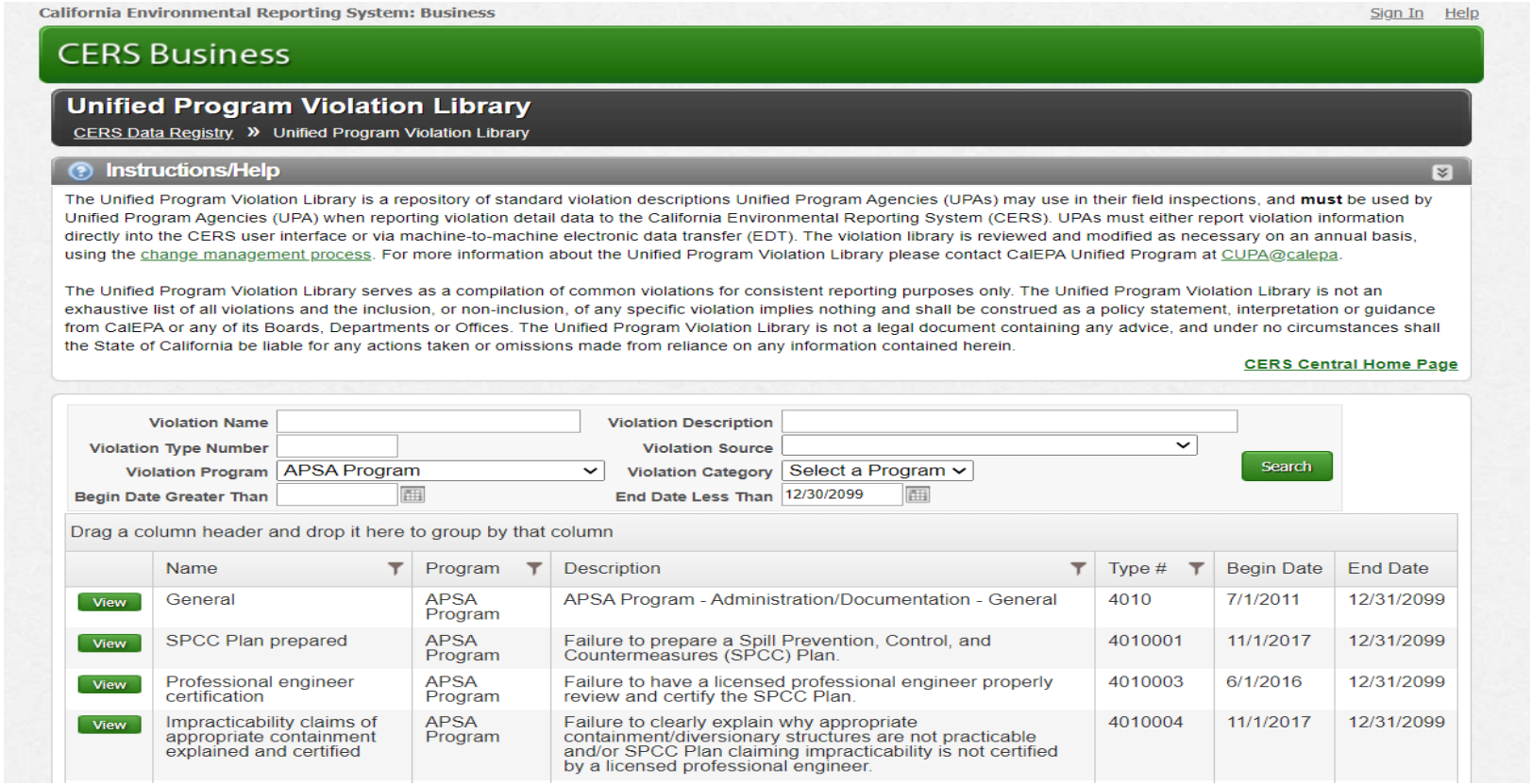
Shell Capacity (in gallons): _____

Location of Tank or Container: _____

Tank 2:

Tank or Container ID Number: _____

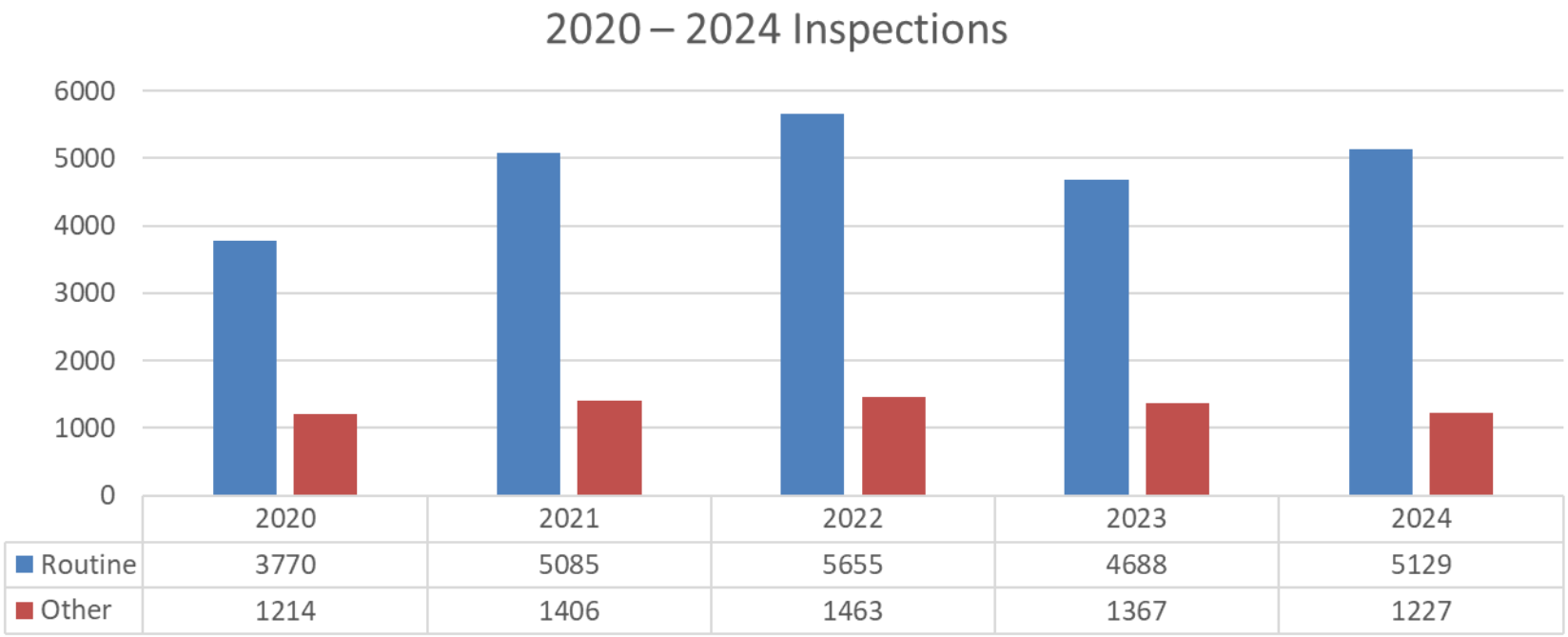
Contents (Gas, Diesel, etc.): _____


California Environmental Reporting System: Business
Sign In
Help
CERS Business
Unified Program Violation Library
CERS Data Registry » Unified Program Violation Library
Instructions/Help
The Unified Program Violation Library is a repository of standard violation descriptions Unified Program Agencies (UPAs) may use in their field inspections, and must be used by Unified Program Agencies (UPA) when reporting violation detail data to the California Environmental Reporting System (CERS). UPAs must either report violation information directly into the CERS user interface or via machine-to-machine electronic data transfer (EDT). The violation library is reviewed and modified as necessary on an annual basis, using the change management process. For more information about the Unified Program Violation Library please contact CalEPA Unified Program at CUPA@calepa.
The Unified Program Violation Library serves as a compilation of common violations for consistent reporting purposes only. The Unified Program Violation Library is not an exhaustive list of all violations and the inclusion, or non-inclusion, of any specific violation implies nothing and shall be construed as a policy statement, interpretation or guidance from CalEPA or any of its Boards, Departments or Offices. The Unified Program Violation Library is not a legal document containing any advice, and under no circumstances shall the State of California be liable for any actions taken or omissions made from reliance on any information contained herein.
CERS Central Home Page
Violation Name
Violation Description
Violation Type Number
Violation Source
Violation Program
APSA Program
Violation Category
Select a Program
Search
Begin Date Greater Than
End Date Less Than
12/30/2099
Drag a column header and drop it here to group by that column
Name
Program
Description
Type #
Begin Date
End Date
View
General
APSA Program
APSA Program - Administration/Documentation - General
4010
7/1/2011
12/31/2099
View
SPCC Plan prepared
APSA Program
Failure to prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan.
4010001
11/1/2017
12/31/2099
View
Professional engineer certification
APSA Program
Failure to have a licensed professional engineer properly review and certify the SPCC Plan.
4010003
6/1/2016
12/31/2099
View
Impracticability claims of appropriate containment explained and certified
APSA Program
Failure to clearly explain why appropriate containment/diversionary structures are not practicable and/or SPCC Plan claiming impracticability is not certified by a licensed professional engineer.
4010004
11/1/2017
12/31/2099

Violation Elements

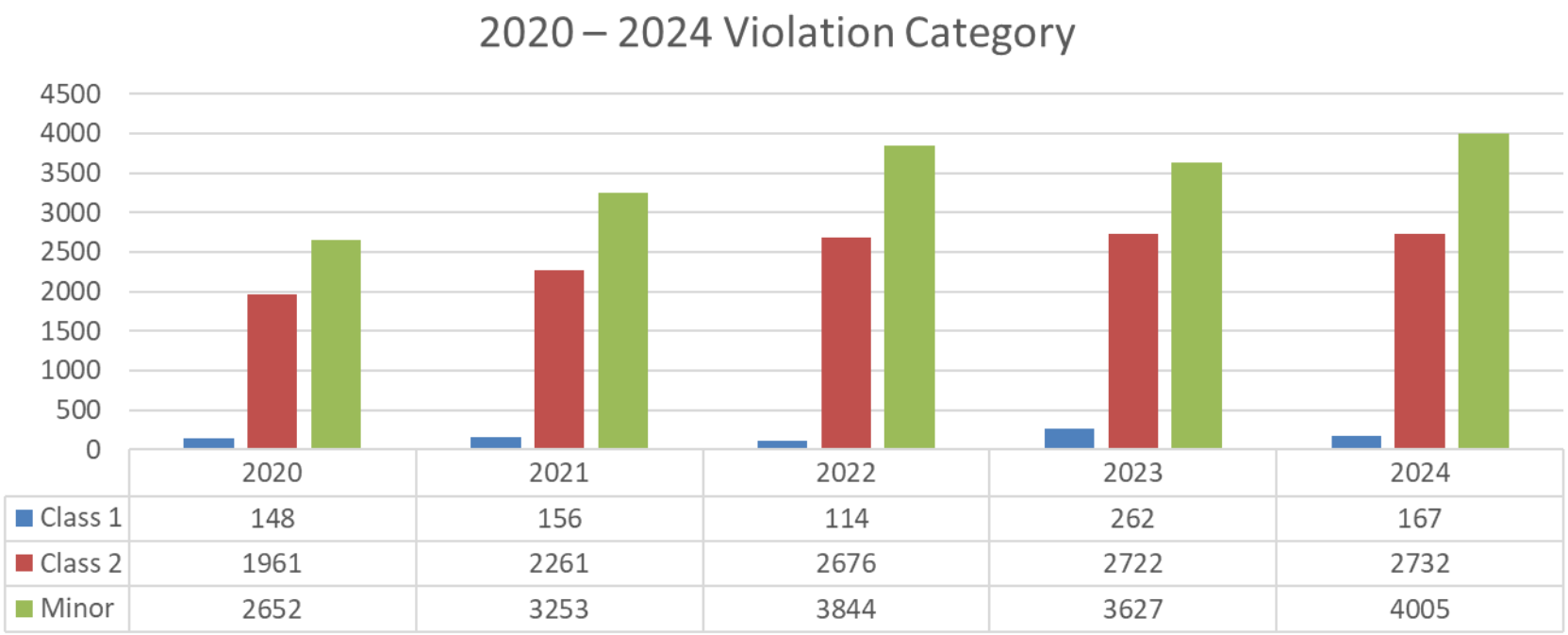
- Identifying the violation as Minor, Class II, or Class I
- Explaining the evidence that supports the violation
- Providing corrective action requirements
- Establishing and documenting compliance

Inspections Conducted



	2020	2021	2022	2023	2024
Routine	3770	5085	5655	4688	5129
Other	1214	1406	1463	1367	1227

Violations Cited



	2020	2021	2022	2023	2024
Class 1	148	156	114	262	167
Class 2	1961	2261	2676	2722	2732
Minor	2652	3253	3844	3627	4005

2024 APSA Inspection data

- Routine inspections conducted – 5103
- Violations cited – 6866
- Violation Categories:
  - Abandonment/illegal disposal/unauthorized treatment – 0 violations
  - Administration/documentation – 4372 violations
  - Operations/maintenance – 1672 violations
  - Release/leaks/spills – 21 violations
  - Training – 776 violations

Top 10	Number	Name	Category	Citation
10	4010008	SPCC Plan available onsite	Administration and Documentation	CHSC 6.67 CHSC 25270.4.5(a) 40 CFR 112.3(e)(1)
9	4010041	Oil type and storage capacity of storage containers	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.7(a)(3)(i)
8	4030038	Implementation of SPCC Plan Failure to implement the SPCC Plan	Operations and Maintenance	CHSC 6.67 CHSC 25270.4.5(a) 40 CFR 112.3
7	4010032	Annual tank facility statement	Administration and Documentation	CHSC 25270.4.5(a). 25270.6(a)(2)
6	4030015	Tank inspected an/or integrity tested	Operations and Maintenance	CHSC 25270.4.5(a) 40 CFR 112.7(e), 112.8(c)(6)

Top 10	Number	Name	Category	Citation
5	4020002	Spill prevention briefings	Training	CHSC 25270.4.5(a) 40 CFR 112.7(f)(3)
4	4020001	Employee training requirements	Training	CHSC 25270.4.5(a) 40 CFR 112.7(f)(1)
3	4010009	Five year SPCC Plan review and documentation	Administration and Documentation	CHSC 25260.5.5(a) 40 CFR 112.5(b)
2	4010001	SPCC Plan prepared	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.3, 112.6
1	4010021	Written records of inspections and tests	Administration and Documentation	CHSC 25270.4.5(a) 40 CFR 112.7(e), 112.8(c)(6)

APSA Inspection Summary

- Verify facility has a current SPCC plan
- Review and ensure the plan is appropriate for operations
- Technical amendments are certified and documented
- Appropriate containment provided
- Inspection of tanks are conducted
- Spills/leaks are cleaned up
- All aspects of SPCC plan are being implemented
- Accurate submittal in CERS

Additional Resources for APSA

- Board of Professional Engineers, Land Surveyors, and Geologists
- California CUPA Forum
- CalOES Spill Reporting
- CERS Violation Library
- Department of Consumer Affairs
- EPA Secondary Containment Calculation

Additional Resources for APSA

- OSFM Farm Guidance
- OSFM Guidance Document
- OSFM Website
- SPCC EPA Guidance Document
- SPCC Tier I Template
- SPCC Tier II Template

Any Questions?

Amanda Liu – amanda.liu@fire.lacounty.gov
LA County Fire Health Hazmat
Erik Cheng – erik.cheng@fire.lacounty.gov
LA County Fire Health Hazmat
Justin Tao – justin.tao@fire.lacounty.gov
LA County Fire Health Hazmat