



A CUPA's Approach to Maintaining a UST Training Program

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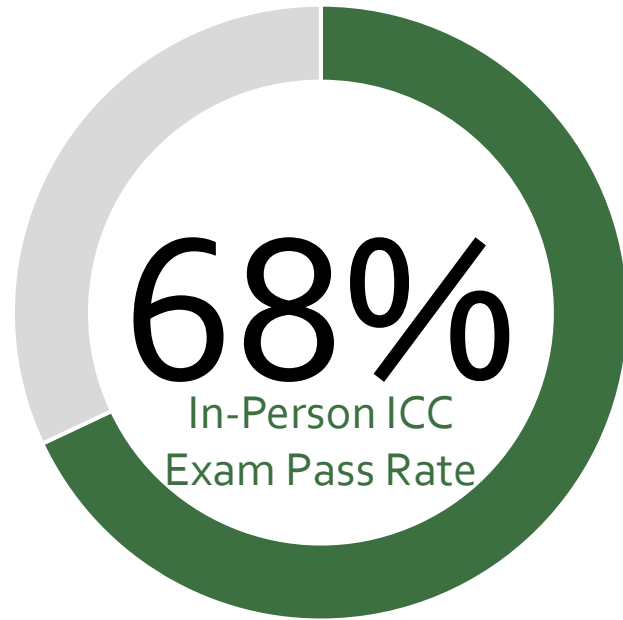
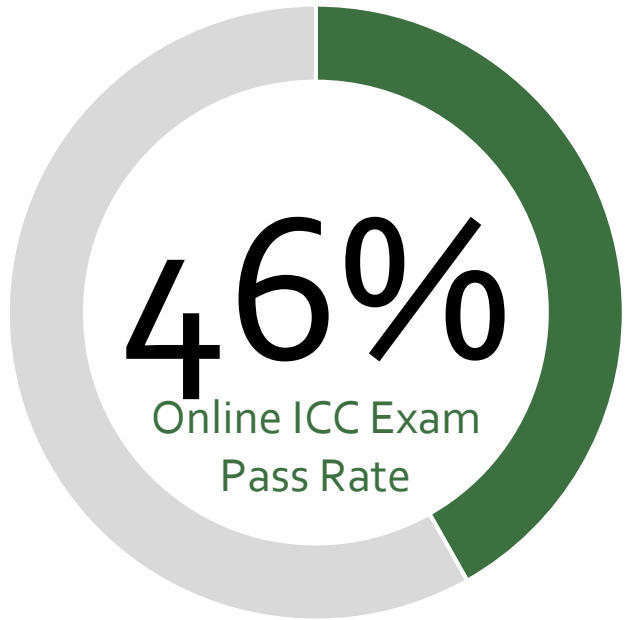
Session Tu-C4

March 25, 2025 at 4:00 PM

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Does anyone know what these percentages represent?

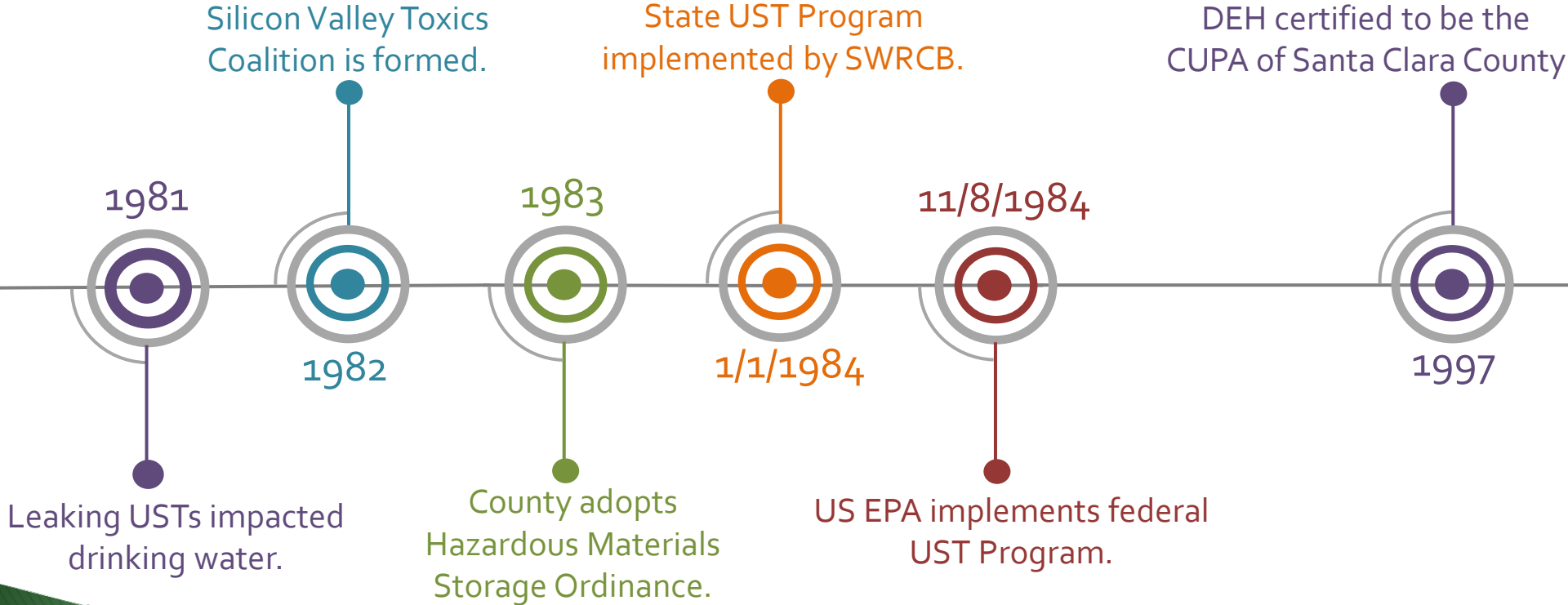


Course Outline

- History of UST Program in Santa Clara County and Beyond
- Our Approach to the Unified Program
- Our UST Training Program
 - Preparing for the ICC Exam
 - Training After the ICC Exam
 - Ongoing Inspector Meetings
- What's Worked For Us
- Resources



History of UST Program in Santa Clara County and Beyond



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Our Approach to the Unified Program

Enforcement

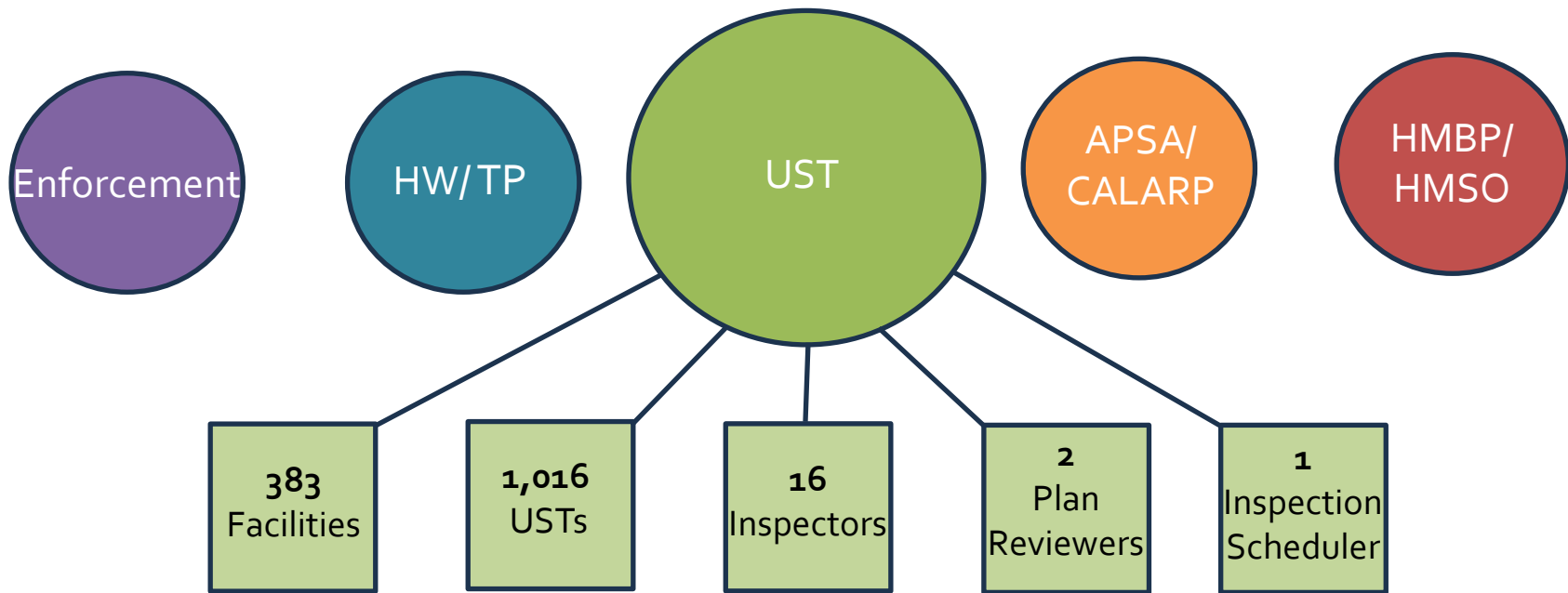
HW/TP

UST

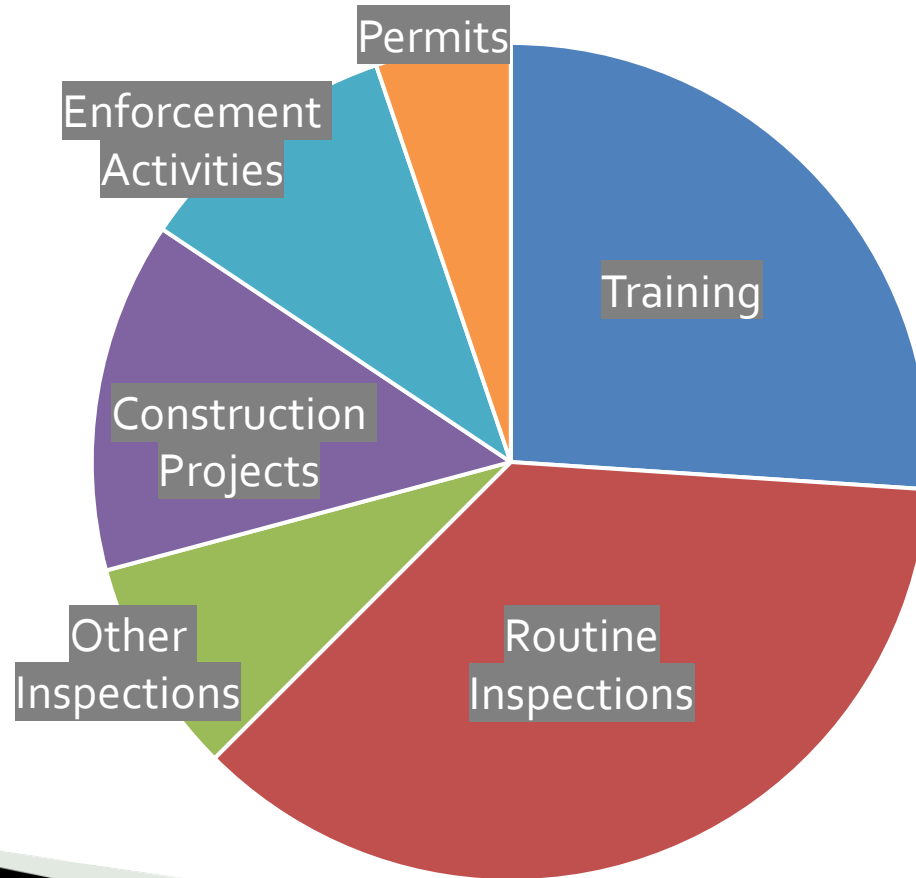
APSA/
CALARP

HMBP/
HMSO

Number Breakdown of Our UST Program

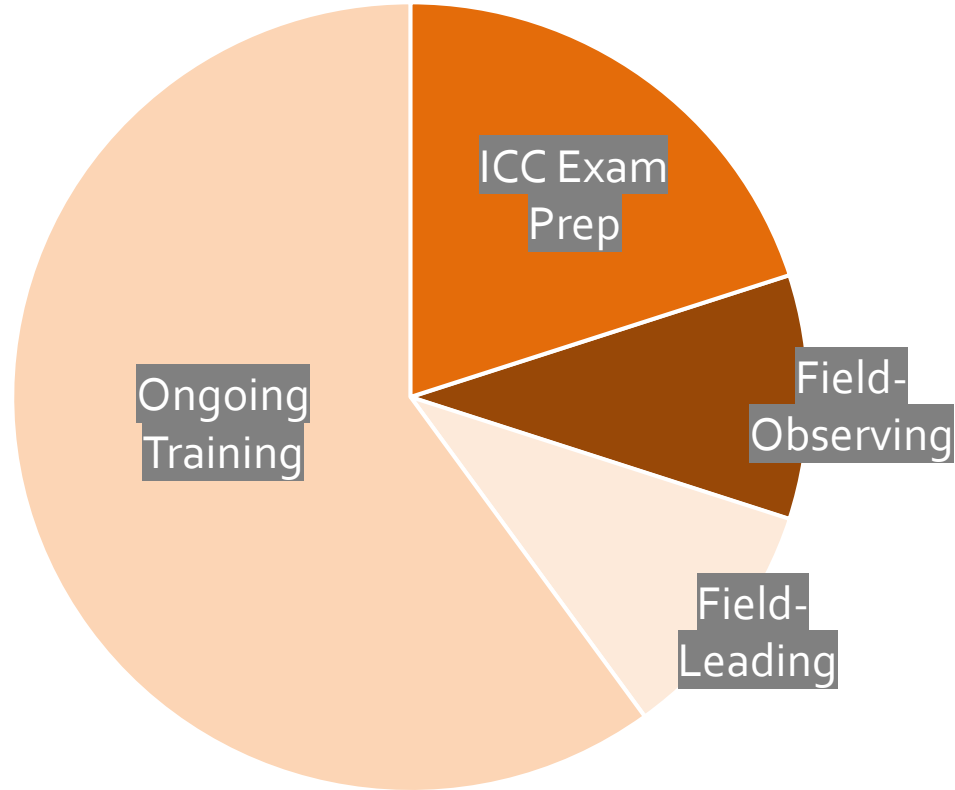


Further Look at Our UST Program



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Our UST Training Program



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Session #1 – ICC Exam Training

Dates in UST Program

- Importance

Overview of ICC Exam

- Format

Preparation of Exam Materials

- Assembling the bound “open book”

Reading and Other Elements

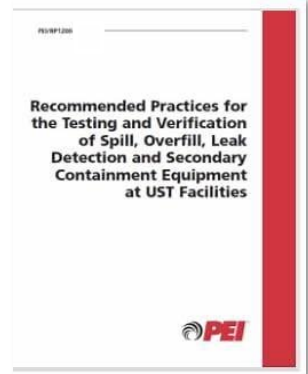
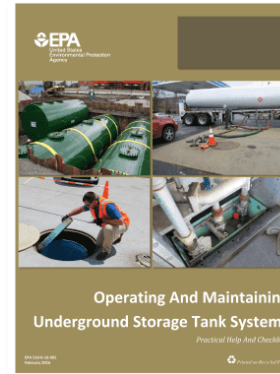
- H&SC: Division 20, Chapter 6.7 [25280-25283.5]
- CCR: Title 23, Division 3, Chapter 16 [2610-2621]
- Watch “Beginner UST Inspector 101” and “Preparing for the ICC UST Inspector Exam” on CUPA Forum Board LMS
- Field Inspections

California Code of Regulations, Title 23,
Division 3, Chapter 16



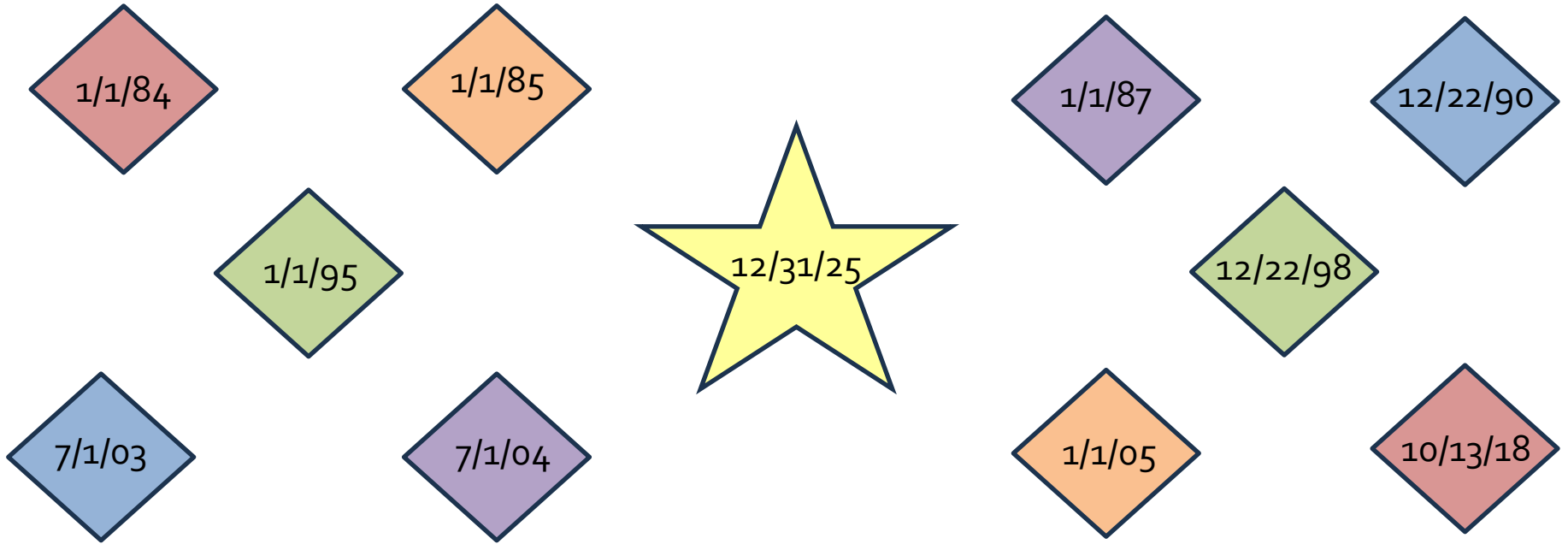
Underground Storage Tank Regulations

Please note: This is a draft version of the regulations and is intended as a guide reference. The official copy of the Underground Tank Test regulations are available at the following link: <http://www.waterboards.ca.gov/undergroundtanktestregulations>



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Dates in UST Program



Overview of ICC Exam

Exam Catalog

+ Available Exam Titles

+ How To Use the Exam Catalog

Catalog Search

Type :

All

Category/Trade :

All

CA UST Inspector

Search

Reset

REFERENCES

External References

[California Code of Regulations, Title 23, Division 3, Chapter 16, October 2018 Underground Storage Tank Regulations](#)

[California Health and Safety Code, Chapter 6.7, October 2018 Underground Storage of Hazardous Substances](#)

[California Code of Regulations, Title 8, Section 5157, February 2019 Permit-Required Confined Spaces](#)

[EPA 510-B-00-008 Operating and Maintaining Underground Storage Tank Systems, 2016](#)

PEI RP500-19  Now RP500-24

PEI RP900-17  Now RP900-21

PEI RP1200-17  Now RP1200-24

INFO

SCOPE

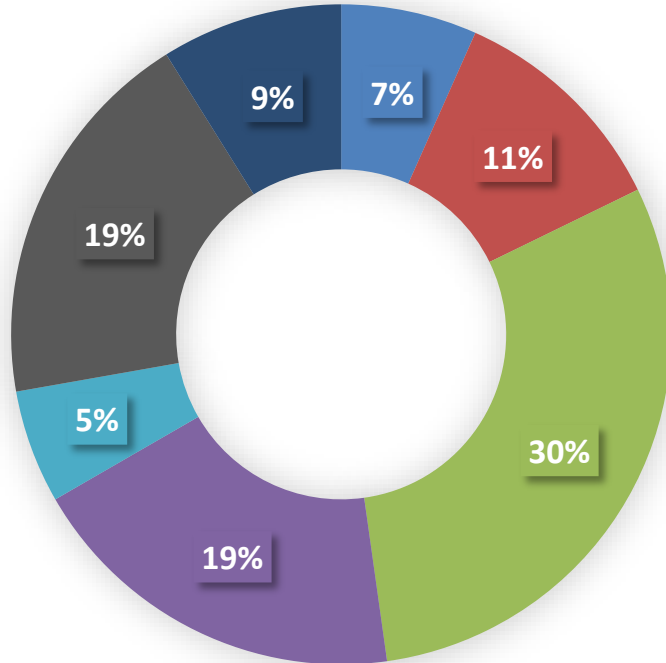
References from the internet must be bound, by being stapled or placed in a binder.

NOTE: During the six-(6) month period commencing on the initial exam date, you may take this exam a total of two (2) times, if necessary, to pass the exam. You will be responsible for payment of the exam fee for every exam you take.

OUTLINE

QUESTIONS	60
TIME LIMIT	1.5 Hours
OPEN BOOK?	Open

ICC Exam Breakdown



■ UST Inspector Qualifications

■ UST System Components and Design

■ Compliance Inspection and Administration Procedures

★ ■ Periodic Testing and Evaluation of UST Systems

■ Health and Safety

★ ■ UST Installation, Closures, Repairs, Upgrades and Modifications

■ Education and Enforcement

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Session #2 – ICC Exam Training

WHAT IS A UST?

- Exclusions
- New vs. Existing
- Exemptions

Acronyms

- LLD
- TIUGA
- STP
- DUSTO
- UDC

Reading Assignments

- H&SC: Division 20, Chapter 6.7 [25284-25290.2]
- CCR: Title 23, Division 3, Chapter 16 [2630-2638]

Session #3 – ICC Exam Training

Operating Permits

- Owner vs. Operator
- 30 Day Notification

Monitoring Plan

- Frequency
- Locations

Response Plan

- Procedures
- Responsible Parties



Installation/Testing Requirements

- Pre/Post Installation Testing for Tanks and Piping
- Secondary Containment, Spill Containment, Overfill Prevention Equipment, Monitoring Equipment



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Session #3 Reading Assignments

H&SC: Division 20, Chapter 6.7 [25291-25299]

CCR: Title 23, Division 3, Chapter 16 [2640-2720]

Session #4 - ICC Exam Training

Monitoring of Existing Tanks

- Quantitative vs. Qualitative

Recording vs. Reporting Spills

- Timelines
- Required elements to report

New Tanks (Installed After 1/1/84)

- Requirements

★ UST Repairs and Upgrades

- Tank repairs
- Secondary containment/Overfill/Spill Containment
- LLDs
- UDCs
- Emergency tank system pressurized piping



Session #4 (cont.) - ICC Exam Training

★ UST Closures

- Temporary vs. Permanent

Permit Conditions

- Record Retention

CERS and Facility Employee Training

- Requirements

DUSTO Requirements

- Inspection elements and timeframes



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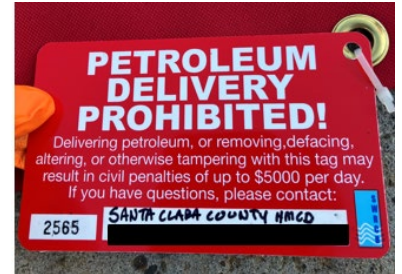
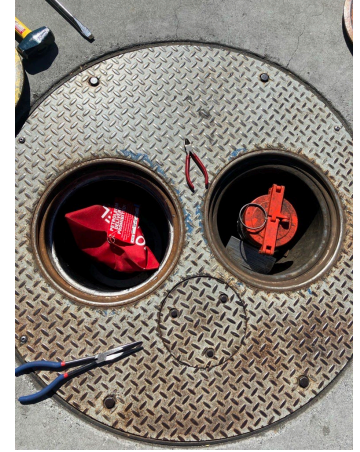
Session #4 (cont.) - ICC Exam Training

Red Tags

- Imminent Threat
- Timelines

Civil Penalties

- Fines



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Session #5 – Last ICC Exam Classroom Training

CCR Title 8, Section 5157 Permit Required Confined Spaces

- Confined Space vs. Permit Required Confined Space
- Hazardous Atmosphere

EPA 510 B Operating and Maintaining UST System

- Guide for UST Owners
- Type of Equipment
- Requirements of Equipment

PEI RP500-2024

- Recommended Practices for Inspection and Maintenance of Motor Fuel Dispensing Equipment

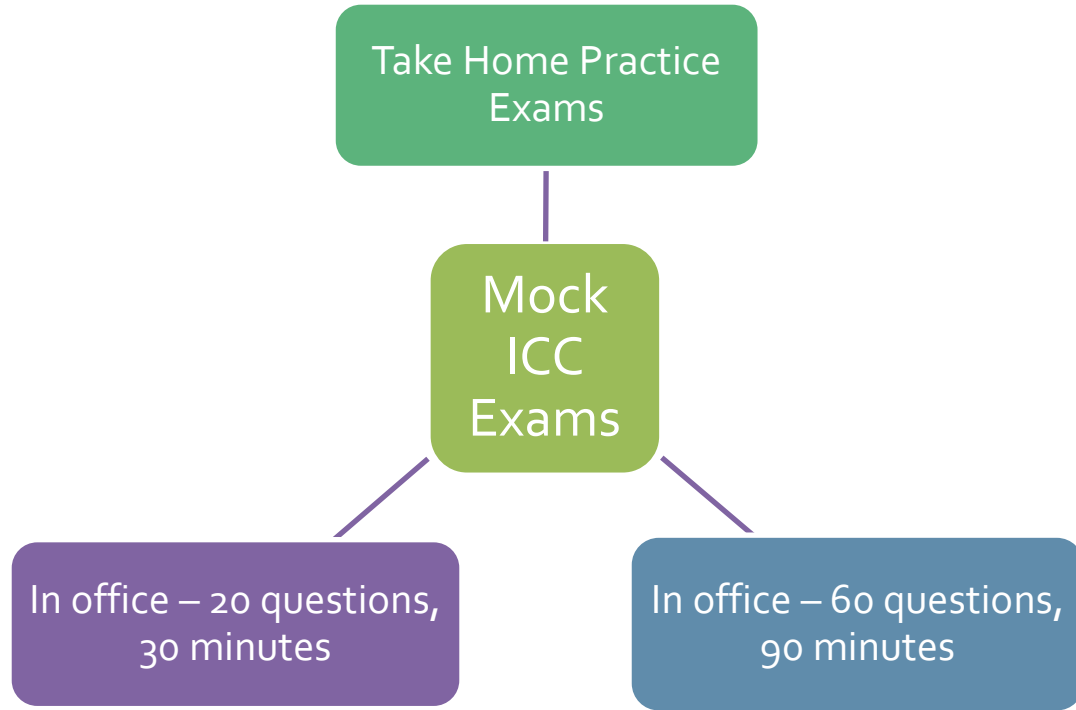
PEI RP 900 -2021

- Recommended Practices for the Inspection and Maintenance of UST Systems

PEI RP 1200-2024

- Recommended Practices for Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment

ICC Exam Preparation



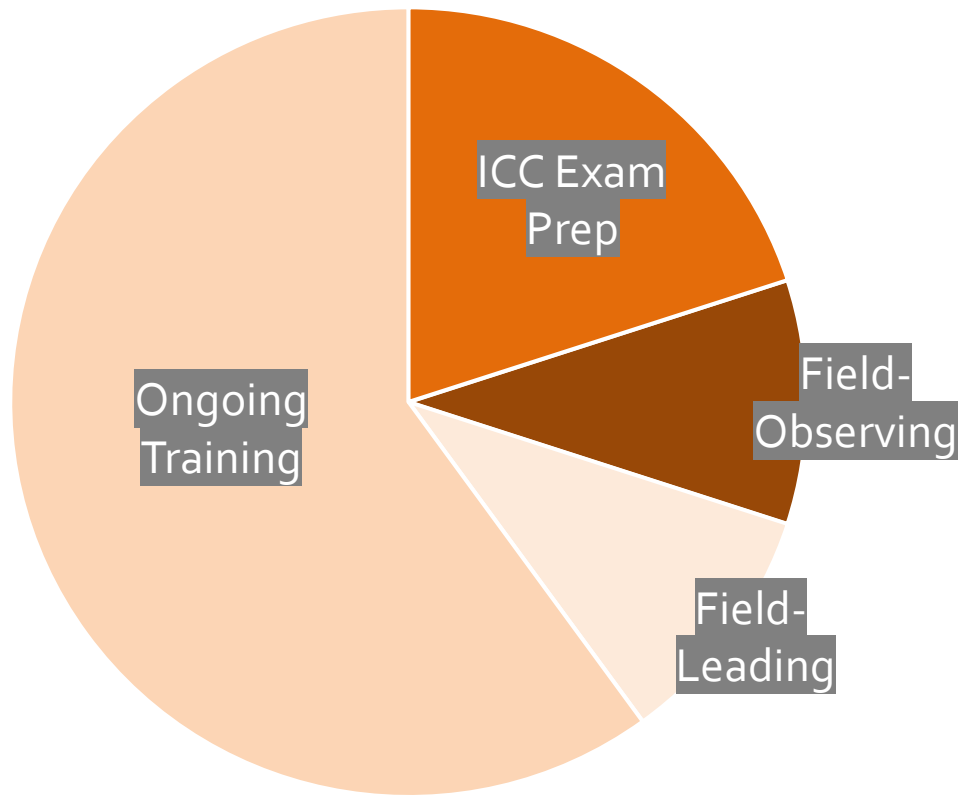
Celebrate Passing of ICC Exam



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After the Exam

Our UST Training Program



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Field- Observing

- **After they pass the ICC exam, trainees are scheduled to shadow other experienced inspectors.**



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Field- Observing

- During this training phase, trainees are in an observational role and “ghost-write” inspection reports.



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Field- Observing

- During this time, trainees see and learn...

How

- Prepare for and conduct an inspection
- Write and issue inspection reports

County of Santa Clara
 Department of Environmental Health
 Hazardous Materials Compliance Division (HMCD)
 1555 Berger Drive, Suite 300, San Jose, CA 95112-2716
 Phone (408) 918-3400 Fax (408) 280-6479 www.EHinfo.org/hazmat



OFFICIAL NOTICE OF INSPECTION

Facility ID: [REDACTED] Inspection Date: 10/29/2024
 Facility Name: [REDACTED]
 Site Address: [REDACTED]
 HW Generator Type: <1000 KG/MO. RCRA LOG
 Consent to Inspect Granted By: [REDACTED] Pictures Taken
 Samples Taken

Summary of Violations & Notice to Comply
 Program: [REDACTED] - UNDERGROUND STORAGE TANK - 2399
 Inspection Type: ROUTINE INSPECTION

VC	Class	Violation	Corrective Actions Taken
T032	M	<p>DUSTO IDENTIFICATION [2010003]</p> <p>Underground storage tank (UST) owner/operator failed to electronically submit a completed "Designated Underground Storage Tank Operator Identification Form" within 30 days of commencing the storage of hazardous material in a newly installed UST; or within 30 days of a change in the facility's DUSTO.</p> <p><i>The DUSTO Identification Form most recently submitted to CERS is outdated. As of 10/1/2020, this form is to be used:</i> http://www.unidocs.org/hazmat/ustmisc/un-062.pdf</p> <p><i>Within 30 days, revise and resubmit to CERS using the current form.</i></p> <p>Within 30 days, complete and upload and electronically submit a PDF copy of the form via the California Environmental Reporting System (CERS) website at http://cers.calepa.ca.gov. The form (UN-062) is available at www.EHinfo.org/hazmat. [23 CCR 2715(a)(1)(B), 2715(a)(3)]</p>	
T034	M	<p>DUSTO FACILITY INSPECTIONS [2030013]</p> <p>Underground storage tank (UST) owner/operator failed to ensure that a qualified Designated UST Operator (DUSTO) has been performing inspections of the UST system(s) as required.</p> <p><i>The time between monthly visual inspections exceeded 30 days on the following dates:</i></p> <ul style="list-style-type: none"> - from 12/13/2023 to 1/30/2024 - from 4/3/2024 to 5/8/2024 - from 6/28/2024 to 8/7/2024 - from 9/4/2024 to 10/9/2024 <p><i>Moving forward, ensure that the DUSTO does not exceed 30 days between inspections.</i></p> <p>Ensure that a qualified DUSTO has performed an inspection of each UST system at least once every 30 days. Inspections must address all required items and be documented on a properly completed "Designated UST Operator Visual Inspection Report" form with an attached copy of an alarm history report or log documenting leak detection alarms since the previous inspection and copies of documentation demonstrating action taken in response to each alarm since the previous visual inspection. [23 CCR 2716(a) through (d)]</p>	



Field- Observing

- **Classroom training supplements the field training.**

Inspection Preparation

- How to properly prepare for an inspection
- Discuss UST inspection safety hazards

CERS Review

- How to review UST submittal elements on CERS

Review of Test Reports

- How to cross-reference test reports with inspection reports

Inspection Report Expectations

- What is documented on an Official Notice of Inspection

Field- Leading

- After shadowing other inspectors, trainees then transition to leading inspections with them.



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Field- Leading

FINAL STEPS

- An inspection conducted with the UST senior is to be completed to “clear” the trainee for solo inspections.

Non-VPH sites,
emergency tank
sites, Overfill,
and Secondary
Containment

VPH sites,
verification of
interstitial
communication

Field- Leading

FINAL STEPS

- **We evaluate the following:**

Soft Skills

- Proper Introduction?
- Effective communication?

Violation Citation

- Correctly identified?
- Knowledge of corrective actions?

Actual Field Inspection

- Consent documented?
- Inspection completed?

Inspection Report

- Narrative reflects complete inspection and follow-up activities?

Field- Leading

FINAL STEPS

- We formalize using a Work Task Release/ Clearance Form.

Work Task Release/Clearance Form	
INSPECTOR:	PROGRAM:
SENIOR:	RELEASE DATE:
NOI COMMENTS [1]	
a.	f.
b.	g.
c.	h.
d.	i.
e.	j.
ADDITIONAL COMMENTS:	
RESPONSIBILITY AND INSPECTION FOLLOW UP [2]	
a.	e.
b.	f.
c.	g.
d.	h.
ADDITIONAL COMMENTS:	
WORK DISTRICT(S) [3]	
a.	

Ongoing Inspector Meetings

- Quarterly basis
- 1-2 hours
- Led by UST Senior + Team
- Topics include SWRCB updates, questions from staff, misc. review, etc.
- ICC contact hours are provided and logged



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What's Worked For Us



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What's Worked For Us

- Prioritizing UST Training
 - Management support



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What's Worked For Us

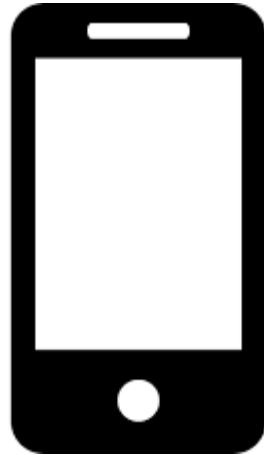
- Using the most current resources



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What's Worked For Us

- An established support system and frequent check-ins



What's Worked For Us

- Show and Tell



What's Worked For Us

- A flexible training plan



Summary



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Resources

- Internal Guidance Documents
- ICC Website
- CalEPA Unified Program Newsletters
- Monthly SWRCB Newsletters
- Local Guidance (LG) Letters
- CalCUPA website
 - Access to Industry Standards through Accuris
 - Learning Management System (LMS)



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Any Questions?

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