

## Unified Program Newsletter – February 2025

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### State Water Board

#### Report 6 Due March 1, 2025

The State Water Resources Control Board (State Water Board) recently distributed the Report 6 forms and instructions to all Unified Program Agencies (UPAs) for the reporting period of July 1 through December 31, 2024. UPAs must submit Report 6 no later than March 1, 2025.

Beginning this reporting period, paperless Report 6 forms now include a question regarding the number of red tags applied within the current cycle. Please note that red tags that were issued prior to this reporting period should not be included in the count of applied red tag.

Additionally, inaccurate Report 6 data provided to the State Water Board will be returned to the UPA for corrections. The UPAs must provide the corrected Report 6 prior to March 1, 2025, or be considered late.

For information regarding Report 6 requirements, contact:

Magnolia Busse at (916) 341-5870 or [Magnolia.Busse@waterboards.ca.gov](mailto:Magnolia.Busse@waterboards.ca.gov).

#### Red Tag Data – CERS and Report 6

The State Water Board has identified that UPAs are not consistently recording red tag information in the California Environmental Reporting System (CERS). Any

underground storage tank (UST) system that has received a red tag must have the red tag information recorded in CERS.

(See California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2713(c)(5)).

UPAs that need assistance with recording red tag information in CERS should refer to the following CERS Frequently Asked Question, [How to Enter Red Tag Information](https://www.waterboards.ca.gov/ust/cers/ru01_red_tag.html) ([https://www.waterboards.ca.gov/ust/cers/ru01\\_red\\_tag.html](https://www.waterboards.ca.gov/ust/cers/ru01_red_tag.html)).

Additionally, when completing Report 6, UPAs should report the total number of red tags issued, not the number of facilities with red tags. If the number of red tags exceeds the available space on the form, an addendum Report 6 form with additional red tag lines can be provided upon request.

For information regarding Red Tag data and Report 6, contact:  
Magnolia Busse at (916) 341-5870 or [Magnolia.Busse@waterboards.ca.gov](mailto:Magnolia.Busse@waterboards.ca.gov).

### **Single-Walled UST Closure Deadline**

#### Single-Walled UST Facility List

The single-walled UST facility list is generated from CERS and includes a list of facilities with single-walled USTs and/or piping that must be permanently closed by the December 31, 2025, deadline. The State Water Board recently updated the single-walled UST facility list that is available on the State Water Board [single-walled UST webpage](https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html) ([https://www.waterboards.ca.gov/water\\_issues/programs/ust/single\\_walled.html](https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html)).

Additionally, the State Water Board will be sending a survey to UPAs that includes a list of remaining single-walled UST facilities for each jurisdiction, as determined by CERS. The survey will include questions regarding the status of permanent closure, including but not limited to whether a closure permit application has been submitted and if work has been scheduled to begin.

#### Enforcement

On January 22, 2025, the State Water Board distributed a [letter to UPAs and UST stakeholders](#) through the UST email subscription that reiterates the permanent closure requirements and the UPAs role in enforcement of single-walled USTs on and after January 1, 2026. ([https://www.waterboards.ca.gov/water\\_issues/programs/ust/docs/2025/SW-Deadline-Enforcement-2025.pdf](https://www.waterboards.ca.gov/water_issues/programs/ust/docs/2025/SW-Deadline-Enforcement-2025.pdf))

The letter is also available on the State Water Board single-walled UST webpage under “Available Guidance for the Closure of Single-Walled UST Systems” and on the State Water Board administrative UST program [notification webpage](https://www.waterboards.ca.gov/ust/adm_notices.html) ([https://www.waterboards.ca.gov/ust/adm\\_notices.html](https://www.waterboards.ca.gov/ust/adm_notices.html)).

UPAs are encouraged to attach this letter to UST operating permits and inspection reports for all single-walled UST facilities in their jurisdiction.

### Single-Walled Suction Piping

Safe suction piping installed before July 1, 2003, is exempt from the secondary containment, monitoring, and testing requirements if it is designed, constructed, and installed in accordance with UST Regulations, section 2636(a)(3). All four requirements in UST Regulations, section 2636(a)(3) must be met to be regulated as safe suction piping. Single-walled safe suction piping installed before July 1, 2003, is exempt from the requirement to permanently close on or before the December 31, 2025, closure deadline.

Suction piping that does not meet the requirements of UST Regulations, section 2636(a)(3) is considered conventional suction piping. Buried single-walled conventional suction piping installed before July 1, 1987, is required to be secondarily contained or permanently closed by the December 31, 2025, closure deadline (See Health and Safety Code section 25292.05(a)(1)). Buried conventional suction piping installed after July 1, 1987, is required to be secondarily contained (See UST Regulations, section 2636(a)). Buried single-walled conventional suction piping installed after July 1, 1987, is prohibited and must be immediately upgraded or permanently closed.

During each compliance inspection, UPAs must confirm if the piping is safe suction through an inspection method that readily demonstrates compliance with UST Regulations, section 2636(a)(3)(A)-(C). With less than one year remaining, it is imperative that UPAs identify piping systems that need construction modifications or closure to assist UST owners and operators with compliance prior to December 31, 2025.

For information regarding single-walled USTs, contact:  
Jenna Hartman at (916) 327-8563 or [Jenna.Hartman@waterboards.ca.gov](mailto:Jenna.Hartman@waterboards.ca.gov).

### **Annual Compliance Inspections for Temporary Closed USTs**

State Water Board evaluation staff have observed that UPAs are not conducting compliance inspections for temporary closed USTs. It is required that every UST system, including temporary closed USTs, be inspected at least once every year (See Health and Safety Code section 25288(a)). Additionally, UPAs should verify the UST owner or operator has updated and submitted the tank information in the CERS to reflect temporary closure.

For information regarding compliance inspections for temporary closed USTs, contact:  
Michelle Suh at (916) 323-0878 or [Michelle.Suh@waterboards.ca.gov](mailto:Michelle.Suh@waterboards.ca.gov).

## **DTSC**

### **27th Annual Certified Unified Program Agency Conference, March 24-27, 2025**

It is that time of year again! The annual California CUPA Conference is set for March 24-27, 2025, at the Marriott in Anaheim, California. This is the premier training opportunity for those in the regulatory field and businesses who are subject to Unified Program regulations. Over the course of the 4-day conference, there are 14 tracks with over 170 courses offered in areas of interest such as Hazardous Waste, Hazardous Materials Business Plans, and the Aboveground Petroleum Storage Act.

This year's theme is **Embracing Change & Encouraging Collaboration**. In our world, we are constantly experiencing new situations and environments and only through working together can we overcome and persevere.

Fees are as follows:

<i>Full Registration (includes breakfast T/W/Th, lunch M/T/W/Th)</i>	<i>On or Before 1/26/2025</i>	<i>Rate Starting 1/27/2025</i>	<i>Rate Starting 2/19/2025</i>
<b>Government per attendee</b>	<b>\$1,030.00</b>	<b>\$1,130.00</b>	<b>\$1,230.00</b>
<b>Non-Government per attendee</b>	<b>\$1,375.00</b>	<b>\$1,775.00</b>	<b>\$2,175.00</b>
<b>Retired CUPA Inspector</b> <small>*Retired from a UP Agency and not working as an employee for another employer. Approval required.</small>	<b>\$675.00</b>	<b>\$775.00</b>	<b>\$875.00</b>
<b>Student or Sponsor Student**</b>	<b>\$675.00</b>	<b>\$775.00</b>	<b>\$875.00</b>
<b>**Student</b> must provide current student ID card, proof of current enrollment of 12 units minimum, cannot be working full-time. Full Student Scholarships are available at <a href="http://www.calcupa.org">www.calcupa.org</a> . See Student Information tab on Annual Conference page.			
<i>Single Day Registration Specify day attending: _____</i>	<i>On or Before 1/26/2025</i>	<i>Starting 1/27/2025</i>	<i>Rate Starting 2/19/2025</i>
<b>Government one day</b>	<b>\$450.00</b>	<b>\$500.00</b>	<b>\$550.00</b>
<b>Non-Government one day</b>	<b>\$575.00</b>	<b>\$625.00</b>	<b>\$675.00</b>
<b>Retired CUPA Inspector</b> <small>*Retired from a UP Agency and not working as an employee for another employer. Approval required.</small>	<b>\$275.00</b>	<b>\$325.00</b>	<b>\$375.00</b>
<b>Student **</b>	<b>\$275.00</b>	<b>\$325.00</b>	<b>\$375.00</b>

**Student scholarships are currently filled, although as you can see above, you may sponsor additional students!** Students are welcome to submit a free application for a [Student Scholarship](#). These scholarships are limited to full-time students in science and environmental fields. This opportunity is great for those looking to get into these fields, presenting opportunities to learn about current topics and network with professionals in regulation and industry. Students who attend on scholarships are eligible for mentoring and four (4) additional \$250 scholarships. If you know a student that might want to take this opportunity or know someone who would like to sponsor additional scholarships, please direct this information to them. (<https://www.calcupa.org/conference/students.html>)

### **Upcoming Environmental Sampling for Enforcement Training Offered by DTSC**

The Department of Toxic Substances Control (DTSC) is excited to announce two upcoming training sessions focused on Environmental Sampling for Enforcement, specifically tailored for the CUPA audience in 2025. These sessions will cover essential preparation and sampling techniques crucial for effective environmental enforcement.

Participants will gain comprehensive knowledge in various areas, including developing sampling strategies, selecting appropriate sampling equipment, and understanding laboratory analyses. The training will also cover how to interpret results and effectively present findings to build legally defensible cases. A significant component of the program will involve hands-on training, allowing participants to practice collecting and documenting different types of samples using various sampling tools.

The first training session is scheduled for May 14, 2025, at the DTSC Cal Center office located at 8800 Cal Center Drive, Sacramento. Due to the interactive nature of the training, spaces are limited to just 30 participants.

Additionally, a second training session is planned for Southern California, tentatively scheduled for September or October 2025. Stay tuned for further details!

Don't miss this opportunity to enhance your skills in environmental sampling and enforcement. Priority will be given to CUPAs looking to develop their enforcement program.

For enrollment information please contact: [DTSC\\_CUPATrainers@dtsc.ca.gov](mailto:DTSC_CUPATrainers@dtsc.ca.gov). We look forward to seeing you!



The flyer features the DTSC logo at the top left, which includes a stylized sun and the text "DTSC Department of Toxic Substances Control". The background is a photograph of a modern building with large windows. Three circular inset images show: 1) a person in a white lab coat holding a clear plastic bottle, 2) several brown glass vials in a rack, and 3) a person in a white shirt and blue pants kneeling outdoors, possibly collecting a sample. The text on the flyer is as follows:

**Environmental Sampling for Enforcement**

**Only 30 Seats Available**

Location: DTSC  
8800 Cal Center Dr.  
Sacramento, CA 95826

Date: May 14, 2024  
Time: 9:00 AM to 4:00PM

To Enroll Contact: [DTSC\\_CUPATrainers@dtsc.ca.gov](mailto:DTSC_CUPATrainers@dtsc.ca.gov)

### **DTSC's 2025 Electronic Verification Questionnaire Report Cycle Opens**

DTSC's 2025 electronic Verification Questionnaire (eVQ) report cycle opened on January 31, 2025. Starting this year, the eVQ System opens during the first quarter of each year. The Verification Questionnaire is completed in the eVQ System. Initial notices to ID number holders required to complete the questionnaire have all been sent. The questionnaire is due by March 31, 2025. Reporting after the March 31st deadline is a violation and may be subject to penalties pursuant to 22 CCR Section 66260.410(c).

If you receive any questions from your stakeholders regarding the questionnaire, refer them to the information below.

Website: <https://evq.dtsc.ca.gov>

Training Video: <https://dtsc.ca.gov/evq-training-video/>

Email: [eVQ@dtsc.ca.gov](mailto:eVQ@dtsc.ca.gov)

Toll-free Number: 1-877-454-4012, Monday to Friday from 9 a.m. – 2 p.m. Pacific Time

### **Cal FIRE OSFM**

#### **Aboveground Petroleum Storage Act (APSA) Program Regulations Highlights**

The APSA Program regulations (California Code of Regulations (CCR), Title 19, Division 1, Chapter 11) became effective on December 17, 2024.

New requirements include the following:

##### *a. Tank Facility Owner or Operator Responsibilities*

- Complete and submit the APSA Facility Information to CERS in conjunction with the tank facility statement or Hazardous Materials Business Plan (HMBP) submittal (CCR Title 19, Section 1614(a) and (c)) (effective within 12 months following December 17, 2024, and annually thereafter).
- For tank facilities required to prepare a Spill Prevention, Control, and Countermeasure Plan (SPCC) Plan under APSA, maintain records of training and discharge prevention briefings at least three years (CCR Title 19, Section 1611(a)(7)).

##### *b. Unified Program Agency Responsibilities*

- Inspect each APSA tank facility with less than 10,000 gallons of petroleum, including each tank facility with less than 1,320 gallons of petroleum and one or more tanks in underground areas, at least once every three years or in a frequency established by the CUPA (CCR Title 19, Section 1609).
- Inspect each tank facility that is conditionally exempt from preparing an SPCC Plan under APSA at least once every three years or in a frequency established by the CUPA (CCR Title 19, Section 1610).

- Issue an inspection report within 30 days of the conclusion of an inspection for compliance with the APSA Program requirements (CCR Title 19, Section 1612(g)).
- Six hours of refresher training every three years for staff conducting SPCC Plan compliance inspections under APSA (CCR Title 19, Section 1615). The three-year cycle begins from the completion date of the initial training required by Health and Safety Code Section 25270.5(c) or from December 17, 2024, whichever is more recent.

*c. Miscellaneous*

- Failure to prepare an SPCC Plan is not a minor violation (CCR Title 19, Section 1612(d)).
- A tank designed and intended for underground use, or any tank used for that purpose, shall not be used as an aboveground storage tank (CCR Title 19, Section 1607(b)).
- A rail car, tank car, or tank vehicle shall not be used as a storage tank in a permanent or fixed installation at a tank facility (CCR Title 19, Section 1607(b)).

The APSA Program regulations are available in Westlaw

(<https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=%28sc.Default%29>).

OSFM will hold webinars in the future on the APSA Program regulations. Stay tuned.

***References or links to information cited in this newsletter are subject to change. CalEPA is interested in your comments and suggestions regarding the Unified Program monthly newsletter. Please email your comments and suggestions to: [cupa@calepa.ca.gov](mailto:cupa@calepa.ca.gov).***

**[CalEPA Unified Program Home Page](#)**