

Unified Program Newsletter – September 2025

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State Water Board

Follow-Up Single-Walled UST Survey

On August 29, 2025, the State Water Resources Control Board (State Water Board) distributed follow-up surveys to Unified Program Agencies (UPAs) with single-walled underground storage tanks (USTs) in their jurisdiction. The survey requests additional information regarding red tag supplies and each UPA's specific enforcement plan for single-walled emergency tank systems and government owned tank facilities following the closure deadline. The State Water Board requests that follow-up single-walled surveys be submitted by September 12, 2025. The survey results will be posted on our [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) and the data will be used to allocate resources. The State Water Board will be distributing red tag supplies soon based on the results of the upcoming survey.

For additional information regarding the single-walled UST surveys or red tag supplies, please contact:

Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Tank Anchoring Systems and Buoyancy Calculations

The proposed Title 23, chapter 16 regulations will require anchoring on all tanks installed on or after January 1, 2027. Anchors must be designed to ensure that tank flotation does not occur after installation. The proposed regulations do not prescribe specific anchoring methods, only that the tank must be anchored to prevent flotation in accordance with the manufacturer, industry code or by engineering specifications approved by a California registered professional engineer.

Anchors are typically concrete blocks or pads with straps that connect to or hold down the UST. Tank manufacturers may provide concrete anchors, sized for the specific tank being sold, along with the required buoyancy calculations for the permit plan submittal as part of the installation plans. Owners or operators are not required to utilize the anchors provided by the tank manufacturer as other options are available. The State Water Board is aware of owners or operators utilizing an alternative method of anchoring while also providing the CUPA with the buoyancy calculations from the tank manufacturer that do not align with the actual anchoring method being installed. This inconsistency could result in inadequate protection from tank flotation.

Installing anchoring systems that were not designed or verified by the tank manufacturer can result in costly repairs for buoyant tanks and may also lead to non-compliance penalties. Repairing a floated tank can be nearly as costly as installing a new tank. Individuals performing plan checks should verify that the tank buoyancy calculations are consistent with the UST's anchoring system.

For additional information regarding anchoring systems on USTs, please contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Request to Submit Abstracts: 27th Annual CUPA Conference

The California Certified Unified Program Agency (CUPA) Forum is requesting abstracts for the 2026 CUPA Conference. Abstracts must be submitted through the [CUPA Forum website](https://calcupa.org/index.html) (<https://calcupa.org/index.html>) by September 26, 2025. Please note that speaker biographies must be submitted and approved prior to submitting an abstract.

The State Water Board recognizes that presenting at the conference is a significant commitment for both UPA management and the individual presenter. UPAs that meet their program obligations while also presenting at the CUPA Conference will be recognized for their outstanding achievements.

For additional information regarding abstracts for the 28th Annual CUPA Conference, contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

DTSC

Now Available: Recorded Training – Implementation of the Generator Improvements Rule

The CUPA Training and Assistance Unit is pleased to announce that the “**Implementation of the Generator Improvements Rule**” training, which was delivered by DTSC at the 2025 CUPA Conference is now available as a recorded course on the CalCUPA Learning Management System (LMS). You can access the training here: https://calcupa.org/lms-course/index.html?moodle_course_id=98

This session provides step-by-step guidance on:

- Implementing the Generator Improvements Rule (GIR)
- Reviewing and applying new regulatory requirements

- Submitting renotification and closure notifications
- Meeting Quick Reference Guide requirements
- Establishing acceptable implementation arrangements with local authorities

Participants who complete the recorded course through the CalCUPA Learning Management System will also earn 1.5 Continuing Education Units (CEUs).

If you have any follow-up questions or would like to recommend future training topics, please contact us at dtsc_cupatrainers@dtsc.ca.gov.

EPA Updates Guide to Illegal Dumping Prevention

Illegal dumping, the disposal of waste in an unauthorized location, is a serious problem in many U.S. communities. Also referred to as "open dumping" or "fly dumping," this action can threaten public health, safety, property values, and quality of life. The most common materials dumped in this way include construction debris, furniture, household appliances, auto parts, medical waste, yard waste, and household hazardous waste.

In June 2025, EPA updated the 1998 Illegal Dumping Prevention Guidebook, which outlines actions communities can take to prevent illegal dumping. The guide includes case studies from around the country that illustrate real actions taken by communities to prevent and respond to illegal dumping. [Visit EPA's webpage](https://www.epa.gov/large-scale-residential-demolition/illegal-dumping) (<https://www.epa.gov/large-scale-residential-demolition/illegal-dumping>) to download the guide and learn more about preventing illegal dumping and how to properly dispose of or recycle unwanted materials.

Cal FIRE OSFM

Aboveground Petroleum Storage Act (APSA) Advisory Committee

The next APSA Advisory Committee meeting will be held on October 15, 2025. The agenda will be available at least 10 days before the meeting on the APSA Advisory Committee website (<https://osfm.fire.ca.gov/committees/aboveground-petroleum-storage-act-apsa-advisory-committee>).

What to do if labels are missing or damaged on a welded steel storage tank?

Steel Tank Institute (STI) – Steel Plate Fabricators Association (SPFA) published an article addressing the question, 'What to do if STI, UL (Underwriters Laboratories), or SwRI (Southwest Research Institute) labels are missing or damaged on a welded steel storage tank?' Refer to the article on the STI/SPFA website at <https://stispfa.org/resource/what-to-do-if-sti-ul-or-swri-labels-are-missing-or-damaged-on-a-welded-steel-storage-tank/>.

The SP001 aboveground tank system inspector training will be held as follows:

- October 6-10, 2025 – Long Beach (full, waitlist available)
- November 17-21, 2025 – Denver, CO

For more information, visit the website at <https://stispfa.org/education/trainings-courses/sp001/>.

STI/SPFA also regularly holds free webinars that may be useful for APSA tank facility owners or operators. For more information, visit the website at <https://stispfa.org/education/webinars/>.

APSA Program Regulations Reminders for Tank Facilities

Recordkeeping – Training and Briefings

Excluding those conditionally exempt from preparing a Spill Prevention, Control, and Countermeasure (SPCC) Plan under APSA, each APSA tank facility is now required to maintain records of training and discharge prevention briefings for at least three years (California Code of Regulations (CCR), Title 19, Section 1611(a)(7)).

Electronic Reporting – APSA Facility Information

Each APSA tank facility, including conditionally exempt tank facilities, is now required to complete and submit the APSA Facility Information to the California Environmental Reporting System (CERS) in accordance with the CCR, Title 19, Section 1614. The APSA Facility Information must be completed and submitted to CERS within 12 months following December 17, 2024, and annually thereafter (CCR, Title 19, Section 1614(a)). The annual submittal of the APSA Facility Information shall be in conjunction with the tank facility statement or HMBP submittal (CCR Title 19, Section 1614(c)).

The APSA Facility Information is not the same as the Tank Facility Statement.

More information on CERS APSA submittals may be found on the following OSFM websites:

- Aboveground Petroleum Storage Tank Facility Statement Reporting Requirements
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/aboveground-petroleum-storage-tank-facility-statement-reporting-requirements>
- Is My Facility Regulated Under APSA?
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/is-my-facility-regulated-under-the-aboveground-petroleum-storage-act>
- Preparing an APSA Submittal in CERS
<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/preparing-an-aboveground-petroleum-storage-act>

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.

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