

Unified Program Newsletter – May 2026

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State Water Board

Inspection of Single-Walled Underground Storage Tanks

An underground storage tank (UST) has only three operating conditions: 1) operational; 2) temporary closure; or 3) permanent closure. Single-walled USTs that have not been permanently closed are considered operational and must be treated as such until permanent closure. Unified Program Agencies (UPAs) must continue to perform the annual compliance inspection even if the single-walled UST has been red tagged and all product has been removed from the tank.

There are some single-walled systems that are still storing motor vehicle fuel, for example emergency tank systems, or those systems the UPA did not require the product to be removed after applying the red tag. Single-walled UST systems with product must continue to perform all required tests and inspections, including but not limited to the designated UST operator inspection, cathodic protection testing, enhanced leak detection testing if located within 1,000 feet of a drinking water well, and release detection equipment testing, including testing of the automatic tank gauge. Failure to perform or pass any test or inspection must be cited on the UPA's inspection report. Additionally, the UPA has the authority to request additional testing relevant to compliance, in accordance with Health and Safety Code, chapter 6.7 (H&SC) section 25289(b). The UPA should pursue civil penalties in accordance with H&SC, section 25299 and consistent with their Inspection and Enforcement (I&E) Plan.

The State Water Resources Control Board (State Water Board) will be reviewing single-walled UST enforcement as part of the Certified Unified Program Agency Performance Evaluations.

For questions on single-walled UST inspection and enforcement expectations, please contact: Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Single-Walled Enforcement Surveys

On April 24, 2026, the State Water Board UST Enforcement Unit distributed enforcement surveys to UPAs with single-walled USTs within their jurisdiction. The survey requests information on the remaining single-walled UST facilities, including closure status, any formal enforcement efforts, and any guidance or assistance needed from the State Water Board. The survey results will be posted on the UST Enforcement Unit's single-walled UST webpage later this month.

For information regarding single-walled UST enforcement, please contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Monitoring Site Plans

California Code of Regulations, title 23 (Title 23), section 2650(c) outlines the requirements for a facility's monitoring site plan. This includes a scaled diagram indicating the layout of the tanks, piping and sumps to the extent known, locations of all release detection equipment, and each vacuum, pressure, or hydrostatically monitored zone (if applicable). As a reminder, scaled or as-built drawings have been required as part of the permit application for decades. The current version of Title 23 has simply unified the permit application and monitoring plan requirements.

State Water Board staff have received several questions regarding the level of detail required for these plans. For a diagram to be to-scale, the site plan required components must be depicted using established, proportional dimensions (for example, by including a scale bar on the plans). If completed properly, the State Water Board expects this plan to be a one-time submittal to the California Environmental Reporting System. If a new monitoring site plan needs to be drafted to meet the requirements of

section 2650(c), this may be developed using a variety of methods, including professional drafting software.

Monitoring site plans are required to include only the information listed in section 2650(c). Topographic lines, parcel boundaries, utilities, ingress, or egress markings are not required to be on the monitoring site plan. When reviewing monitoring site plans, UPAs should confirm a scale bar or other scaling information is present and verify all release detection equipment locations are identified.

For additional information regarding monitoring site plans, contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Veeder Root TLS 350 End of Life Notification

The Veeder Root TLS-350 and earlier models (TLS-3XX) are the most common release detection equipment monitoring panels utilized in California. Veeder-Root has discontinued sales and issued an [End of Life Notification](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj5w6iw9KKUAxXrDTQlHW8qCt8QFnoECBYQAQ&url=https%3A%2F%2Fdocs.veeder.com%2Fgold%2Fdownload.cfm%3Fdoc_id%3D11251&usg=AOvVaw29KEEdGgjxsgp-6UX3pSna&opi=89978449) for all TLS-3XX systems (https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwj5w6iw9KKUAxXrDTQlHW8qCt8QFnoECBYQAQ&url=https%3A%2F%2Fdocs.veeder.com%2Fgold%2Fdownload.cfm%3Fdoc_id%3D11251&usg=AOvVaw29KEEdGgjxsgp-6UX3pSna&opi=89978449). UST owners and operators may continue to use the TLS-3XX, however, if a component needs to be repaired, replacement parts are no longer being manufactured or supplied. As a result, this will require an upgrade to another tank monitoring system.

Currently, there is robust market for prohibited remanufactured or used Veeder Root TLS 3XX components. Title 23, section 2651(c) prohibits the use of release detection equipment that has been remanufactured or rebuilt by anyone other than the manufacturer of the device (See Title 23, section 2651(c)). UPA inspectors should review permit applications, or maintenance and service records to determine whether any unauthorized repairs have been performed on the TLS-3XX and cite prohibited repairs. State Water Board recommends that UPAs cite at least the following violations: *Failure of the release detection equipment to be installed, calibrated, operated, or maintained in accordance with manufacturer's specifications (UST Program Violation 2031006)*

UPAs should follow their I&E Plan when applying progressive enforcement.

For more information regarding repairs to the TLS-3XX, please contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov.

Addition to Local Guidance Letter 113 – PetroVac Auxiliary Vacuum Pump

The State Water Board has updated Local Guidance Letter 113 (LG-113) with the Petro Specialties PetroVac Positive Displacement Vacuum Pump as a vacuum source for the [Veeder-Root Secondary Containment Leak Detection method](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/vendors/veeder_root_y.html) (https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/vendors/veeder_root_y.html). A PetroVac auxiliary vacuum source may only be used in instances where a submersible turbine pump is not installed or as specified in the

Veeder-Root Secondary Containment Vacuum Sensing module (see the California Installations section of the LG-113).

For more information regarding additions to LG-113, please contact: Stephanie Duong at (916) 322-8544 or Stephanie.Duong@waterboards.ca.gov.

28th Annual CUPA Conference – UST Leak Prevention and Office of Enforcement Presentations

UST Leak Prevention Update 2026

Tom Henderson discussed the changes to the UST Program during 2025 and expectations for 2026. This presentation was recorded for the Learning Management System.

New UST Regulations: The Good, the Bad, and the Road Ahead

Austin Lemire-Baeten discussed the implementation of the new regulations since January 1, 2026, and expectation with Chapter 16 going forward. This presentation was recorded for the Learning Management System.

UST Evaluations: What's New for You?

Magnolia Busse and Michelle Suh presented how the new Title 23 will impact CUPA Performance Evaluations. This presentation was recorded for the Learning Management System.

UST Enforcement: From Single-walled to Abandoned Tanks and Beyond

Amber Camarena and Jenna Hartman presented an overview of the Office of Enforcement, UST Enforcement Unit's role in supporting UPAs with ongoing and emerging enforcement cases. They also discussed the Water Board's process for investigating and developing enforcement actions and the unit's prioritization of single-walled and abandoned USTs for 2026-2027.

Single-walled Tanks Enforcement Strategies and Stories

Chase Mendenhall and Jenna Hartman discussed single-walled UST enforcement strategies and methods from the LA City Fire Department CUPA and State Water Board perspective. This course also encouraged audience discussion of current single-walled UST enforcement issues and approaches statewide, including preparing and issuing administrative enforcement orders.

Steel Tanks: Allow Me to Reintroduce Myself

Steve Pollock (STI), Garrick Mullen (Watco Tanks), David Spaeth (TrueNorth Steel), and Austin Lemire-Baeten presented steel tank manufacturer and installation requirements from the steel fabricator perspective, and the lessons learned from working with the CUPAs and State Water Board.

The CUPA Performance Evaluation and Assessment Process

Kaitlin Cottrell reviewed the UST portion of the CUPA Evaluation all-evaluators assessment process. This presentation was recorded for the Learning Management System.

DTSC

2025 National Biennial Hazardous Waste Report Cycle Open!

The 2025 National Biennial Hazardous Waste Report (Biennial Report, or BR) cycle opened on January 2, 2026, and was due March 1, 2026. Even though the report is now past due, we are still accepting late submissions. The BR is completed through U.S. EPA's [RCRAInfo](#) System. Sites are required to file the 2025 BR if in any one month during 2025, they met any of the following conditions:

- Generated more than 2,200 pounds of RCRA non-acute hazardous waste OR
- Generated or accumulated more than 2.2 pounds of RCRA acute hazardous waste OR
- Generated or accumulated greater than 220 pounds of spill cleanup materials contaminated with RCRA acute hazardous waste OR
- Treated, stored, or disposed of RCRA hazardous waste on-site.

The Department of Toxic Substances Control has sent email and mail notices to sites whose records show have met the reporting requirements to inform them to file. If you receive any questions regarding the Biennial Report, refer them to the resources below.

Website (includes training video and guide): <https://dtsc.ca.gov/biennial-reports-information/>

Email: brsstaff@dtsc.ca.gov

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

Submit your training request now!

The DTSC CUPA Training and Assistance Unit would like to express our sincere appreciation for your continued collaboration and support. Your partnership has been the foundation to the success of our training program.

We invite you to complete the **2-minute survey** below to help us evaluate our efforts and identify future training needs in Hazardous Waste Management and/or Tiered Permitting:

https://forms.office.com/Pages/ResponsePage.aspx?id=9P+PP2DHKky6uMY-9L0kOUOUI8FqzDJKtQuXPjc_pyNUQVNYMTJKNVFUQ1IPTDA1RVNPMURMNkQwVC4u



Since becoming fully staffed in January 2024, our unit has delivered several core trainings, including:

- Generator Improvements Rule (GIR)
- Sampling and Lab Results Interpretation
- Conducting Hazardous Waste Generator Inspections
- In-Person Sampling for Enforcement
- Tiny Topics Series (e.g., HWTS, Speculative Accumulation, Used Oil Definition, Local Oversight Program for Cleanup, Waste Counting)

These training topics were developed based on a Training Needs Assessment, which included wish-list from CUPA managers, survey responses, and analysis of Summary of Finding (SOF). Our team continues to work diligently to develop new training opportunities while supporting CUPA staff with technical and programmatic inquiries.

Many of the training courses presented at the CUPA Conference are available through the Learning Management System:

- CUPA Forum Training Center, [CUPA Forum Training Center · calcupa.org](https://www.calcupa.org)
- Additionally, the *Sampling and Lab Results Interpretation* training is available here: <https://www.youtube.com/watch?v=WvJvnXWQHE&t=10s>

Would you like to be a co-instructor?

Please, contact us at: DTSC_CUPATrainers@dtsc.ca.gov.

Subscribe to get training updates and announcements!



Or go to the Subscription page manually at the following link:

https://forms.office.com/Pages/ResponsePage.aspx?id=9P+PP2DHKky6uMY-9L0kOUOUI8FqzDJKtQuXPjc_pyNUQzI4SURWUjVZS0FFS1JJNTBMQk9RUIIENC4u

Thank you again for your partnership and continued commitment.

Sincerely,

DTSC CUPA Training and Assistance Unit

DTSC's 2026 Electronic Verification Questionnaire Reporting Cycle Will Be Closing

Late electronic Verification Questionnaire (eVQ) submissions are accepted until June 1, 2026, when the eVQ System closes. Completing the eVQ does not automatically reactivate an inactive ID number. To reactivate, the handler must elect to have the ID number reactivated in Step 3 of the questionnaire. Then complete the remaining steps until they are done.

If you receive any questions from your stakeholders regarding the questionnaire, please 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
- **Toll-free Number:** 1-877-454-4012, Monday to Friday from 9 a.m. – 2 p.m. Pacific Time

In Person Environmental Sampling for Enforcement Training – Program Update

DTSC is pleased to announce an upcoming **In-Person Environmental Sampling for Enforcement Training**, an important program designed to strengthen field capabilities and promote statewide consistency in environmental sampling procedures.

Over the past year, this hands-on training has been delivered at multiple locations across California. DTSC remains committed to offering this popular training to support our partner agencies.

Upcoming Training Session

Stanislaus County

Date: Thursday, June 25, 2026

Time: 9:00 AM – 4:00 PM

Location:

Stanislaus County Department of Environmental Resources
3800 Cornucopia Way
Modesto, CA 95358

Registration:

Registration is now open. Please use the link below to reserve your spot:

<https://forms.office.com/g/jnBTyhqH17>

Training Overview

This course provides practical instruction on environmental sampling techniques for enforcement activities, including:

- Planning and preparation for field sampling
- Sampling strategies and selection of appropriate equipment
- Identifying and requesting relevant laboratory analyses
- Interpreting analytical results
- Presenting findings to support legally defensible cases
- Hands-on practice using sampling equipment and collecting/documenting various sample types

We encourage early registration, as space is limited and demand for this training remains high.

If you have any questions, feel free to reach out to us at dtsc_cupatrainers@dtsc.ca.gov.

Cal FIRE OSFM

No. 1 Aboveground Petroleum Storage Act (APSA) Program Violation

Currently, the No. 1 APSA program violation cited by Unified Program Agencies (UPA) is failure to maintain written records of inspections and tests of aboveground storage tanks (AST) and containers. Inspections and tests are based on the industry standard in which the AST is subject to, considering their size, configuration, and design. Many shop-fabricated ASTs at APSA tank facilities are subject to the Steel Tank Institute (STI)/Steel Plate Fabricators Association (SPFA) SP001 standard. If a tank facility references this inspection standard in their Spill Prevention, Control, and Countermeasure (SPCC) Plan and their plan does not already have inspection checklists for monthly and annual inspections or perhaps the owner or operator is interested in comprehensive checklists, they may be able to download the following resources for free from the STI/SPFA website at <https://stispfa.org/library-resources/standards-regulatory-resources/sp001-standard/>:

- STI SP001 AST Record
- STI SP001 Monthly Inspection Checklist
- STI SP001 Annual Inspection Checklist
- STI SP001 Portable Container Monthly Inspection Checklist

For more information on AST inspections, visit the U.S. Environmental Protection Agency website at <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/tank-inspections>.

OSFM APSA Webinar

Another OSFM APSA webinar is coming soon. This next series will be held in early June and will cover tips when reviewing SPCC Plans.

Use the link below to join the webinar on June 9 from 2:00-3:00 PM.

<https://teams.microsoft.com/meet/262599469566998?p=E3qFErZtDWLWodRykn>

Meeting ID: 262 599 469 566 998

Passcode: ka3MS3kw

Dial in by phone: +1 (650) 564-3271

Phone conference ID: 940 974 309#

Use the link below to join the webinar on June 10 from 10:00-11:00 AM.

<https://teams.microsoft.com/meet/225404731854484?p=bv4PgNhOM5erasVbkT>

Meeting ID: 225 404 731 854 484

Passcode: Qb6nf6vp

Dial in by phone: +1 (650) 564-3271

Phone conference ID: 363 654 612#

STI/SPFA Webinar

STI/SPFA regularly holds free webinars that may be useful for APSA tank facility owners or operators. For example, there will be a webinar on corrosion protection of industrial tanks on June 11, 2026. For more information, visit the website at

<https://stispfa.org/education/webinars/>.

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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