
State Water Resources Control Board

March 5, 2013

Unified Program Guidance Letter 13-03

To: Unified Program Agencies

Current Status of the Relationship Between Semi-Annual UST Program Reporting (Report 6) and the California Environmental Reporting System (CERS)

In consultation with the California Environmental Protection Agency (Cal/EPA) it has been determined that Unified Program Agencies (UPAs) must continue to submit the “paper” version of Report 6 to the State Water Resources Control Board (State Water Board) by March 1 and September 1 this year until all necessary UST data can be inputted by businesses and the UPAs.

Currently, there are several hurdles to clear before we can move to fully automate extraction of information from CERS. The first step for a UPA toward eliminating the “paper” Report 6 is to have all UST facility data properly entered into CERS. As you may recall, Report 6 requires the number of UST facilities, number of petroleum USTs, and the number of non-petroleum USTs within each UPAs jurisdiction. It also requires the number of new and closed USTs and UST facilities during a given reporting period, so the timely update of that information into CERS is necessary. Please note that even though an UPA may have entered the facility and UST data into CERS, the data is unavailable for reporting purposes until the facility owner / operator formally submits it (takes ownership), and in some cases, the UPA accepts the submittal. UST data should be entered into CERS by January 1, 2014.

The second step of eliminating the “paper” Report 6 deals with the violations observed during the annual compliance inspections. In order for annual compliance violations to be reported through CERS, it is imperative that each UPA properly “map” their violations to the CERS Violation Library or use the CERS web site directly. If you use Decade, Garrison or Acella as a service provider for your UST management, this effort has been done by those providers. Mapping violations is a one-time process that will properly align the UPAs violations with the significant operational compliance (SOC) categories (release detection, release prevention). Promptly entering inspection information will allow for more precise reporting. To achieve consistent and timely reporting, proposed revisions to Title 27 requires inspection, violation, and enforcement information to be entered into CERS not later than 30 days after each calendar quarter (April 30, July 30, October 30, and January 30).

The final hurdle is ensuring the State Water Board can access all the data to meet federal reporting requirements. The State Water Board and Cal/EPA are currently working together to ensure that access. The State Water Board will inform UPAs when they no longer need to submit the “paper” Report 6 forms.

If you have questions please contact Gabe Herrera with the State Water Board at (916) 319-9128, gherrera@waterboards.ca.gov or Dan Firth with Cal/EPA at (916) 445-5049, dfirth@calepa.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Laura Fisher". The signature is written in a cursive, flowing style.

Laura S. Fisher, Chief
UST Leak Prevention Unit and
Office of Tank Tester Licensing

cc: Jim Bohon, Assistant Secretary
California Environmental Protection Agency