

Unified Program Newsletter – October 2021

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State Water Board

Underground Storage Tank Leak Prevention January – December 2020 Annual Report

On September 9, 2021, the State Water Resources Control Board (State Water Board) provided underground storage tank (UST) stakeholders with the [California Underground Storage Tank Leak Prevention January – December 2020 Annual Report](https://www.waterboards.ca.gov/water_issues/programs/ust/docs/final_ust_leak_prevention_2020.pdf)

(https://www.waterboards.ca.gov/water_issues/programs/ust/docs/final_ust_leak_prevention_2020.pdf).

This report was developed in collaboration between the United States Environmental Protection Agency (U.S. EPA) and the State Water Board. The California Environmental Reporting System (CERS) and the California GeoTracker database were utilized to obtain report data. A few noteworthy data points include: releases discovered during system closure remain higher for single-walled systems than for double-walled systems; ten additional Unified Program Agencies (UPAs) have been approved for paperless reporting; COVID-19 health and safety restrictions expectedly decreased both the number of compliance inspections and red tag applications for the year; unauthorized release numbers remain very low; and the removal of single-walled tanks/piping continues to be slow.

For more information regarding the annual report, contact:
Mrs. Laura Fisher at (916) 341-5870, or Laura.Fisher@waterboards.ca.gov.

Secondary Containment Testing of Underground Storage Tanks

State Water Board staff are aware of secondary containment testing performed on tank interstices where service technicians are reaching the initial test level vacuum very quickly, often within a minute or less, far more quickly than that of tanks with similarly

sized interstices. This condition is indicative of a blocked or collapsed interstice, where only portions of the interstice are being tested or monitored. While there may be several ways to test a UST interstice, if the secondary containment test cannot be performed in accordance with California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2637, the system is out of compliance. If the UST cannot be repaired, it must be permanently closed.

The *Secondary Containment Testing Report Form* does not require the service technician to provide information on the time taken to reach the initial reading vacuum level, however service technicians should be aware that pulling a vacuum on a tank interstice should take 25-60 minutes in most cases. The State Water Board is aware of service technicians pulling a vacuum in less than five minutes, letting it hold for the prescribed test duration time, then passing the tank secondary containment test. This is obviously not acceptable, as only part of the interstice is tested.

If either the service technician or UST inspector is concerned with the secondary containment test only evaluating part of the UST secondary, additional testing should be performed. Performing a volume test using Boyle's Law ($P_1V_1 = P_2V_2$) would allow the service technician to determine the volume of interstice being tested. Tank manufactures can provide the interstice volumes upon request. If the interstice is blocked or collapsed, a repair should be performed. If the tank cannot be repaired, it must be permanently closed.

For additional information regarding secondary containment testing of USTs, contact: Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Wildfire Preparation and Recovery Guide

On August 31, 2021, the U.S. EPA released the [Wildfire Guide: Preparation and Recovery for Underground and Aboveground Storage Tank Systems](#)

(https://www.epa.gov/system/files/documents/2021-09/wildfire-guide_8-31-21_0.pdf)

to serve as guidance for UST owners and operators located in areas that are susceptible to wildfires. The guide provides recommended actions to take before and after a wildfire catastrophe to increase safety while reducing facility damage and inventory loss. The document also provides guidance on using new tools alongside

[UST Finder](#)

(<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=b03763d3f2754461adf86f121345d7bc>)

to determine the potential risks wildfires pose to facilities based on their geography and recent area weather conditions. These guidelines are based on federal practices and should only be implemented if they are compatible with state, local, or tribal programs.

For additional information regarding wildfire preparation / recovery or UST Finder, please contact:

Mrs. Laura Fisher at (916) 341-5870 or Laura.Fisher@waterboards.ca.gov.

Updates to Local Guidance 167 – Qualifications and Scopes of Work for Tank Installers and Service Technicians

The State Water Board has updated Local Guidance (LG) 167 on the necessary qualifications and scopes of work for Tank Installers and Service Technicians. The update clarifies scopes of work, licensing, and training requirements for individuals working on USTs and related equipment. Additionally, the letter addresses the necessary qualifications required by the Contractors State Licensing Board (CSLB) in relation to UST work. This is in response to questions received by State Water Board staff concerning applicability of certain licenses obtained from the CSLB with regards to UST work. LG 167 and other LG letters can be found on the State Water Board's [UST Program – Available Local Guidance \(LG\) Letters](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/) webpage.
(https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/)

For additional clarification regarding contractor licensing requirements, please visit the CSLB website at www.cslb.ca.gov or contact CSLB by phone at (800) 321-2752 or by email at classifications@cslb.ca.gov.

For additional information regarding qualifications or scopes of work, contact:
Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov, or
Mr. Austin Lemire-Baeten at (916) 327-5612 or
Austin.Lemire-Baeten@waterboards.ca.gov.

DTSC

Inactivation of ID Numbers Due to Non-Completion of DTSC's 2021 Hazardous Waste ID Number Verification Questionnaire and Fees Assessment

Hazardous waste handlers that are required to complete the 2021 Verification Questionnaire and Fees Assessment for hazardous waste identification (ID) numbers and manifests and fail to do so by October 31st by 5:00 PM will have their ID number(s) inactivated on November 1st. The inactive date will be backdated to June 30, 2021. The questionnaire and applicable fees were due 30 days from the date the handler received their first notice in July 2021. Handlers will have been sent three notices via email or U.S. Postal Service and will have been given more than 90 days to complete the questionnaire by October 31st. Inactivating ID numbers due to non-compliance with Health and Safety Code sections 25205.16 helps DTSC clean up data for handlers that are not using their ID number(s) and do not respond to notices.

The eVQ System will still be opened to accept late submissions. If a handler has not completed their 2021 Verification Questionnaire, refer them to the information below. Inactive ID numbers can be reactivated in step 3 of the questionnaire. Any fees owed must be paid, then posted by DTSC's Accounting Unit before the ID number will be reactivated.

- ▷ **Website:** <https://evq.dtsc.ca.gov>
- ▷ **Training Video:** <https://dtsc.ca.gov/evq-training-video/>
- ▷ **Email:** eVQ@dtsc.ca.gov
- ▷ **Phone:** 1-877-454-4012 (toll-free) Monday through Friday from 9:00 AM to 4:00 PM Pacific Time.

Verification Questionnaire History Available on HWTS

The Annual ID Number Verification Questionnaire history is available to regulators with a Hazardous Waste Tracking System (HWTS) user account. To view the information, follow the steps below.

1. Log into your HWTS account at: hwts.dtsc.ca.gov.
2. Enter the respective ID number or handler name into the search box and click on the magnifying glass icon.
3. Click on “View Profile.”
4. Scroll down the page until you see the heading “Annual ID Number Verifications.”

If you are a regulator and do not have a HWTS account, submit the [HWTS Account Request Form](#) or contact hwtsadmn@dtsc.ca.gov.

(<https://app.smartsheet.com/b/form/8c9e3e99f9c444e69253e778e93b26f2>)

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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