

Unified Program Newsletter – August 2022

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CalEPA

EPA ID Validation Overview for Business

Background

Businesses in California subject to regulation under the Certified Unified Program Agency (CUPA) are required electronically report and submit required information to the California Environmental Reporting System (CERS)) in accordance with Title 27 California Code of Regulations section 151888(b). All applicable data fields of CERS are required to be completed.

CalEPA has created an EPA ID database validation tool for use during the CERS submittal process. With the implementation of the new tool instead of manual entry, the EPA ID number will be provided to the user.

Implementation

CalEPA will be implementing the validation tool in two phases.

Phase 1 – August 29, 2022

A facility that reports activities pertaining to hazardous waste in CERS requiring an EPA ID will be triggered to validate their EPA ID number.

Failure to successfully validate the EPA ID will result in a warning message but will not prevent submittal of any section of CERS. CUPAs will see the warning when reviewing the submittal through the Submittal Element Processing.

Phase 2 – Spring of 2023 pending feedback

A facility that reports activities pertaining to hazardous waste in CERS requiring an EPA ID will not be able to submit in CERS without a validated EPA ID number.

In cases where the EPA ID cannot be validated, the facility will be directed to contact their CUPA for assistance. CUPAs will coordinate with their PAs and the CERS information technology staff to correct the issue and complete their submittal.

Validation Tool

Historically, a facility has been required to manually enter their EPA ID number into CERS. This project will change that process and instead an EPA ID number will be provided to the user for selection and confirmation. The validation tool will compare the CERS facility name and address against records in HWTS. Four different interfaces are possible with the validation tool:

1. Automatic Validation – The EPA ID number and facility information in CERS match HWTS. No action will be needed by the facility.
2. Validation Needed – EPA ID number in CERS is not a direct match to HWTS.
 - a. Warning message to validate the EPA ID number in the business activates section of CERS
3. Validation Failed – No EPA ID number identified as a match from HWTS.
 - a. Warning message to obtain EPA ID or contact CUPA for assistance. CUPA contact information provided in pop-up on screen

Once the EPA ID number has been validated no future action will be required. A validated EPA ID may be updated by re-running the validation process.

CERS EPA ID Validation Project

CalEPA has created an EPA ID validation tool for use during the CERS submittal process. Beginning August 29, 2022, a facility that reports hazardous waste activities in CERS requiring an EPA ID, will be triggered to validate their EPA ID number. Project overview and guidance are available online at [CERS Central](https://cers.central.ca.gov/).

(<https://cers.calepa.ca.gov/>)

For additional information, please join CalEPA during one of the following zoom webinars:

August 16, 2022

10:00 a.m.

<https://us02web.zoom.us/j/89059636956>

Meeting ID: 890 5963 6956

August 18, 2022

9:00 a.m.

<https://us02web.zoom.us/j/83739773343>

Meeting ID: 837 3977 3343

August 22, 2022

1:00 p.m.

<https://us02web.zoom.us/j/89198216853>

Meeting ID: 891 9821 6853

August 26, 2022

2:00 p.m. (Spanish interpretation available)

<https://us02web.zoom.us/j/89984476179>

Meeting ID: 899 8447 6179

State Water Board

Underground Storage Tank Leak Prevention January – December 2021 Annual Report

On June 30, 2022, the State Water Resources Control Board (State Water Board) posted the [California Underground Storage Tank Leak Prevention January – December 2021 Annual Report](https://www.waterboards.ca.gov/ust/docs/final_ust_leak_prevention_2021.pdf) (https://www.waterboards.ca.gov/ust/docs/final_ust_leak_prevention_2021.pdf) on the Underground Storage Tank (UST) web site. This report was developed in collaboration with the United States Environmental Protection Agency (U.S. EPA) and the State Water Board. The CERS and the California GeoTracker database were utilized to obtain report data. A few noteworthy data points include: releases discovered during system closure remain markedly higher for single-walled systems than for double-walled systems; the removal of single-walled tanks/piping continues to be below the target rate to have all single-walled systems closed by the December 31, 2025, deadline; seven additional Unified Program Agencies (UPAs) have been approved for paperless reporting; and unauthorized release numbers remain very low.

For more information regarding the annual report, contact:

Mr. Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Testing and Inspection Notification Requirement

California Code of Regulations, title 23, division 3, chapter 16, (UST Regulations), require the UST owner or operator to notify the UPA at least 48 hours prior to performing certifications, tests, or inspections. State Water Board staff (staff) are aware of situations where the UST owner or operator has provided notification at least 48 hours in advance, and in some cases up to 30 days in advance, only for the UPA to reject the notification based on scheduling conflicts. There are no provisions in the Health and Safety Code, chapter 6.7 or UST Regulations that require UPA inspectors

be present for these activities or allow the UPA to reject a proper notification. UPAs cannot reject a notification provided at least 48 hours in advance of the certification, test, or inspection without the authority specifically provided by a local ordinance.

For more information regarding testing and inspection notification requirements, contact: Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Use of Veeder Root TLS-450 and TLS-450 Plus

Staff are again fielding questions regarding the use of Veeder Root TLS-450 and TLS-450 Plus monitoring panels in California. Both the TLS-450 and the TLS-450 Plus monitoring panels are listed on [Local Guidance letter \(LG\) 113](#)

(https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lg113/).

However, neither the TLS-450 nor the TLS-450 Plus currently have In-Station Diagnostic (ISD) features that meet the requirements of the California Air Resources Board. Although the TLS-450 and TLS-450 Plus panels are not yet available for facilities requiring ISD, UPAs should anticipate their use at new installations and facility upgrades and should obtain manufacturer training on them.

For more information regarding the use of the Veeder Root TLS-450 panels, contact: Mr. Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov.

Report 6 Due September 1, 2022

The State Water Board recently distributed the Report 6 forms and instructions to all UPAs for the reporting period of January 1 through June 30, 2022. UPAs must submit Report 6 to staff no later than September 1, 2022.

For more information regarding Report 6 requirements please contact: Mr. Steven Mullery at (916) 341-5850 or Steven.Mullery@waterboards.ca.gov.

CUPA Evaluation Web Site

Staff updated the [CUPA Performance Evaluation web site](#)

(https://www.waterboards.ca.gov/water_issues/programs/ust/performance-evaluations.html)

with new pages regarding single-walled UST systems and the UST facility file selection process. As staff continue to develop the web site, inclusions will be noted in the [UST Program Updates](#).

(<https://www.waterboards.ca.gov/ust/cupa/updates/>)

For more information regarding CUPA performance evaluations, please contact: Ms. Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Cal FIRE OSFM

Portable Emergency Generators

Question: Is there an exemption for portable emergency generators storing petroleum under the Aboveground Petroleum Storage Act (APSA)?

Answer: No. There is no exemption for portable emergency generators storing petroleum under APSA.

APSA Definition of “Storage” or “Store”

“Storage” or “store” means the containment, handling, or treatment of petroleum, for a period of time, including on a **temporary** basis (Health and Safety Code, Chapter 6.67, Section 25270.2(l)).

Guidance Materials

APSA Program guidance materials are available on the CAL FIRE-Office of the State Fire Marshal website at: <https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/>.

- [APSA Program Guidance Document](https://osfm.fire.ca.gov/media/z4zlg3pr/apsa-faq-12apr2021-final.pdf)
(<https://osfm.fire.ca.gov/media/z4zlg3pr/apsa-faq-12apr2021-final.pdf>)
- [Farms](https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/farms/)
(<https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/farms/>)
- [Petroleum](https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/petroleum/)
(<https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/petroleum/>)
- [Tanks in Underground Areas \(TIUGA\)](https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/tank-in-an-underground-area-tiuga/)
(<https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/tank-in-an-underground-area-tiuga/>)

For additional information on the APSA Program, email cupa@fire.ca.gov.

Refer to the U.S. Environmental Protection Agency (US EPA) website at: <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations> for information on the Spill Prevention, Control, and Countermeasure (SPCC) requirements. A few guidance materials are noted below.

- [SPCC Guidance for Regional Inspectors](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors)
(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors>)
- [Qualified Facility Determination](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/my-facility-qualified-facility-under-spcc-rule)
(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/my-facility-qualified-facility-under-spcc-rule>)
- [Secondary Containment Calculation Worksheets](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/secondary-containment-calculation-worksheets)
(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/secondary-containment-calculation-worksheets>)

- [SPCC for Agriculture](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spill-prevention-control-and-countermeasure-spcc)
(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spill-prevention-control-and-countermeasure-spcc>)

Frequent SPCC questions are addressed at: <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/oil-spill-prevention-and-preparedness-0>.

For additional information on the Federal SPCC rule or SPCC Plan requirements, contact [US EPA Region 9 Oil Program staff](https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/contact-us-about-oil-spill-prevention-and).
(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/contact-us-about-oil-spill-prevention-and>)

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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