



UST Program Update February 2022

California Environmental Reporting System Submittal History

State Water Board Resources Control Board (State Water Board) staff are reminding Unified Program Agencies (UPAs) that the California Environmental Reporting System (CERS) limits edits and modifications to the most current 15 submittals. As you are aware, some facilities may submit 10 or more submittals a year, which severely limits the UPAs' ability to repair longstanding deficiencies in the data. California Environmental Protection Agency (CalEPA) is aware of this limitation and plans to change this during a future upgrade to CERS, however this likely will not happen quickly.

Facilities with longstanding incorrect data with over 15 submittals will need to create a new facility submittal to correct the condition. In situations where the UPA for the facility has changed or the facility is no longer in business, the current regulator is encouraged to reach out to Mr. Dan Firth at Daniel.Firth@waterboards.ca.gov or CalEPA CERS assistance to resolve the condition.

For more information regarding CERS submittal history, 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.

Compartmentalized Tank Denotation in CERS

In October 2021, it was discovered that approximately 500 tanks containing more than one substance were being improperly reported in CERS. Of these, several tanks contain diesel exhaust fluid (DEF), which [in a letter dated October 2, 2019](#)¹, has been determined to be a non-hazardous substance and therefore not regulated under the

https://www.waterboards.ca.gov/ust/tech_notices/docs/letter_def_2019.pdf¹

underground storage tank (UST) program. It is important for facilities that have compartmentalized tanks containing DEF or other unregulated substances in at least one compartment to note this in CERS so that discrepancies in the count of stand-alone versus compartmentalized tanks is mitigated. Per the [CERS frequently asked question](#)² on reporting tank contents, when reporting a tank that has at least one compartment containing an unregulated substance in CERS, add a comment in the “Additional Description” field that one of the compartments contains an unregulated substance. Include the name of the substance in this field as well.

For more information regarding compartmentalized tank denotation in CERS, 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.

Manufacturer’s Secondary Containment Test Method

The State Water Board has been notified that S. Bravo Systems has included the Dri-sump Containment Tightness Test method in their published standards for testing secondary containment. Although the Dri-sump method is now allowed to be used on Bravo sumps, as noted in several previous UST Monthly Program Updates, the requirements regarding methods used for secondary containment testing must meet one of the following, in the following order: 1) the method is included in the manufacturer’s published guidelines or standards for testing the secondary containment component; 2) if there are no manufacturer’s published guidelines or standards for testing the secondary containment component and the test method is specified in industry code or engineering standards; or 3) if there are no published manufacturer’s guidelines or standards for testing the secondary containment component, and if there are no applicable industry codes or engineering standards for testing the secondary containment component, the test method must be approved by a California registered professional engineer for testing the secondary containment component.

As no other manufacturer has included Dri-sump in their published guidelines or standards for testing the secondary containment components, Dri-sump may only be used on Bravo sumps.

For more information regarding secondary containment testing, 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.

https://www.waterboards.ca.gov/ust/cers/tutorials/bu06_tank_contents.html²

Violation for Piping Without Secondary Containment

Systems with single-walled vents or riser piping without the proper overfill prevention equipment as required by California Code of Regulations, Title 23, Division 3, Chapter 16, (UST Regulations), section 2636(a)(1), are being incorrectly cited in CERS as overfill protection equipment violations. These are construction violations as the pipe is incorrectly utilizing a secondary containment exemption. For UST systems incorrectly constructed without secondary containment, the UPA must use the CERS secondary containment violation *2060005 Double-Walled Construction After January 1, 1984*.

For more information regarding secondary containment violations, 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.