



UST Program Update

February 2025

Report 6 Due March 1, 2025

The State Water Resources Control Board (State Water Board) recently distributed the Report 6 forms and instructions to all Unified Program Agencies (UPAs) for the reporting period of July 1 through December 31, 2024. UPAs must submit Report 6 no later than March 1, 2025.

Beginning this reporting period, paperless Report 6 forms now include a question regarding the number of red tags applied within the current cycle. Please note that red tags that were issued prior to this reporting period should not be included in the count of applied red tag.

Additionally, inaccurate Report 6 data provided to the State Water Board will be returned to the UPA for corrections. The UPAs must provide the corrected Report 6 prior to March 1, 2025 or be considered late.

For information regarding Report 6 requirements, contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Red Tag Data – CERS and Report 6

The State Water Board has identified that UPAs are not consistently recording red tag information in the California Environmental Reporting System (CERS). Any underground storage tank (UST) system that has received a red tag must have the red tag information recorded in CERS.¹ UPAs that need assistance with recording red tag information in CERS should refer to the following CERS Frequently Asked Question, [How to Enter Red Tag Information](#).²

Additionally, when completing Report 6, UPAs should report the total number of red tags issued, not the number of facilities with red tags. If the number of red tags exceeds

¹ See California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2713(c)(5).

² https://www.waterboards.ca.gov/ust/cers/ru01_red_tag.html

the available space on the form, an addendum Report 6 form with additional red tag lines can be provided upon request.

For information regarding Red Tag data and Report 6, contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Single-Walled UST Closure Deadline

[Single-Walled UST Facility List](#)

The single-walled UST facility list is generated from CERS and includes a list of facilities with single-walled USTs and/or piping that must be permanently closed by the December 31, 2025 deadline. The State Water Board recently updated the single-walled UST facility list that is available on the [State Water Board single-walled UST webpage](#).³ Additionally, the State Water Board will be sending a survey to UPAs that includes a list of remaining single-walled UST facilities for each jurisdiction, as determined by CERS. The survey will include questions regarding the status of permanent closure, including but not limited to whether a closure permit application has been submitted and if work has been scheduled to begin.

[Enforcement](#)

On January 22, 2025, the State Water Board [distributed a letter to UPAs and UST stakeholders](#)⁴ through the UST email subscription that reiterates the permanent closure requirements and the UPAs role in enforcement of single-walled USTs on and after January 1, 2026. The letter is also available on the State Water Board single-walled UST webpage under “Available Guidance for the Closure of Single-Walled UST Systems” and on the State Water Board administrative UST program notification webpage⁵. UPAs are encouraged to attach this letter to UST operating permits and inspection reports for all single-walled UST facilities in their jurisdiction.

[Single-Walled Suction Piping](#)

Safe suction piping installed before July 1, 2003 is exempt from the secondary containment, monitoring, and testing requirements if it is designed, constructed, and installed in accordance with UST Regulations, section 2636(a)(3). All four requirements in UST Regulations, section 2636(a)(3) must be met to be regulated as safe suction piping. Single-walled safe suction piping installed before July 1, 2003 is exempt from the

³ https://www.waterboards.ca.gov/water_issues/programs/ust/single_walled.html

⁴ https://www.waterboards.ca.gov/water_issues/programs/ust/docs/2025/SW-Deadline-Enforcement-2025.pdf

⁵ https://www.waterboards.ca.gov/ust/adm_notices.html

requirement to permanently close on or before the December 31, 2025 closure deadline.

Suction piping that does not meet the requirements of UST Regulations, section 2636(a)(3) is considered conventional suction piping. Buried single-walled conventional suction piping installed before July 1, 1987 is required to be secondarily contained or permanently closed by the December 31, 2025 closure deadline.⁶ Buried conventional suction piping installed after July 1, 1987 is required to be secondarily contained.⁷ Buried single-walled conventional suction piping installed after July 1, 1987 is prohibited and must be immediately upgraded or permanently closed.

During each compliance inspection, UPAs must confirm if the piping is safe suction through an inspection method that readily demonstrates compliance with UST Regulations, section 2636(a)(3)(A)-(C). With less than one year remaining, it is imperative that UPAs identify piping systems that need construction modifications or closure to assist UST owners and operators with compliance prior to December 31, 2025.

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

Annual Compliance Inspections for Temporary Closed USTs

State Water Board evaluation staff have observed that UPAs are not conducting compliance inspections for temporary closed USTs. It is required that every UST system, including temporary closed USTs, be inspected at least once every year.⁸ Additionally, UPAs should verify the UST owner or operator has updated and submitted the tank information in the CERS to reflect temporary closure.

For information regarding compliance inspections for temporary closed USTs, contact:
Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov.

⁶ See Health and Safety Code section 25292.05(a)(1)

⁷ See UST Regulations, section 2636(a)

⁸ See Health and Safety Code section 25288(a)