
State Water Resources Control Board

Date: January 1, 2026

Local Guidance 200 Reporting of Technical Compliance Rate

To: Unified Program Agencies

The purpose of this guidance letter is to outline the United States Environmental Protection Agency (U.S. EPA) reporting requirements of the Technical Compliance Rate (TCR) for underground storage tank (UST) facilities using the Semi-Annual UST Program Report (Report 6). This includes reporting field constructed tanks (FCTs) and those facilities with USTs that have received a red tag during the reporting period or have a UST that was abandoned or temporarily closed at any time during the reporting period.

After amending the federal UST regulations in 2015, the U.S. EPA revised the UST compliance performance measures known as TCR consistent with those amendments. Since September 1, 2020, Unified Program Agencies (UPAs) have been required to submit the number of FCT facilities as part of Report 6. Additionally, Report 6 will require UPAs to identify using the California Environmental Reporting System (CERS) identification number, USTs that have received a red tag during the report period, have an abandoned or temporarily closed UST within the reporting period.

REPORTING REQUIREMENTS

UPAs are required to submit Report 6 to the State Water Board pursuant to California Code of Regulations (CCR), title 23, section 2692(a) and CCR title 27, section 15290(b). Each UPA must provide to the State Water Resources Control Board (State Water Board) the total numbers of FCTs, USTs with red tags applied, abandoned or temporarily closed USTs, and TCR performance measures as part of the semiannual Report 6. Reporting periods are January 1 through June 30 and July 1 through December 31. Each UPA must submit Report 6 or the paperless Report 6 Certification to the State Water Board by March 1 and September 1 for the most recently completed reporting period. The State Water Board will return inaccurate or incomplete Report 6 submissions to the UPA for correction. A corrected Report 6 must be resubmitted prior to the March 1 and September 1 deadlines. The Report 6 form and instructions can be downloaded from the [UST Leak Prevention web site](#).

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

TCR Reporting

The purpose of TCR is to assess national compliance with the federal UST program as determined by the U.S. EPA. The performance measures are required to be determined by the onsite UST inspector based on the facility conditions at the beginning of the compliance inspection. Therefore, even if a TCR violation is corrected during the inspection, the violation must be cited and included in CERS, and the facility would not meet the TCR requirement.

Data will be collected on seven performance measures, four of which will be used to determine the combined TCR measure. When determining the combined compliance rate, a facility must comply with all four technical compliance performance measures which include spill containment, overfill prevention, cathodic protection and release detection (USEPATCR 9a through 9d) to meet the combined TCR measure (USEPATCR 9e). Federal reporting also requires data collection on the following UST compliance performance measures: designated operator training (USEPATCR 10), financial responsibility (USEPATCR 11), and designated operator inspection requirements (USEPATCR 12).

To assist simplicity, consistency, and accuracy, the CERS violation library identifies the violations associated with a compliance measure by using the USEPATCR# identifier in the violation name. For those UPAs utilizing paperless reporting, the TCR information is automatically determined by the CERS Report 6. Please ensure that all violations identified with USEPATCR# are included as part of the UPA inspection checklists.

TCR Violation Reissuance

The State Water Board requires reissuance of the same U.S. EPA TCR violation during the subsequent annual compliance inspection if the violation remains uncorrected. Failure to do so will result in the violation not being captured in the Report 6 data for that reporting period. Refer to CERS FAQ: [Using CERS Reports to Ensure Accurate UST Facility and Tank Counts - CERS FAQs | California State Water Resources Control Board](#).

FCT Reporting

The U.S. EPA is collecting information on FCTs from all states and territories. To that end, UPAs must report the number of FCTs within their jurisdiction as part of the. The U.S. EPA defines an FCT as:

A tank constructed in the field. For example, tanks constructed of concrete that is poured in the field, or steel or fiberglass tanks primarily fabricated in the field are considered field-constructed.

This is a broad definition and expands upon what the State Water Board has historically termed as Bulk Field Constructed Storage Tanks. Therefore, any UST where either the primary or secondary containment was poured, assembled or constructed onsite or in situ must be identified and reported as an FCT in the Report 6.

Red Tags, Abandoned and Temporarily Closed UST Reporting

The Report 6 includes a page for UPAs to identify by the CERS identification number, those USTs that have received a red tag during the report period, or have an abandoned or temporarily closed UST on the closing date of the reporting period.

If you have questions regarding technical compliance rate reporting, please contact DWQ-USTReport6@Waterboards.ca.gov

Sincerely,



Tom Henderson
Supervisor, UST Leak Prevention Unit and Tank Tester Licensing
State Water Resources Control Board
Tom.Henderson@waterboards.ca.gov

cc:

Steven McMasters, P.G.
UST & Site Cleanup Programs Section Lead
State Water Resources Control Board
Steven.McMasters@waterboards.ca.gov

Julie M. Osborn, Attorney IV
Office of Chief Counsel
State Water Resources Control Board
Julie.Osborn@waterboards.ca.gov

Magnolia Busse
UST Leak Prevention Unit
State Water Resources Control Board
Magnolia.Busse@waterboards.ca.gov