



UST Program Update September 2024

Request to Submit Abstracts: 27th Annual CUPA Conference

The California Certified Unified Program Agency (CUPA) Forum is requesting abstracts for the 2025 CUPA Conference. Abstracts must be submitted on the [CUPA Forum website](#)¹ by September 15, 2024. Please note that speaker biographies must be submitted and approved prior to submitting an abstract.

The State Water Resources Control Board (State Water Board) realizes that the time required to prepare and present at the conference is a substantial commitment for UPA management and the individual presenting. UPAs that continue to meet their obligations in addition to providing presentations will be recognized for their outstanding achievements.

For additional information regarding abstracts for the CUPA Conference, contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

CUPA Evaluation Process Website Updates

The State Water Board evaluation staff (evaluation staff) have updated the [CUPA Evaluation Process Website](#)² to clarify the State Water Board evaluation process and assist CUPAs in developing and maintaining their UST program.

[Evaluation Homepage](#)

A process flow chart with descriptions of each evaluation process has been added to the website. The “Guidance Documents and Templates” section contains a comprehensive list of evaluation processes and components. Additional updates are in progress and will be added as they become available.

¹ <https://calcupa.org/>

² https://www.waterboards.ca.gov/ust/leak_prevention/performance-evaluations/

Start of Evaluation

- **What Starts with the Notice Letter**

Includes both the Pre-notification and Notification Letter templates for reference and lists the documents the evaluation staff will request as part of the facility file review.

- **Kickoff Meeting**

Details how to prepare for the Kickoff Meeting, and provides the Supplemental Questionnaire discussed in the meeting.

Facility File Selection

- **GeoTracker-Enhanced Leak Detection (ELD) Testing**

Outlines the evaluation staff process using GeoTracker to identify UST facilities located within 1,000 feet of a public water well requiring ELD testing.

Document Evaluation

- **Facility File Review**

Summarizes the documents review process used by evaluation staff during the facility file review and provides examples of potential issues.

Data Review

- **CME Data Review**

Outlines the steps used by evaluation staff to review the California Environmental Reporting System (CERS) CME UST Data Download report and the Semiannual UST Program Report (Report 6) and assess the CUPA's inspection, violation, and enforcement data.

Oversight Inspection

- **What to Expect During an Oversight Inspection**

Discusses the purpose of the oversight inspection, CUPA pre-inspection preparation, and the oversight inspection process. It includes a list of items verified by evaluation staff while observing the CUPA inspector during the compliance inspection.

Report 6 and Compliance Inspection Report

- **Report 6 – Timeliness of Reporting and Accuracy of Data Provided**

Outlines the required content for Report 6 and emphasizes the importance of timely submission with accurate data and details the review process for Report 6 and the circumstances under which the report may be returned to CUPA for revisions.

UST Closure Procedures

○ **Permanent and Temporary Closure**

Explains the evaluation staff review process for permanent and temporarily closed UST documents, to include the CERS data reviewed.

For additional information regarding the CUPA Evaluation Process website, contact: Michelle Suh at (916) 323-0878 or Michelle.Suh@waterboards.ca.gov.

Reviewing Single-Walled UST Facility Submittals

With the single-walled UST closure deadline quickly approaching it is imperative that UPA's review and set a submittal status for single-walled UST facility submittals in CERS. Single-walled UST facilities that do not have a current and accurate CERS UST submittal will impact Report 6, Energy Policy Act of 2005 (EPAAct) reporting, and the ability to determine if single-walled tanks or piping remain that must be permanently closed prior to December 31, 2025.

UPA inspectors should review a submittal either for completeness if a site inspection has not yet been completed, or after verifying the tank construction and monitoring information during a compliance inspection. Additionally, UPA inspectors must set a submittal status, either accepted or not accepted, after reviewing a submittal for completeness or site inspection verification. For additional guidance, please refer to the CERS Frequency Asked Questions, "[Setting 'Accepted' Submittal Status.](#)"³

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

Manufacturer Training and Certification Renewal

The State Water Board is aware that some manufacturer training and certifications do not expire, and therefore, completion of a refresher course is not being required by the manufacturer. California Code of Regulations, title 23, chapter 16 (UST Regulations), section 2715(e) and (f) requires all training and certifications issued by a manufacturer to complete a manufacturer's refresher course at a time interval recommended by the manufacturer, but not to exceed 36 months. Service Technicians and UST Installers that have not had manufacturer's training within 36 months cannot install, repair, upgrade, maintain, test, or inspect the equipment from that manufacturer until a refresher course has been completed. Furthermore, UPAs should reject test and inspection results from Service Technicians and UST Installers that have not renewed

³ https://www.waterboards.ca.gov/ust/cers/ru11_accepted_status.html

the manufacturer training. For additional detailed guidance, please reference [Local Guidance \(LG\) 167-2](#)⁴.

For additional information regarding manufacturer training and certifications, contact: Jenna Hartman at (916) 327-8563 or Jenna.Hartman@waterboards.ca.gov.

Office of Tank Tester Licensing Webpage Updates

The Office of Tank Tester Licensing (OTTL) has updated [LG-105](#)⁵ on the [OTTL website](#)⁶ to reflect the current list of State Water Board Licensed Tank Testers. In addition to LG-105, the OTTL website offers links to OTTL Regulations, OTTL testing notification forms, and LG-113. The OTTL website also provides licensing information for applicants and study materials for the exam.

For additional information regarding the OTTL website updates, contact: Kaitlin Cottrell at (916) 319-0742 or Kaitlin.Cottrell@waterboards.ca.gov.

⁴ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/docs/lg-167-2.pdf

⁵ https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/105_12.html

⁶ https://www.waterboards.ca.gov/ust/tank_testers/