CUPA Performance Evaluation

Supplemental Questionnaire -up to 75 Minutes-

State Water Resources Control Board (State Water Board)

<u>Underground Storage Tank (UST) Program:</u>

- 1. What parts of the UST Program are being implemented exceptionally well by the CUPA?
- 2. What parts of the UST Program could the State Water Board assist the CUPA with to improve implementation?

Single-Walled and Abandoned USTs:

- 1. How many single-walled UST systems are currently within the jurisdiction of the CUPA?
 - a. What is the strategy for ensuring all single-walled UST systems are removed before the December 31, 2025 deadline?
- 2. What is the enforcement process if a single-walled UST has not been removed by the December 31, 2025 closure deadline?
- 3. How many abandoned USTs are within the jurisdiction of the CUPA?
- 4. How are abandoned USTs being inspected and tracked?

Inspections:

- 1. Do staff conduct the annual UST compliance inspections during the annual monitoring certification?
- 2. How is a compliance inspection scheduled if staff are unavailable to meet on the date/time of the 48-hour notice?

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- 3. How are inspection report summaries provided to the UST owners/operators?
- 4. Describe how staff internally collect, maintain, and manage UST facility records, other program materials required by regulations, or guidance.
- 5. What is the process for collecting, maintaining, and managing return to compliance documentation?
- 6. When is a violation closed as "not resolvable"?

Enforcement:

- 1. Are there any local ordinances pertaining to the UST Program and if so, when were they last updated?
- 2. Has any formal enforcement (red tag, AEO, or jurisdiction attorney) been applied within the last three years?
- 3. When was the I&E plan last updated?
- 4. How is return to compliance verified for violations cited during the annual UST compliance inspection?
- 5. Describe any additional process for tracking and enforcing violations not corrected past 60 days?

UST Operating Permits:

1. How long is the UST operating permit valid for?

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- 2. Are UST operating permits issued at the same time or at different times based on individual facilities?
- 3. What software is used for UST Operating Permit issuance?
- 4. Is the UST Operating Permit issued under the UPFP?

Training:

- 1. What is the training process for new inspectors conducting UST inspections?
- 2. What is the process for maintaining training for each UST inspector?
- 3. Describe the training that occurs with Unified Program state agencies, if any.
- 4. Describe any training staff have attended that has been provided by other CUPA representatives.
- 5. Are all UST inspection staff signed up for the UST Email Subscription at: https://public.govdelivery.com/accounts/CAWRCB/subscriber/new?qsp=ust?