



# UST Program Update

## June 2024

### Paperless Report 6 Discrepancies

Currently, 77 Unified Program Agencies (UPAs) have been approved to submit the Semiannual Underground Storage Tank (UST) Program Report (Report 6) through paperless reporting. The State Water Resources Control Board (State Water Board) evaluates the California Environmental Reporting System (CERS) data of each UPA requesting paperless reporting for accuracy and completeness prior to approval. The paperless reporting approval is provided with the understanding that the information entered in CERS and included as part of the Report 6 is accurate in UST and inspection count, and Technical Compliance Rate (TCR) performance measures. With each report, the UPA certifies with the paperless Report 6 submittal that the data in CERS was verified for accuracy for that reporting period. Inaccurate data in CERS negatively impacts the State Water Board's required reporting to the United States Environmental Protection Agency.

The July-December 2023 Report 6 submittals found 43% of paperless reports had data discrepancies. UPAs providing incorrect data as part of the Report 6 submittal will be returned to the UPA for correction and considered late if the corrections are provided after the March 1 or September 1 deadlines. Report 6 discrepancies and late submissions are reviewed as part of the UPA evaluation. UPAs that had paperless Report 6 discrepancies or late submissions of Report 6 should consider reviewing Local Guidance (LG) 164 and may reach out to State Water Board staff for training on performing CERS data quality reviews.

For additional information regarding paperless reporting and Report 6, contact: Magnolia Busse at (916) 341-5870, or [Magnolia.Busse@waterboards.ca.gov](mailto:Magnolia.Busse@waterboards.ca.gov).

For data quality training, please contact:

Kaitlin Cottrell at (916) 319-0742 or [Kaitlin.Cottrell@waterboards.ca.gov](mailto:Kaitlin.Cottrell@waterboards.ca.gov).

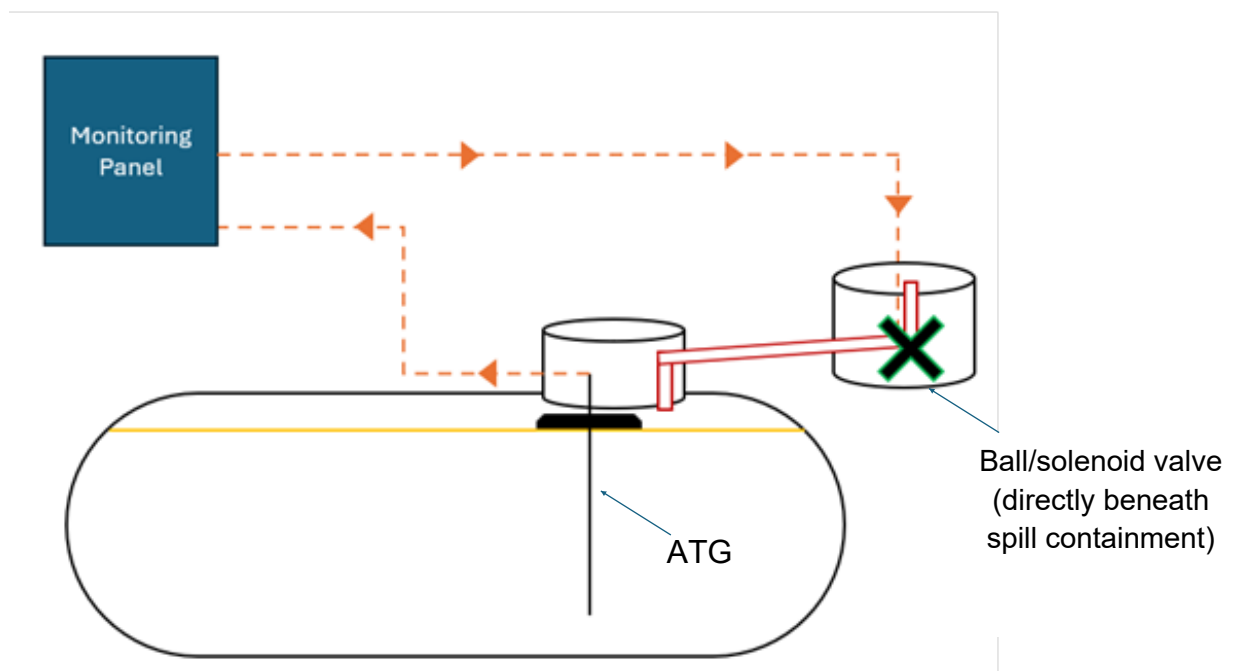
### Overfill Prevention Equipment for Waste Oil USTs

The State Water Board has been asked to provide additional guidance on overfill prevention equipment (OPE) methods for waste oil USTs. As discussed in previous

[monthly updates](#)<sup>1</sup>, using positive shut off OPE for waste oil USTs has been complicated due to problems associated with compatibility, flow rates, and removal of the drop tube to empty the waste oil tank. UPAs have asked the State Water Board if there are additional OPE methods available that meet the overfill prevention equipment requirement in California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations), section 2635(c)(1)(c).

The most common waste oil OPE devices are shut off valves where a float arm lifts as fluid rises in the tank and closes a ball valve in the drop tube, stopping flow into the tank (positive shut off). These OPE devices do not work for all UST configurations, such as USTs with a remote fill or direct bury spill containment, and therefore may not meet the requirements of UST Regulations, section 2635(c)(1)(c).

Another OPE method for waste oil USTs combines the automatic tank gauge (ATG) with a ball or solenoid valve located directly beneath the spill container to shut off the flow to the tank when the tank is filled to 95 percent of capacity. The ATG activates at 95 percent or less tank volume and the monitoring panels sends a relay signal to close the automated ball or solenoid valve beneath the spill containment stopping flow into the tank. This method can be utilized by systems where the spill containment is located within a sump or aboveground, and is depicted in the diagram below:



For additional information regarding OPE for waste oil USTs, contact:  
Tom Henderson at (916) 319-9128 or [Tom.Henderson@waterboards.ca.gov](mailto:Tom.Henderson@waterboards.ca.gov).

<sup>1</sup> [https://www.waterboards.ca.gov/ust/cupa/updates/docs/2023/may2023\\_ust.pdf](https://www.waterboards.ca.gov/ust/cupa/updates/docs/2023/may2023_ust.pdf)

## Designated UST Operator Visual Inspection

The State Water Board is aware of designated operators (DOs) prefilling the date for the owner or operator's signature in section VI of the DO visual inspection report. UST Regulations, section 2716(e)(2) requires that the owner or operator sign and date the report to acknowledge the results of the inspection.

While the DO may not be intentionally deceitful by prefilling the date, this does not meet UST Regulations, section 2716(e)(2) as the owner or operator is required to acknowledge the results of the DO inspection by signing and dating the report. Furthermore, it is a misrepresentation by the owner or operator if the date is added before or after the owner or operator signs the report. UPAs observing prefilled dates from the DO in section VI of the DO visual inspection report should cite this as a violation.

For additional information regarding DO visual inspection reports, contact:  
Jenna Hartman at (916) 327-8563 or [Jenna.Hartman@waterboards.ca.gov](mailto:Jenna.Hartman@waterboards.ca.gov).

## Office of Tank Tester Licensing Webpage Updates

The Office of Tank Tester Licensing (OTTL) has updated [LG-105](#)<sup>2</sup> on the [OTTL website](#)<sup>3</sup> 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](mailto:Kaitlin.Cottrell@waterboards.ca.gov).

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<sup>2</sup> [https://www.waterboards.ca.gov/water\\_issues/programs/ust/leak\\_prevention/lgs/105\\_12.html](https://www.waterboards.ca.gov/water_issues/programs/ust/leak_prevention/lgs/105_12.html)

<sup>3</sup> [https://www.waterboards.ca.gov/ust/tank\\_testers/](https://www.waterboards.ca.gov/ust/tank_testers/)