

Solano County CUPA Training

Underground Storage Tanks

Provided by Accent Communications, LLC
on Behalf of

Solano County Department of Resource Management,
Environmental Health Services

September 2, 2016

Acknowledgements

- Instructor: Paula Dueweke
- Additional information provided by:
 - California Environmental Protection Agency
 - State Water Resources Control Board
 - CalCUPA Forum Board
 - San Diego County Dept of Environmental Health
 - Sacramento Dept of Environmental Health

Topics

- Unified Program Overview
- Laws and Regulations
- Common Violations
- Designated Operator-basics
- Ultra Low Sulfur Diesel Corrosion
- Electronic Reporting

**Solano County is your
CUPA**

What are the CUPA Programs?

- Hazardous Materials Business Plan
- California Fire Code Hazardous Materials Management Plan (HMMP)
- Hazardous Waste Generator
- **Underground Storage Tanks**
- Aboveground Petroleum Storage Act
- Calif Accidental Release Program

Underground Storage Tanks

-Rules and Regulations

Where Are the Rules?

- **State Law - California Health and Safety Code (HSC), Division 20, Chapter 6.7**
- **Regulations – California Code of Regulations (CCR), Title 23, Division 3, Chapter 16**
- **Federal Law – U.S. Code, Title 42, Chapter 82, Subchapter IX**
- **Federal Regulations – 40 CFR Parts 280 and 281**
 - **Revised July 2015, effective October 31, 2015**

New Federal Requirements

- **Over and Above State Requirements:**
 - **Effective 10/13/2015**
 - New notification requirements
 - New testing requirements for repairs
 - New Statistical Inventory Reconciliation requirements
 - http://www.swrcb.ca.gov/water_issues/programs/ust/tech_notices/docs/ca_fed_regs.pdf
 - **State Water Board will Update Regulations**
 - Estimated to be published in 2017

Violation Consequences

- Administrative Enforcement Order (AEO)
- Civil Actions – Fines and legal restrictions
- Criminal Actions – Fines, imprisonment

Possible Penalties

- **An owner/operator** - Up to \$5,000 per day per tank per violation. HSC 25299(a), (b)
 - Failure to obtain a permit
 - Failure to repair, permit inspection, perform monitoring/testing, maintain records, report a release
 - Abandoning a tank system (including piping)
 - Improper closure of a tank system
- **A Person** - Up to \$10,000 per day per tank per violation. HSC 25299 (d) and (e)
 - Violation of a corrective action
 - Falsifies monitoring records
 - Disables or tampers with leak detection system
- **Jail time!**

Typical Violations in Solano County

The 'Top' Violations

- #7- Failure to have adequate overfill/spill prevention
- #6- Failure to provide annual leak detection system maintenance
- #5 - Failure to report adequate UST facility or tank information
- #4- Failure to have an owner/operator agreement

The 'Top' Three Violations

- #3- Failure to report a suitable site monitoring plan
- #2- Failure to obtain an operating permit
- #1 - Most common: Failure to report or document financial responsibility option

Underground Storage Tanks

-Designated Operator Basics

Designated Operator

■ Why

- Every UST Facility must have a Designated Operator

■ Who

- Anyone who has passed the CA UST System Operator exam: International Code Council (ICC)

■ Role

- Designated by the tank owner is responsible for:
 - Conducting monthly visual inspections
 - Training facility employees

Designated Operator

- The *Designated Operator (DO)* is not considered the UST “operator” as defined in HSC Chapter 6.7, although the same person may hold both positions
- HSC 25281(j):
 - ‘*Operator*’ means any person in control of, or having daily responsibility for, the daily operation of an underground storage tank system.

DO Monthly Visual Inspection...

- **Prepare monthly report addressing:**
- **Verify Monitoring system operability**
- **Review Alarm History**
 - **If monitoring system does not print the owner/operator is required to keep a manual written log of all alarms.**
 - **DO must review every month and attach a copy to the DO Monthly inspection summary report**
- **Research all alarms and assure that all have been responded to appropriately**

...DO Monthly Visual Inspection...

- **Inspect Spill Containers and UDCs**
- **Inspect all containment sumps**
 - **Check for proper placement of sensors (lowest point)**
- **Note: Sumps with an alarm in the past month must be inspected**
 - **Exception: if a qualified service technician responded to, and properly addressed, the cause of the alarm. Attach documentation verifying appropriate service.**

...DO Monthly Visual Inspection...

- **Verify all required testing and maintenance have been completed and all testing certifications are onsite**
- **Monthly D/O checklist testing dates must match testing certifications onsite**
- **Verify that all appropriate facility employees have been trained and documentation of training is available for inspector review**
- **Provide a copy of the report each month to owner or operator with detailed findings**

...DO Monthly Visual Inspection

- **Alert the owner/operator of any condition requiring follow-up**
- **Owner/operator of UST system is always responsible for any UST violation issued**
- **Owner/operator shall maintain a copy of the report and all attachments for the previous 12 months**

DO Employee Training...

- **Training required within 30 days of hire for new employees**
- **Required refresher every 12 months**
- **At least one trained facility employee must be present during normal operating hours**
- **A list of trained facility employees shall be maintained onsite and include:**
 - **Training dates**
 - **Hiring dates for all employees hired after 7/1/05**

...DO Employee Training

- **Training shall include**
 - **Operation of the UST system consistent with Best Management Practices**
 - **Monitoring equipment operation and alarm response**
 - **Spill/overfills response procedures**
 - **Emergency contact information and procedures**
 - **Recordable verse Reportable release**

Working with Your DO



4. INSPECT SPILL BUCKETS

DO Common Violations...

- **Monthly Inspection Summary Reports not available for review**
- **Failure to attach monitoring system tapes/log to Monthly Inspection Summary Reports**
- **Failure to attach a maintenance receipt when applicable**
- **The Designated Operator is not ICC certified**

...DO Common Violations

- **Incorrect testing dates on Monthly Inspection Summary Report**
- **Owner Statement of Designated Operator Compliance notification form has not been submitted to CUPA**
- **Facility employees are not trained**
- **Training records are incomplete or not on-site**

Underground Storage Tanks

Ultra Low Sulfur Diesel Corrosion Issues

UST Program Information

- http://www.swrcb.ca.gov/water_issues/programs/ust
- http://www.solanocounty.com/depts/rm/documents/hazardous_materials.asp/





Electronic Reporting:

Using CERS

The California Environmental Reporting System

Guidance Letters, FAQs, Help

- Guidance Letters-posted to CalEPA web site
- FAQs for Business and Regulator on CERS Central
- Help guides on CERS Central
- Training Portal (Requires a CERS Security Account)
- Your CUPA or PA
- CERS@calepa.ca.gov

UST SUBMITTALS

- **Step one: Find CERS**
- **Step two: Sign in**
- **Step three: Start...**

Step 3 Making the Submittal: Start...

The screenshot displays the CERS Business web application interface. At the top, a green navigation bar contains the text "CERS Business" and five buttons: "Home", "Submittals", "Facilities", "Compliance", and "My Business". Below this is a dark grey banner with the text "Home: Dans Farm" and a smaller "Home" link. The "Common Tasks" section features four colored boxes: a green "START" button for "Start Facility Submittal", a yellow "Add Facility" button, a pink "People/Users" button, and a purple "Contact Your Local Regulator(s)" button. The "Facilities" section includes "Add Facility..." and "Search..." buttons above a table. A red arrow points from the "Start Facility Submittal" button to the "Start / Edit Submittal" button in the table.

CERS Business

Home Submittals Facilities Compliance My Business

Home: Dans Farm
Home

Common Tasks

- START Start Facility Submittal**
CERS will help walk you through the forms and documents required for your facility(s).
- Add Facility**
If you are new to CERS, or must add new facility(s), the Add Facility pages will ensure you get started correctly!
- People/Users**
You can allow/manage other people in your business who need to view or edit your facility reporting.
- Contact Your Local Regulator(s)**
Find contact information for your facility's local regulator(s).

Facilities Add Facility... Search...

	Facility Name	Address	Last Submittal	CERS ID
Start / Edit Submittal	Dans Farm	260 Hamilton Ave, Palo Alto 94301	10/2/2015	10160774

Pick a Previous Submittal

Training Use Only! Perform Official Submittals Here

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Start New Submittal ×

Submittal Element: *Facility Information*

I would like to start my submittal...

Based upon my submittal of 8/15/2013 (Submitted) ▾

You must update/replace any out-of-date data

From scratch


35

CERS Creates Draft Data

The screenshot displays a web application interface with four main sections, each representing a different type of draft data. Each section includes a title, a status (DRAFT), a date, and a 'Submit' button. Below each title are links to various data entry points and actions.

- Facility Information** (DRAFT Nov. 3, 2014):
 - Business Activities (Ready to Submit, Edit)
 - Business Owner/Operator Identification (Ready to Submit, Edit)
 - Discard Draft Submittal
 - Miscellaneous State-Required Documents
 - Add Comment To Regulator
- Hazardous Materials Inventory** (DRAFT Nov. 3, 2014):
 - Hazardous Material Inventory (23) (Add Material, Ready to Submit with warnings, Discard)
 - Site Map (Official Use Only): Upload Document(s) (4) (Ready to Submit, Edit, Discard)
 - Discard Draft Submittal
 - Miscellaneous State-Required Documents
 - Add Comment To Regulator
- Emergency Response and Training Plans** (DRAFT Nov. 3, 2014):
 - Emergency Response/Contingency Plan: Upload Document(s) (Ready to Submit, Edit, Discard)
 - Employee Training Plan: Provided Elsewhere in CERS (Ready to Submit, Edit, Discard)
 - Discard Draft Submittal
 - Miscellaneous State-Required Documents
 - Add Comment To Regulator
- Underground Storage Tanks** (DRAFT Oct. 10, 2014):
 - UST Facility Operating Permit Application (Ready to Submit, Edit, Discard)

Click to Make Changes

 If there has been NO CHANGE in the HMBP submittal elements (*Facility Information, Hazardous Material Inventory, and Emergency Response/Training Plans*) since the last submittal, you may select the following button to prepare them.



Create All HMBP Submittal Elements



Facility Information

SUBMITTED Jan. 25, 2016

Start 

Not Applicable

 [Business Activities](#) 




 [Business Owner/Operator Identification](#) 


Hazardous Materials Inventory

SUBMITTED Jan. 25, 2016

Start 

Not Applicable

 [Hazardous Material Inventory \(2\)](#)  


 [Site Map \(Official Use Only\): Provided to Regulator](#)

Emergency Response and Training Plans

SUBMITTED Jan. 25, 2016

Start 

Not Applicable

 [Emergency Response/Contingency Plan: Exempt](#)

 [Employee Training Plan: Exempt](#)

Financial Responsibility

Facility Type

- Motor Vehicle Fueling Fuel Distribution Farm Processor
 Other

BOE Number

44345678

Is the facility located on Indian Reservation/Trust lands?

- Yes No

Property Owner

Owner Name

Dan

Phone

408-857-5766

Mailing Address

PO Box 1362

City

Felton

State

ca

ZIP/Postal Code

5018

Country

United States

[For International Address](#)

PO Box 1362

City

Felton

State

ca

ZIP/Postal Code

95018

Country

United States

[For International Address](#)

Tank Owner

Owner Name

Dan

Phone

408-857-5766

Mailing Address

PO Box 1362

City

Felton

State

ca

ZIP/Postal Code

950189

Country

United States

[For International Address](#)

Tank Owner Type

- Local Agency/District County Agency State Agency
 Federal Agency Non-Government

Permit Holder Information

Permit Holder Notification Information

- Facility Owner Facility Operator Tank Owner Tank Operator

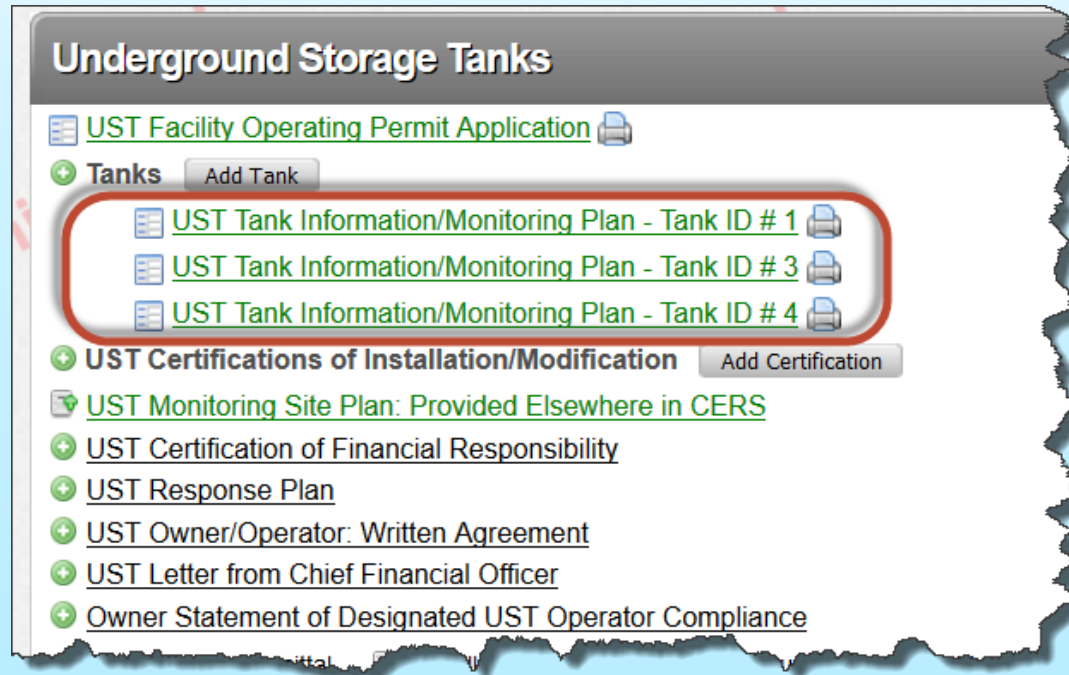
Supervisor of Division, Section, or Office (Required for Public Agencies Only)

Financial Responsibility Mechanism(s)

Indicate which approved mechanism(s) are being used to show financial responsibility either as contained in the federal regulations (40 CFR, Part 280, Subpart H, Sections 280.93 through 280.107) or CCR, Title 23, Division 3, Chapter 18, Section 2808.1.

- Self-Insured Surety Bond State Fund and CFO Letter Other Mechanism (specify below)
 Guarantee Letter of Credit State Fund and CD
 Insurance Exemption Local Government Mechanism

Don't Renumber Tanks!



- Renumbering a tank creates a new tank record. This means CERS shows more tanks than you actually have
- Extra tank records cannot be deleted after they are accepted

Entering Tank Information

Tank Description

Tank ID # 1 <input type="button" value="Edit"/>	Date UST System Installed <input type="text"/>	Tank Configuration <input checked="" type="radio"/> A Stand-alone Tank <input type="radio"/> One in a Compartmented Unit
Tank Manufacturer <input type="text"/>	Date Existing UST Discovered <input type="text"/>	Number of Compartments in the Unit <input type="text" value="1"/>
Tank Capacity In Gallons <input type="text" value="5000"/>	Date UST Permanently Closed <input type="text"/>	Additional Description <input type="text"/>

Tank Use and Contents

Tank Use <input checked="" type="radio"/> Motor Vehicle Fueling <input type="radio"/> Marina Fueling <input type="radio"/> Aviation Fueling <input type="radio"/> Chemical Product Storage <input type="radio"/> Hazardous Waste (includes used oil) <input type="radio"/> Emergency Generator Fuel <input type="radio"/> Other Generator Fuel <input type="radio"/> Unknown	Tank Contents Read This First <input checked="" type="radio"/> Regular Unleaded <input type="radio"/> Premium Unleaded <input type="radio"/> Midgrade Unleaded <input type="radio"/> Diesel <input type="radio"/> Jet Fuel <input type="radio"/> Aviation Gas <input type="radio"/> Used Oil <input type="radio"/> Petroleum Blend Fuel <input type="radio"/> Other Petroleum
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Tank Construction

Type of Tank Read This First <input checked="" type="radio"/> Single Wall <input type="radio"/> Double Wall <input type="radio"/> Unknown	Primary Containment <input checked="" type="radio"/> Steel <input type="radio"/> Fiberglass <input type="radio"/> Internal Bladder <input type="radio"/> Steel + Internal Lining <input type="radio"/> Unknown <input type="radio"/> Other	Secondary Containment <input type="radio"/> Steel <input type="radio"/> Fiberglass <input type="radio"/> Exterior Membrane Liner <input type="radio"/> Jacketed <input checked="" type="radio"/> None <input type="radio"/> Unknown
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Uploading a Monitoring UST Site Plan

Underground Storage Tanks DRAFT Feb. 9, 2015

[UST Facility Operating Permit Application](#) Ready to Submit

Tanks

- [UST Tank Information/Monitoring Plan - Tank ID # 1](#) Ready to Submit
- [UST Tank Information/Monitoring Plan - Tank ID # 3](#) Ready to Submit
- [UST Tank Information/Monitoring Plan - Tank ID # 4](#) Ready to Submit

UST Certifications of Installation/Modification

- [UST Monitoring Site Plan](#)
- [UST Certification of Financial Responsibility](#)
- [UST Response Plan](#)
- [UST Owner/Operator: Written Agreement](#)
- [UST Letter from Chief Financial Officer](#)
- [Owner Statement of Designated UST Operator Compliance](#)

- **Failure to provide a suitable Monitoring UST Site Plan is the third most common UST violation in Solano County- reported 115 times**

Uploading a Monitoring UST Site Plan

UST Monitoring Site Plan: Dans Test Site

Home » Prepare Submittal (10138123) » UST: UST Monitoring Site Plan (Draft)

Instructions/Help

UST Monitoring Site Plan Documentation

UST monitoring plans must include a Site Plan showing the general tank and piping layouts and the locations where monitoring is performed (i.e., location of each sensor, line leak detector, monitoring system control panel, etc.). A UST monitoring site plan template is available from the State Water Resources Control Board [here](#). If your facility's Hazardous Materials Inventory site map shows all the required information, select the "Provided in Other Submittal Element" option on the left side of this web form and then select from "Hazardous Materials Inventory."

To upload a document, select the **Browse** button and then the file on your computer to upload, provide a document title, and then select **Save & Finish** to complete the upload. Use of other document options shown on the left (e.g., Exempt) must be approved by your local regulator.

Document Options

- Upload Document(s)
- Public Internet URL
- Provided Elsewhere in CERS
- Provided to Regulator
- Stored at Facility
- Exempt

Document Upload(s)

[CERS Document Upload Policy](#)

Upload Document

No file selected.

Date Authored (Required)

2/11/2016

Document Title (Required)

UST Monitoring Site Plan

Description/Comments (Optional)

Completing the UST Submittal Element

Underground Storage Tanks

[UST Facility Operating Permit Application](#)

+ Tanks [Add Tank](#)

- [UST Tank Information/Monitoring Plan - Tank ID # 1](#)
- [UST Tank Information/Monitoring Plan - Tank ID # 3](#)
- [UST Tank Information/Monitoring Plan - Tank ID # 4](#)

+ UST Certifications of Installation/Modification [Add Certification](#)

- [UST Monitoring Site Plan: Provided Elsewhere in CERS](#)
- [UST Certification of Financial Responsibility](#)
- [UST Response Plan](#)
- [UST Owner/Operator: Written Agreement](#)
- [UST Letter from Chief Financial Officer](#)
- [Owner Statement of Designated UST Operator Compliance](#)

Save and Submit

The screenshot displays two main sections of a web application interface:

- Facility Information:** This section is at the top and includes a 'Submit' button in the top right corner. Below the title, there are two items: 'Business Activities' and 'Business Owner/Operator Identification', both with 'Ready to Submit' status and 'Edit' buttons. Below these items are three links: 'Discard Draft Submittal', 'Miscellaneous State-Required Documents', and 'Add Comment To Regulator'.
- Hazardous Materials Inventory:** This section is below the first one and also includes a 'Submit' button in the top right corner. Below the title, there are two items: 'Hazardous Material Inventory (2)' with an 'Add Material' button, and 'Site Map (Official Use Only): Provided to Regulator'. Both items have 'Ready to Submit' status and 'Discard' buttons. Below these items are three links: 'Discard Draft Submittal', 'Miscellaneous State-Required Documents', and 'Add Comment To Regulator'.

A red rounded rectangle highlights the left-hand side of both sections, containing the item titles and their associated icons. A red arrow originates from the top of this highlighted area and points to the 'Submit' button in the 'Hazardous Materials Inventory' section.

Proof you are done...

The screenshot shows the CERS Business website interface. At the top, there is a green navigation bar with the text 'CERS Business' and several buttons: 'Home', 'Submittals', 'Facilities', 'Compliance', and a partially visible 'M'. Below this is a dark grey banner with the text 'Submittal Finished: Dans Farm'. Underneath the banner is a breadcrumb trail: 'Home » Draft Submittal » Submittal Finished (10160774)'. The main content area is divided into two columns. The left column features a green circular icon with a white checkmark. To its right, there are two sections of text. The first section states: 'You have submitted the following elements on 1/25/2016 to **Santa Clara County Environmental Health**' followed by a bulleted list: '• Facility Information'. The second section states: 'You have submitted the following elements on 1/25/2016 to **Palo Alto City Fire Department**' followed by a bulleted list: '• Hazardous Materials Inventory' and '• Emergency Response and Training Plans'. Below this list is a green button with the text 'Print Submittal' and a printer icon. The right column has a section titled 'What's Next?' with two bullet points: '• Return to the [Draft Submittal](#)' and '• Return to [Facility Home](#)'. A large, semi-transparent red watermark with the word 'Training' is visible in the bottom right corner of the screenshot.

Get Help

- If you aren't sure, get help
- Contact Soiano County CUPA at 707-784-6765

Helpful Resources

- **Solano County CUPA**

- **Website:**

- https://www.solanocounty.com/depts/rm/environmental_health/hazmat/default.asp

- **California Environmental Reporting System (CERS)**

- **CalCUPA Forum**

- **Website:** <https://calcupa.org/video-library.html>

- **Sacramento CUPA YouTube Videos**

- https://www.youtube.com/playlist?list=PLuGev7RbJOmZbBBv1cgoSB9q-EdQ76er_

- **5 short video clips worth watching**

Sacramento County Environmental Management Channel
Features compliance "How to" and informational videos about the department's environme... Show more



UST Inspections & Maintenance

EMDInfo1 • 10 videos • 252 views • Last updated on Jun 15, 2015

Underground Storage Tank (UST) Inspections & Maintenance videos

▶ Play all ◀ Share + Save

1  **UST Compliance Series -- 01: UST Overview & Inspection Basics**
by EMDInfo1

2  **UST Compliance Series -- 02: Sensors**
by EMDInfo1

3  **UST Compliance Series -- 03: Spill Buckets**
by EMDInfo1

4  **UST Compliance Series -- 04: Overfill Prevention**
by EMDInfo1

5  **UST Compliance Series -- 05: Designated Operator**
by EMDInfo1

Questions?

**Solano County Department of Resource Management,
Environmental Health Services Division**

Contact the Hazardous Materials Staff at 707-784-6765