



SINGLE-WALLED UST OUTREACH AND RUST

Johnny Wales—Environmental Specialist/Project
Manager, Redhorse Corporation

McLean Reich—RUST, EAR, & Reporting Section
Manager, SWRCB



AGENDA

- **JOHNNY:**

- Single-Walled UST (SWT) population updates
- What has Johnny been doing to accelerate SWT closure rates?

- **MCLEAN:**

- RUST overview/updates
- Common RUST application problems

BRACE YOURSELF

**POWERPOINT SLIDES ARE
COMING**



CA SWT UNIVERSE

HOW MANY SWTS ARE LEFT?

WHERE ARE THEY?

HOW ARE THEY USED?



SWT UNIVERSE—CLOSURE PROGRESS

- US EPA's recent **Semi-Annual Leak Prevention Reports** are available at <https://www.waterboards.ca.gov/ust/docs/>

- From Jan – Dec 2021 SALP Report
 - (CERS data pulled **4/1/22**):

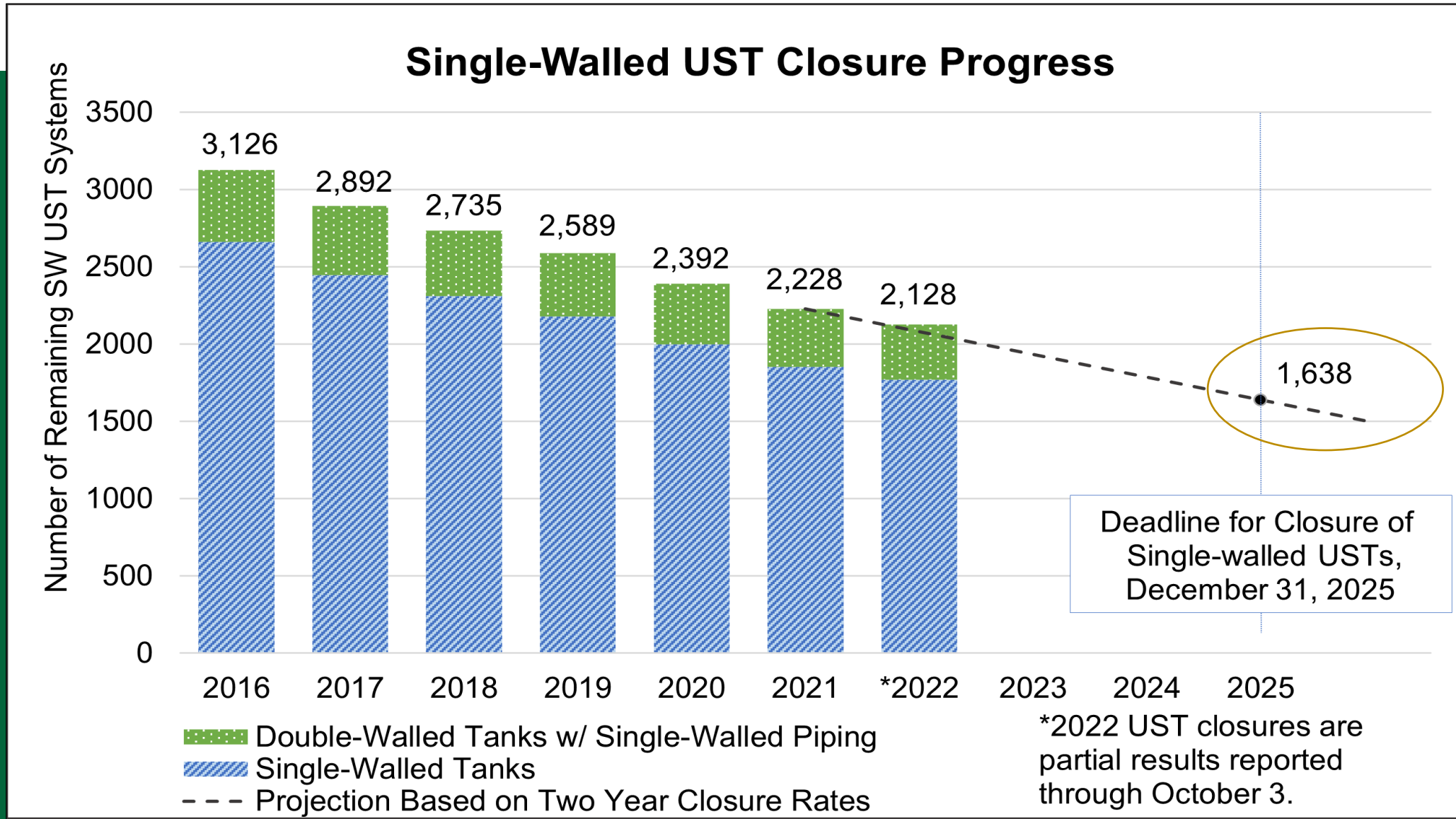
California Single-Walled USTs			
	SW Tank	DW Tank SW Piping	Total
USTs	1,838	535	2,373
Facilities	666	312	962

- From Jan – Jun 2022 SALP Report
(CERS data pulled **10/3/22**):

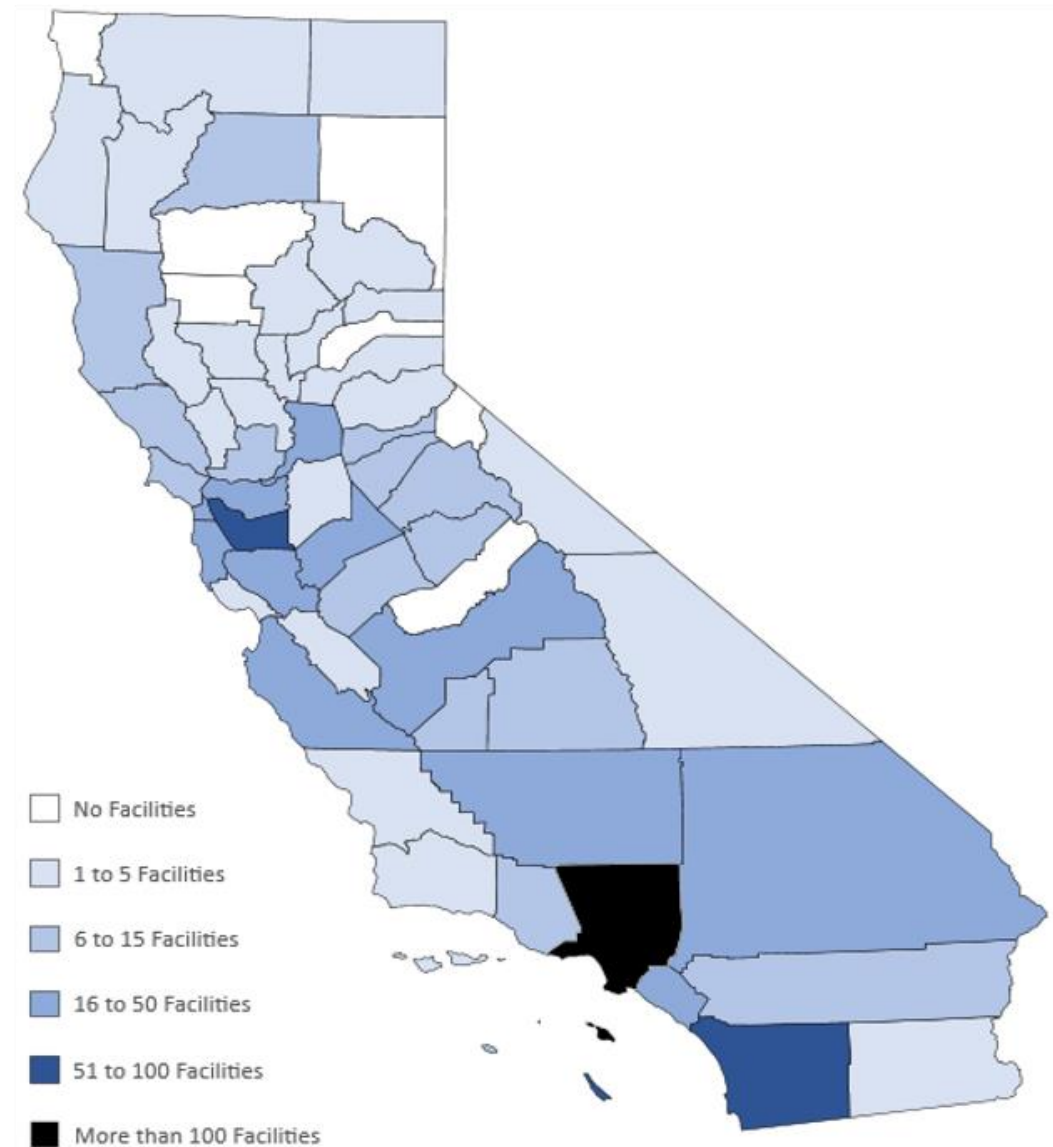
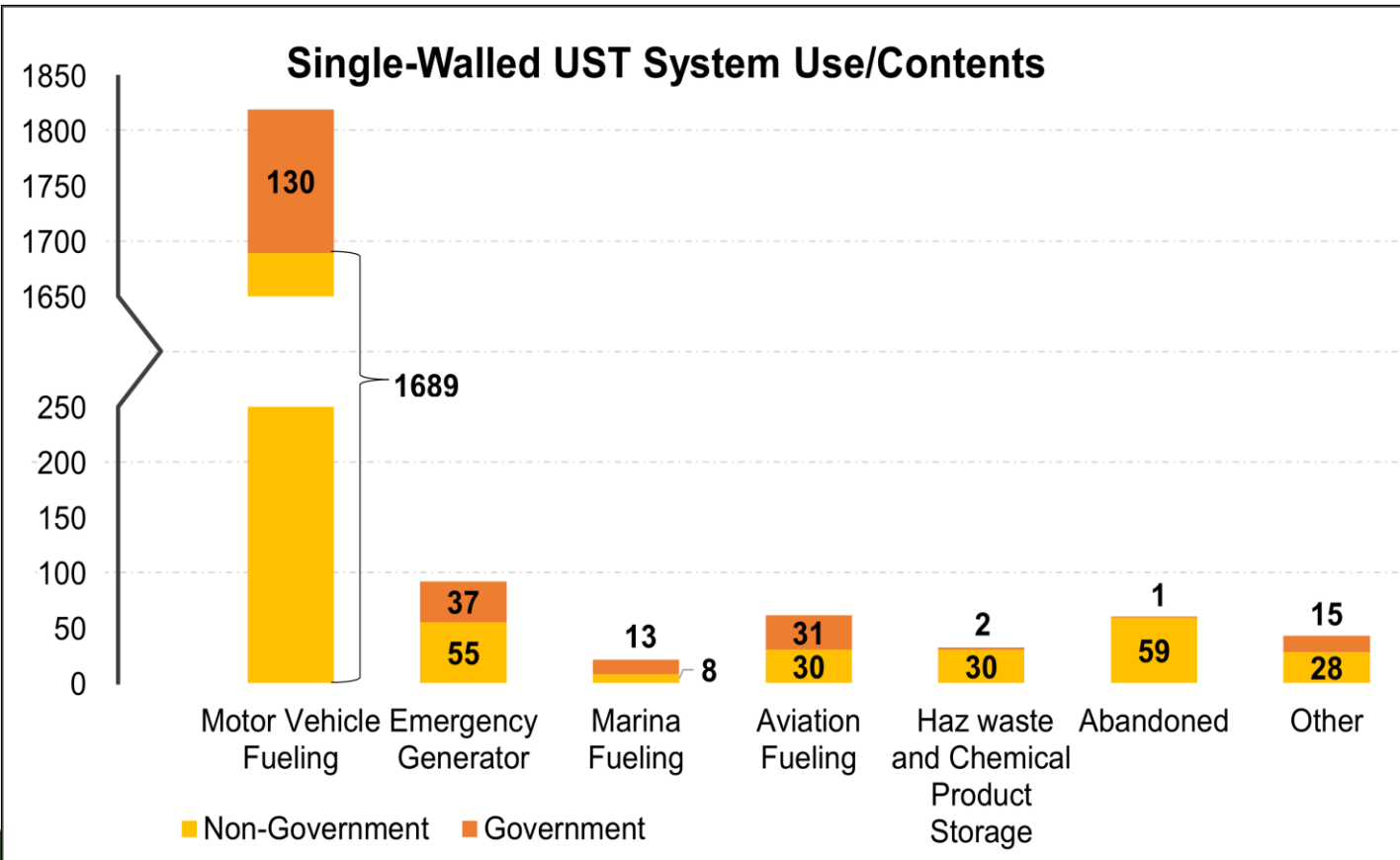
California Single-Walled USTs			
	SW Tank	DW Tank SW Piping	Total
USTs	1,770	358	2,128
Facilities	639	173	807



SWT UNIVERSE—PROJECTED CLOSURES



SWT NUMBERS



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25th California Unified Program
Annual Training Conference
March 20-23, 2023

SWTS AND NEW UNAUTHORIZED RELEASES

- Since **1/1/2017**:
 - **66/840 DW UST** Closures/Upgrades have resulted in discovery of a new release
 - **7.8%**
 - **146/618 SW UST** Closures/Upgrades have resulted in discovery of a new release
 - **23.6%**



***HOW IN THE CERS* ARE SALPR NUMBERS GENERATED?**

UST Facility/Tank Data Download Report and/or Consolidated Report: These reports capture the most recent submittal data for each CERS Tank ID (from facilities with an accepted UST submittal)

UST Data Download

UST Facility/Tank Data Download

Generates an Excel file containing UST Facility / Tank data that has been "Accepted" by Regulators.

UST Consolidated Facility/Tank Data Download For US EPA

This report is a subset of the CERS UST Facility/Tank Data Download report. It generates an Excel file formatted for US EPA.



FROM WHICH UST SITES?

UST Facility/Tank Data Download is checked against *UST Reporting Requirement* shown in UST Facility Search Report: UST Facilities marked as **Not Applicable** are treated as not having regulated USTs.

Facility / Tank / Monitoring Summary Reports

UST Facility Search

Provides a list of sites that are or were a UST site, including sites that reported a UST submittal or had a reported UST inspection, grouped by Regulator.



WHICH FIELDS TELL US IF UST IS ACTIVE?

- UST Tank Type of Action and Date UST Permanently Closed: Is the UST in question still active? Is it now regulated under APSA?

Type of Action

Type of Action (UST Tank)
Renewal Permit

Date UST Permanently Closed

-

Type of Action

Type of Action (UST Tank)
UST Removal

Date UST Permanently Closed

4/27/2022

WHICH FIELDS DENOTE DW/SW?

- **Type of Tank and Product / Waste Piping Construction: Is it SW or DW?**

Tank Construction

Type of Tank
Single Wall

Primary Containment
Fiberglass

-

Product / Waste Piping Construction

Piping Construction
Single-walled

Piping System Type
Conventional Suction

Primary Containment
Unknown

-



LIMITATIONS OF CERS

- Reality is complex and may be difficult to 100% describe using tank form fields in CERS. *SEE*: double-walled waste oil tanks with no connected product piping and single-walled fill risers
- Open-ended fields can be helpful, but are not mandatory submittal fields
- Sites with no accepted UST submittals are not captured in statewide reports. What to do with abandoned sites with no responsible owner or operator?



SWT SITES IN GEOTRACKER

- Historically used mainly to track Cleanup projects, Redhorse Corporation, at the direction of US EPA, has assisted with importing curated and reinterpreted SWT data into [GeoTracker](#)
- SWT webpages are now available to the public at <https://geotracker.waterboards.ca.gov/>
- GeoTracker allows for data entry by UST staff to describe things that might not be captured in statewide CERS reports, and tracking of site subsets via new and different fields



SWTs, GeoTracker, and Cleanup

- Upon SWT Closure, Cleanup agencies are able to change SWT pages into **LUST cases** or **Non-cases** as needed
- As Cleanup agency staff do not use **CERS**, prepopulated SWT sites will give a better starting point in their management of **Cleanup** cases
- Any **Regulator User** of **GeoTracker** with the correct permissions can enter Activity Notes, update Case Status, upload documents, etc.



PUBLIC SWT SITES IN GEOTRACKER

- One goal is to improve **transparency**, per Hendersonian *glasnost* policy—“exactly *which* sites are being called ‘**single-walled?**’ ”
 - Johnny invites any and all questions, criticisms, clarifications... We just want to be accurate, and this is a lot of complex data to manage in aggregate... **EXCEL** is the way...
- Public database will help SWT businesses connect with UST contractors. [New SWT Contact List](#) is posted on [SW webpage](#)



GEOTRACKER—SEARCH BY... FACILITY NAME



STATE WATER RESOURCES CONTROL BOARD GEOTRACKER



Tools

Reports

UST Case Closures

How to Use GeoTracker

ESI

WEST ADAMS PETROLEUM

Projects

WEST ADAMS PETROLEUM INC. (UST100019235)

1691 W ADAMS BLVD, LOS ANGELES, CA 90007

Site Type: Single-Walled UST - **Status:** SWT-No Plan Returned

[VIEW ON MAP](#) | [VIEW INFORMATION](#)

GEOTRACKER—SEARCH BY... ADDRESS OR CERS ID

1691 w adams

Projects

WEST ADAMS PETROLEUM INC. (UST100019235)

1691 W ADAMS BLVD, LOS ANGELES, CA 90007

Site Type: Single-Walled UST - **Status:** SWT-No Plan Returned

[VIEW ON MAP](#) | [VIEW INFORMATION](#)

10245940

Projects

WEST ADAMS PETROLEUM INC. (UST100019235)

1691 W ADAMS BLVD, LOS ANGELES, CA 90007

Site Type: Single-Walled UST - **Status:** SWT-No Plan Returned

[VIEW ON MAP](#) | [VIEW INFORMATION](#)



GEOTRACKER—EXPORT SWT LIST: STEP 1

- Tools > Advanced Search

CA.GOV

STATE WATER RESOURCES CONTROL BOARD
GEOTRACKER

Home Tools Reports UST Case Closures How to Use GeoTracker ESI

Advanced Search
Download Data
Download ESI Data
GAMA GIS
GeoTracker Map

Search



GEOTRACKER—EXPORT SWT LIST: STEP 2

- Deselect all unwanted Site Types and hit the “Search” button at the bottom of the page...

SITE / FACILITY TYPE(S) - [INFO](#) - [CHECK ALL](#) / [CHECK NONE](#)

- Leaking Underground Storage Tank (LUST) Cleanup Sites
- Cleanup Program Sites
- Land Disposal Sites
- Military Sites
- WDR Sites
- Irrigated Lands Regulatory Program
- AGLand Domestic Wells
- Sampling Points - Public
- Permitted Underground Storage Tank (UST) Facilities
- Single-Walled UST Sites
- Non-Case Information Sites
- Project Sites
- Confined Animal Sites

Search



SWT LIST IS COMPILED

PROJECT SEARCH RESULTS

SEARCH CRITERIA: SWUST

831 RECORDS FOUND

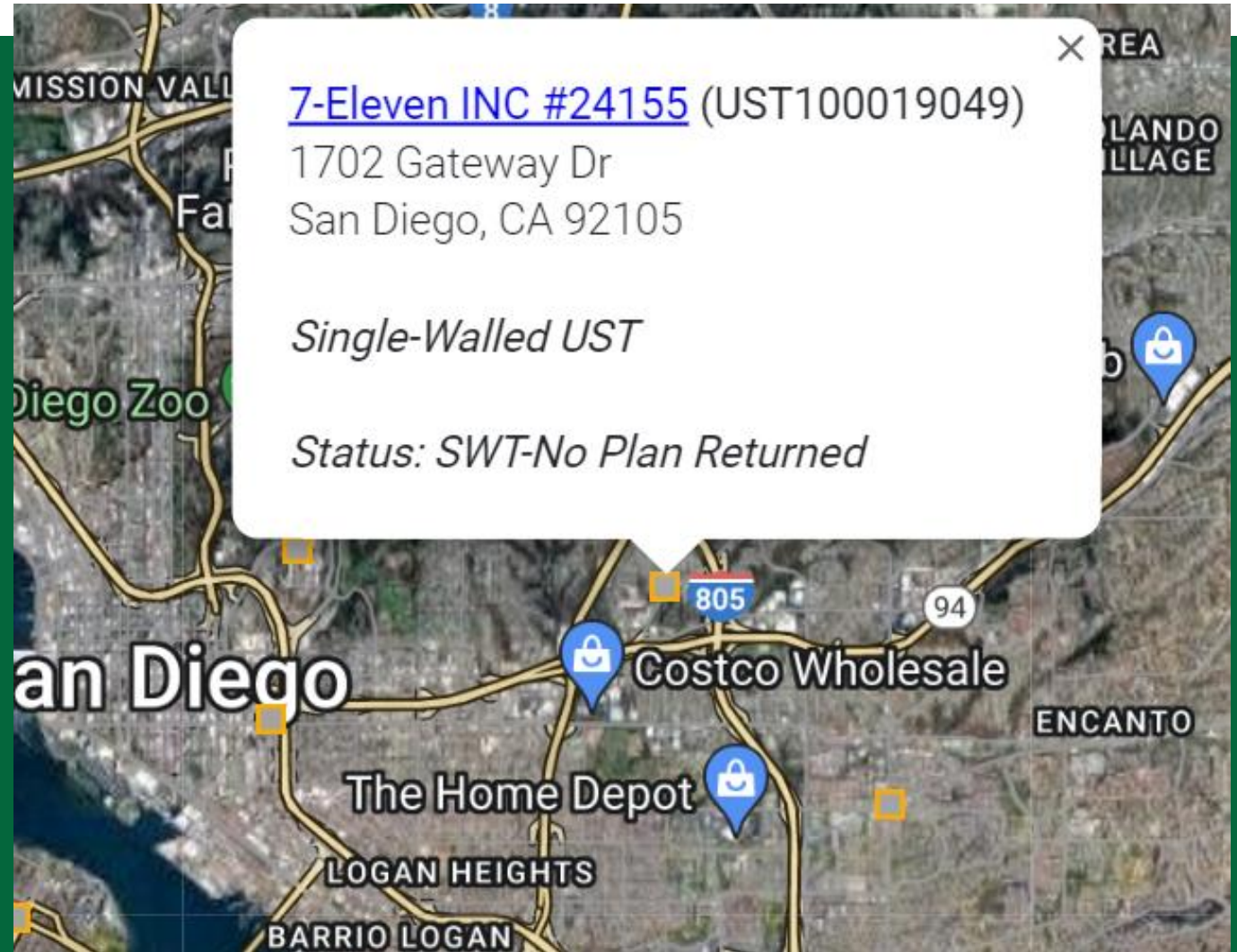
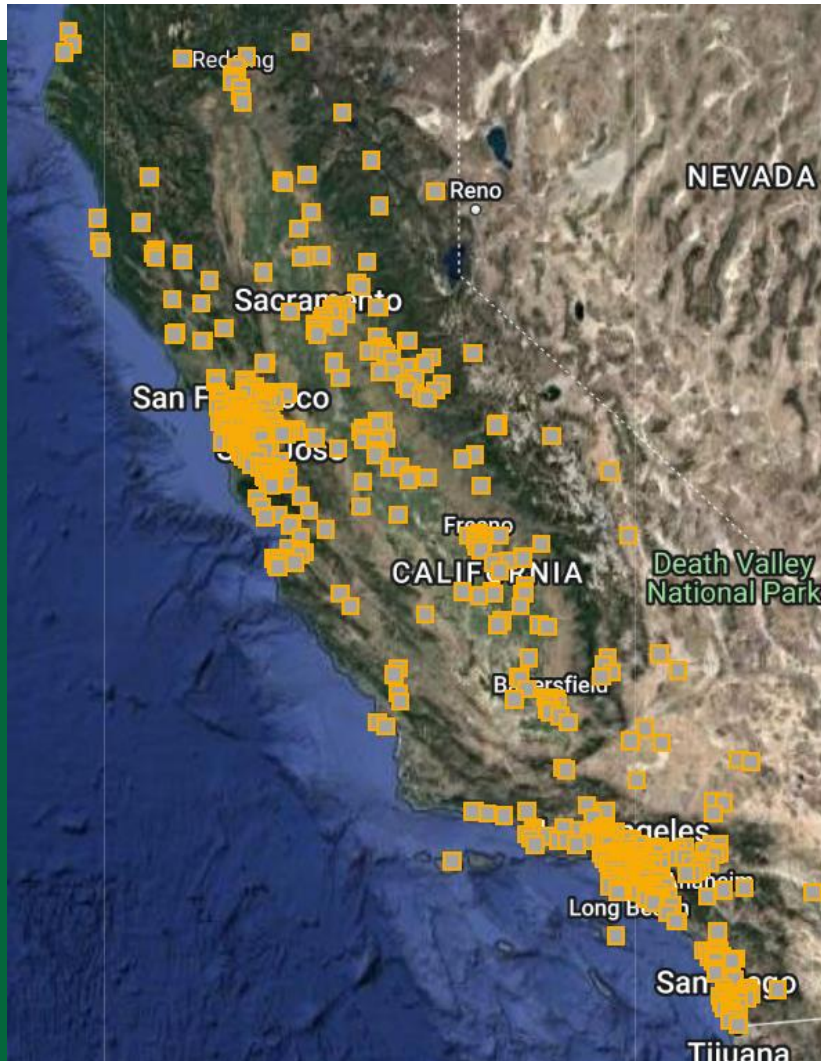
[VIEW RESULTS ON MAP](#)

[EXPORT TO EXCEL](#)

	SITE / FACILITY NAME	SITE / FACILITY TYPE	STATUS	ADDRESS (OR PARTIAL ADDRESS)
[REPORT] [MAP]	"THE GRIZZLY BEAR"	SINGLE-WALLED UST	SWT-NO PLAN RETURNED	1075 HIGHWAY 4
[REPORT] [MAP]	#1002 JACO OIL CO	SINGLE-WALLED UST	SWT-NO PLAN RETURNED	3101 STATE RD
[REPORT] [MAP]	#2209 SHORT STOP LIQUOR	SINGLE-WALLED UST	SWT-NO PLAN RETURNED	10000 MAIN ST
[REPORT] [MAP]	#2210 DULAI'S	SINGLE-WALLED UST	USTS PERMANENTLY CLOSED - REPORT PENDING	1915 N CHESTER AVE



MAPPING SWT FACILITIES



SWT LANDING PAGES... "WHAT ARE WE TRACKING, AGAIN?"

- "Regulatory Activities" and uploaded documents
- Case Status

7-ELEVEN INC #24155 (UST100019049) - [\(MAP\)](#) [SIGN UP FOR EMAIL ALERTS](#)

1702 GATEWAY DR
SAN DIEGO, CA 92105
SAN DIEGO COUNTY
SINGLE-WALLED UST ([INFO](#))
SWT-NO PLAN RETURNED AS OF 5/2/2022 - [DEFINITION](#)
[PRINTABLE CASE SUMMARY / CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES
SAN DIEGO RWQCB (REGION 9) *(LEAD)*

[Summary](#) [Cleanup](#) [Action Report](#) [Regulatory Activities](#) [Environmental Data \(ESI\)](#) [Site Maps / Documents](#) [Community Involvement](#) [Related Cases](#)

Regulatory Activities

Action Type Filter: ▼

INCLUDE ACTIVITIES FOR ASSOCIATED CASES

* **Indicates a revised due date**

	ACTION TYPE	ACTION	ACTION DATE	RECEIVED / ISSUE DATE	TITLE / DESCRIPTION / COMMENTS
--	-------------	--------	-------------	-----------------------	--------------------------------

[VIEW DOCS]	Notices	Letter - Notice	10/29/2021	10/29/2021	Notice to submit a UST Closure Commitment Plan regarding the permanent closure of single-walled underground storage tank systems
[VIEW DOCS]	Notices	Letter - Notice	6/12/2019	6/12/2019	Single-walled Tank Initiative Notice

“VIEW DOCS,” eh?



State Water Resources Control Board

June 12, 2019

7-Eleven INC #24155

Attention: [REDACTED] - Franchisee
1702 Gateway Drive
San Diego, CA 92105

NOTICE ON THE PERMANENT CLOSURE OF SINGLE-WALLED UNDERGROUND STORAGE TANK SYSTEMS AND STATE WATER RESOURCES CONTROL BOARD FUNDING OPPORTUNITIES

Dear [REDACTED]

This letter serves as notice that the underground storage tank (UST) system located at the facility identified above, for which you have been identified as the owner/operator, is constructed



- Johnny is required to maintain SWT correspondence records, *new and historical*, **unredacted**, in GeoTracker
- Other Regulator users can upload, too

WHAT DO THE 7 SWT SITE TYPE STATUS OPTIONS TRACK?

- UST Closure Commitment Plan outreach:
 - “**CONFIRMED PLAN**” vs. “**NO PLAN RETURNED**”

ACTIVITY TYPE	ACTION DATE	RECEIVED / ISSUE DATE	RESPONSE DATE	TITLE / DESCRIPTION / COMMENTS
State Water Board Facilitated Project Plan/Summary	11/2/2021	11/2/2021		UST Closure Commitment Plan
Letter - Notice	10/29/2021	10/29/2021		Notice to submit a UST Closure Co

estimate does not include tank installation costs ☹

When will you permanently close the single-walled UST system(s) currently at your facility? (If needed, provide comments in the space provided.)

2021 2022 2023 2024 2025

Estimated to replace tanks late 2023 or early 2024 depending upon availability of equipment

When will you contact a UST contractor about the work necessary to close the single-walled UST system(s) at your facility?

Plans get uploaded upon receipt



STATUS MEANINGS



- Are all SWTs permanently closed?
 - “**PERMANENTLY CLOSED – REPORT PENDING**” vs. “**PERMANENTLY CLOSED – REPORT RECEIVED**”
- Is SWT site part of SWRCB Office of Enforcement’s **RAT** (Removal of Abandoned Tanks) initiative, or owned by a **federal** agency?
 - “**ABANDONED SWT**” and “**FEDERALLY OWNED SWT**”



STATUS MEANING—“SAFE SUCTION VERIFIED BY CUPA”

- Have all USTs at the site been explicitly confirmed by the CUPA to be double-walled, with single-walled **safe suction** piping meeting the exemption criteria of **23 CCR div 3, chp. 16, sec. 2636(a)(3)**?
- The main sticking point is subparagraph **(D)**:
 - “An ***inspection method is provided*** which readily demonstrates compliance...”



GEOTRACKER REGULATOR-ONLY FEATURES

- SWT Summary Report (still in Beta):

CALENVIROSCREEN 4.0 PERCENTILE:

RUST STATUS:

SINGLE-WALLED UST (SWT) STATEWIDE SUMMARY REPORT BY

ORGANIZATION NAME	Total SWT Sites	Abandoned SWT	Federally Owned SWT	SWT-Confirmed Plan	SWT-No Plan Returned	Safe Suction Piping Verified by CUPA	USTs Permanently Closed - Report Pending	USTs Perma Rep
ALAMEDA	4	0	0	1	3	0	0	
ALPINE	0	0	0	0	0	0	0	
AMADOR	0	0	0	0	0	0	0	

- Generates distribution of remaining SWT sites by: Regional Board boundary, county, CES 4.0 Score, GeoTracker Status, and RUST status (application under review, grant awarded, loan awarded)



CERS NEXTGEN—WHAT IS A “FACILITY?”

- If CERS IDs will no longer “stay with the dirt” in NextGen, GeoTracker may become useful for another reason... case linking
- All GeoTracker cases (SWT, LUST, Permitted UST) can be *linked* on the Regulator side, allowing for tracking and viewing of everything associated with a specific site, all in one place
 - This helps Cleanup agencies decide whether to re-open old Cleanup cases, or to open new ones



CASE LINKING

- Multiple historical LUST cases



Activities Report Documents / Data Environmental Conditions

THERE ARE 3 OTHER CA

<u>ASSOCIATION</u>	<u>DESCRIPTION</u>	<u>IDENTIFIER</u>	<u>PROJECT NAME</u>
Related Permitted UST	CERSID	10165935	7-Eleven INC #24155
Related Global ID		T0608164939	7-ELEVEN FOOD STORE #24155
Related Global ID		T0607302228	7-ELEVEN FOOD STORE #24155

- Multiple CERS IDs



Activities Report Documents / Data Environmental Conditions

THERE ARE 2 OTHER CASES A

<u>ASSOCIATION</u>	<u>DESCRIPTION</u>	<u>IDENTIFIER</u>	<u>PROJECT NAME</u>
Related Permitted UST	CERSID	10890004	WESTBOROUGH PETROLEUM INC
Related Permitted UST	CERSID	10066147	WESTBOROUGH KWIK SERV



...SO WHAT?

- **USEPA** and **SWRCB** now have much more control over tracking progress of SWT sites towards permanent closure, as compared to using only legacy CERS methods
- Moving forward, all SWT correspondence will be tracked in **GeoTracker**, for all to see, forevermore
- Regulators can use **GeoTracker** to share documents and information without searching through offline files and Byzantine inboxes





Any Questions?

Johnny Wales

Redhorse Corporation

Environmental Specialist/Project Manager

Johnny.Wales@Waterboards.ca.gov

804-852-7274





REPLACING, REMOVING, OR UPGRADING UNDERGROUND STORAGE TANKS (RUST) PROGRAM

March 21, 2023



RUST Program Overview

- 💧 Provides financial assistance - grants and low-interest loans to remove and/or replace, repair, and upgrade USTs
- 💧 Assists eligible small business UST owners/operators to come into compliance with UST regulatory requirements
- 💧 **An executed agreement is required for reimbursable work to begin**
- 💧 New regulations take effect 7/1/2023
- 💧 Apply through FFAST



Important Deadlines

- 💧 RUST Program Sunsets – **January 1, 2026**
- 💧 Corrective Action Claim application submittal to UST Cleanup Fund for reimbursement of eligible costs – **December 31, 2024**
- 💧 Single-Walled Tank Closure Deadline – **December 31, 2025**
- 💧 UST Cleanup Fund sunsets – **January 1, 2026**



Eligible Applicants

💧 Small Business UST Owner and/or Operator Residing in California

💧 Grants

- ✓ Independently owned/operated
- ✓ Under 20 employees
- ✓ Less than 1,500,000 gallons sold per year

💧 Loans

- ✓ Independently owned and operated
- ✓ Under 500 employees



Typical Projects Covered

- 💧 Removing and/or replacing USTs and/or piping
- 💧 Repairing and/or upgrading USTs



Typical Repair/Upgrade Costs

- 💧 Replace or repair secondary containment, including penetration fittings, test boots, and/or containment sumps
- 💧 Replace under-dispenser containment
- 💧 Replace or repair spill buckets, fill pipes, and/or overflow protection devices
- 💧 Replace electronic monitoring system
- 💧 Conduct enhanced leak detection test
- 💧 Replace manway covers
- 💧 Enhanced vapor recovery upgrades



Typical Ineligible Costs

- 💧 Aboveground Storage Tanks – exception: If replacing UST with an AST, will fund costs associated with removal/disposal of the UST only
- 💧 Non-qualifying dispensers – unless replacing entire fueling system or for an environmental reason
- 💧 Payment Card Industry/Point of Sale equipment
- 💧 Signage, decals, bollards, speakers, and monitors
- 💧 Canopies, valances, cash registers, fuel software, travel, and convenience store-related expenses



Grants

- 💧 Between **\$3K to \$70K maximum** per entity
- 💧 Finance up to 100 percent of the costs for certain UST-related work
- 💧 Includes UST removal only work



24th California Unified Program
Annual Training Conference
March 22, 23, 24, 29, 30, 31 - 2022

Grants - Eligibility

- 💧 Applicant's principal office/officers reside in CA and have CA address;
- 💧 Facility legally in business retailing motor fuel anytime within the 2 years preceding the application;
- 💧 Facility retails less than 1,500,000 gallons of gasoline annually
- 💧 Tanks owned/operated in compliance with H&S Code Chapter 6.7 and implementing regulations and EVR requirements (requires current UST permit and current PTO) ***Unless work will bring them into compliance and application submitted within 180 days of going out of compliance***

💧 **Exception – Removal Only Projects**



Grant Waiver

💧 If applicant does not meet permit compliance requirements or retailing motor fuel requirement, applicant may apply for a waiver of requirements if:

- ✓ Tank owner or operator;
- ✓ Removal only project (any type of tank; not limited to single-walled tank); and
- ✓ Does not qualify for RUST loan



Grants – CERS Compliance

💧 Compliance with California Environmental Reporting System (CERS) is mandatory before grant eligibility can be assessed and completed.

💧 Notices of Violations cleared with return to compliance dates

💧 Submittals accepted by local regulatory agency

💧 Owners and Operators should work with regulatory agency to ensure issues resolved



Loans

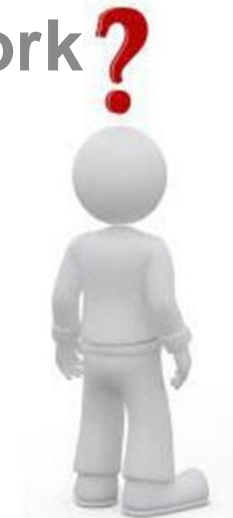
- 💧 \$10K to \$750K maximum per entity
- 💧 10- or 20-year terms
- 💧 Below Market Interest Rate: (2.7%)
- 💧 Financing up to 100 percent of costs to upgrade, remove, or replace USTs,
- 💧 Two percent (2%) loan fee



Loans Eligibility

💧 Must be UST owner and/or operator - Meeting following requirements:

- ✓ Tanks owned/operated must comply with H&S Code chapter 6.7 and regulations adopted pursuant to chapter and EVR requirements, **unless the work will bring them into compliance**
- ✓ Demonstrate ability to repay loan and possess adequate collateral; and
- ✓ Must be in compliance with all financial responsibility requirements



Loans – CERS Compliance

💧 Compliance with CERS is mandatory for administrative items affecting compliance (e.g., UST monitoring, site plans submittal), before eligibility assessment can be completed.

💧 Owners or Operators should work with local regulatory agency to ensure issues resolved and Return to Compliance dates are in CERS



Common Application Issues

- 💧 Missing required documents
- 💧 Proposal not itemized or missing material list
- 💧 Proposal missing required tasks
- 💧 Discrepancies between applicant and CERS/Permits
- 💧 Open CERS violations



RUST Program Information

For more information, visit our website at:

http://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.shtml

Join our Electronic Notification List to receive Program updates:

http://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.shtml#financialy

Email: RUST@Waterboards.ca.gov





Any Questions?

McLean Reich

State Water Resources Control Board

RUST, EAR, and Reporting Section Manager

McLean.Reich@waterboards.ca.gov

916-322-6593

