



APSA CERS Submittal February 26, 2024



26th California Unified Program
Annual Training Conference
February 26-29, 2024

Overview

➤ APSA Applicability

- Marking 'Yes' to the APSA question in Business Activities
- Determining aboveground petroleum storage capacity

➤ APSA Facility Information

- Conditionally exempt
- Tank in an underground area (TIUGA)
- Total petroleum storage capacity
- Date of SPCC Plan certification or 5-year review



Overview

- APSA Documentation
 - The Do's and Don'ts
 - Upload Document
 - Provided elsewhere in CERS
- Is this facility regulated under APSA?
- **If your facility is not APSA regulated**
- CUPA Review of the APSA CERS submittal
- Online Resources and Contact Information



APSA Applicability

Scroll down the Business Activities Page and you'll find the Aboveground Petroleum Storage question



CERS Business

Home Submittals Facilities Compliance My Business

Business Activities: **APSA Facility Name**

Home » Prepare Submittal (10176419) » Facility Information: Business Activities (Draft)

Instructions/Help

Use this form to identify the activities occurring at your facility that are regulated under California's Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. CERS will provide guidance on completing the reporting requirements for these business activities.

Save Cancel

Site Identification

Does your facility recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25143.2)? Yes No

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: Yes No

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Regulated Substances

Does your facility have Regulated Substances stored onsite in quantities greater than the threshold quantities established by the California Accidental Release prevention Program (CalARP)? Yes No

If yes, coordinate with your local agency responsible for CalARP. CERS does not currently support any data entry or document uploads for CalARP.

Additional Information

Provide any additional information as necessary and/or required by your local regulator(s).

Save Cancel

APSA Applicability

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

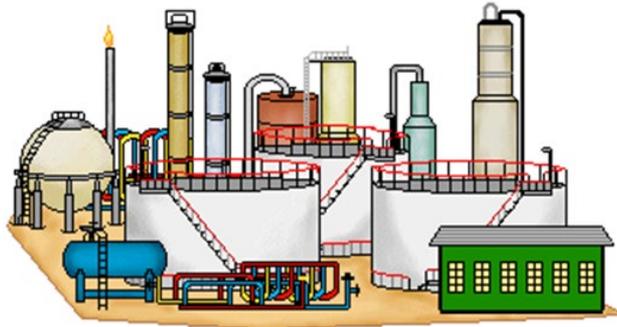
Yes No



- Your tank facility is subject to the Federal Spill Prevention, Control, and Countermeasure (SPCC) requirements found in CFR, Title 40, Part 112; **or**
- Your tank facility's total aboveground petroleum storage capacity is 1,320 gallons or more of petroleum; **or**
- Your tank facility has one or more tanks in an underground area (TIUGAs), regardless of the total aboveground petroleum storage capacity.

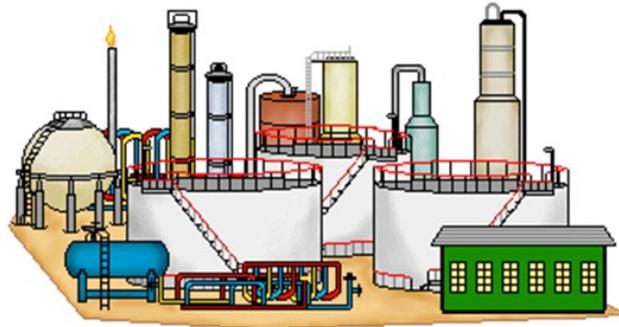
APSA Applicability

- Determining your facility's total aboveground petroleum storage capacity
 - **DO NOT** include:
 - Actual volume stored in the AST, container or equipment
 - Certain tanks, containers, or equipment that are excluded under APSA (HSC Section 25270.2(a)(1)-(8))



APSA Applicability

- Determining your facility's total aboveground petroleum storage capacity
 - Add together the shell capacity of each AST, container, and equipment, including each TIUGA, with shell capacity equal to or greater than 55 gallons of petroleum



APSA Facility Information

- Determining your facility's total aboveground petroleum storage capacity
 - **IF** facility stores less than 1,320 gallons and has at least one or more TIUGAs
 - Add together the shell capacity of each 55-gallon or larger **stationary** TIUGA
 - **DO NOT** include capacities of the following
 - Tank holding hydraulic fluid for a closed loop mechanical system that uses compressed air or hydraulic fluid to operate lifts, elevators, or other similar devices,
 - Tank is a heating oil tank, or
 - Tank is a sump, separator, clarifier, catch basin, or storm drain

APSA Applicability

- Tanks, containers, or equipment that are excluded under APSA (HSC Section 25270.2(a)(1)-(8)):
 1. Pressure vessel or boiler
 2. Tank containing hazardous or extremely hazardous waste
 - a) And has a permit from DTSC, or a PBR authorization from the UPA
 3. Aboveground oil production tank
 4. Oil-filled electrical equipment, including but not limited to, transformers, circuit breakers, or capacitors, if the oil-filled electrical equipment meets certain conditions

APSA Applicability

5. A tank regulated as an underground storage tank
6. A transportation-related tank facility
7. A tank or tank facility located on and operated by a farm that is exempt from SPCC rule
8. A TIUGA that has the capacity to store less than 55 gallons of petroleum
 - a) OSFM TIUGA website provides a list of questions and answers to assist in determining if a tank is considered a TIUGA

<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/tank-in-an-underground-area-tiuga>

APSA Facility Information

- April 1, 2019 – A submittal element was included to identify
 - Conditionally exempt facilities
 - Total aboveground storage capacity of petroleum
 - Number of tanks in underground area(s)
 - Date of SPCC Plan certification or date of 5-year review

Facility Information

Conditionally Exempt [?](#)

Total Aboveground Storage Capacity of Petroleum [?](#)

Number of Tanks in Underground Area(s) [?](#)

Date of SPCC Plan Certification or Date of 5-Year Review [?](#)

APSA Facility Information

- Conditionally exempt
 - Indicate if tank facility is located on and operated by a farm, nursery, logging site, or construction site and if the following conditions are met (HSC 25270.4.5(b)):
 - No aboveground storage tank exceeds 20,000 gallons; and
 - The cumulative storage capacity of the tank facility does not exceed 100,000 gallons

APSA Applicability: Farms

A farm may be regulated under APSA if facility:

- Stores, contains, handles, or treats petroleum oil or petroleum products, including on a temporary basis
- Stores at least 1,320 gallons of petroleum in aboveground tanks or containers
- Stores at least 2,500 gallons of oil, which includes petroleum, animal and vegetable oil, and oil products subject to the SPCC rule

<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/farms>

Farms: WRRDA and SB 612

Under WRRDA, a farm is not subject to the Federal SPCC rule nor required to have an SPCC Plan if:

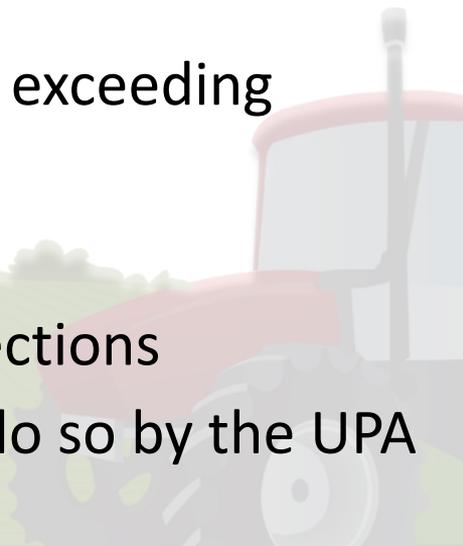
- Aggregate aboveground **oil** storage capacity is less than 2,500 gallons

OR

- Aggregate aboveground **oil** storage capacity is greater than 2,500 gallons, but less than 6,000 gallons, *and*
- No reportable discharge history

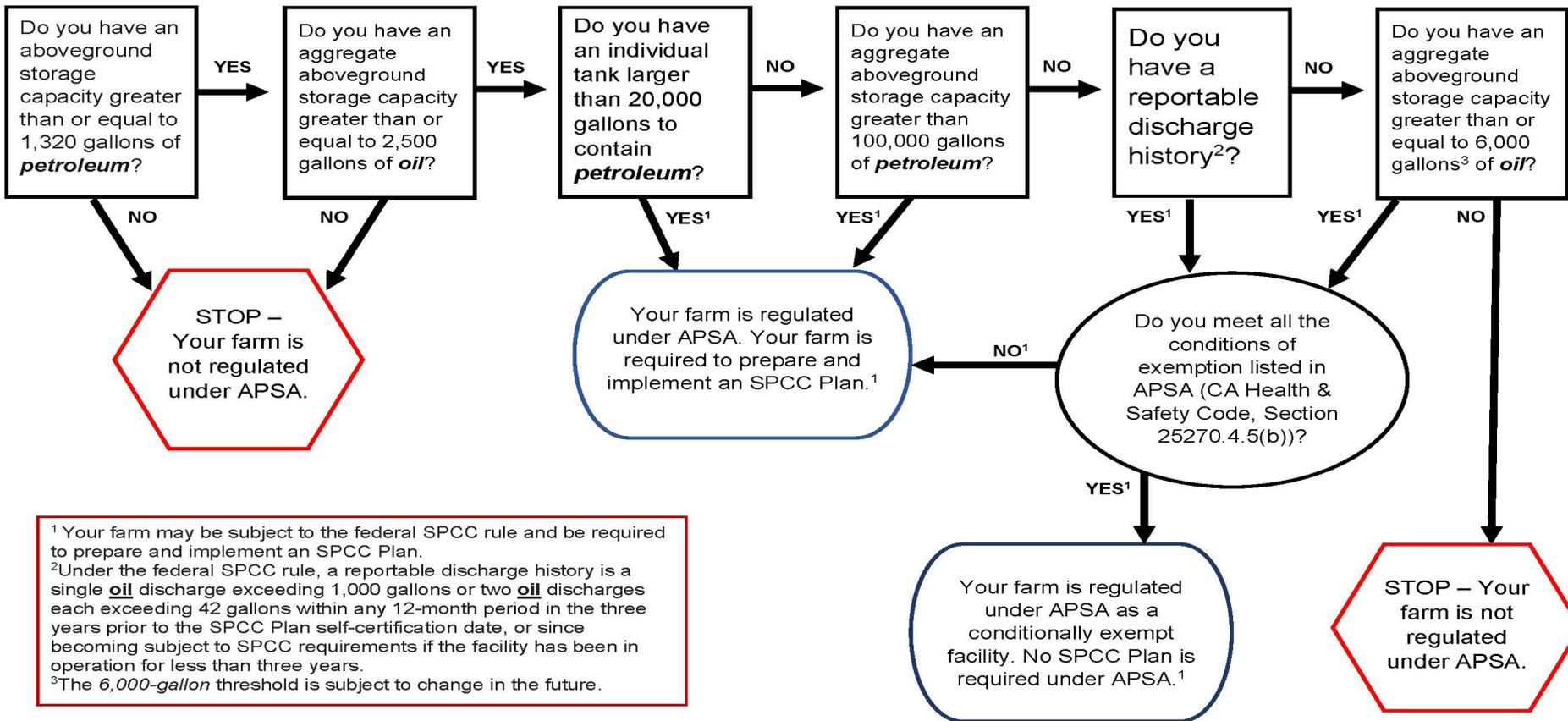
APSA Conditional Exemption

A farm is conditionally exempt from preparing an SPCC Plan under the APSA Program provided:

- Has no single petroleum storage tank with a capacity larger than 20,000 gallons
 - Has a petroleum aggregate storage capacity not exceeding 100,000 gallons
 - Conducts daily inspections of APST
 - Allows UPA inspectors to conduct periodic inspections
 - Installs secondary containment if requested to do so by the UPA [HSC Section 25270.4.5(b)]
- 

APSA Conditional Exemption

- Conditionally exempt tank facility is:
 - Not required to prepare and implement an SPCC Plan under APSA
 - But facility **MUST**:
 1. Conduct daily visual inspections of any petroleum storage tank, container, or equipment
 2. Allow the UPA to conduct a periodic inspection of the tank facility
 3. Install secondary containment for each tank or group of tanks if determined necessary by the UPA



¹ Your farm may be subject to the federal SPCC rule and be required to prepare and implement an SPCC Plan.
² Under the federal SPCC rule, a reportable discharge history is a single **oil** discharge exceeding 1,000 gallons or two **oil** discharges each exceeding 42 gallons within any 12-month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to SPCC requirements if the facility has been in operation for less than three years.
³ The 6,000-gallon threshold is subject to change in the future.

APSA Facility Information

- If your tank facility is conditionally exempt
 - Check the box next to 'Conditionally Exempt'
 - Click Save and continue
 - You have completed your APSA Facility Information



APSA Facility Information

- Total Aboveground Storage Capacity of Petroleum
 - Enter the total number of gallons from your tank facility's aboveground petroleum storage capacity
 - Add together the aggregate shell capacities of petroleum storage tanks, containers, or equipment
 - For 55-gallon drums, use the maximum number of drums that would typically be stored at your facility



APSA Facility Information

- Number of Tanks in Underground Area(s) (TIUGAs)
 - Report the total number of **stationary** storage tanks with a shell capacity of 55 gallons or more of petroleum that are located in a basement, cellar, shaft, pit or vault
 - **DO NOT** count drums or portable containers/tanks as TIUGAs
 - **IF** your facility has less than 1,320 gallons of petroleum, **DO NOT** include the following:
 - Tank holding hydraulic fluid for a closed loop mechanical system that uses compressed air or hydraulic fluid to operate lifts, elevators, or other similar devices,
 - Tank is a heating oil tank, or
 - Tank is a sump, separator, clarifier, catch basin, or storm drain
 - If your facility has no TIUGA, enter '0' (zero)

APSA Facility Information

- Date of SPCC Plan Certification or Date of 5-Year Review
 - Enter your facility's SPCC Plan certification date or the last SPCC Plan 5-year review date, whichever is more recent
 - You cannot enter a future date
 - If your tank facility does not have an SPCC Plan, this field can be left blank

Additional Help

- Click on the blue help bubble for more information to complete the submittal

Facility Information

Conditionally Exempt 

Total Aboveground Storage Capacity of Petroleum 

Number of Tanks in Underground Area(s) 

Date of SPCC Plan Certification or Date of 5-Year Review 
 



APSA Documentation

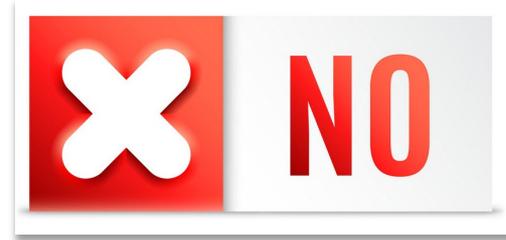
➤ Select

- Provided Elsewhere in CERS, or
- Upload Document(s)



➤ Do **not** select

- Public Internet URL
- Provided to Regulator
- Stored at Facility
- Exempt



APSA Documentation

- Do I file or submit information in the APSA documentation section if I have already submitted a complete Hazardous Materials Business Plan?
 - You have met the Tank Facility Statement reporting requirement for the APSA program
 - Complete the documentation section to indicate your HMBP submittal in lieu of the APSA Tank Facility Statement

APSA Documentation

Document Options

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

Provided Elsewhere in CERS

If requirements for this supplemental documentation can be satisfied by another document you have provided in CERS, please indicate the submittal element where the document can be found and provide the submittal date or other comments to assist your regulator in locating this document in your current/previous CERS facility submittals.

Supplied in Submittal Element...

- Facility Information
- Hazardous Materials Inventory
- Emergency Response and Training Plans
- Aboveground Petroleum Storage Act

Indicate submittal date or other explanation...

- Select '**Provided Elsewhere in CERS**'
 - Then choose '**Hazardous Materials Inventory**'
 - Click '**Save**'

APSA Documentation

- You can upload a Tank Facility Statement if you do not select the other document option (provided elsewhere in CERS)

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

Date Authored (Required)

Document Title (Required)

Description/Comments (Optional)

- Select **'Upload Document(s)'**
 - Then choose **'Browse'** to upload your document

APSA Documentation

- If you're not required to submit an HMBP, upload a completed Tank Facility Statement

The screenshot shows a web form for document upload. On the left, under 'Document Options', the 'Upload Document(s)' radio button is selected. In the main form area, the 'Document Upload(s)' section is titled, and a red arrow points to the 'Browse...' button. Below this, the 'Date Authored (Required)' field contains '3/8/2019'. The 'Document Title (Required)' field contains 'Aboveground Petroleum Storage Act Documentation', with a red arrow pointing to it. Below the title field is a 'Description/Comments (Optional)' text area. At the bottom right, there are three buttons: 'Save & Upload Again', 'Save & Finish', and 'Cancel', with a red arrow pointing to the 'Save & Finish' button. A link for 'CERS Document Upload Policy' is visible in the top right corner.

- Select **'Upload Document(s)'**
 - Then choose **'Browse'** to upload your document

APSA Documentation

Should I file an SPCC Plan in CERS?



- Tank Facility Statement is NOT the SPCC Plan
- SPCC Plans are not required to be uploaded to CERS and, therefore, should not be uploaded to CERS

APSA Documentation

Should I file an SPCC Plan in CERS?



APSA Documentation

You can meet the APSA tank facility statement requirement by either uploading a Tank Facility Statement or by submitting a hazardous materials business plan. To obtain a Tank Facility Statement (fillable PDF) or for APSA Program inquiries, please contact OSFM at cupa@fire.ca.gov

To upload a tank facility statement, select the **Browse** button, locate the file on your computer to upload, provide a document title, and then select **Save & Finish**.

To submit a hazardous materials business plan, you must submit the Facility Information, Hazardous Materials Inventory, Site Map, and Emergency Response and Training Plans submittal elements through CERS. To indicate that you are using the hazardous materials business plan to meet the APSA tank facility statement requirement, select the **Provided Elsewhere in CERS** document option below, select **Hazardous Materials Inventory**, and then click the **Save** button.

Facilities subject to APSA shall keep a copy of their Spill Prevention, Control, and Countermeasure (SPCC) Plan onsite if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended.

SPCC PLANS ARE NOT REQUIRED TO BE UPLOADED INTO CERS AND, THEREFORE, SPCC PLANS SHOULD NOT BE UPLOADED INTO CERS.

Your local regulator may request additional documentation to be provided if indicated below under "Local Reporting Requirements" information. For additional information, please contact your local regulator.

APSA Documentation

- You can email CUPA@fire.ca.gov to request the Tank Facility Statement form to complete and upload to CERS

OR

- Download from:

<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>

ABOVEGROUND PETROLEUM STORAGE ACT: TANK FACILITY STATEMENT

I. IDENTIFICATION

FACILITY NAME (Same as BUSINESS NAME or DBA – Doing Business As): _____

FACILITY PHONE: _____

FACILITY ADDRESS: _____

FACILITY CITY: _____ STATE: CA ZIP CODE: _____

CONTACT NAME: _____

CONTACT PHONE: _____

II. TOTAL FACILITY STORAGE CAPACITY

Tank facility's total aboveground petroleum storage capacity (in gallons) for all tanks and containers, including tanks in an underground area, with a shell capacity **greater than or equal to** 55 gallons (see instructions for details):
_____ gallons

III. TANK AND CONTAINER DETAILS

Details of each aboveground petroleum storage tank or container **greater than** 10,000 gallons in shell capacity (attach additional forms if needed)

Tank 1:

Tank or Container ID Number: _____

Contents (Gas, Diesel, etc.): _____

Shell Capacity (in gallons): _____

Location of Tank or Container: _____

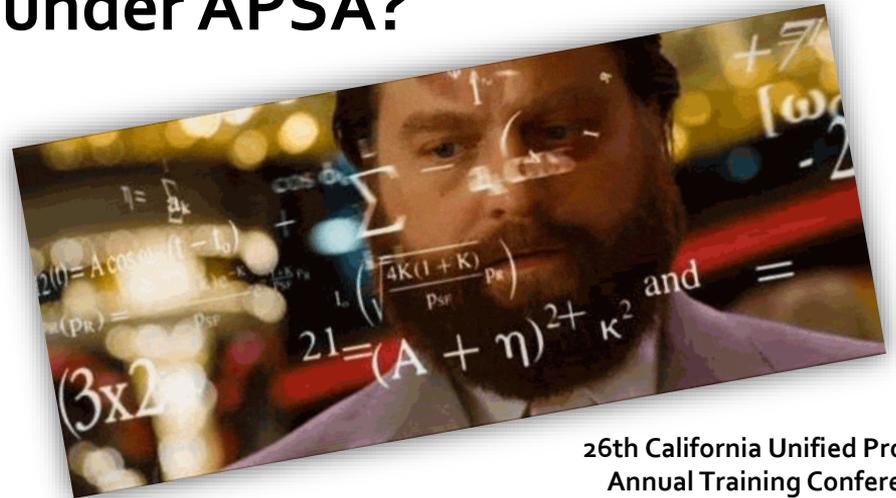
Tank 2:

Tank or Container ID Number: _____

Contents (Gas, Diesel, etc.): _____

Quick Recap

- ✓ APSA Applicability
- ✓ APSA Facility Information
- ✓ APSA Documentation
- ❑ **Is this facility regulated under APSA?**
 - **Let's count petroleum!**



Is this facility regulated under APSA?

➤ Facility 1

Petroleum Storage Inventory

Tank or Container	Shell Capacity (Total)	Contents	APSA regulated?
Transformer (Oil-filled electrical equipment)	4,000 gallons	Insulating Oil (Petroleum based)	No
Circuit Breakers (Oil-filled electrical equipment)	100 gallons	Insulating Oil (Petroleum based)	No
Capacitors (Oil-filled electrical equipment)	55 gallons	Insulating Oil (Petroleum based)	No
55-gallon Drum	55 gallons	Used Oil (Petroleum based)	Yes
Hydraulic System (aboveground)	60 gallons	Hydraulic Oil (Petroleum based)	Yes
Total APSA Storage Capacity:			115 gallons

Facility 1

- NO
- Total APSA Storage Capacity is equal to 115 gallons
- The first three are oil-filled electrical equipment
 - Excluded under APSA if meet certain provisions

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

**Facility would mark 'NO' for the APSA question in
Business Activities**

Is this facility regulated under APSA?

➤ Facility 2

Petroleum Storage Inventory			
Tank or Container	Shell Capacity (Total)	Contents	APSA regulated?
Tank A (AST)	10,000 gallons	Liquefied Petroleum Gas	No
Tank B (AST)	10,000 gallons	Hot Mix Asphalt	No
Tank C (Hazardous waste AST)*	1,000 gallons	Used Oil (Petroleum based)	No
Tank D (Hazardous waste AST)*	500 gallons	Waste Solvent (Petroleum based)	No
Tank E (AST)	500 gallons	Motor Oil (Petroleum based)	Yes
Tank F (AST)	500 gallons	Renewable Diesel (100%) (Non-crude oil based)	No
Tank G (AST)	500 gallons	Unleaded Gasoline	Yes
Tank H (AST)	100 gallons	Hydraulic Oil (Petroleum based)	Yes
Four 55-gallon Drums	220 gallons	Used Oil (Petroleum based)	Yes
Two 30-gallon Drums	60 gallons	Lubricating Oil (Petroleum based)	No
Total APSA Storage Capacity:			

Facility 2

- YES
- Total APSA Storage Capacity is equal to 1,320 gallons

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

Facility would mark 'YES' for the APSA question in
Business Activities

Facility 2

➤ Facility Information

Instructions/Help

You must indicate if your tank facility is conditionally exempt from having to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan under APSA. Refer to [HSC §25270.4.5\(b\)](#) for details.

If you indicate that your facility is conditionally exempt, then no additional information is requested on the APSA Facility Information.

If you indicate that your facility is not conditionally exempt, then complete the remaining fields in the APSA Facility Information.

For assistance with calculating the total aboveground storage capacity of petroleum at your facility, read the CERS Help Materials for APSA: [Is My Facility Regulated Under APSA?](#)

For information on "tanks in underground areas," please contact OSFM at cupa@fire.ca.gov or contact your local regulator for assistance.

Facility Information

Conditionally Exempt

Total Aboveground Storage Capacity of Petroleum
1320

Number of Tanks in Underground Area(s)
0

Date of SPCC Plan Certification or Date of 5-Year Review
8/14/2017

Facility 2

➤ APSA Documentation

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

Browse...

Date Authored (Required) 12/3/2019

Document Title (Required) Aboveground Petroleum Storage Act Documentation

Description/Comments (Optional)

Discard Save & Upload Again Save & Finish Cancel

OR

Document Options

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

Provided Elsewhere in CERS

If requirements for this supplemental documentation can be satisfied by another document you have provided in CERS, please indicate the submittal element where the document can be found and provide the submittal date or other comments to assist your regulator in locating this document in your current/previous CERS facility submittals.

Supplied in Submittal Element...

- Facility Information
- Hazardous Materials Inventory
- Emergency Response and Training Plans
- Aboveground Petroleum Storage Act

Indicate submittal date or other explanation...

Discard Save Cancel

Is this facility regulated under APSA?

➤ Facility 3

Petroleum Storage Inventory

Tank or Container	Shell Capacity (Total)	Contents	APSA regulated?
Tank A (UST)	10,000 gallons	Unleaded Gasoline	No
Tank B (UST)	5,000 gallons	Diesel	No
Tank C (AST)	1,000 gallons	Motor Oil (Petroleum based)	Yes
Tank D (Tank in an underground area)	500 gallons	Used Oil (Petroleum based)	Yes
Ten 55-gallon Drums	550 gallons	Used Oil (Petroleum based)	Yes
Total APSA Storage Capacity:			

Facility 3

- YES
- Total APSA Storage Capacity is equal to 2,050 gallons
- Tank A and Tank B are USTs and are not regulated under APSA

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

Facility would mark 'NO' for the APSA question in Business Activities

Facility 3

➤ Facility Information

Instructions/Help

You must indicate if your tank facility is conditionally exempt from having to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan under APSA. Refer to [HSC §25270.4.5\(b\)](#) for details.

If you indicate that your facility is conditionally exempt, then no additional information is requested on the APSA Facility Information.

If you indicate that your facility is not conditionally exempt, then complete the remaining fields in the APSA Facility Information.

For assistance with calculating the total aboveground storage capacity of petroleum at your facility, read the CERS Help Materials for APSA: [Is My Facility Regulated Under APSA?](#)

For information on "tanks in underground areas," please contact OSFM at cupa@fire.ca.gov or contact your local regulator for assistance.

Facility Information

Conditionally Exempt

Total Aboveground Storage Capacity of Petroleum
2050

Number of Tanks in Underground
1

Date of SPCC Plan Certification or Date of 5-Year Review

Save Cancel

Save Cancel

Is this facility regulated under APSA?

➤ Facility 4

Petroleum Storage Inventory

Tank or Container	Shell Capacity (Total)	Contents	APSA regulated?
Tank A (Oil-production AST)	10,000,000 gallons	Crude Oil	
Tank B (Oil-production AST)	1,000,000 gallons	Crude Oil	
Tank C (Breakout tank [transportation-related AST] and bulk storage AST)	2,000,000 gallons	Petroleum Oil	
Total APSA Storage Capacity:			

Is this facility regulated under APSA?

➤ Facility 4

Petroleum Storage Inventory			
Tank or Container	Shell Capacity (Total)	Contents	APSA regulated?
Tank A (Oil-production AST)	10,000,000 gallons	Crude Oil	No
Tank B (Oil-production AST)	1,000,000 gallons	Crude Oil	No
Tank C (Breakout tank [transportation-related AST] and bulk storage AST)	2,000,000 gallons	Petroleum Oil	No
Total APSA Storage Capacity:			0 Gallons

Facility 4

- NO
- Total APSA Storage Capacity is equal to 0 gallons
- Tank A and Tank B (oil production tanks) are not regulated under APSA
- Tank C is regulated under US DOT, not APSA

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

Facility would mark 'NO' for the APSA question in Business Activities

Facility 5

- If your facility was previously regulated under APSA and is no longer subject to the APSA program
 - Mark 'NO' to the APSA question in Business Activities
 - **Do not** make any APSA submittal, including the APSA documentation, to CERS
 - Any submittal under the APSA documentation will indicate that the facility is regulated under APSA, regardless of whether the facility is truly regulated under APSA and even if the 'Exempt' option is selected

CUPA Review of APSA CERS Submittal

- CERS data collection gaps
 - Software limitations, potential for data gaps
- CUPA handling erroneous data
 - Data errors will be made by tank facilities in their submittals
 - Discussion of error types
 - Strategies relative to submittal acceptance, non-acceptance
- Using the APSA Facility Information Report
 - Generating the report in CERS
 - Reviewing the report
 - How to use the report

CUPA Review of APSA CERS Submittal

➤ CERS structure implemented April 1, 2019

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: [?](#)

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

Facility Information

Conditionally Exempt [?](#)

Total Aboveground Storage Capacity of Petroleum [?](#)

Number of Tanks in Underground Area(s) [?](#)

Date of SPCC Plan Certification or Date of 5-Year Review [?](#)

➤ Known data collection gaps

- Facilities start, but do not complete the submittal (Invisible)
- Facilities make a submittal, but do not provide a date in the SPCC data field (Incomplete)

CUPA Review of APSA CERS Submittal

- APSA submittal error types
 - Regulated facility answers NO to APSA question
 - Unregulated facility answers YES to APSA question
 - Regulated facility checks the Conditionally Exempt box, but does not meet the requirements for exemption
 - Regulated facility does not check the Conditionally Exempt box, but does meet the requirements for exemption
 - APSA petroleum amount inaccurate
 - Number of TIUGAs inaccurate
 - SPCC Plan certification/5-year review date missing or inaccurate

CUPA Review of APSA CERS Submittal

- Data entry errors by tank facilities are happening frequently
- Missing data and erroneous data are being identified
- CUPAs have responded in different ways depending on circumstances
- Examples of CUPA feedback provided in next few slides

CUPA feedback to facilities incorrectly responding to APSA regulation question

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: 

- have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR
- have one or more petroleum tanks in an underground area?

Yes No

- “This farm stores less than 2,500 gallons of petroleum onsite. Therefore, this facility is not subject to the Aboveground Petroleum Storage Act requirements.”
- “Facility is not in APSA - please mark the question regarding APSA “No” on the Business Activities page.”
- “This site is subject to [APSA] because it has 1,935 gallons of petroleum on-site (i.e. from CERS Hazardous Materials Inventory). Please update the information and resubmit the correct information.”

CUPA feedback to incorrect Conditionally Exempt claim

- “Your site is not conditionally exempt...think this was a misunderstanding...your site is a regular APSA site (Qualified Tier 1 site - no tank greater than 5K gallons of petroleum and no storage of greater than 10K total at the site). Please contact us should you have any questions.”
- “Your APSA facility information is not accepted: Our records indicate this facility does not meet the conditionally exempt requirements.”

CUPA feedback to incorrect Conditionally Exempt claim

- “Your facility is not currently permitted as a farm exempt site. The SPCC rule defines a farm as a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, \$1,000 or more of agricultural products during a year. If you are being permitted incorrectly please contact your inspector.”
- “Please select "Yes" to exempt, since the site is considered Farm Exempt.”
- “Verification will be made to see if facility is conditionally exempt.”

CUPA feedback to inaccurate APSA petroleum amount

- “The total AST capacity of petroleum listed in the materials inventory does not match the APSA Facility Information quantity. Please review and verify.”
- “Accepted with the condition that APSA storage capacity is reviewed for applicability in accordance with Chapter 6.67 of the California Health and Safety Code. If the storage capacity remains 10,000 or greater than we will change your program category to a non-qualified facility.”
- “Not accepted because the reported quantity of 2700 gallons does not match the actual quantity of 10,660 gallons observed at the 7/2/2023 CUPA inspection.”

CUPA feedback to inaccurate APSA petroleum amount

- “Please edit your total petroleum capacity to 12,220 so that your gear lube and waste oil are included and then resubmit for approval.”
- “The amount you report for total aboveground petroleum storage must include your new and used oils. Please add this to your total at the next submittal”
- “Per the FIELD HELP section, when determining the aggregate petroleum storage capacity for the facility, do not include ASTs, containers or equipment excluded under APSA.”

CUPA feedback to inaccurate numbers of TIUGAs

- “Regulated Underground Storage Tanks are not considered Tanks In Underground Areas (TIUGA) for purposes of APSA. You do not have any TIUGAs. Please change this to say zero and resubmit.”
- “Please verify if facility has "TIUGAs"- not "underground storage tanks".”
- “Please be advised, APSA Facility Information has 2 tanks listed as "Tanks In Underground Area" (TIUGA). TIUGAs are not the same as Underground Storage Tanks (UST). The 2 TIUGAs identified in the APSA Facility Information will be verified during the next inspection”

CUPA feedback to incorrect SPCC Plan dates

- “Your APSA facility information is not accepted in CERS for the following reason: Please add a date for the SPCC Plan and resubmit in CERS.”
- “CONDITIONALLY ACCEPTED. This submittal was accepted, however the following must be corrected: ** Provide the date of the SPCC Plan **.”
- “SPCC Plan is outdated and needs to be revised, reviewed and signed by a P.E. The document provided was dated to August 29, 2019.”

CUPA feedback for accepted submittals

- “Accepted as an administrative complete. Validity of data submitted will be assessed during the next routine compliance inspection.”
- “This facility is claiming to have aboveground petroleum storage but does not currently have a APSA permit with our Department. Facility inspection will be conducted in the near future to determine if APSA permit is required.”

CUPA feedback for accepted submittals

- “Verified by site inspection.”
- “The CUPA has reviewed the submitted program elements and finds the data/documents meet state and local reporting requirements. The CUPA has not necessarily field-verified the submitted data.”
- “It is the responsibility of the owner/operator to report accurate and complete information. The APSA section will be accepted contingent upon a field verification.”

APSA Facility Information Report

- Using the report
 - The report is found on the CERS General Reports page

The screenshot shows the 'General Reports' section of a website. It contains several links and descriptions for various reports. The link for 'APSA Facility Information Report' is circled in red. Below is a table summarizing the visible report links and their descriptions.

Report Name	Description
Regulator Reports	Section header for the top group of reports.
Unified Program Local Reporting Requirements Listing	View/search/download local reporting requirements for all CUPAs statewide.
CUPA Electronic Reporting Status	This report summaries by CUPA the count of facilities in CERS and how many have reported on various submittal elements during a specified time period. CUPAs and Cal/EPA can use this report to evaluate CUPA progress toward meeting the electronic reporting mandates.
Regional Inventory Materials Search	Download a set of the latest accepted or submitted hazardous material inventories for facilities regulated by your regulatory agency.
New Facilities Added To CERS	View/search/download Facilities added to CERS within the last 30 days, or custom date range.
Facility Reporting Status	View the Reporting Requirements for all facilities in the selected CUPA, and search for facilities that have not reported to CERS since a specified date.
CME Data Download	Download a set of the latest accepted facility information for facilities regulated by your regulatory agency.
APSA Program Reports	Section header for the middle group of reports.
APSA Facility Information Report	Download the latest accepted or submitted APSA Facility Information data for regulated APSA facilities.
Evaluation Reports	Section header for the bottom group of reports.
Summary Regulated Facilities by Unified Program Element Report	This report replaces the facility count portions of the legacy 'Report 2' and 'Report 3'.
Summary Enforcement Report	This report replaces the legacy 'Report 4'.
Summary Regulated Facility Inspection Report	This report replaces the Inspection related portion of the legacy 'Report 3'.

APSA Facility Information Report

➤ Generating the report

- Be aware of the 'Include Conditionally Exempt' checkbox and the 'Accepted Submittal' or 'Last Submittal Only' choices!

CERS Regulator | Submittals | Facilities | Businesses | Regulators | Compliance | Responders | Reports

APSA Program Report: APSA Facility Information

[Home](#) » [Reports](#) » [APSA Program](#) » [APSA Facility Information Report](#)

Instructions/Help

This report generates an Excel file containing APSA Facility Information data.

- Selecting 'accepted' APSA data (this is the default for this report) provides a report of APSA Facility Information data for every regulated APSA site that has at least one accepted APSA submittal.
- Selecting 'last submittal only' provides a report of APSA Facility Information data derived from the most recent submittal with a status of 'submitted', 'in process' or 'accepted'. This report may not provide complete data as it does not include data from prior other 'accepted' submittals. 'Not accepted' submittals are not included in either report.

APSA Program Report: APSA Facility Information

Regulator:

Date Submitted: to

CERS ID:

Total Capacity >= Gallons

Include Conditionally Exempt

Accepted Submittal Only

Last Submittal Only (regardless submittal status)

[Generate Excel Report](#)

APSA Facility Information Report

➤ Reviewing the report - the Overview tab

APSA Facility Information Report

This spreadsheet contains APSA Facility Information exported from the California Environmental Reporting System (CERS).

Use Excel's worksheet tabs or the hyperlinks below to access the export data. Please note, this exported data includes all APSA Facility data reported regardless of whether it has been reviewed or accepted by Regulators. Use the Record Filtering to limit the exported data to only that which has been

Report contents:

- The Overview tab includes the total number of regulated APSA facilities, number of APSA facilities that were reported as Conditionally Exempt, number of APSA facilities that reported a Total Aboveground Petroleum Storage Capacity of 10K gallons or more, and number of APSA facilities that reported 1 or more Tanks in Underground Areas.
- The 'APSA Facility Info' tab includes Facility Identification and Location, APSA Facility Information, Regulator, and Inspection information for the APSA facility

Data Export Date/Time: 12/9/2019 2:00:05 PM
Record Filtering Criteria (if any): All Regulated Facilities in CERS
Data submitted on or after
4/1/2019 and on or before
12/9/2019.

Generated Worksheets	Facilities	Conditionally Exempt	Total Capacity 10K gallons or more	TIUGA > 0
APSA Facility Info	4680	748	1112	713

For more information about the meaning of the Unified Program Data Dictionary (UPDD) codes, visit the CUPA Data Registry at the following URL:

<https://cersapps.calepa.ca.gov/DataRegistry>

APSA Facility Information Report

➤ Reviewing the report

- The APSA Facility Info tab
- Columns F, G, H and I contain the entries for Conditionally Exempt, Date of SPCC plan certification, Total Aboveground Storage capacity and number of TIUGAs
- Column L displays the regulator comments
- Column O identifies the Last APSA Routine Inspection date



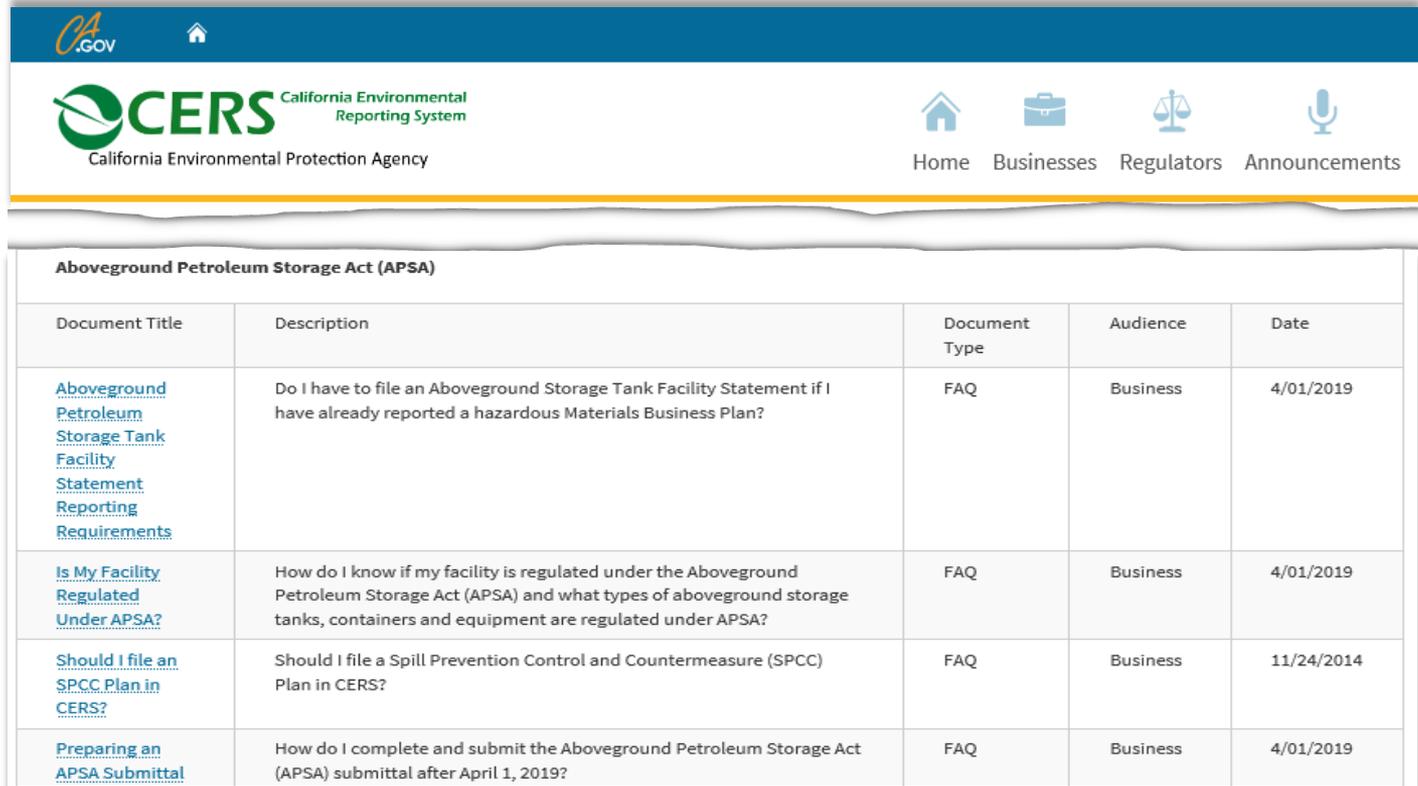
Facility Identification and Location				APSA Facility Information				Submittal / Acceptance Information			Regulator Information		Inspection Information	
1a	3	103	104	800	801	802	803							
CERS ID	Facility Name	Facility Street Address	Facility City	Facility ZIP Code	Conditionally Exempt	Date of SPCC Plan Certification or Date of 5-Year Review	Total Aboveground Storage Capacity of Petroleum	Number of Tanks in Underground Area	Date Submitted to CERS	Date Accepted by Regulator	Regulator Comment	Regulator Agent Name	Regulator Name	Last APSA Routine Inspector
10333678	AMGEN INC-MAIN CAMPUS		THOUSAND OAKS	91320-1799	No	06/07/2019	47169	51	11/26/2019				Ventura County Environmental I	09/12/2019
10828324	898 N. Pacific Coast Hwy		El Segundo	90245	No	11/26/2019	100	1	11/26/2019	11/26/2019		Jairo Garcia	El Segundo City Fire Departmen	10/31/2019
10199581	W. David Marini Farms		Holtville	92250	Yes						This farm stores less than 2,500	Steven Gailey	Imperial CUPA - DTSC	
10227175	RECYCLING INDUSTRIES, INC		NORTH HIGHLAND	95660	No	02/14/2019	2000	0	11/26/2019				Sacramento County Environmental Management Department	
10133884	Solid Rock Ranches, Inc.		Brawley	92227	Yes				11/26/2019	11/26/2019		Steven Gailey	Imperial CUPA - DTSC	06/05/2018
10105305	VALLEY TRUCK AND TRACTOR		DORRING	95626	No	11/03/2017	2550	0	11/26/2019	11/26/2019		Subh. Gabarra	Butte County Environmental M	01/09/2018

Online Resources

- OSFM APSA website: <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>
- CERS Help Materials: <https://cers.calepa.ca.gov/about-cers/help-materials/>
 - Aboveground Petroleum Storage Tank Facility Statement Reporting Requirements
 - Is My Facility Regulated Under APSA?
 - Should I file an SPCC Plan in CERS?
 - Preparing an APSA Submittal
- https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.67.&article
 - Health and Safety Code, Division 20, Chapter 6.67

Online Resources

➤ <https://cers.calepa.ca.gov/about-cers/help-materials/>



The screenshot shows the CERS website header with the logo for the California Environmental Reporting System and the California Environmental Protection Agency. Navigation links for Home, Businesses, Regulators, and Announcements are visible. Below the header is a table titled "Aboveground Petroleum Storage Act (APSA)" with five rows of resources.

Document Title	Description	Document Type	Audience	Date
Aboveground Petroleum Storage Tank Facility Statement Reporting Requirements	Do I have to file an Aboveground Storage Tank Facility Statement if I have already reported a hazardous Materials Business Plan?	FAQ	Business	4/01/2019
Is My Facility Regulated Under APSA?	How do I know if my facility is regulated under the Aboveground Petroleum Storage Act (APSA) and what types of aboveground storage tanks, containers and equipment are regulated under APSA?	FAQ	Business	4/01/2019
Should I file an SPCC Plan in CERS?	Should I file a Spill Prevention Control and Countermeasure (SPCC) Plan in CERS?	FAQ	Business	11/24/2014
Preparing an APSA Submittal	How do I complete and submit the Aboveground Petroleum Storage Act (APSA) submittal after April 1, 2019?	FAQ	Business	4/01/2019



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OSFM "CUPA" Program at cupa@fire.ca.gov

(916) 263-6300



<https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>

Any Questions?

26th California Unified Program
Annual Training Conference
February 26-29, 2024

