

CERS Regulator User Group Notes and Action Items 3/15/2011

Compiled by Cal/EPA Unified Program Staff March 2011

Action Items:

April 5, 2011 8:30-10:00 <https://www1.gotomeeting.com/register/535585512>

Discussion of UST UPCF forms, Facility-Program Element-Regulator assignment item from 3/15/2011

Review [UST Minimally-Required Fields Document](#) by **April 5th** meeting for discussion and adoption of the initial fields. Emailing comments to the CERS Help Center in advance is appreciated.

April 12, 2011 8:30-9:30 CERS Regulator User Group Meeting

Agenda/Minutes from March 8, 2011

- Minutes were approved

UST UPCF Minimally-Required Fields Discussion

Dan Firth and Chris Allen led a discussion to review and modify/adopt the recommended minimally-required fields discussed in this document:

<http://cers.calepa.ca.gov/TempDocs/RegUserGroup/2011/03152011/MinRequiredUSTFields.pdf>

UST Facility Information form

- Do not require BOE field #421 (informal unanimous)

Tank Information form

- Require Overfill prevention field #452 (informal unanimous)
- Type of Action Fields #400 (UST Facility Information Page) and #430 (Tank Information Page)
 - Keep as minimally required field (9+ in favor, 7 against; motion carried)

Certification of Installation/Modification form

- Contractor License # (#482b) and ICC Certification # (#482c) will not be required (5 favored making required, 7+ were against)
- Chris confirmed that this document is not linked to UST forms (because it has not field(s) directly identifying a tank ID(s)).
- Some initial discussion occurred regarding making the certification fields at the end of the document minimally-required. To be continued at April 5 special Regulator User Group meeting.

In discussing Monitoring Plan field #490-2, Cal/EPA staff indicated the need to tie Monitoring Plan data directly to tank information data to overcome EDT-related problems involving vague/inconsistent naming of tanks by facility owner/operators. CERS2 will be designed to make it simple for businesses to

“copy” or “apply” monitoring plan data from/to other tanks when necessary, and the regulators will be able to view when monitoring plan data has changed for one or more tanks in a specific UST submittal. Some group members indicated that most facilities had only one set of monitoring data for their tanks). Cal/EPA staff indicated the complexity of the problem is definitely related to automated EDT transactions, not data entry via a user interface, and that the issue had been researched extensively and no other viable approaches had been identified.

The discussion was wrapped-up to move on to the next agenda item. A final discussion of UST Minimally-Required fields will be held at the next meeting.

CUPA/PA Policies

Jim Bohon discussed Cal/EPA Unified Program position relating to the state, CUPA, and PA relationships from a policy standpoint and from a technical standpoint. Cal/EPA will require PA data to flow to the CUPA for exchange with CERS. He will develop a written policy to confirm.

There are 8 CUPAs that have PAs. All of these CUPAs are Decade clients. Cal/EPA will work with Decade to ensure that all PAs can provide inspection and enforcement data to the CUPAs in a consistent format.

At this time, PAs are **only** required to report summary inspection and enforcement information. However, Cal/EPA intends to pursue regulations requiring inspection and enforcement information be accompanied by violation data at some point in the future.

Two PAs expressed concern regarding the recent change in policy. Jim confirmed that the change had occurred in the last month but that it was due to technical (and funding) limitations that were unanticipated and only recently identified. He also indicated that the deadline for filing a transition plan and grant application could be extended for those PAs that are adversely affected by this change in policy.

Additional User Group Meeting

Chris Allen requested an additional meeting of the group to cover various upcoming CERS issues. The meeting will be April 5, 2011.

Adjournment

Meeting was adjourned at 10:30am