APSA Program Updates

County of San Diego CUPA

Presented By:

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APSA
Workshop Outline

What is in it for me?

1. Introductions
2. New APSA State Regulations
3. APSA Tank Inspection Requirements
4. Top Five APSA Tips to Stay in Compliance
5. Questions and Answers

Introductions

Erin Thomas

HMD APSA Technical Lead

Getting to Know Us

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APSA Rulemaking

What has changed?

APSA Regulations Update

CCR Title 19 rulemaking establishes APSA Regulations.

- Prior to December, all APSA requirements were in Statute
- Office of Administrative Law (OAL) Approved the rulemaking package on December 17, 2024 and made the regulations effective upon approval.
- The new regulations reside in California Code of Regulations (CCR) Title 19, Division 1, Chapter 11, Article 1.
- Final Text of APSA Regulations - Express Terms

APSA Regulations Update

The new regulations mandate CUPAS to inspect all APSA facilities every three years (or establish another frequency approved by OSFM).

- HMD already performs APSA compliance inspections at facilities with 1,320 gallons or more. There is no change for this group.
- HMD conducts triennial HMBP inspections at “TIUGA-Only” facilities, but now we must also inspect for compliance with APSA.
- Since 2018, we have been providing guidance to “TIUGA-Only” facilities that they must be compliant with APSA and prepare and implement an SPCC Plan.

Tank In an Underground Area (TIUGA)

TIUGA:

- Stationary
- On or above the surface of the floor in a below-grade structure
- Is in one of four categories:
  1. Lubricant/coolant tank
  2. Hazardous waste tank
  3. Emergency system tank
  4. Other petroleum tank

STRUCTURE:

- At least 10% below grade,
- Provides secondary containment
- Allows for direct viewing.

APSA Regulations Update

- HMD will perform APSA scope inspections at “TIUGA-Only” facilities during their next scheduled Routine
  - Approximately 53 facilities in San Diego County.
- New regulations create State mandate for facilities to complete the APSA section in CERS annually.
- CUPAs must inspect Conditionally Exempt facilities every three years to ensure they still meet requirements of the exemption.

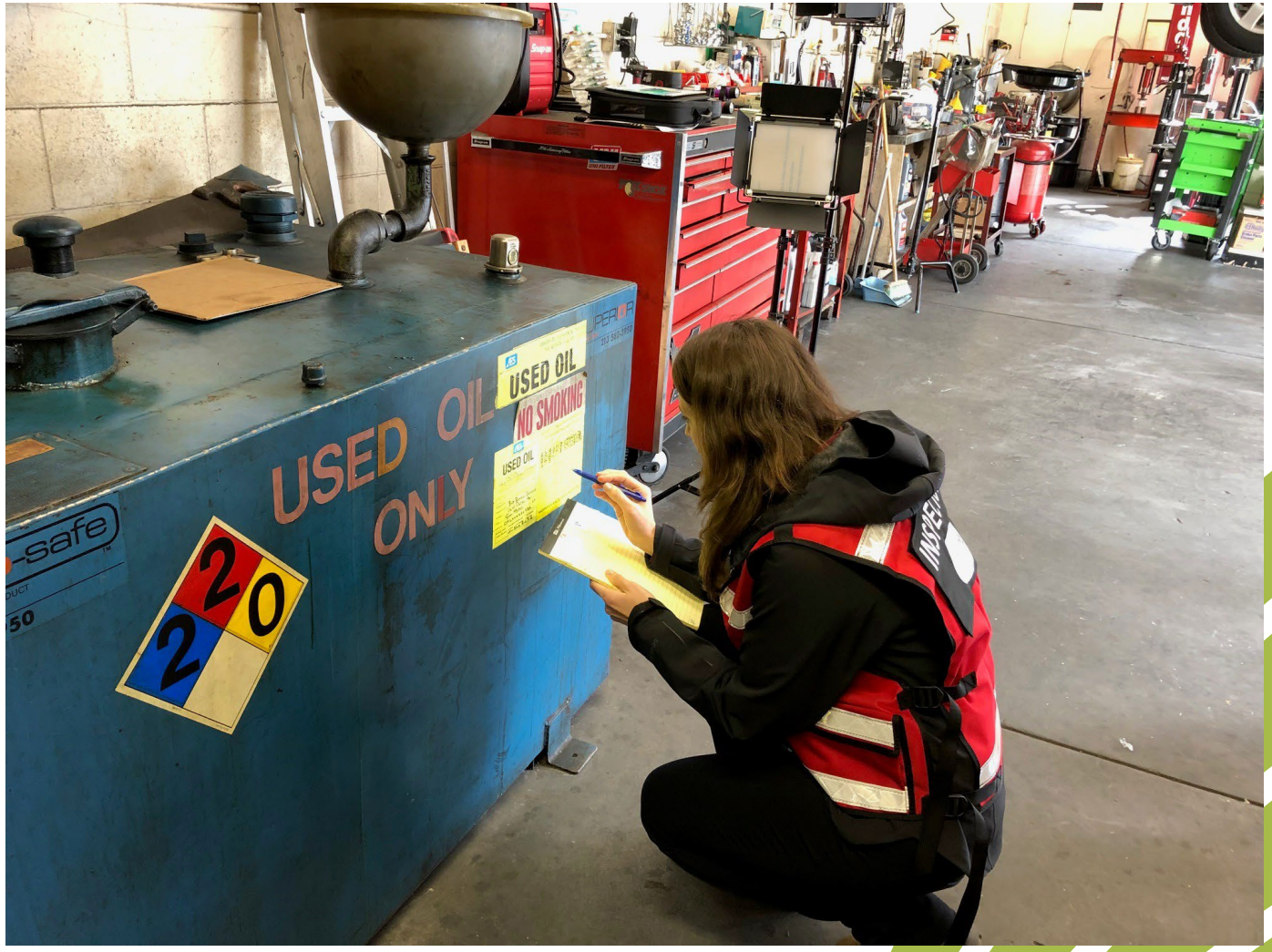
HMD APSA Inspections

FACILITY TYPE	Small APSA	Large APSA
TOTAL VOLUME	< 10,000 gal*	≥ 10,000 gal
INSPECTION TYPE	Abbreviated	Comprehensive
INSPECTED BY	EHS	Lead EHS

New regulations mandate CUPAs to inspect **all facilities with less than 10,000 gallons of petroleum.*

APSA Tank Inspection Requirements

What exactly is needed?



Why do I Need to Inspect my Tanks?

HSC 25270.4.5: The owner or operator of an APSA Facility shall prepare a spill prevention control and countermeasure (SPCC) plan applying good engineering practices to prevent petroleum releases **using the same format required by Part 112**.

An owner or operator of an APSA Facility shall **conduct periodic inspections of the storage tank to ensure compliance with Part 112** (commencing with Section 112.1) of the most up to date version of 40 CFR.

40 CFR 112.8(c)(6): Facilities subject to the Spill rule must **test or inspect each aboveground container for integrity on a regular** schedule and whenever you make material repairs. You must **determine, in accordance with industry standards**, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design.

STI SP001: Inspection standard for welded, carbon or stainless-steel shop-fabricated tanks (up to 75,000 gallons in capacity) and field-erected tanks (up to 264,000 gallons). Typically, any tank larger than 30 ft diameter x 50 ft height would not be applicable to SP001.

In addition, SP001 can apply to the inspection of portable containers such as 55-gallon drums or intermediate bulk containers (IBCs).

Why do I Need to Inspect my Tanks?

TABLE 5.5 TABLE OF INSPECTION SCHEDULES

AST Type and Capacity in U.S. gallons (liters)		Category 1	Category 2	Category 3
Shop-Fabricated ASTs	0 – 1100 (0-4164 liters)	P	P	P, E&L(10)
	1101 - 5,000 (4168-18,927 liters)	P	P, E&L(10)	[P, E&L(5), I(10)] or [P, L(2), E(5)]
	5,001 - 30,000 (18,931-113,562 liters)	P, E(20)	[P, E(10), I(20)] or [P, E(5), L(10)]	[P, E&L(5), I(10)] or [P, L(1), E(5)]
	30,001 - 75,000 (113,566-283,906 liters)	P, E(20)	P, E&L(5), I(15)	P, E&L(5), I(10)
Portable Containers		P	P	P**

** Owner shall either discontinue use of portable container for storage or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule (refer to Section 9.0):
Plastic portable container - every 7 years
Steel portable container - every 12 years
Stainless Steel portable container - every 17 years

Why do I Want to Inspect my Tanks?

Cost savings

Tank longevity

- Minimize possibility of a tank failure
- A replacement tank could range from **$11,000 – 15,000** (based on a 2006 EPA study)
  - In 2025, **~$18,000 – $24,000** [calculated using CPI in 2006 (102.600) vs CPI in 2025 (315.605)]
  - A Single UL142 certified 1,000 gallon tank could cost $4,500 - $10,000 (google search)
- Well-maintained tanks can last 20 years (if not, longer)

Less Spills and Releases

- Contractor clean-ups could cost $4,000 – $25,000, depending on the size of the spill
- Even more if the spill released to sewer

Minimize chance of enforcement

- Minor violations could cost up to **$5,600 per day, per violation**
- Major violations could cost up to **$70,000 per day, per violation**
- Penalties from investigation: cost of sampling, waste disposal, hourly CUPA staff, case preparation

How Do I Inspect my Tanks

[SP001 Monthly Checklist for Shop Fabricated Tanks]

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

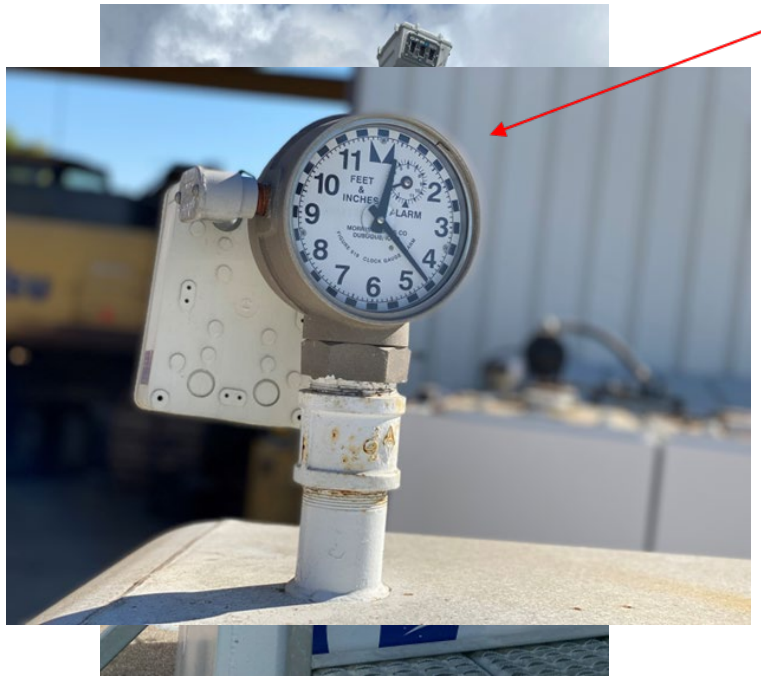
- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are equivalent and meet all applicable inspection checklist items. Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that some non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- If the inspection finds the integrity of the spill control system and/or the CRDM, such as items 13 and 14, is compromised the tank category and inspection time table should be re-evaluated by someone knowledgeable about the SP001 standard.
- Retain the completed checklists for at least 36 months.
- **After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency ven valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note**: *If "No", identify tank and describe leak and actions taken.*	☐ Yes ☐ No*	
2	Is the tank liquid level gauge legible and in good working condition?	☐ Yes ☐ No* ☐ N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	☐ Yes ☐ No*	
4	Is tank shell or supports free of soil, vegetation, water, or foreign material collected or covering the grade line (tank chime or bottom projection)?	☐ Yes ☐ No* ☐ N/A	
5	Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	☐ Yes ☐ No* ☐ N/A	
6	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	☐ Yes ☐ No* ☐ N/A	
7	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	☐ Yes ☐ No* ☐ N/A	
	Equipment on tank		
8	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	☐ Yes ☐ No* ☐ N/A	
9	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	☐ Yes ☐ No* ☐ N/A	
10	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	☐ Yes ☐ No* ☐ N/A	
11	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note**: *If "No", identify location and describe leak.*	☐ Yes ☐ No*	
12	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	☐ Yes ☐ No* ☐ N/A	
	Containment (Diking/Impounding)		
13	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	☐ Yes ☐ No* ☐ N/A	
14	Are dike drain valves closed and in good working condition?	☐ Yes ☐ No* ☐ N/A	
15	Are containment egress pathways clear and any gates/doors operable?	☐ Yes ☐ No* ☐ N/A	
	Concrete Exterior AST (CE-AST)		
16	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	☐ Yes* ☐ No ☐ N/A	
17	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	☐ Yes ☐ No* ☐ N/A	
18	Visual inspect all tank top openings including nipples, manways, tank top spill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	☐ Yes ☐ No* ☐ N/A	
	Other Conditions		
19	Is the system free of any other conditions that need to be addressed for continued safe operation?	☐ Yes ☐ No*	

How Do I Inspect my Tanks

SP001 Monthly Checklist for Shop Fabricated Tanks

	ITEM	STATUS
	Tank and Piping	
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note**: *If "No", identify tank and describe leak and actions taken.*	☐ Yes ☐ No*
2	Is the tank liquid level gauge legible and in good working condition?	☐ Yes ☐ No* ☐ N/A
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	☐ Yes ☐ No*



How Do I Inspect my Tanks?

SP001 Monthly Checklist for Shop Fabricated Tanks

4	Is tank shell or supports free of soil, vegetation, water, or foreign material collected or covering the grade line (tank chime or bottom projection)?	☐ Yes ☐ No* ☐ N/A
5	Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	☐ Yes ☐ No* ☐ N/A
6	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	☐ Yes ☐ No* ☐ N/A
7	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks?

[SP001 Monthly Checklist for Shop Fabricated Tanks]

		Equipment on tank	
8	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	☐ Yes ☐ No* ☐ N/A	
9	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	☐ Yes ☐ No* ☐ N/A	
10	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	☐ Yes ☐ No* ☐ N/A	
11	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note**: *If "No", identify location and describe leak.*	☐ Yes ☐ No*	
12	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	☐ Yes ☐ No* ☐ N/A	

How Do I Inspect my Tanks?

[SP001 Monthly Checklist for Shop Fabricated Tanks]

	Containment (Diking/Impounding)	
13	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	☐ Yes ☐ No* ☐ N/A
14	Are dike drain valves closed and in good working condition?	☐ Yes ☐ No* ☐ N/A
15	Are containment egress pathways clear and any gates/doors operable?	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks?

SP001 Monthly Checklist for Shop Fabricated Tanks

	Concrete Exterior AST (CE-AST)	
16	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	☐ Yes* ☐ No ☐ N/A
17	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	☐ Yes ☐ No* ☐ N/A
18	Visual inspect all tank top openings including nipples, manways, tank top spill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks?

SP001 Annual Checklist for Shop Fabricated Tanks

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent and meet all applic
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not re shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Promptly remove standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharg environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing device ensure proper operation (40 CFR 112.8(c)(8)(v)).
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that non-conforming items imp containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determir action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated aga requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	☐ Yes ☐ No*	
2	Concrete pad or ring wall free of cracking and spalling?	☐ Yes ☐ No* ☐ N/A	
3	Tank supports in satisfactory condition?	☐ Yes ☐ No* ☐ N/A	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	☐ Yes ☐ No* ☐ N/A	
5	Is the grounding strap between the tank and foundation/supports in good condition?	☐ Yes ☐ No* ☐ N/A	
	Tank Shell, Heads and Roof		
6	Free of visible signs of coating failure?	☐ Yes ☐ No*	
7	Free of noticeable distortions, buckling, denting, or bulging?	☐ Yes ☐ No*	
8	Free of standing water on roof?	☐ Yes ☐ No* ☐ N/A	
9	Are all labels and tags intact and legible?	☐ Yes ☐ No*	
	Tank Manways and Piping		
10	Are piping system joints, manway covers, gaskets, and attachment bolts tight and in good condition with no sign of wear, damage, leaks or corrosion?	☐ Yes ☐ No* ☐ N/A	
11	Are piping supports in good condition and free of corrosion and damage?	☐ Yes ☐ No* ☐ N/A	
12	Is leak or release detection on underground piping being performed and documented if required?	☐ Yes ☐ No* ☐ N/A	
	Tank Equipment		
13	Normal and emergency vents free of obstructions?	☐ Yes ☐ No*	
14	Have the level sensing devices (e.g. level gauges, alarms) been checked for operability, where possible, as per manufacturer's instructions or good engineering practice?	☐ Yes ☐ No* ☐ N/A	
15	Have flame arrestors been maintained per manufacturer's recommendations?	☐ Yes ☐ No* ☐ N/A	
16	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	☐ Yes ☐ No* ☐ N/A	

How Do I Inspect my Tanks?

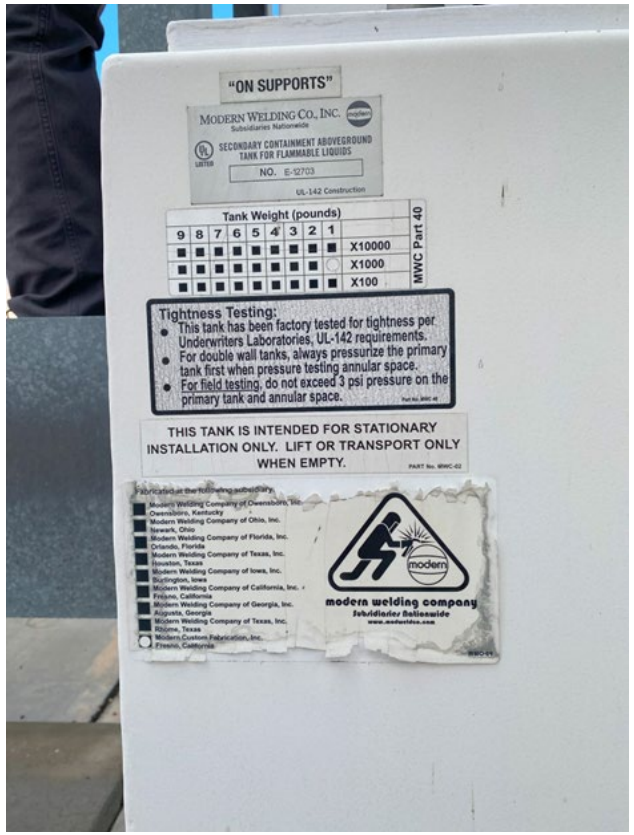
[SP001 Annual Checklist for Shop Fabricated Tanks]

	ITEM	STATUS
	Tank Foundation/Supports	
1	Free of tank settlement or foundation washout?	☐ Yes ☐ No*
2	Concrete pad or ring wall free of cracking and spalling?	☐ Yes ☐ No* ☐ N/A
3	Tank supports in satisfactory condition?	☐ Yes ☐ No* ☐ N/A
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	☐ Yes ☐ No* ☐ N/A
5	Is the grounding strap between the tank and foundation/supports in good condition?	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks?

[SP001 Annual Checklist for Shop Fabricated Tanks]

		Tank Shell, Heads and Roof	
6	Free of visible signs of coating failure?	☐ Yes ☐ No*	
7	Free of noticeable distortions, buckling, denting, or bulging?	☐ Yes ☐ No*	
8	Free of standing water on roof?	☐ Yes ☐ No* ☐ N/A	
9	Are all labels and tags intact and legible?	☐ Yes ☐ No*	



How Do I Inspect my Tanks?

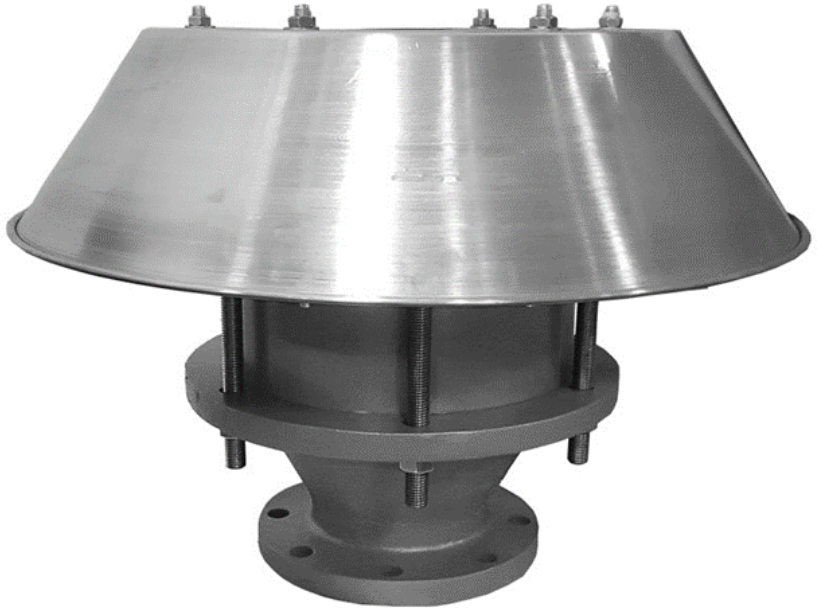
SP001 Annual Checklist for Shop Fabricated Tanks

	Tank Manways and Piping		
10	Are piping system joints, manway covers, gaskets, and attachment bolts tight and in good condition with no sign of wear, damage, leaks or corrosion?	☐ Yes ☐ No* ☐ N/A	
11	Are piping supports in good condition and free of corrosion and damage?	☐ Yes ☐ No* ☐ N/A	
12	Is leak or release detection on underground piping being performed and documented if required?	☐ Yes ☐ No* ☐ N/A	

How Do I Inspect my Tanks?

[SP001 Annual Checklist for Shop Fabricated Tanks]

Tank Equipment			
13	Normal and emergency vents free of obstructions?	☐ Yes ☐ No*	
14	Have the level sensing devices (e.g, level gauges, alarms) been checked for operability, where possible, as per manufacturer's instructions or good engineering practice?	☐ Yes ☐ No* ☐ N/A	
15	Have flame arrestors been maintained per manufacturer's recommendations?	☐ Yes ☐ No* ☐ N/A	
16	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	☐ Yes ☐ No* ☐ N/A	



How Do I Inspect my Tanks

[SP001 Annual Checklist for Shop Fabricated Tanks]

17	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?"	☐ Yes ☐ No* ☐ N/A
18	Are all valves free of leaks, corrosion, and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable):	
	☐ Anti-siphon valve	☐ Yes ☐ No* ☐ N/A
	☐ Check valve	☐ Yes ☐ No* ☐ N/A
	☐ Gate, ball, or isolation valve	☐ Yes ☐ No* ☐ N/A
	☐ Pressure regulator valve	☐ Yes ☐ No* ☐ N/A
	☐ Expansion relief valve	☐ Yes ☐ No* ☐ N/A
	☐ Solenoid valve	☐ Yes ☐ No* ☐ N/A
	☐ Fire valve	☐ Yes ☐ No* ☐ N/A
	☐ Shear valve	☐ Yes ☐ No* ☐ N/A
19	Are strainers and filters clean and in good condition?	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks

SP001 Annual Checklist for Shop Fabricated Tanks

	Insulated Tanks	
20	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	☐ Yes ☐ No* ☐ N/A
21	Insulation free of noticeable areas of moisture?	☐ Yes ☐ No* ☐ N/A
22	Insulation free of mold?	☐ Yes ☐ No* ☐ N/A
23	Free of visible signs of coating failure?	☐ Yes ☐ No* ☐ N/A
	Other Equipment	
24	Are electrical wiring and boxes in good condition?	☐ Yes ☐ No* ☐ N/A
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	☐ Yes ☐ No* ☐ N/A

How Do I Inspect my Tanks

SP001 Annual Checklist for Shop Fabricated Tanks

STI SP001 Portable Container Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature (): _____

Container(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are equivalent and meet all applicable inspection checklist items.
- This periodic Inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.

	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*
3	Are drain valves closed and in good working condition?	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A
4	Are containment egress pathways clear and any gates/doors operable?	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A	☐ Yes ☐ No* ☐ N/A
	Container				
5	Is the container free of leaks? Note: *If "No", discontinue use of container*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*
6	Is the container free of distortions, buckling, denting or bulging? Note: *If "No", discontinue use of container*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*	☐ Yes ☐ No*

Inspection Schedule - Category

TABLE 5.5 TABLE OF INSPECTION SCHEDULES

AST Type and Capacity in U.S. gallons (liters)		Category 1	Category 2	Category 3
Shop-Fabricated ASTs	0 – 1100 (0-4164 liters)	P	P	P, E&L(10)
	1101 - 5,000 (4168-18,927 liters)	P	P, E&L(10)	[P, E&L(5), I(10)] or [P, L(2), E(5)]
	5,001 - 30,000 (18,931-113,562 liters)	P, E(20)	[P, E(10), I(20)] or [P, E(5), L(10)]	[P, E&L(5), I(10)] or [P, L(1), E(5)]
	30,001 - 75,000 (113,566-283,906 liters)	P, E(20)	P, E&L(5), I(15)	P, E&L(5), I(10)
Portable Containers		P	P	P**

** Owner shall either discontinue use of portable container for storage or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule (refer to Section 9.0):
Plastic portable container - every 7 years
Steel portable container - every 12 years
Stainless Steel portable container - every 17 years

Understand your equipment

No legible tank plate?

- STI AST Record

Document ALL Inspections (Minimum 3 years)

Know which agency you're working with.

APCD – Generator engine and emissions

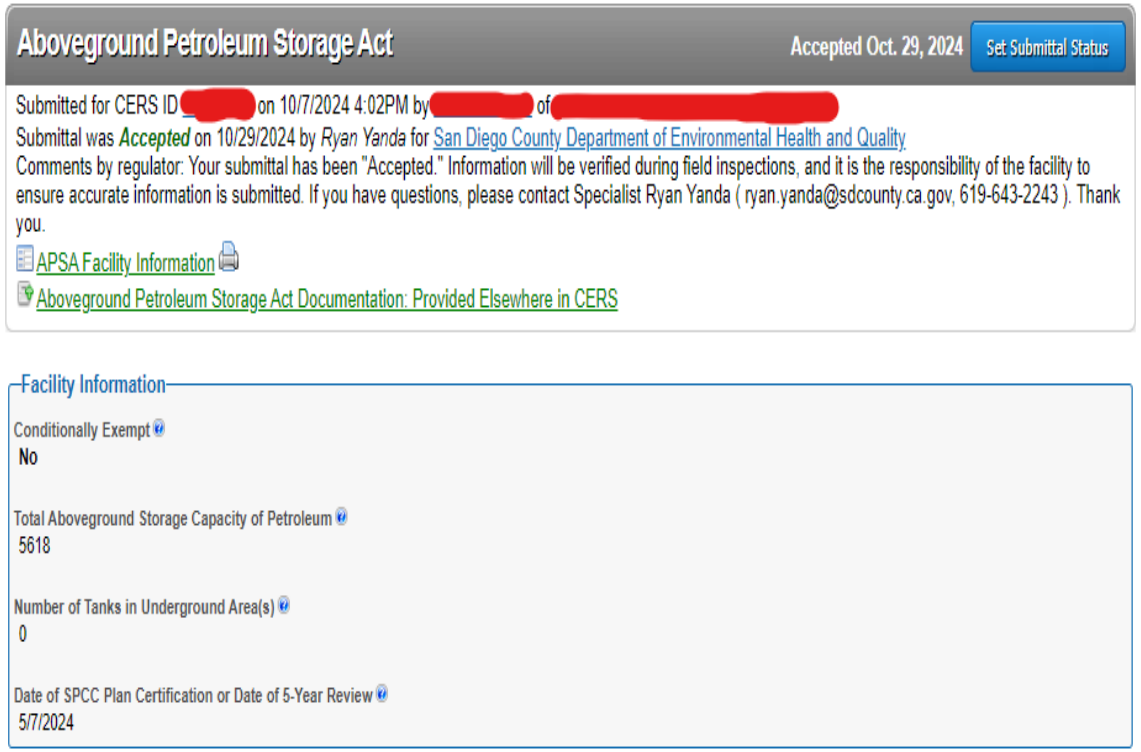
HMD – Hazardous materials storage tank and tank equipment

APSA Tips

COUNTY OF SAN DIEGO

Top Five APSA Tips since 2022

1 Keep up to date and annually submit the APSA Program element in CERS.



Aboveground Petroleum Storage Act — Accepted Oct. 29, 2024 — Set Submittal Status

Submitted for CERS ID [redacted] on 10/7/2024 4:02PM by [redacted] of [redacted]

Submittal was *Accepted* on 10/29/2024 by *Ryan Yanda* for San Diego County Department of Environmental Health and Quality

Comments by regulator: Your submittal has been "Accepted." Information will be verified during field inspections, and it is the responsibility of the facility to ensure accurate information is submitted. If you have questions, please contact Specialist Ryan Yanda (ryan.yanda@sdcounty.ca.gov, 619-643-2243). Thank you.

APSA Facility Information

Aboveground Petroleum Storage Act Documentation: Provided Elsewhere in CERS

Facility Information

Conditionally Exempt
No

Total Aboveground Storage Capacity of Petroleum
5618

Number of Tanks in Underground Area(s)
0

Date of SPCC Plan Certification or Date of 5-Year Review
5/7/2024

2 Prepare and implement an SPCC Plan.

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

CALIFORNIA CUPA FORUM – APSA WORKING GROUP
TIER II QUALIFIED FACILITY SPCC PLAN TEMPLATE

Top Five APSA Tips since 2022

3 Conduct an annual Spill Prevention Briefing.

4 Perform and document a five-year review of the SPCC Plan.

Top Five APSA Tips since 2022

5

Keep a record of inspections and integrity tests.

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are equivalent and meet all applicable inspection checklist items. Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that some non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- If the inspection finds the integrity of the spill control system and/or the CRDM, such as items 13 and 14, is compromised the tank category and inspection time table should be re-evaluated by someone knowledgeable about the SP001 standard.
- Retain the completed checklists for at least 36 months.
- **After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note**: *If "No", identify tank and describe leak and actions taken.*	☐ Yes ☐ No*	
2	Is the tank liquid level gauge legible and in good working condition?	☐ Yes ☐ No* ☐ N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	☐ Yes ☐ No*	

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	☐ Yes ☐ No ☐ N/A	
2	Concrete pad or ring wall free of cracking and spalling?	☐ Yes ☐ No ☐ N/A	

Certified STI SP001 Integrity Test

APSA Resources

OSFM APSA Website

Emergency? Call 911 Translate Settings

ABOUT | WHAT WE DO | OUR IMPACT | COMMITTEES | RESOURCES | JOIN US | Search safety information | SEARCH

Home › What We Do › Pipeline Safety & CUPA › Certified Unified Program Agency (CUPA) › Aboveground Petroleum Storage Act

Aboveground Petroleum Storage Act

CAL FIRE-Office of the State Fire Marshal (OSFM) is responsible for ensuring the implementation of the Aboveground Petroleum Storage Act (APSA) program element of the Unified Program.

The original aboveground storage of petroleum statute was adopted in 1989 (Statutes of 1989, chapter 1383, section 1). Under the 1989 law, the State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (Regional Water Boards) were responsible for the administration of the law and the Regional Water Boards were responsible for inspection of the regulated facilities and enforcement of the law. The Unified Program Agencies' (UPA) role under the original law and during the course of conducting Unified Program inspections was to determine whether a tank facility had prepared a Spill, Prevention, Control and Countermeasure (SPCC) Plan and to refer noncompliance to the Regional Water Boards. As a result of the fiscal year 2002-2003 fiscal crisis, the State Water Board's resources for this program were eliminated as a cost saving measure and all inspection and enforcement activities were halted.

Effective January 1, 2008, Assembly Bill (AB) 1130 (Laird) transferred the responsibility for the implementation, enforcement and administration of APSA with the UPAs. Assembly member John Laird's letter, dated September 11, 2007, provided clarification on the nature of the program being transferred from the state to the UPAs. On September 25, 2012, AB 1566 (Wieckowski) authorized the CAL FIRE-Office of the State Fire Marshal the oversight responsibility of APSA effective January 1, 2013.

APSA regulates tank facilities that are subject to the federal SPCC rule or tank facilities with an aggregate storage capacity of 1,320 gallons or

HMD APSA Website

Aboveground Petroleum Storage Act Forms

Complete and implement the appropriate form:

Tier I Facility Spill Prevention Control and Countermeasure (SPCC) Plan
Tier II Facility Spill Prevention Control and Countermeasure (SPCC) Plan
Certification of the Applicability of the Substantial Harm Criteria (Required at all APSA facilities)

For guidance on selecting the correct SPCC Plan for your facility and for more information about APSA, please visit our **Aboveground Petroleum Storage Program** page.

Submit a completed Tank Facility Statement to the Aboveground Petroleum Storage Act Documentation link in the APSA section in CERS:

Tank Facility Statement (APSA)

(This form is optional if you rely on a submitted Hazardous Materials Business Plan (HMBP) in CERS to meet the annual Tank Facility Statement requirement.)

APSA Checklists

STI SP001 AST Record
STI SP001 Monthly AST Inspection Checklist
STI SP001 Annual AST Inspection Checklist
Monthly Visual (OSFM) Inspection Checklist for TIUGAs at Facilities with Less than 1,320 gallons
Sample Monthly Aboveground Tank/Container Inspection Form

Monthly Checklist for TIUGA Facility with Less than 1,320 Gallons of Petroleum (**Word** | **PDF**)

Questions

and answers.

THANK YOU