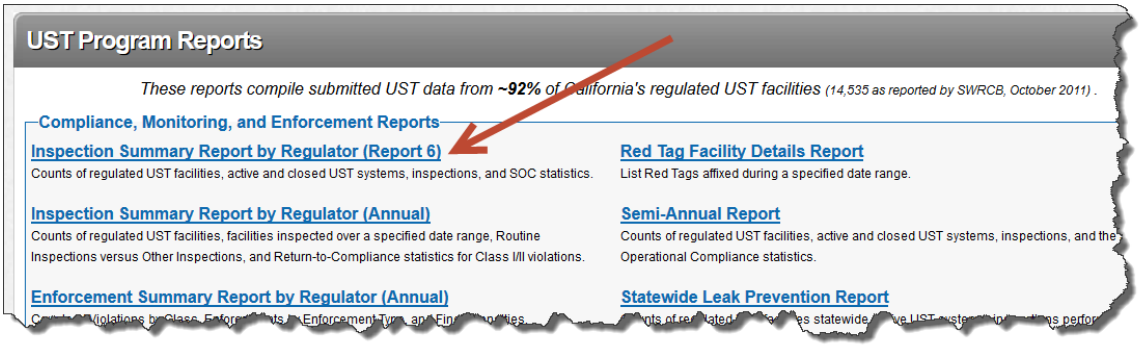
Creating a Valid CERS Report 6 (Revised 4/26/2016)

Question: How does a UPA ensure that the CERS generated Report 6 provides current, accurate information?

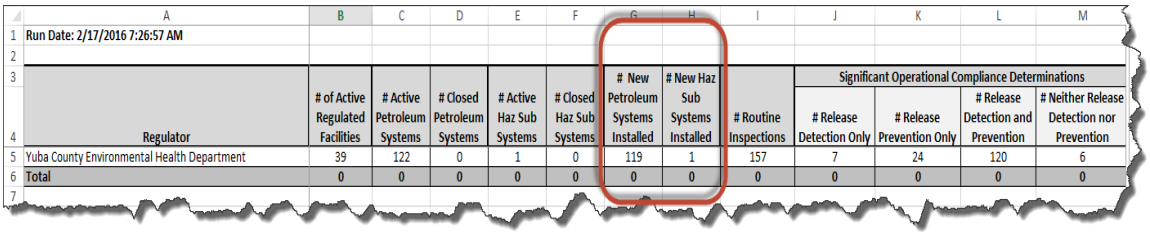
Answer: Much of the data reported in the CERS UST reports is based on 'Accepted' submittals. If a submittal has not been reviewed (status = 'submitted'), or its' status has been set to 'under review' or 'not accepted' the results will not be included in these reports. This was intentional to ensure that the data from the reports is based on UPA-validated data. The following will assist UPAs in evaluating the UST related data in CERS and will identify actions to take to resolve inconsistencies. Once completed, as long as the UPA maintains the data as described below the UST reports in CERS should be valid for the Water Board, US EPA and your own use. Report 6 was revised in December 2015 and again in February 2016. Changes include two new columns; G: #New Petroleum Systems Installed, and H: #New Hazardous Substance Systems. Additional changes to this FAQ are highlighted in red. April 2016 changes are highlighted in bright red.

Developing an accurate Report 6 in CERS for the first time

Step 1: Run Report 6. Do not enter a date range if you are trying to verify all UST data to date.

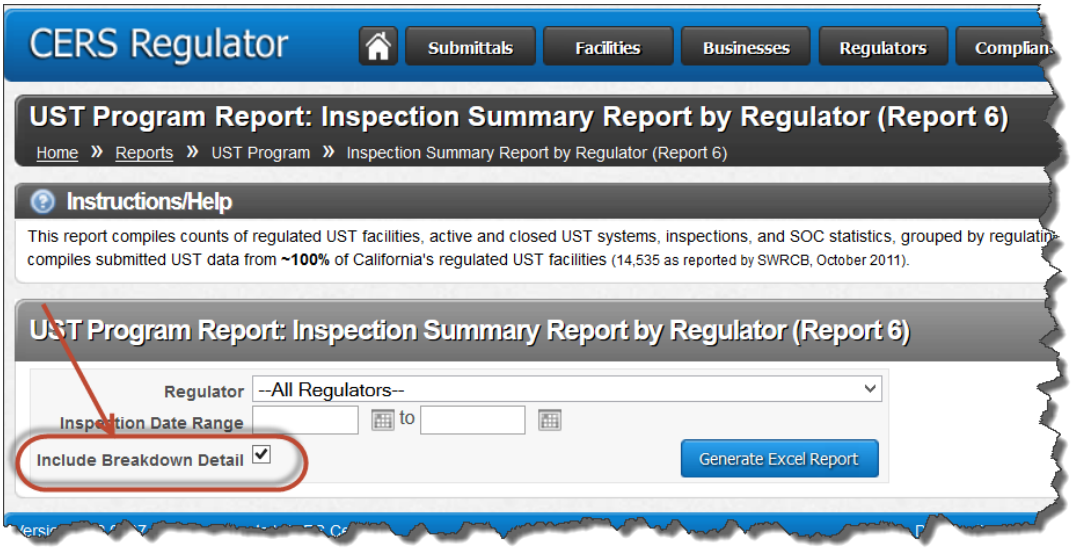


Note the new columns

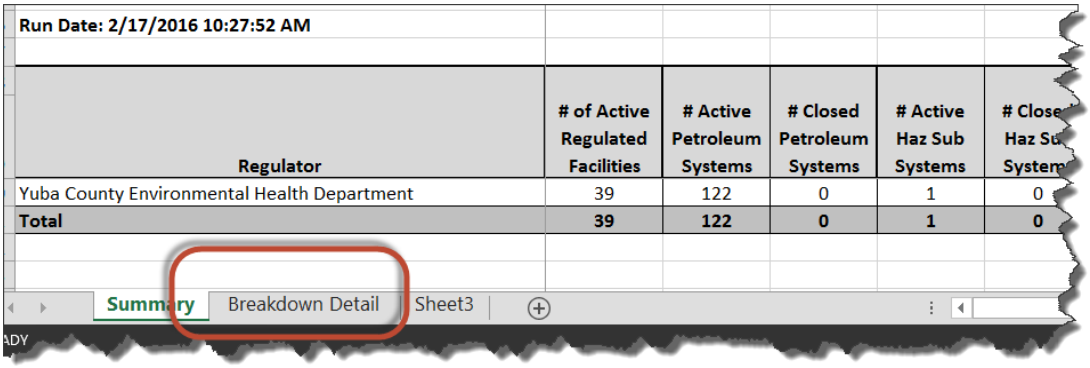


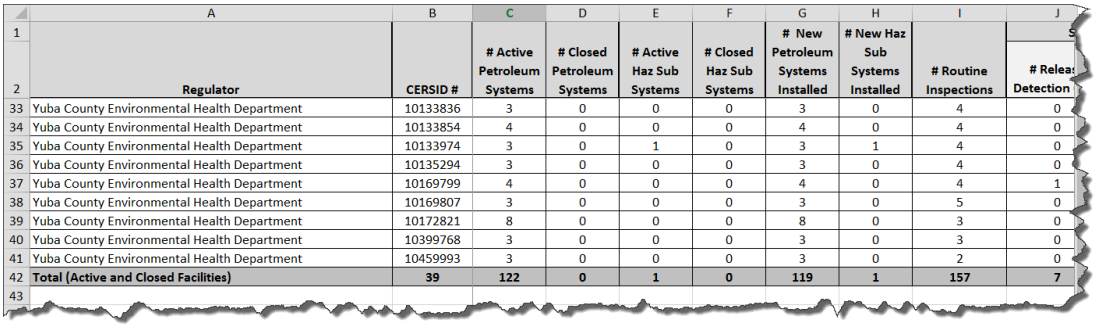
	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Run Date: 2/17/2016 7:26:57 AM												
2													
3							# New Petroleum Systems Installed	# New Haz Sub Systems Installed		Significant Operational Compliance Determinations			
4	Regulator	# of Active Regulated Facilities	# Active Petroleum Systems	# Closed Petroleum Systems	# Active Haz Sub Systems	# Closed Haz Sub Systems			# Routine Inspections	# Release Detection Only	# Release Prevention Only	# Release Detection and Prevention	# Neither Release Detection nor Prevention
5	Yuba County Environmental Health Department	39	122	0	1	0	119	1	157	7	24	120	6
6	Total	0	0	0	0	0	0	0	0	0	0	0	0
7													

- Check the box 'Include Breakdown Detail' to view CERS IDs included in the Report 6 summary. Later you can compare this data with the results from the Facility/Tank Data Download report.



Select the 'Breakdown Detail' tab at the bottom of the report to display the details:

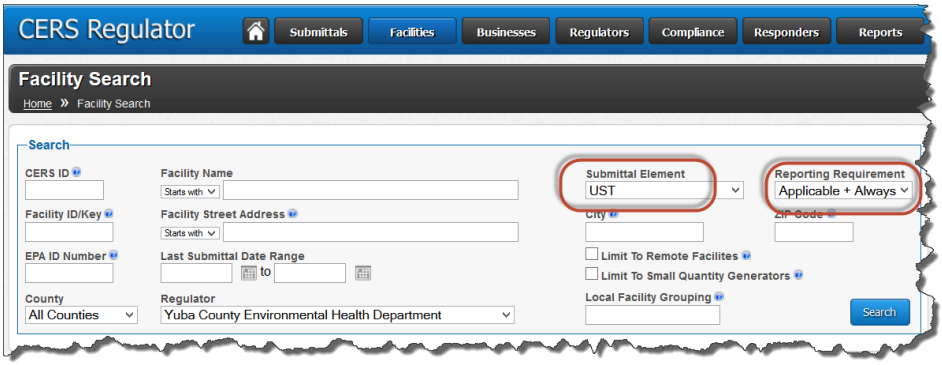




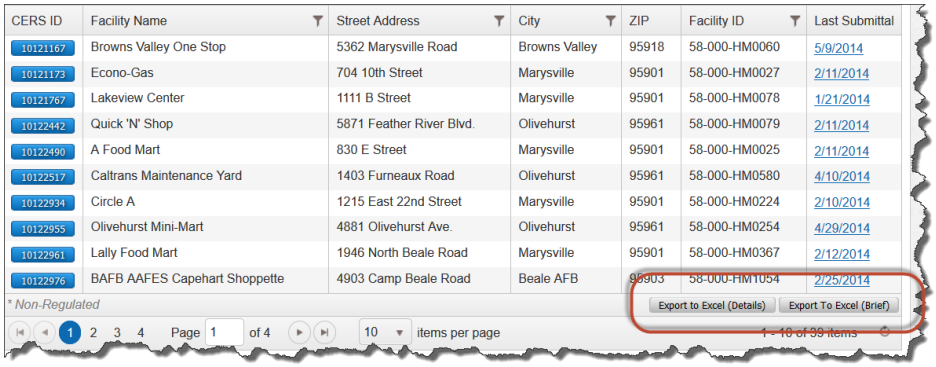
	A	B	C	D	E	F	G	H	I	J
1										
2	Regulator	CERSID #	# Active Petroleum Systems	# Closed Petroleum Systems	# Active Haz Sub Systems	# Closed Haz Sub Systems	# New Petroleum Systems Installed	# New Haz Sub Systems Installed	# Routine Inspections	# Releas Detection
33	Yuba County Environmental Health Department	10133836	3	0	0	0	3	0	4	0
34	Yuba County Environmental Health Department	10133854	4	0	0	0	4	0	4	0
35	Yuba County Environmental Health Department	10133974	3	0	1	0	3	1	4	0
36	Yuba County Environmental Health Department	10135294	3	0	0	0	3	0	4	0
37	Yuba County Environmental Health Department	10169799	4	0	0	0	4	0	4	1
38	Yuba County Environmental Health Department	10169807	3	0	0	0	3	0	5	0
39	Yuba County Environmental Health Department	10172821	8	0	0	0	8	0	3	0
40	Yuba County Environmental Health Department	10399768	3	0	0	0	3	0	3	0
41	Yuba County Environmental Health Department	10459993	3	0	0	0	3	0	2	0
42	**Total (Active and Closed Facilities)**	**39**	**122**	**0**	**1**	**0**	**119**	**1**	**157**	**7**
43										

Step 2: Verify the number of UST Facilities in Report 6 is correct

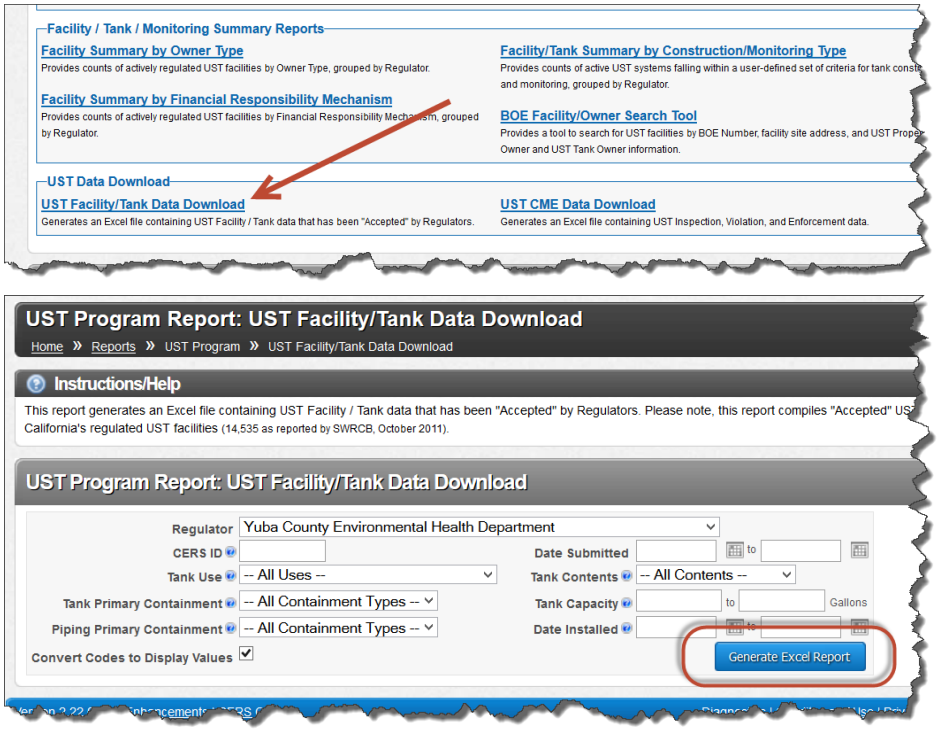
- Every UST facility in your jurisdiction must have a UST Submittal Element in CERS that is set to 'applicable' or 'always applicable'. You can confirm this number by performing a search in the Facility section for all facilities with the UST submittal element set to 'applicable' or 'always applicable'.



- If the search results total number matches the correct number of UST facilities in your jurisdiction you can move on to step 3. If not, you need to identify which facilities are causing the inconsistency. Follow these steps:
    - After you perform the search in the Facility section for all facilities with the UST submittal element set to 'applicable' or 'always applicable' export the results to Excel using either of the links in the lower right hand corner of the table.



    - Run a UST Facility/Tank Data Download report from the Reports section. Click on the link to get the Excel list of UST sites.



- Compare the two tables and the list of CERS IDs in the Breakdown detail of Report 6 to find the facilities *that are **not** on all three tables*. Investigate to determine the reason for the inconsistency for each facility and take appropriate action. These tables must match and must include all known UST sites in your jurisdiction before going to the next step.
- Exception: Sites where all tanks have been permanently closed or removed will be listed in the UST Facility/Tank Data Download, provided there is at least one 'accepted' UST submittal, but they will not be in Report 6 if the UST submittal element has been set to 'not applicable'. Report this as an anomaly on your Report 6 or in the email certification if you are reporting using the paperless process. Note: this inconsistency will be corrected in CERS 3.

Step 3: Verify the number of underground tank systems in columns B through H

B	C	D	E	F	G	H	
CERSID #	# Active Petroleum Systems	# Closed Petroleum Systems	# Active Haz Sub Systems	# Closed Haz Sub Systems	# New Petroleum Systems Installed	# New Haz Sub Systems Installed	# In
10135294	3	0	0	0	3	0	

- Once the number of UST facilities in CERS is correct, the number of tank systems listed in Report 6 should be consistent with the number reported in the UST Facility/Tank Data Download report

and with your internal records. Staff familiar with the UST sites should review to ensure that UST facilities properly reported each UST. Note that for compartmented tanks, each compartment must be reported as a separate UST. Any inaccuracies should be reported to the business along with a request for an updated UST submittal. Temporarily closed USTs are ~~not~~ included in the count of active UST systems.

- CERS counts of Petroleum and Hazardous Substance systems are based on the 'Tank Contents' field visible in the UST Facility/Tank Data Download report.
    - Petroleum systems include Regular, Premium, Midgrade Unleaded, Diesel, Jet Fuel, Aviation Gas, Petroleum Blend Fuel and Other Petroleum.
    - Hazardous Substance systems include Used Oil, Ethanol, Other Non-Petroleum.
    - 'Tank Use' field data is not included in determining the tank counts in Report 6.
- Make sure all USTs have a valid date in the "Date UST System Installed" box on the UST Tank Information page (field #435). CERS uses this date to calculate the number of active USTs and new UST systems installed in the Report 6.
- The number of closed UST systems is covered later in this FAQ (Step 6).

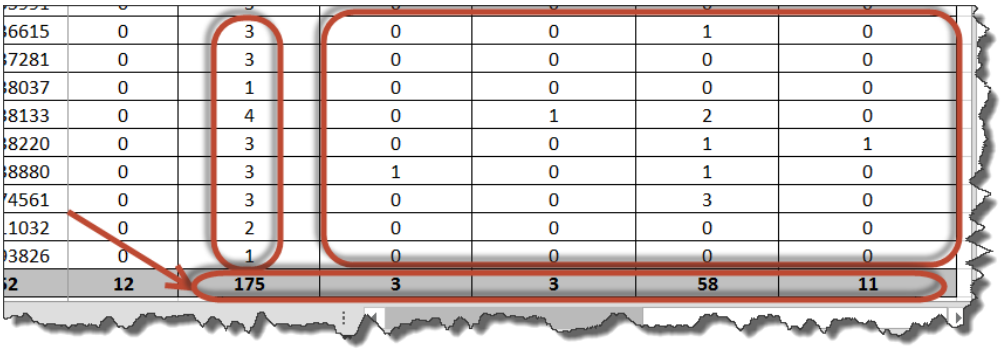
Step 4: Confirm '# Routine Inspections', column I, equals the sum of the totals displayed for the Significant Operational Compliance (SOC) Determinations, columns J, K, L and M.

- If they are not equal you can scan the breakdown to see which site was incorrectly reported:

Correct:

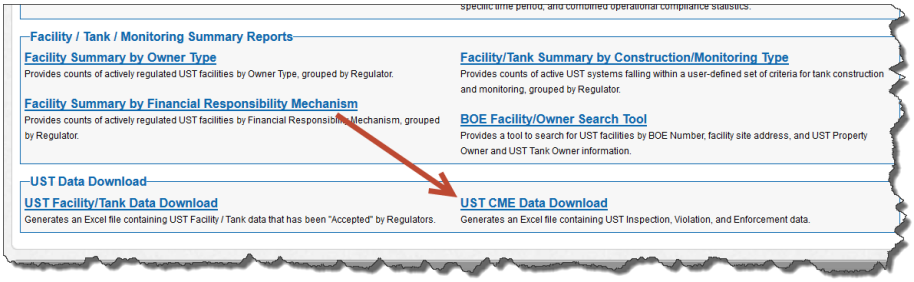
4	0	3	1	0
4	0	1	3	0
4	1	0	2	1
5	0	0	5	0
3	0	0	3	0
3	0	1	2	0
2	0	0	2	0
157	**7**	**24**	**120**	**6**

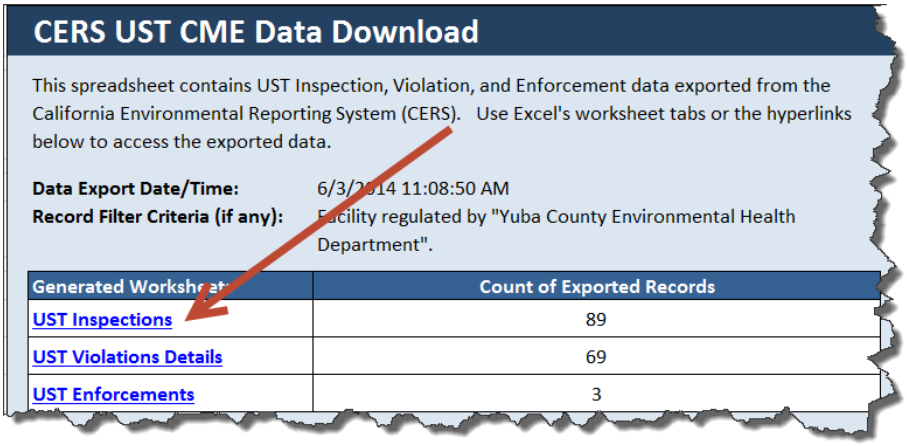
Not Correct:



6615	0	3	0	0	1	0
7281	0	3	0	0	0	0
8037	0	1	0	0	0	0
8133	0	4	0	1	2	0
8220	0	3	0	0	1	1
8880	0	3	1	0	1	0
4561	0	3	0	0	3	0
1032	0	2	0	0	0	0
3826	0	1	0	0	0	0
2	**12**	**175**	**3**	**3**	**58**	**11**

- If the numbers are not equal run the UST CME Data Download report and select the 'UST Inspections' link.

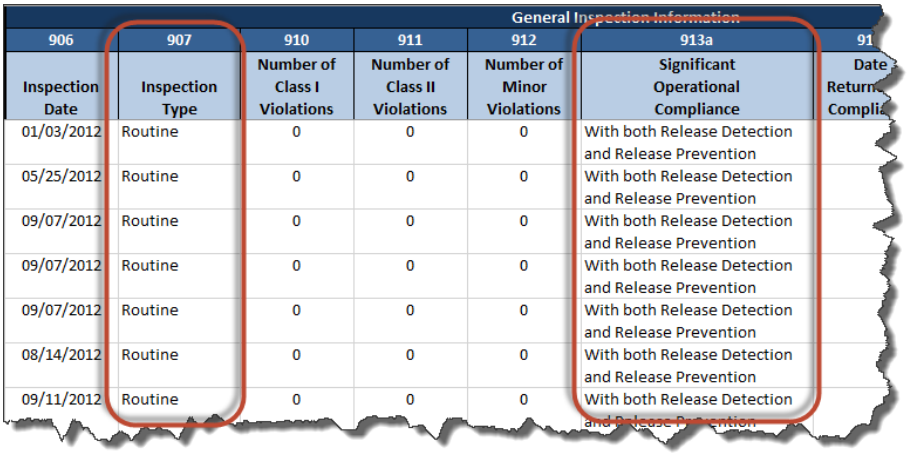




- Review columns 907 and 913a. (Note that Fields 910, 911, 912 are automatically populated when violations are created in the CME section of CERS and are not limited to Release Detection (RD) or Release Prevention (RP) violations.)
    - For each 'Routine' inspection in field 907 there should be an entry in field 913a. (SOC determination should be set only for initial routine compliance inspections. If you are manually entering CME Data into CERS, enter the SOC determination on the 'create inspection' screen.)
        - Note: If you report no violations for the inspection the SOC status should ***always*** be 'SOC with both RD and RP'.

- If you report any RP and RD violations, even minor, the facility cannot be in SOC because SOC is not recording whether a facility is *significantly* out of compliance, but whether it is in compliance with **significant** requirements.

- For each 'Other' inspection in field 907 field 913a should be blank. If 913a has an entry for an 'other' inspection the inspection record should be revised to delete the SOC determination. Even if left in, CERS will not count SOC determinations for 'Other' inspections.

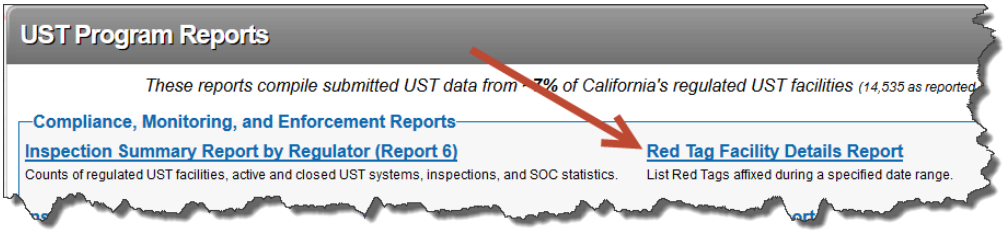


General Inspection Information

906	907	910	911	912	913a	91
Inspection Date	Inspection Type	Number of Class I Violations	Number of Class II Violations	Number of Minor Violations	Significant Operational Compliance	Date Return Compli
01/03/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
05/25/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
09/07/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
09/07/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
09/07/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
08/14/2012	Routine	0	0	0	With both Release Detection and Release Prevention	
09/11/2012	Routine	0	0	0	With both Release Detection and Release Prevention	

Step 5: Verifying all Red Tags are entered in CERS

- Run a Red Tag Facility Details report. If all known Red Tags are not listed in this report you will need to enter them in the Compliance section of CERS under Enforcement. Note that the Red Tag report only lists the facility, not which tank(s) is red-tagged. To note specific tank(s) use the comment field in the Create Enforcement or Edit Enforcement screens. This comment field is displayed as field 925 in the UST CME Download Report referenced in step 5 above. Further details are provided in the 'How to Enter Red Tag Information FAQ'.



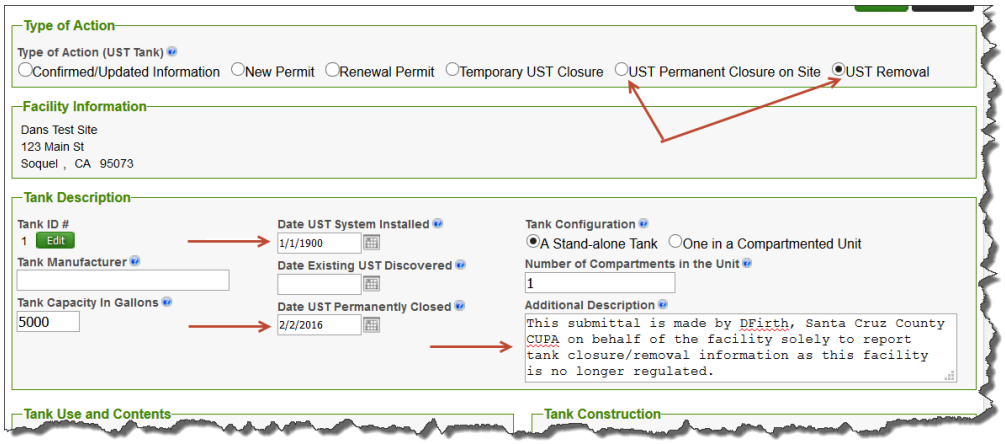
Maintaining an accurate Report 6 and other UST related data in CERS

Once you have established an accurate base of UST related information in CERS maintenance is straightforward. The following outlines the steps to maintaining the UST data so that your agency meets reporting requirements and the Water Board and US EPA can access your agency's UST data directly in CERS.

Step 6: Require timely UST facility submittals

- CERS Facilities are required to provide notice within 30 days of a significant change in their HMBP. A UST tank removal or installation is a significant change so any facility installing or removing a UST should make submittals to CERS within that timeframe to update both the HMBP and UST submittal elements. Sites where all USTs have been closed or removed and non UST sites that install a new UST can be included in CERS reports based on these submittals.

    - It may be difficult to get sites that have closed and are no longer regulated to report one last submittal to CERS confirming all tanks have been permanently closed or removed. If the facility does not make such a submittal, CUPAs with Tiers 5 and 6 EDT services can make a proxy submittal that includes the tank closure information. CUPAs and PAs that do not have these EDT services can add themselves to the business organization as a lead user to make a submittal that includes the tank closure information. In both instances, a comment should be added to the additional description field clarifying the reason for the submittal by the UPA.



- Similarly, maintaining the number of UST systems is contingent upon timely submittals from UST facilities. The count of closed USTs in Report 6 is based on UST submittals reporting installations or closures during the previous reporting period.
- For routine business reporting tracking, you can run a 'Facilities Reporting Status' Report in the Reports section of CERS. It will give you a list within a specified date range for any submittal element of who has reported and who has not.

Step 7: Provide timely review and 'acceptance' of UST submittals

- UST submittals must be reviewed and accepted before the data will be included in many of the UST reports. When reviewing UST submittals verify that the number of tanks and compartments is reported correctly. Verify there is at least one financial responsibility mechanism.

Step 8: Provide timely reporting of UST CME data

- For any agency that is manually entering CME data in CERS, an SOC determination should be entered for all initial routine compliance inspections. Agencies with electronic data transfer (EDT) capability may have software that automatically sets and reports the SOC determination as part of the EDT process.

Step 9: Periodic CERS Report validation

- Periodically perform steps 1 through 6 to verify that the data in CERS is current and correct.