

How should a changed UST Tank ID be handled?

How should a changed UST Tank ID be handled? (Updated December 16, 2016)

Answer: Do not accept a submittal where the tank ID number has been changed. Tank records cannot be deleted, so when a UPA accepts a submittal that includes a change to the UST Tank ID number, CERS counts the new Tank ID number ***as an additional tank***. Please review the related FAQ posted for Business Users, 'Can or should I change a UST Tank ID Number?' UPAs that have proxy submittal capability are advised not to make any changes to Tank ID numbers for the same reason.

CERS allows a business user to change a UST tank ID. The user selects the 'edit' button and gets the following warning pop-up screen that allows the user to change the ID number.

The screenshot shows the CERS Business portal interface. At the top, there are navigation tabs: Home, Submittals, Facilities, Compliance, and My Business. The main heading is "UST Tank Information/Monitoring Plan: Dans Test Site". Below this, there are instructions and a "Type of Action" section with radio buttons for "Confirmed/Updated Information", "New Permit", "Renewal Permit", "Temporary UST Closure", "UST Permanent Closure on Site", and "UST Removal". The "Facility Information" section shows "Dans Test Site" at "123 Main St, Soquel, CA 95073". The "Tank Description" section includes fields for "Tank ID #", "Date UST System Installed", "Date Existing UST Discovered", "Tank Configuration", and "Number of Compartments in the Unit". A red arrow points to the "Edit" button next to the "Tank ID #" field.

The screenshot shows a warning pop-up window titled "Edit Tank ID". It contains a warning icon (a red triangle with an exclamation mark) and the following text: "The Tank ID is used in local and state reporting systems to identify your tank(s). If you have previously submitted this Tank ID, do not change it without consulting with your local regulator." Below the text is a text input field labeled "Edit Tank ID" with the text "1" entered. At the bottom right of the window are two buttons: "Change Tank ID" and "Cancel".

Problem: When a UPA accepts a submittal that includes a change to the UST Tank ID number, CERS counts the new Tank ID number ***as an additional tank***. For example, a UPA has accepted a submittal

with three tanks with tank IDs 01, 02, and 03. Subsequently, the business makes a submittal and changes the tank ID numbers to tanks 1, 2 and 3, deleting the leading zero for each. Once the UPA accepts this new submittal, CERS counts these three tanks separately from tanks 01, 02 and 03 so the tank count in CERS is six tanks for the site even though they only have three tanks.

This cannot be corrected. Tank records cannot be deleted so once the submittal has been accepted the tank record becomes permanent. Even if the UPA changes the previously accepted submittal to 'not accepted', the tank data is still in the system and there is no way to delete it.

For State Water Resources Control Board reporting purposes, the UPA will need to include a variance statement in all reports and in the Paperless Report 6 Certification that states the following:

- CERS ID xxxxxxxx incorrectly reports xx underground tanks.
 - The correct tank count for this facility is xx
 - Tank ID xx was renumbered and should not be included in any report calculation. (Repeat for each tank that was given a new tank ID number).

Important note: If there have been subsequent UST submittals with the new tank ID numbers where data or uploaded documents have been changed it will be necessary to perform **a second UST submittal** based on the most recent submittal where all data and documents were correct in order that those more recent changes are not replaced with earlier outdated information. This second UST submittal is not needed if there have been no other changes except the renumbering of the tank IDs.