UST FAQ: Are hard copies of documents required to be kept onsite?

Do I have to retain hard copies of UST related documents onsite at my facility? -What about the UST Permit issued by the CUPA?

Answer: It depends. CalEPA UP Guidance Letter 14-01, revised July 7, 2014, and posted at http://www.calepa.ca.gov/CUPA/Bulletins/ states that if required information (including documents) can be 'readily accessed onsite by facility staff and UPA inspectors through electronic means' then keeping hard copies of this information and/or documents at the facility is not required. If information or document(s) cannot readily be accessed electronically then the facility is required to maintain hard copies onsite.

There is an exception in cases where there is a local law or ordinance that requires a hard copy onsite even though the information was reported electronically. Any such local requirement must be posted with the applicable local code citation(s) at https://cersbusiness.calepa.ca.gov/Reports/RegulatorLocalRequirements.

Regarding the UST permit, it is a hard copy document issued by a CUPA. There is no requirement for a business to report it electronically. Therefore, it is not addressed by the Guidance Letter and must be retained as a hard copy at the facility, as it always has been.

CalEPA's intent for the Guidance was to avoid unnecessary duplication. The primary question is, 'Is the information/document(s) readily available onsite?' The answer can be yes, electronically available, **or** yes, hard copies are available. There is no requirement for both.