

Welcome!

The CUPA Performance Evaluation & Assessment Process

March 27, 2025

Th-D1 8:00-11:45 AM



27th California Unified Program Annual Training Conference March 24-27, 2025

Introductions And Changes

John Paine, CalEPA Unified Program Manager





Introductions

Introductions				
S	State Agency		Presentation Information	Presenters
7	9	CalEPA	Overview of Presentation Overview of Evaluation Process CalEPA Assessment	John Paine Kaeleigh Pontif Melinda Blum
Wa	Vater Boards	State Water Board	UST Program Assessment	Magnolia Busse Michelle Suh
7	9	CalEPA	HMBP Requirements and CalARP Program Assessment	Andrea Moron-Solano Garett Chan
		DTSC	HWG Program Assessment	Pheleep Sidhom Mia Goings
	CAL SINCE 1885	OSFM	APSA Program Assessment	Denise Villanueva Mary Wren-Wilson

What we have planned...

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8 - 8:20 Introductions and Changes
8:20 - 8:50 Evaluation Process and CalEPA Assessment
8:50 - 9:20 UST Evaluation and Assessment Process
9:20 - 9:30 10 Minute BREAK
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9:30 - 10:00 HMBP and CalARP Program Assessment

10:00 - 10:30 HWG Program Assessment

10:30 - 10:45 HWG Program Appendix of Deficiency Detail

10:45 - 10:55 10 Minute BREAK

10:55 - 11:25 APSA Program Assessment

11:25 - 11:45 Questions & Answers

27th California Unified Program Annual Training Conference March 24-27, 2025

If You Have Questions...



To ensure we can present all information from each state agency, please be patient and ask questions at the end of the full presentation.

~ Thank YOU





Changes for 2025...

- Improved evaluation process
 - Suggestions from Evaluation Steering Committee,
 CUPA Forum Board, BDOs
- Focused scope: inspection, enforcement, data quality, administration
- Fewer documents requested: Enclosure 1
- Simplified Supplemental Questionnaire
- Shortened timeline of evaluation
 - New Workplan Template





Changes to come...

- Evaluation Progress Report process
 - Time between each EPR
 - Duration of EPR process
- Summary of Findings Report
 - Revised Deficiency Library: Corrective Actions & Resolutions
 - Sections within the report
- Further improvements to the evaluation process





If You Have Questions...



To ensure we can present all information from each state agency, please be patient and ask questions at the end of the full presentation.

~ Thank YOU





The CUPA Performance Evaluation Process & CalEPA Assessment

Melinda Blum, CalEPA Evaluation Team Lead Supervisor





The Evaluation Process





<u>Pre</u>- Notification Letter

Provides scheduled evaluation month

Notification Letter

- Provides assessment timeframe
- Formal Request for Information = 60 Days
 - Enclosure 1
 - Administrative Documents
 - Standard Operating Procedures
 - Program Specific Documents
 - CalARP, APSA, HMBP, HWG, UST
 - Enclosure 2
 - Documentation for selected Facility Files
 - HMBP, CalARP, HWG, APSA, UST
 - DTSC referred complaints





Gavin Newson

Yana Garcia Secretary for Environmental Protection

)ate

First Last, Title (if one word)
Title (if more than one word)
Department/Unit
CUPA address

City, California ZIP

Dear Mr. / Ms. Last Name

The CUPA name Certified Unified Program Agency (CUPA) performance evaluation begins upon receipt of this letter. The evaluation will assess the implementation of the Unified Program during the timeframe of Month Day, Year, through Month Day, Year.

A state evaluation team will conduct the evaluation remotely. The state evaluation team consists of representatives from CaIEPA, the Department of Toxic Substances Control (DTSC), CAL FIRE - Office of the State Fire Marshal (OSFM) and the State Water Resources Control Board (State Water Board).

The CUPA evaluation may also include one or more oversight inspections. You will be contacted by the evaluation team representative of the Program element to coordinate oversight inspections, with the intent to utilize the existing inspection schedule.

The information requested in Enclosures 1 and 2 should be electronically submitted to CalEPA's SharePoint site by Date. The CalEPA evaluation team lead will provide you with access instructions to the SharePoint site and guidelines for submitting the information.

The CalEPA evaluation team lead will contact you to establish the evaluation workplan, consisting of deadline and meeting dates.

Please contact Melinda Blum with any questions at Melinda.Blum@calepa.ca.gov.

Sincerely,

John Paine Unified Program Manager

Enclosures (3)

cc sent via email

Air Resources Board - Department of Pesticide Regulation - Department of Resources Recycling and Recovery - Department of Toxic Substances Control - Office of Environmental Health Hazard Assessment - State Water Resources Control Board - Regional Water Quality Control Board.

Establishing the Workplan



- CalEPA Team Lead works with CUPA to establish meeting dates:
 - Kickoff, Q&A and Exit Briefing
- Establishes deadlines for:
 - SharePoint Upload
 - Follow up and missing information requests
 - Supplemental Questionnaire
 - <u>PRELIMINARY</u> Summary of Findings (<u>PSOF</u>)
 - Provide additional information to be considered during the evaluation
 - Providing Final Summary of Findings (FSOF) to CUPA



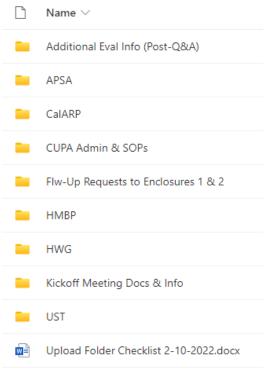
Providing Information

SharePoint

- Secure access link and password
 - Provided by CalEPA Team Lead
- Organized File Structure
 - Follows Enclosures 1 and 2
- CUPAs can request state agency assistance to scan and/or upload requested information.









Kickoff Meeting, Begin Assessment

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- Meet the Evaluation Team
- Meet the CUPA Representatives
- Evaluation process overview and confirm SharePoint access
- Overview of CUPA Program Implementation (optional)
- Discuss accomplishments and/or challenges since the last evaluation
- Review Supplemental Questionnaire
- Review Workplan





Scheduling Oversight Inspections



- Oversight and/or Verification inspections coordinated with CUPA
 - CalEPA, DTSC and/or State Water Board









Follow-Up Information Request



After CUPA uploads to SharePoint:

- CalEPA Team Lead confirms all requested information was uploaded
- Assessment Begins
 - Distributes evaluation information to State Evaluation Team
 - Sends Missing Information Request to CUPA
 - CUPA provides missing information from Enclosures 1 and 2
- State Team develops Preliminary Summary of Findings (PSOF) Report
 - Discusses PSOF at 1st Team Meeting





Questions & Answers (Q&A) Meeting

A facilitated review and discussion of:

- DRAFT PSOF Report
- Additional Information Requests
 - Identify any additional information needed to clarify any potential deficiencies/incidental findings or to be considered during the evaluation
- Obtain proposed alternative corrective actions/resolutions and timelines
- State Evaluation Team has 2nd Team Meeting to discuss revisions to





Exit Briefing Meeting

CUPA receives the PSOF Report one week prior to Exit Briefing meeting.

A facilitated review and discussion of the "final" DRAFT of the PRELIMINARY Summary of Findings Report

Review proposed timeline for corrective actions and resolutions







- State Evaluation Team supervisors review PSOF Report and generate the "final" Summary of Findings (FSOF) Report
- Program Implementation Rating is Determined
- FSOF is issued to CUPA
- Evaluation Progress Report (EPR) process begins



Evaluation Progress Report (EPR)



Process

After FINAL Summary of Findings Report is issued to CUPA:

- Within 60 days, the 1st Evaluation Progress
 Report is due to CalEPA.
- Subsequent EPRs due to CalEPA dependent upon date established with EPR BDO Responses
 - Approximately every 120 days
 - We are flexible with the timeline.
 - We much prefer a quality response rather than an incomplete response to meet a deadline.





Gavin Newsom Governor

Yana Gardi Secretary for Environmental Protection

CERTIFIED UNIFIED PROGRAM AGENCY Evaluation Progress Report #X

CUPA: Not in bold font

YEAR Evaluation Period: Month Year Notification Letter Sent through Month Year of Exit Briefing

Timeframe Evaluated: Month Day Year of Exit Briefing for last Evaluation through last day of quarterly CME due date before Notification Letter was sent

Evaluation Team Members:

- CalEPA Team Lead: Name
- · DTSC: Name

- State Water Board: Name
- · CAL FIRE-OSFM: Name

CalEPA*: Name

Evaluation Progress Report #X Received by CalEPA: Month Day, Year

Deficiencies Pending Correction: #'s X

Incidental Findings Pending Resolution: #'s X

Evaluation Progress Report #Next Due to CalEPA: Month Day, Year

Deficiencies Pending Correction: #'s X

Incidental Findings Pending Resolution: #'s X

Questions or comments regarding this evaluation should be directed to the CalEPA Team Lead:

Team Lead

CalEPA Unified Program

Phone:__(916) #

E-mail: name@calepa.ca.gov

The CUPA is required to submit the first Evaluation Progress Report 60 days from receipt of the Final Summary of Findings Report. Thereafter, the CUPA will submit each subsequent Evaluation Progress Report to CalEPA in accordance with the specified date provided in the Evaluation Progress Report response. For each identified deficiency and incidental finding, the CUPA must complete the corrective action and resolution as indicated to demonstrate sufficient implementation of the Unified Program as required by regulation or statute. The Evaluation Progress Report process will continue until all deficiencies and incidental findings have been acknowledged as corrected or resolved by each issuing Unified Program state agency.

Each Evaluation Progress Report must be submitted to the CaIEPA Team Lead via email at name@calepa_ca_gov, or uploaded to the established SharePoint website. A narrative stating the status of progress towards the correction of each deficiency and resolution of each incidental finding identified in the Final Summary of Findings Report, and any applicable supporting documentation must be included in each Evaluation Progress Report.

Air Resources Board • Department of Pesticide Regulation • Department of Resources Recycling and Recovery • Department of Toxic Substances Control • Office of Environmental Health Hazard Assessment • State Water Resources Control Board • Regional Water Quality Control Boards

1001 | Street, Sacramento, CA 95814 * P.O. Box 2815, Sacramento, CA 95812 * (916) 323-2514 * www.calepa.ca.gov



CalEPA Assessment

- What to know...
- Tips to prevent commonly identified
 Deficiencies and/or Incidental Findings







CUPA Performance Evaluation: Key Components of Title 27

- Record Maintenance
- Data Management & Local Ordinances
- Electronic Reporting
- Inspection & Enforcement (I&E) Plan
- Unified Program Facility Permit (UPFP)

- Self-Audit Reports
- Fee Accountability
- Education & Training
- Financial Management:
 - Single Fee System
 - Surcharge collection & remittance
- CUPAs with PAs
- CUPA to State Reporting











Record Maintenance- 15185(f)(1)

When documentation that is required to be maintained can't be provided.

- > Identify files maintained by the CUPA, and retention timeframes
 - ✓ Ensure the 5-year minimum retention time is used for required documents.
- Include specifics listed in 15185(g)
- Review procedure annually
 - ✓ If not annually, before the next evaluation
- > If by default, the City or County Records Retention schedule is used, incorporate it into the CUPA procedure by reference.



Data Management- 15180(e)(6)



- > Reference all requirements in the cited sections, even if just a sentence or two.
 - ✓ 15185(e)(1): Collection and management of documents and electronic data
 - √ 15185(e)(2): Transfer and exchange of electronic data, if applicable (see 15187)
 - √ 15290(d): Quarterly reporting CME information to CERS (see 15290(f))
 - For CUPAs with a PA, include:
 - How the PA reports CME information to the CUPA, or CERS (see 15290(d)(1))
 - How the CUPA includes CME information from the PA with quarterly reporting (see 15290(d)(2))









Local Ordinances- 15185(c)

> Identify all local ordinances requiring information to be provided with CERS submittals





Electronic Reporting- 15187



When compliance, monitoring and enforcement (CME) information discrepancies exist with electronic data transfer (EDT) between the CUPA data management system (DMS) and the California Environmental Reporting System (CERS).

- > For CUPAs with a local reporting portal, see 15187(a)
- > If known EDT issues exist, or if transitioning to a new DMS, let the State Evaluation Team know at or before the Kickoff Meeting.
- > Ensure CME information is reported quarterly to CERS (see 15290(d))





CalEPA Assessment ...continued...

Kaeleigh Pontif, CalEPA Evaluation Team Lead





1&E Plan- 15200 (INSPECTIONS)



- > NEW with Title 27 Revision 2024: Ensure there is an inspection process for each program element, including procedures for:
 - ✓ Pre-inspection, on-site and off-site inspection, post-inspection, re-inspection
 - Consolidation of inspections when possible
- > Include inspection frequencies per statute and regulation (see 15200(a)(2)):
 - Establish HWG Program inspections per 15200(e)
- > Include provisions for sampling capability (HSC, Chapter 6.5, Section 25198)
 - ✓ Reviewed by DTSC
- > Include procedures for addressing complaints:
 - Receipt, investigation, enforcement and closure





1&E Plan- 15200 (ENFORCEMENT)



- Identify all informal and formal progressive enforcement actions, including:
 - Referral of formal enforcement cases to local, state, or federal agencies
 - When, why, and how enforcement is escalated
- Identify all penalties
- > Address provisions for multi-media enforcement
- > Address how duplication, inconsistencies and lack of coordination are minimized or eliminated
- Include procedures for enforcement notification, including:
 - Appropriate confidentiality, coordination, timely notification of appropriate agencies





1&E Plan- 15200 (For CUPAs with a PA)



- > Address development of the I&E Plan in cooperation with the PA, including:
 - Describing coordination efforts between the CUPA and PA
 - ✓ Procedures for coordinating enforcement efforts between the CUPA and PA
- > Include a review and revision date
- Address each topic, even if briefly
 - Refer to the Guidance for Inspection and Enforcement Plans
 - https://calepa.ca.gov/wp-content/uploads/2025/02/CalEPA-IE-Plan-Guidance-Document-2024.pdf



UPFP- 15180(e)(7) & 15190



- Procedures for issuing and renewing the UPFP
- > Identify conditions for revoking or withholding issuance
- > Ensure aspects of the CA fire and/or building codes are not included
- > Ensure the UPFP template includes:
 - ✓ Issuing agency
 - Permitted facility (business name and address)
 - ✓ Issuance and Expiration dates
 - State Water Board will review UST information







CUPA Self-Audit Report- 15280

- Reflect actual activities for the previous Fiscal Year (July 1 through June 30).
 - ✓ Include performance of PA(s) or other agency authorized to implement any program element (EX- Ag. Commissisoner)
 - ✓ Include areas of improvement needed, progress towards improvement and plans for future improvement
 - Don't just copy and paste the latest Final Summary of Findings Report





CUPA Self-Audit Report- 15280

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- > Summarize the following:
 - ✓ Staffing status
 - √ # of inspections conducted
 - ✓ Enforcement actions taken

- Community outreach efforts
- ✓ Training (internal & external
- ✓ Accuracy of CERS information
- Include an explanation of any discrepancies in annual or quarterly reporting (see 15290)
- Include annual review of Fee Accountability Program (see 15220).
- Describe any changes in local ordinances, resolutions or agreements
- Include a summary of new programs, if applicable







Education and Training- 15260 & 15270

- > Review recent MQs/job postings and staff REHS certifications to verify minimum education requirements are met.
- Make sure common licensures and certifications are up to date for all relevant staff
 - ✓ ICC UST, APSA Inspector, HAZWOPER, etc.
- > Document all inhouse and other ongoing training for all staff
- Staff/Supervisors conducting inspections and/or applying enforcement prior to July 1, 2024, are not required to meet minimum education requirements.



Fee Accountability- 15220

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- > Incorporate annual review into the Self-Audit
- Components Include:
 - ✓ Operating costs: billable services, staff hours and salary/wages for each position
 - ✓ Direct expenses: expense for the CUPA (EX equipment)
 - ✓ Indirect expenses: shared expense of the CUPA (CUPA portion of department/city/county expenses, facilities)
 - ✓ Non-recurring activities (fees for initial permits, special inspections, etc.)

 Additional funding sources to assist in covering implementation costs (general fund, grants)





Fee Accountability- 15220

- > Components Include:
 - ✓ A comparison of actual operating costs (see 15220(a)(1)(A)-(J) with:
 - The fee schedule
 - The actual single fee amount billed and collected (including any amount on behalf of a PA)
 - Regulated businesses:
 - # regulated in each program element (including those regulated by a PA)
 - # businesses assessed the single fee
 - # businesses with waived/prorated fees (no single fee, no surcharge)





Fee Accountability- 15220

- Components Include:
 - Services provided, including but not limited to:
 - Frequency of inspection
 - Oversight of electronic reporting
 - Verification of return to compliance (RTC)
 - Enforcement actions
 - √ HSC 25404.1.1(i):
 - Include a clear accounting of collected penalties
 - Identify how penalties are used by the CUPA
 - Administrative penalties must be used by the CUPA Use by other departments is considered misappropriation.











\$ingle Fee System- 15180 (15210 & 15220)

Addresses the CUPA's fee structure and identifies how the program is supported.

- > Include any methods used to determine fees, program cost calculations, billing system and schedule, and fee collection process.
- > Identify when the last fee study was conducted
- > Include the process for determining if the fee schedule needs revision:
 - ✓ Does it include the annual Fee Accountability review? (see 15220)
- > Include the process to revise the fee schedule
- > Identify when the fee schedule was last updated







\$ingle Fee System- 15180 (15210 & 15220)

Include the SINGLE FEE & STATE SURCHARGE "fee dispute resolution" process between:

CUPA & PA Regulated Business & CUPA/PA

Regulated Business & State

- ✓ If not resolved locally, forward state surcharge disputes to the Secretary with a recommended resolution.
- > Identify fees for non-recurring activities
- > For CUPAs with a PA, if the PA established a fee schedule, identify how the PA established fee amounts
- > Identify how fees are remitted from CUPA to PA, or from PA to CUPA





State Surcharge Collection & Remittance- 15210



- > If single fee is waived/prorated, state surcharge must also be waived/prorated
- > Submit a surcharge transmittal report quarterly
 - Even if there are no surcharges collected during the quarter
- Submit the Annual Single Fee Summary Report by September 30th of each year
 - Reflects the previous state fiscal year (July 1 through June 30)
 - ✓ Identify significant changes in the number of regulated businesses in a cover letter





\$urcharge Collection and Remittance

Are the current state surcharge amounts being collected?

- > Oversight Surcharge: \$94
 - \$67 for Oversight, \$27 for CERS NextGen (Reported separately)
- > UST Program: \$20 per tank
- > CalARP Program: \$370 per regulated business
- > APSA Program: \$26 per tank facility
- > Refinery Safety
 - > Tier 1 (≥ 200,000 DBC): \$45,000
 - > Tier 2 (100,000 199,999 DBC): \$27,500
 - > Tier 3 (50,000-99,999 DBC): \$13,750
 - > Tier 4 (< 50,000 DBC): \$3,500
- > Indicate which Fiscal Year surcharges are being remitted for



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Program							
		GE TRANSMITTAL F R §§15250 and 152		RT			
CUPA:							
Date Submitted:							
Fiscal Year of Accrued Surcharges: Check Number:	fe	iscal Year and Quar or Collection of urcharge:					
Completed By:							
Telephone Number:							
Program Elem	ent	A	Amount Remitted				
OVERSIGHT SURCHARG Split Oversight to reflec NextGen Amount Separ	t the CERS	# Businesses Remitting		Amount Remitting			
CUPA (OVERSIGHT \$67						
CER	S NEXTGEN \$27						
	ID PETROLEUM IGE ACT (APSA)						
UNDERGROUND	PROGRAM						
CALIFORNIA ACCIDE PREVENTION PRO							
RE	FINERY SAFETY						
		TOTAL REMITTED					

This Surcharge Transmittal Report, a copy thereof, or a substantially equivalent report shall be completed and submitted to the Secretary no later than 30 days after the end of each state fiscal quarter as specified in CCR, title 27, §15290(b).

Please staple the remittance check to this Surcharge Transmittal Report as a cover document each time surcharge revenues are remitted.

Please make remittance payable to the Secretary for Environmental Protection. Submit the Surcharge Transmittal Report and remittance check to CalEPA, care of the Air Resources Board, at:

> Air Resources Board Attn: Accounting P.O. Box 1436

Sacramento, California 95812

An electronic copy of this Surcharge Transmittal Report must also be sent to: cupa@calepa.ca.gov.

For questions, please contact the Unified Program at cupa@calepa.ca.gov

Revised October 19, 2023

For CUPAs with PA Agreements...

- 9
- Establish and implement financial management procedures to account for PA program implementation costs and annually review the Fee Accountability Program as it pertains to each PA.
 - Title 27, Sections 15210(e), (f), (h), (i) and (k) and 15220(a)(2)
- > Ensure PA staff meet applicable training and education requirements
 - √ Title 27, Sections 15260(c) and 15270
- Ensure the annual self-audit clearly identifies the assessment of performance for each PA
 - ✓ Title 27, Section 15280(b)
 - Review the PA agreement and determine if any revisions are needed to reflect current practice, including withdrawal/removal of the PA (see 15180(e)(5))



For CUPAs with PA Agreements...



- > Ensure each PA completely and accurately reports inspection, violation and enforcement information to the CUPA, or to CERS.
 - Title 27, Sections 15290(a)(3)(A), (a)(3)(A)(i) and (a)(3)(B)
 - ✓ Address how CME information from PA(s) will be reported to CERS in the Data Management Procedure
- When applicable, ensure a Formal Enforcement Summary is provided to CalEPA for enforcement taken by the PA
 - ✓ Title 27, Sections 15300
- Does current implementation reflect a PA agreement approved by the Secretary?







CUPA-to-State Reporting - 15290



- > Ensure Quarterly Surcharge Transmittal Reports are submitted:
 - ✓ Within 30 days of the end of each Fiscal Quarter
 - ✓ To CalEPA: cupa@calepa.ca.gov AND California Air Resources Board:

Air Resources Board

Attn: Accounting

P.O. Box 1436

Sacramento, California 95812

- > Submit the Annual Single Fee Summary Report by September 30th of each year.
- Submit formal enforcement actions and complete Formal Enforcement Summary Reports for any actions that have received a final judgement
 - Not applicable to statewide enforcement cases







Changes in Implementation- 15300

- > The CUPA must notify the Secretary and obtain approval prior to:
 - ✓ Changes to implementation of a program element
 - Replacing or adding a PA







The Biggest Tip...

Just ask!

- > Regulations and requirements are vague
- CalEPA Team Leads have seen dozens of procedures from across the state
- CalEPA has an archive of good examples for all administrative procedures (including I&E Plans and Self-Audit reports)



Contact Information

CalEPA Unified Program: CUPA@calepa.ca.gov

CERS Help: CERS@calepa.ca.gov

John Paine (Program Manager) john.paine@calepa.ca.gov (916) 327-5092

Melinda Blum (Supervisor) melinda.blum@calepa.ca.gov (916) 327-9560

CalEPA Team Leads and State Evaluators have answers and examples!!



Tim Brandt (Team Lead Evaluator) timothy.brandt@calepa.ca.gov (916) 323-2204

Kaeleigh Pontif (Team Lead Evaluator) kaeleigh.pontif@calepa.ca.gov (916) 803-0623

Jess Snow (Team Lead Evaluator)
jessica.snow@calepa.ca.gov
(916) 460-2394



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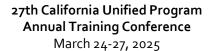




Any Questions?

Please stop by the CalEPA Booth!









State Water Resources Control Board UST Evaluation and Assessment Process

Magnolia Busse Michelle Suh UST Leak Prevention Unit





UST Evaluation Updates

Single-walled UST system focused

Outreach to CUPAs

- CERS training
- Report 6 Training
- Field Training
- ICC Training

CUPA UST Evaluation webpage

Updated Supplemental Questionnaire



UST Evaluation Updates

State Water Resources Control Board (State Water Board)

Underground Storage Tank (UST) Program:

- What parts of the UST Program are being implemented exceptionally well by the CUPA?
- 2. What parts of the UST Program could the State Water Board assist the CUPA with to improve implementation?

Single-Walled and Abandoned USTs:

- 1. What is the strategy for ensuring all single-walled UST systems are removed before the December 31, 2025 deadline?
- 2. What is the enforcement process if a single-walled UST has not been removed by the December 31, 2025 closure deadline?
- 3. How many abandoned USTs are there and how are they being inspected and tracked?

Inspections:

 How is a compliance inspection scheduled if staff are unavailable to meet on the date/time of the 48-hour notice?

Enforcement:

 Have all enforcements (red tag, AEO, or case referral to attorney or other agency to take administrative, civil, or criminal enforcement action) applied within the last three years been uploaded to CERS?

Training:

- 1. What is the training process for new inspectors conducting UST inspections?
- 2. What is the process for maintaining training for each UST inspector?

CUPA Performance Evaluation

Supplemental Questionnaire

- Describe any training staff have attended that has been provided by other CUPA representatives.
- Are all UST inspection staff signed up for the UST Email Subscription at: https://public.govdelivery.com/accounts/CAWRCB/subscriber/new?gsp=ust?





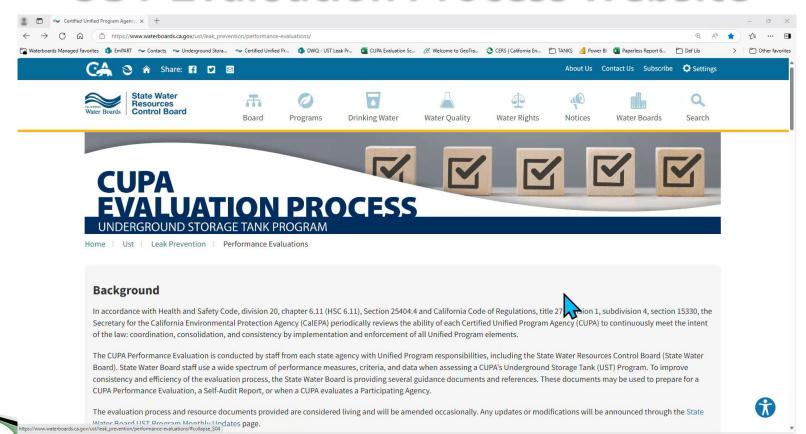
UST Evaluation Process Website



of the law: coordination, consolidation, and consistency by implementation and enforcement of all Unified Program elements.

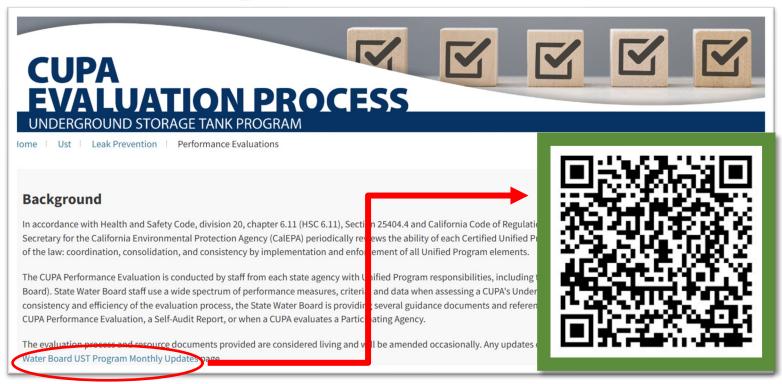


UST Evaluation Process Website





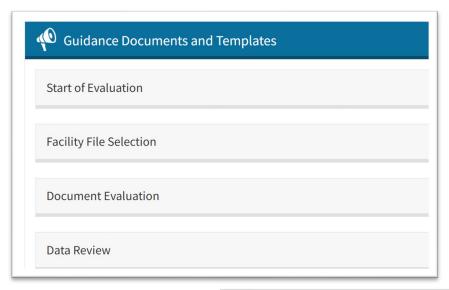
UST Program Monthly Updates

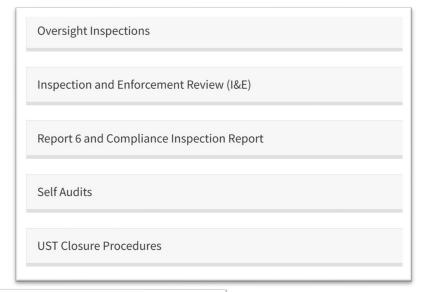






UST Evaluation Process Website



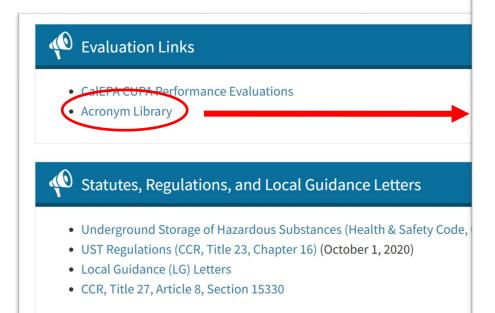


Abandoned Tanks

Local Ordinances



UST Evaluation Process Website



List of Acronyms and Terms

AEO	Administrative Enforcement Order
CalEPA	California Environmental Protection Agency
CCR	California Code of Regulations
CERS	California Environmental Reporting System
CUPA	Certified Unified Program Agency
ELD	Enhanced Leak Detection
FSOF	Final Summary of Findings
HSC	Health and Safety Code
I&E	Inspection and Enforcement
LG	Local Guidance
PSOF	Preliminary Summary of Findings
RTC	Return to Compliance
SOF	Summary of Findings
SWRCB	State Water Resource Control Board
TCR	Technical Compliance Rate
UPA	Unified Program Agency
UPFP	Unified Program Facility Permit
UST	Underground Storage Tank
UST CME	Inspection, Violation, Enforcement data
USEPA	United States Environmental Protection Agency







File Review

I&E Plan

Data Management Procedures

Staff ICC records

Permit Procedures

UST Operating Permit

Inspection reports

Test reports

Closure Procedures and Documents

- Temporary Closure
- Permanent Closure

Correspondence





CERS Reports

UST Program Reports

Compliance, Monitoring, and Enforcement Reports

Inspection Summary Report by Regulator (Report 6)

Counts of regulated UST facilities, active and closed UST systems, inspections, and TCR statistics.

Enforcement Summary Report by Regulator (Annual)

Counts of Violations by Class, Enforcements by Enforcement Type, and Fines/Penalties.

Red Tag Facility Details Report

List Red Tage affixed during a specified date range

UST Routine Inspection Frequency Search

Provides an Excel table identifying the date of the most recent Roughe UST Inspection performed with a text field for comment/explanation. This report is for the UPA to comply with the annual Energy Policy Act of 2005 reporting requirement due to the State Water Board each January 31st.

Facility / Tank / worldoring Summary Reports-

UST Facility Search

Provides a list of sites that are or were a UST site, including sites that reported a UST submittai or had a reported UST inspection, grouped by Regulator.

BOE Facility/Owner Search Tool

Provides a tool to search for UST facilities by BOE Number, facility site address, and UST Property Owner and UST Tank Owner information.

–US∓ Bata Download–

UST Facility/Tank Data Download

Senerates an Excel file containing UST Facility Frank data that has been "Accepted" by Regulators

UST Consolidated Facility/Tank Data Download For US EPA

This report is a subset of the CERS UST Facility/Tank Data Download report. It generates an Excel file formatted for US EPA.

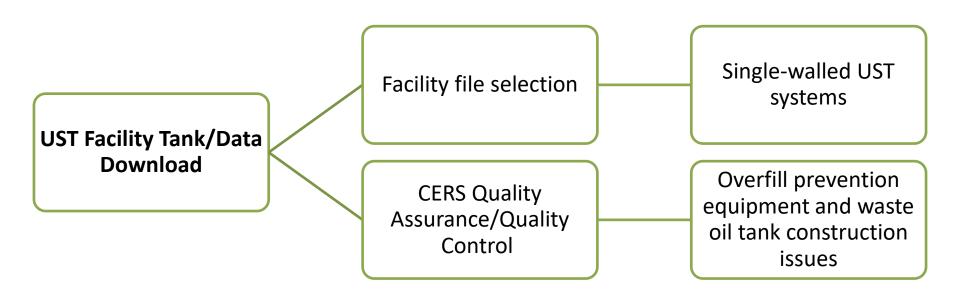
UST CME Data Download

Generates an Excel file containing UST Inspection, Violation, and Enforcement data.





CERS Reports







Facility File Selection

Randomly selected

Single-walled USTs

Government Owned Tanks

UST Construction/Design

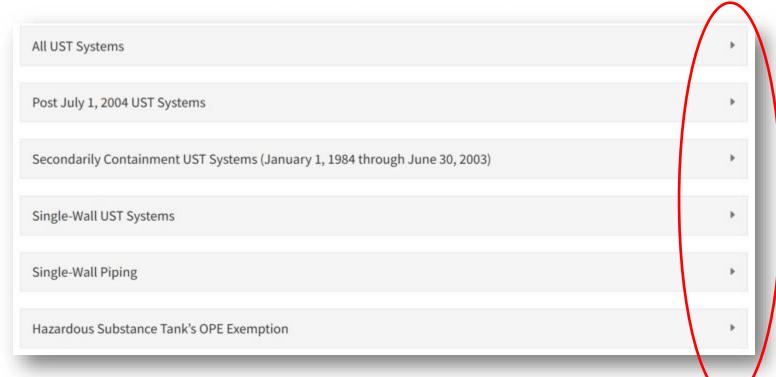
UST Facility Files Requested

	Number of Files Requested				
Number of UST Facilities	Minimum	Maximum			
1 to 10	5	All			
11 to 100	7	15			
101 to 250	10	20			
251 to 750	15	30			
751 to 1000+	20	50			





CERS QAQC

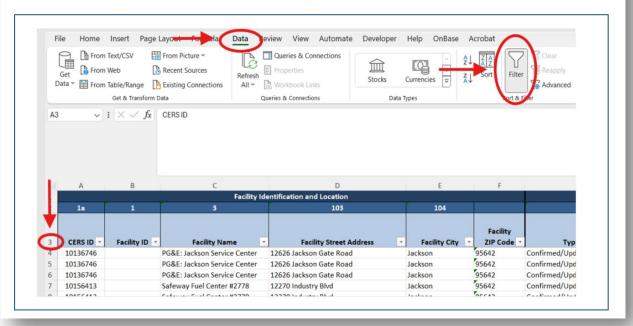






Overfill Prevention Equipment & Waste Oil Tanks

5. Select row 3 (highlight entire row), go to the **Data** tab at the top, and then select now see a drop-down arrow (for filtering) in each of the columns.







Overfill Prevention Equipment & Waste Oil Tanks

6. Find columns 452a (Audible/Visual Alarms), 452b (Ball Float), 452c (Fill Tube Shut-Off Valve), and 452d (Exempt) and filter for the following the followi

a. USTs citing **Ball Float** only:

i. 452a: No

ii. 452b: Yes

iii. 452c: No

iv. 452d: No

	AL	AU	AE	AF	DA	ΑП	Al	AJ	AN	AL
1			Tank Overf	ill Preventio	n			Pro	duct / Waste Piping Cons	struction
2	445a	452	452b	452c	452d	460	458	464	464a	464b
3	ther Secondary Containment Construction	Audib Visus Alarn	31	Fill Tube Shut-Off Valve -T	Exemp -T	Piping Construction •	Piping System Type	Primary Containment Construction	Other Primary Containment Construction	Secondar Containme Constructi
432		No	Yes	No	No	Double-walled	Pressure	Fiberglass		Fiberglass
433		No	Yes	No	No	Double-walled	Pressure	Fiberglass		Fiberglass
434		No	Yes	No	No	Double-walled	Pressure	Fiberglass		Fiberglass
1336	5	No	Yes	No	No	Double-walled	Gravity	Fiberglass		Fiberglass
1739		No	Yes	No	No	Single-walled	Pressure	Fiberglass		Fiberglass
1740		No	Yes	No	No	Single-walled	Pressure	Fiberglass		Fiberglass
1741	L	No	Yes	No	No	Single-walled	Pressure	Fiberglass		Fiberglass
2276	5									
2277	7									
2278	3									
2279										
2280										
2281										





CERS Reports

UST Inspection Frequency Search

Annual inspection rate

UST Facility Search

Column H (Owner or Operate UST) is "N"

Column J (UST Reporting Requirement) is "Not Applicable"

Column N (UST Permanently Closed Date) includes a date





CERS REPORTS

UST CME Data Download

Return to Compliance

Violation Information

Not Resolvable Enforcement Actions





Violation Information

CERS ID	Violation Type Number	Class	Violation Date	Scheduled Return to Compliance Date	Actual Return to Compliance Date	Days to RTC	Actual Return to Compliance Qualifier
10138287	2030040	Minor	8/12/2015	12/30/2015	3/16/2016	22/1	Documented
10149381	2030043	Minor	10/5/2018	11/6/2018		#NUM!	
10166269	2030025	Minor	1/30/2020	1/30/2020	1/30/2020	0	Documented
10166269	2030043	Minor	1/30/2019	3/4/2019	6/17/2019	138	Documented
10195654	2030047	Minor	6/18/2020	7/20/2020		#NUM!	
10195654	2030016	Class 1	6/28/2016	7/28/2016	5/12/2017	318	Documented
10195654	2030035	Minor	6/9/2021	7/9/2021		#NUM!	
10229101	2030035	Minor	10/9/2018	11/9/2018		#NUM!	
10229104	2030035	Minor	10/25/2018	11/26/2018	10/25/2018	0	Observed





Enforcement Actions

	General Enforcement Information												
914	915	916	917a	918	919	920				925	913b		
Type of Enforcement	Date of Enforcement Action	Type of Formal Enforcement Action	Date a Referred Case Settled	Docket	Final Fine or Penalty	Supplemental Environmental Projects Value	Count of Linked Class I Violations	Count of Linked Class II Violations	Count of Linked Minor Violations	Enforcement			
Action Notice of Molat	2/8/2021	Action	or Dropped	Number	Assessed	Projects Value	Violations			Comments	Red Tag Issued		
Notice of Violat	9/16/2021						0						
Notice of Violat	9/10/2021						0				No		
Notice of Violat	9/10/2020						0				No		
Notice of Violat	9/10/2021						1	_	0		No		
Notice of Violat	11/30/2022						0		1		No		
Notice of Violat	9/1/2020						0	_			No		
Notice of Violat	9/7/2021						0				No		
Notice of Violat	10/29/2020						0				No		
Notice of Violat	10/29/2021						0				No		
Notice of Violat	10/23/2021						0				No		
Notice of Violat	10/26/2022						0	_			No		
Notice of Violat	4/21/2021						0				No		
Notice of Violat	6/27/2023						0	_			No		
Notice of Violat	11/16/2022						1				No		
Notice of Violat	3/23/2021						0				No		
Notice of Violat	10/8/2020						0	_			No		
Notice of Violat	10/29/2020						0		0		No		
Notice of Violat	11/16/2023						0		1		No		
	,,												
••• n Details	Violation Type	Number UST (Outstanding violati	on UST	Enforcements	+				- 1 €			





Report 6

Timely Reporting

- March 1
- September 1

Accuracy of Reporting

- Rejections
- Revisions

Technical Compliance Rate

• CA vs CUPA

Report 6 and Compliance Inspection Report

- Accuracy of Data Provided
- Timeliness of Reporting





Report 6

1	А	В	С	D	Е	F	G	н	1
1	Run Date: 2/19	9/2025 8:07:54 AM							
2	Inspection Da	te Range: 7/1/2024	4 To 12/31/2024						
3									
					Petroleum				
		# of Active	# Active	# Closed	Systems			Haz Systems	
		Regulated	Petroleum	Petroleum	reclassified	# Active Haz Sub	# Closed Haz	reclassified	#Routine
4	Regulator	Facilities	Systems	Systems	under APSA	Systems	Sub Systems	under APSA	Inspections
5		727	2088	9	0	32	2	0	353
_			2000	•	•		-	•	252

Technical Compliance Rate Determinations												
		9e										
9a	9b	9c	9d	Technical 10		11	12					
Spill	Overfill	Corrosion	Release	Compliance	DO/Owner	Financial	DO					
Prevention	Prevention	Protection	Detection	Rate	Training	Responsibility	Inspection					
298	322	353	239	190	337	320	328					
298	322	353	239	190	337	320	328					





Report 6

Routine Inspections

- Typically, one annually
- Align with Routine Inspection Frequency Search

TCR without RTC

Report during next routine inspection

UST Count Discrepancies

Confirm install and closure dates



Report 6 Rejection

1 A	В	С	D	E	F	G	Н	l l
Regulator ▽	CERSID ▼	# Active Petroleum Systems 🔻	#Closed Petroleum Systems	Petroleum Systems reclassified under APSA	# Active Haz Sub System 💌	# Closed Haz Sub System •	Haz Systems reclassified under APSA	# Routine
	10130134	4	0	0	0	0	0	2
1	10192468	1	0	0	0	0	0	3
1	10192537	3	0	0	0	0	0	2
1	10192561	2	0	0	0	0	0	3
1	10192603	3	0	0	0	0	0	3
1	10192783	3	0	0	0	0	0	2
1	10192966	3	0	0	0	0	0	1
	10193236	3	0	0	0	0	0	4
	10193251	2	0	0	0	0	0	2
1	10193536	0	0	0	0	0	0	4
3	10207090	1	0	0	0	0	0	1

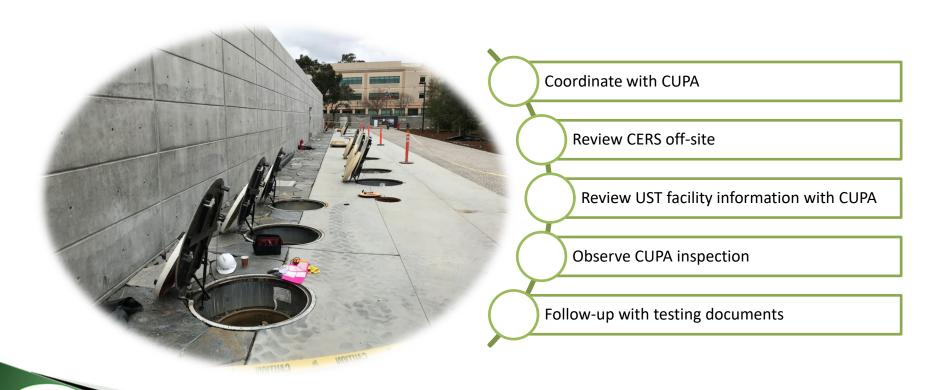
What will result in a rejected Report 6?

- Incomplete Forms
- Outdated Forms
- Inaccurate Data





Oversight Inspections



Common Issues

UST Operating Permit

- Citations
 - Ch. 6.75, Ch. 17, Ch. 18
- References
 - Non-transferrable language
- Conditions
 - Report any unauthorized release





Common Issues

Inspection Reports

- Incorrect violation type numbers cited
- Missed violations

Testing Documents

- Missing training/Certification
- Discrepancies with CERS
- Missing Reports (ELD, Tank Lining, etc.)

I&E

- Penalty matrix
- UST regulation and HSC references

Report 6

- Late Reporting
- Inspection Frequency



Summary of Findings

Deficiencies/Incidental findings

- Enforcement
- Inspection quality
- UST operating permit
- Report 6
- I&E Plan
- OPE and waste oil tank construction

Observations

- Number of remaining single-walled USTs
- "Not Resolvable" RTC qualifier
- Oversight





Evaluation Progress Report Process

Common issues:

Missing corrective action items/resolutions

Unresolved deficiencies/findings

Reassessed during next evaluation

"Closed, but not corrected"

• Does not guarantee deficiency or finding is carried to next evaluation



Looking Forward



Continue improving the UST evaluating program



Focus on enforcement



Provide support for all CUPA UST programs



Provide training



Provide a positive, constructive, and beneficial evaluation experience



Contact Information

UST Evaluation Team

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Tom Henderson:

tom.henderson@waterboards.ca.gov



What we have planned...

9:20 - 9:30 10 Minute BREAK

```
9:30 - 10:00 HMBP and CalARP Program Assessment
10:00 - 10:30 HWG Program Assessment
10:30 - 10:45 HWG Program Appendix of Deficiency Detail
10:45 - 10:55 10 Minute BREAK
10:55 - 11:25 APSA Program Assessment
11:25 - 11:45 Questions & Answers
```



TIME FOR A BREAK!

27th California Unified Program Annual Training Conference March 24-27, 2025





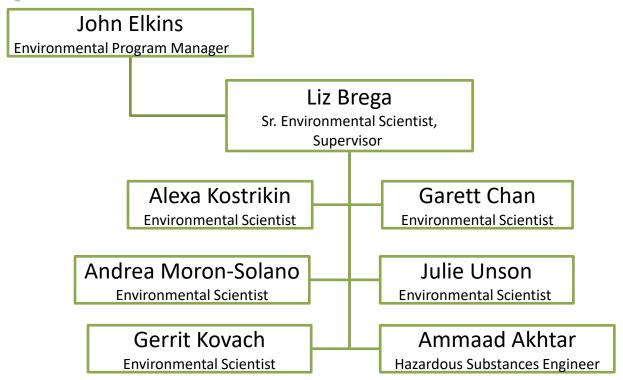
Hazardous Materials Business Plan and California Accidental Release Prevention Program Assessment

Andrea Morón-Solano, Environmental Scientist, HMBP/CalARP Unit Garett Chan, Environmental Scientist, HMBP/CalARP Unit





HMBP/CalARP Unit Overview





27th California Unified Program Annual Training Conference March 24-27, 2025

Introduction and Overview

Present	OTION	ntorm	ation
P (252111			

Introduction

HMBP Evaluation Process

•Including Area Plan Review

CERS Data Evaluation Overview

CalARP Evaluation Process

CERS Data Evaluation Overview

HMBP/CalARP Unit Contacts and Website



HMBP/CalARP Unit Highlights

- Hazardous Materials Business Plan (HMBP), including Area Plan
 - Health and Safety Code, Division 20, Chapter 6.95, Article 1, Sections 25500-25519
 - California Code of Regulations, Title 19, Division 5, Chapter 1, Article 2 and 3, Sections 5020.1-5030.11
- California Accidental Release Prevention (CalARP) Program
 - Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25531-25543.3
 - California Code of Regulations, Title 19, Division 5, Chapter 2, Articles 1-11, Sections 5050.1-5160.1



Changes to HMBP/CalARP Title 19 Regulation

- Assembly Bill 148
- Office of Administrative Law (OAL) approved rulemaking package pursuant to CCR, Title 1, Section 100
- Updates do not materially alter any requirement, right, responsibility, condition, prescription, or regulatory element.
- Regulatory crosswalk available on website



HMBP/CalARP Unit Goals

- Ensure fair and consistent statewide implementation of the HMBP and CalARP programs
- Develop resources for CUPAs and industry
- Ensure transparency in how we conduct our CUPA evaluations



Performance Evaluation Highlights

- Ensure adequacy of implementation of the HMBP and CalARP programs
- Conduct a review of facility files
- Conduct a review of the area plan
- Conduct a review of the Inspection and Enforcement (I&E)
 Plan



HMBP Evaluation Process

Health and Safety Code, Division 20, Chapter 6.95, Article 1, Sections 25500-25519 California Code of Regulations, Title 19, Division 5, Chapter 1, Article 2 and 3, Sections 5020.1-5030.11



Overview of HMBP Elements Evaluated

- Ensure annual HMBP submittals and certification
- Ensure each HMBP facility has been inspected at least once in the last three years
- Review facility files
 - Ensure the accuracy and completeness of submittals
 - Ensure inspection reports are consistent with CERS
 - Ensure exemptions are properly reported and recorded
- Review prior performance evaluations



Evaluation of HMBP Submittal and Inspection Frequency

- Business Plan submittals and certification [HSC Sections 25508(a)(2) and 25508.2]
 - Ensure HMBPs are submitted or certified annually
- Inspections [HSC Section 25511]
 - Ensure a routine inspection is conducted at least once every three years
 - Or more frequently if established under local ordinance or the Inspection & Enforcement Plan



Review of Facility Files – HMBP Submittals

HMBP Submittal Completeness Review:

- Inventory [HSC Section 25505(a)(1)]
- Site Map [HSC Section 25505(a)(2)]
- Emergency Response Plan [HSC Section 25505(a)(3)]
- Employee Training Program [HSC Section 25505(a)(4)]



Review of Facility Files – HMBP Inspections

Inspection Report Review:

- Citations
- Violations
- Return to Compliance
- Notes



HMBP Oversight Inspections

- Coordinate with the CUPA to arrange oversight inspections
- Observe inspector performance in conducting a complete, thorough, and adequate inspection



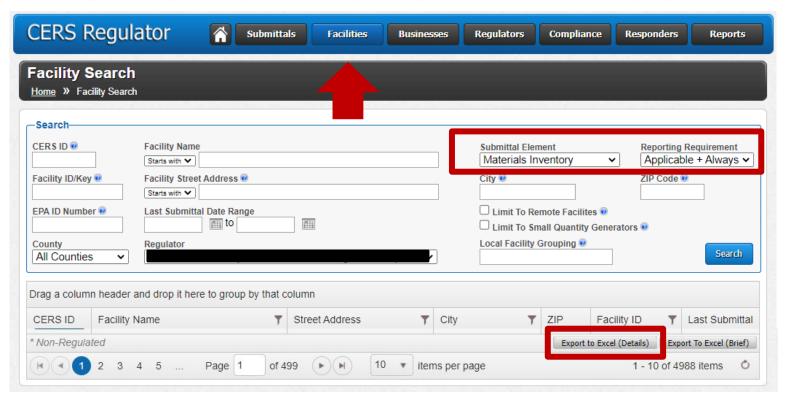
Overview of Area Plan Requirements Evaluated

- Ensure the Area Plan has been reviewed and certified within the last three years [HSC Section 25503 (d)(2)]
- Ensure all required elements are contained in the Area Plan [19 CCR Sections 5020.1-5020.8]





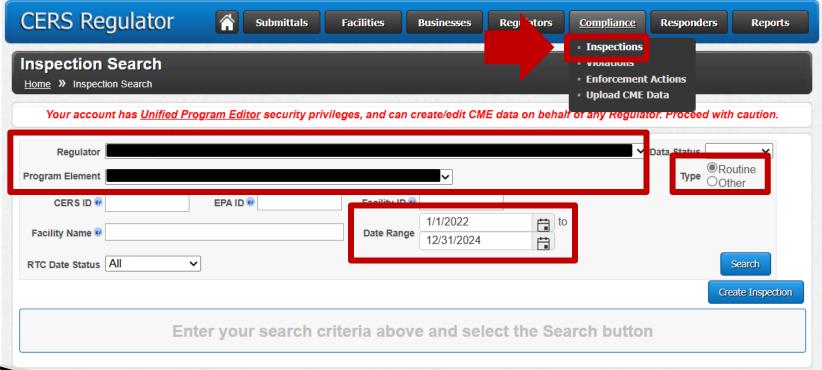
CERS Data Review – Facilities







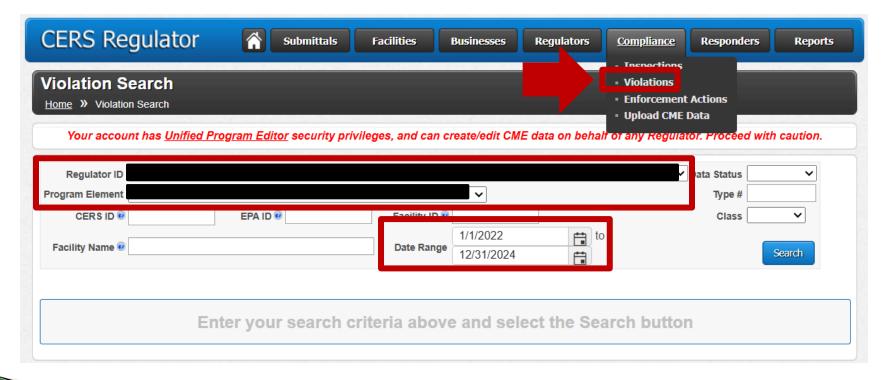
CERS Data Review - Inspections







CERS Data Review - Violations





CalARP Evaluation Process

Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25531-25543.3 California Code of Regulations, Title 19, Division 4, Chapter 2, Articles 1-11, Sections 5050.1-5160.1



Overview of CalARP Elements Evaluated

- Ensure each CalARP facility has been inspected at least once in the last three years
- Ensure CUPAs annually conduct an audit of their activities to implement the CalARP program
- Review prior performance evaluations



Overview of CalARP Requirements Evaluated

- Review facility files
 - Ensure inspection reports are consistent with CERS
 - Ensure exemptions are properly reported and recorded
- Ensure proper implementation of the CalARP program



Evaluation of CalARP Inspection Frequency

- Inspections [HSC Section 25537(a)]
 - Ensure a routine inspection is conducted at least once every three years
 - Or more frequently if established under local ordinance or the Inspection & Enforcement Plan



CalARP Performance Audit

- Ensure the CUPA conducts an annual self-audit of its activities to implement the CalARP program [19 CCR Section 5150.5 (b)]
- Conduct a completeness review of the performance audit [19 CCR Section 5150.5 (b)]



Risk Management Plan

Ensure each stationary source has updated their RMP every 5
years [19 CCR Sections 5070.11(a)(1) and (b)(1)]



Review of Facility Files - CalARP Inspections

- Inspection Report Review:
 - Citations
 - Violations
 - Return to Compliance
 - Notes



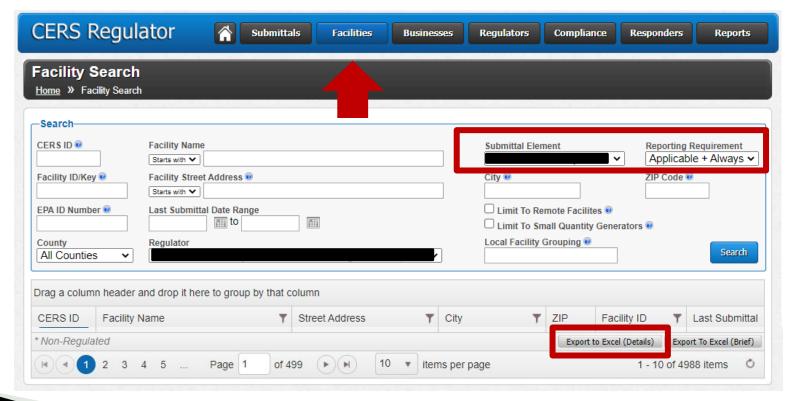
CalARP Oversight Inspections

- Coordinate with the CUPA to arrange oversight inspections
- Observe inspector performance in conducting a complete, thorough, and adequate inspection





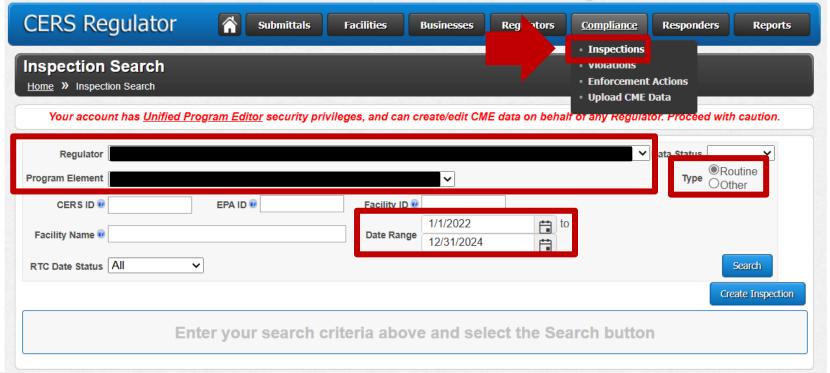
CERS Data Review – Facilities







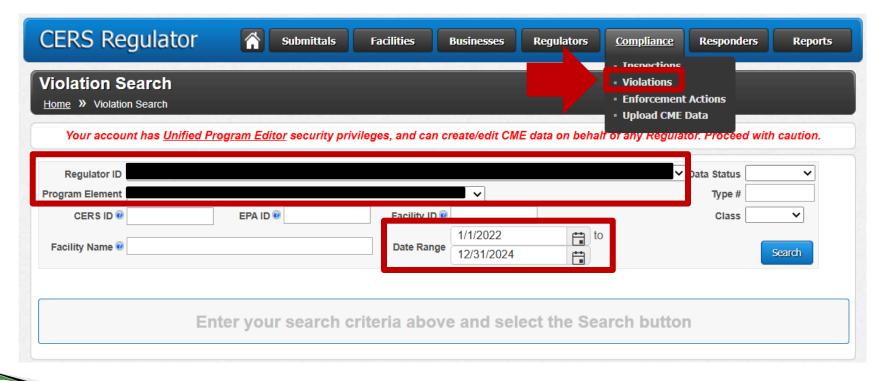
CERS Data Review - Inspections







CERS Data Review - Violations





Contact HMBP/CalARP Unit Staff

Visit the HMBP and CalARP webpages for more information

HMBP Program Website



CalARP Program Website



HMBP Program Listserv



<u>CalARP Program Listserv</u>





Contact HMBP/CalARP Unit Staff

If you have any questions regarding the HMBP or CalARP programs, please contact: HMBP@calepa.ca.gov or CalARP@calepa.ca.gov

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The CUPA Performance Evaluation and Assessment Process

TH-D/1

March 27, 2025

Mia Goings, Senior Environmental Scientist (Specialist);

Pheleep Sidhom, Environmental Scientist



Table of Contents



- Purpose
- The Evaluation Process
- CERS Compliance, Monitoring, and Enforcement (CME) Data
- Common Findings
- Suggestions



Purpose



- California Code of Regulations
- Evaluate CUPA Performance Regularly¹
- Ensure CUPA Statewide Consistency²
- Conformity to Inspection Standards³
- Quality Local Environmental Protection

³ Cal. Code Regs., tit. 27, section 15200(c)(1) and (2).



¹ Cal. Code Regs., tit. 27, section 15330(a).

² Cal. Code Regs., tit. 27, section 15100(b)(1).

Department of Toxic Substances Control

- Prepare Facility File Request
- Evaluation Timeframe
- 5+ Assorted Facilities
- Referred Complaints
- Compiled in Enclosure 2
- Notice and Enclosure 14

⁴ Cal. Code Regs., tit. 27, section 15330(b)(1).





- Kickoff Meeting
- Introductions
- Plans for Oversight Inspections⁵
- CUPA Presentation
- Supplemental Questionnaire
- Meet and Initiate Evaluation

⁵ Cal. Code Regs., tit. 27, section 15330(b)(3)(A).





- Follow-Up Information Request
- Missing or Incomplete Items⁶
- Inspection & Enforcement (I&E) Plan
- Spreadsheets and Documents Complete
- Correct Facility Files Uploaded

⁶ Cal. Code Regs., tit. 27, section 15330(b)(1)(A) and (B).





- Oversight Inspections⁷
- Optional Training Offered
- Preparation and Coordination
- Inspection Activities
- Inspector Knowledge and Conduct
- Documentation and Follow-Up

⁷ Cal. Code Regs., tit. 27, section 15330(b)(3)(A) and 15200(c)(1) and (2).





- CERS CME Data Reports
- Download SharePoint Files
- Inspection Percentage Calculation⁸
- Return to Compliance Percentage
- Generator Universe Analysis
- 45-Day Review of Notifications9

⁹ Cal. Code Regs., tit. 22, section 67450.2(b)(4) and 67450.3(d).



⁸ Cal. Code Regs., tit. 27, section 15100(b)(1)(G).



- I&E Plan Review
- Inspection Frequencies Correct¹⁰
- Enforcement Procedures Complete¹¹
- Procedures for Addressing Complaints¹²
- Sampling Capability Provisions

¹² Cal. Code Regs., tit. 27, section 15200(a)(10) and (11).



¹⁰ Cal. Code Regs., tit. 27, section 15200(a)(2)(A) and (B) and (e).

¹¹ Cal. Code Regs., tit. 27, section 15200(a)(5) et seq.



- Facility File Review¹³
- Review Inspection Reports¹⁴
- Program Element and Consent
- Violation Details and Classifications
- Return to Compliance Information
- Compare to CERS¹⁵

¹⁵ Cal. Code Regs., tit. 27, section 15290(d).



¹³ Cal. Code Regs., tit. 27, section 15330(b)(2).

¹⁴ Health & Saf. Code section 25185(c)(2)(A) and (3).



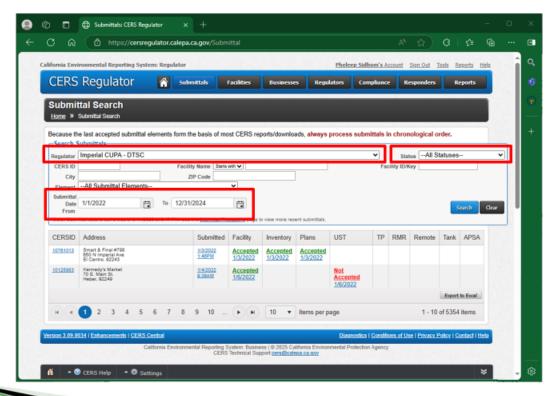
- Review Formal Enforcement
- Review Previous Evaluation
- Preliminary Summary of Findings¹⁶
- Questions & Answers (Q&A) Meeting¹⁷
- Exit Briefing
- Evaluation Progress Reports¹⁸

¹⁸ Cal. Code Regs., tit. 27, section 15330(b)(6).



¹⁶ Cal. Code Regs., tit. 27, section 15330(b)(5).

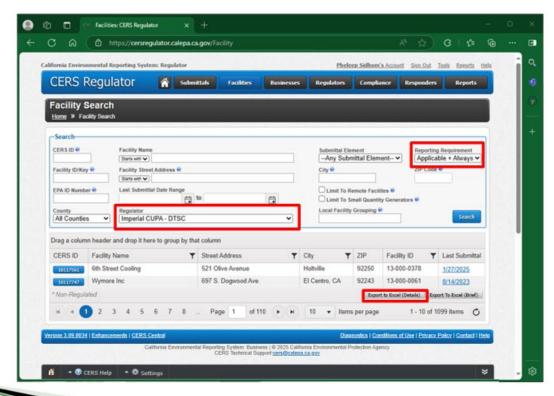
¹⁷ Cal. Code Regs., tit. 27, section 15330(b)(4).







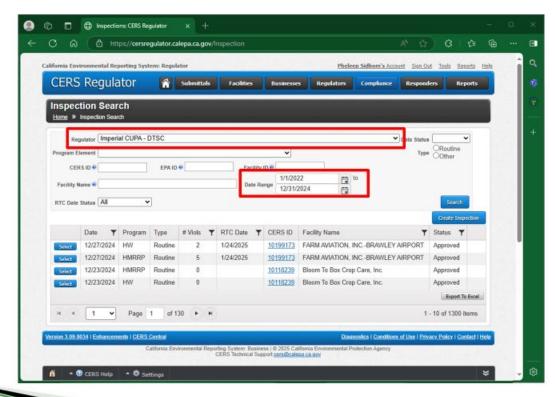








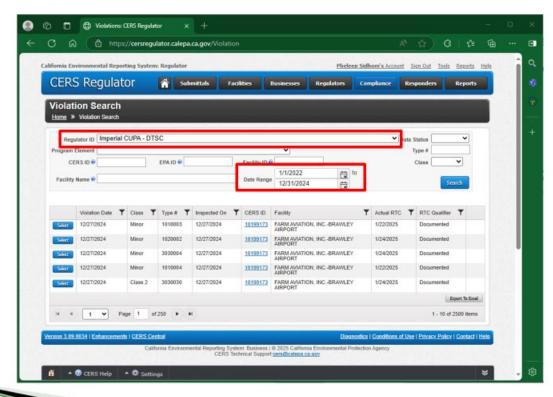








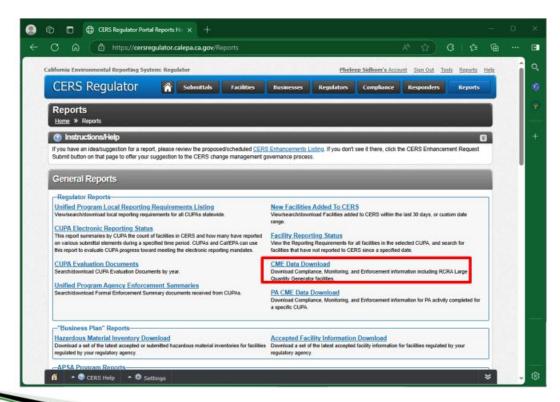








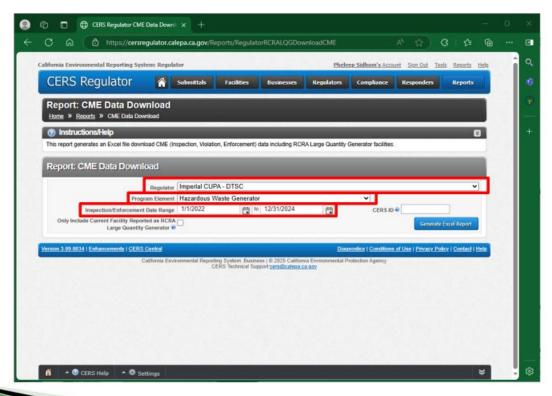








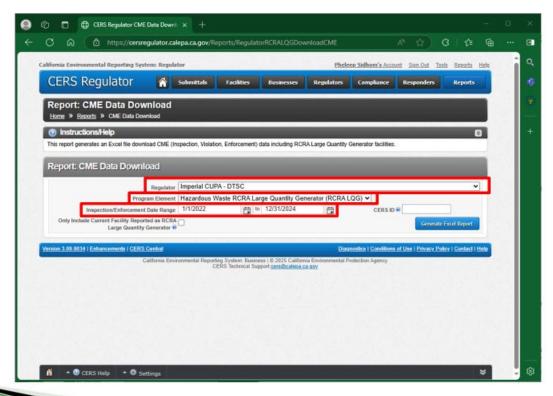








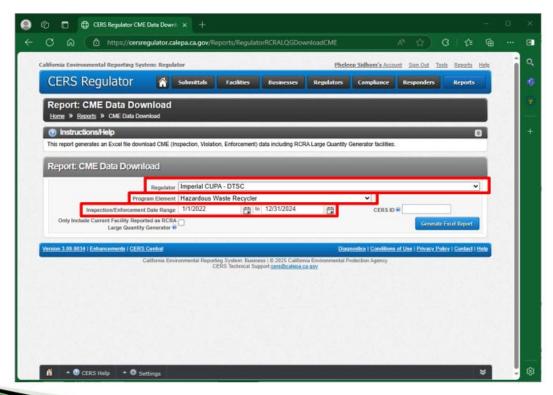








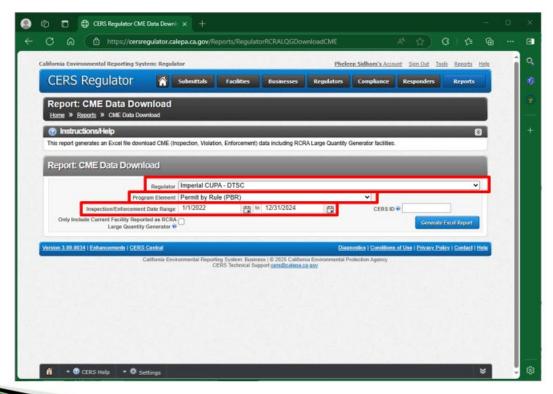








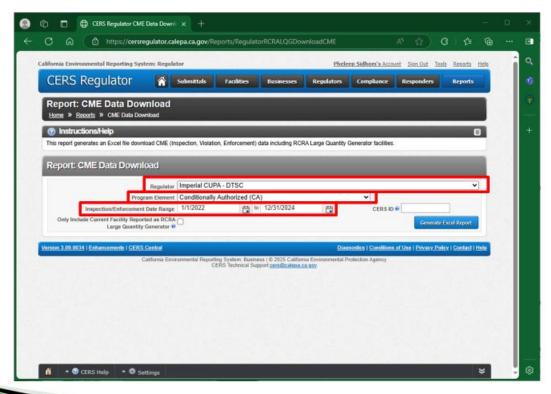








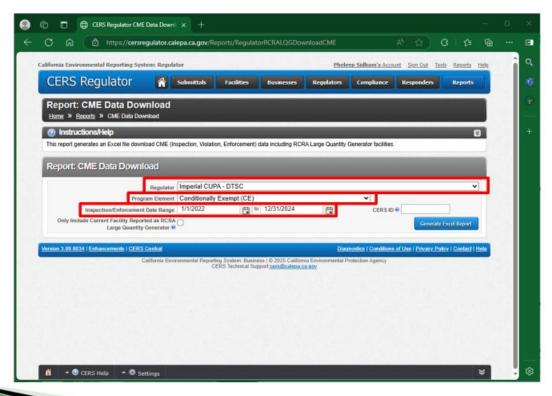








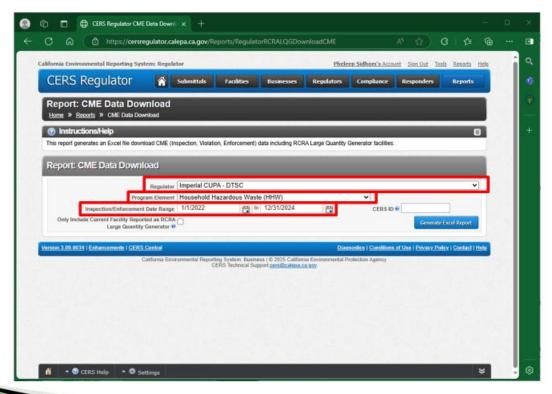


























Buy 3, Get 1 Free!





What do we find?







DTSC Evaluation Process

- ✓ Outstanding efforts/Accomplishments/Challenges
- √ Observations
- ✓ Incidental Findings
 - ✓ Requires a resolution to correct.
- ✓ Deficiencies in program elements
 - ✓ Corrective actions taken to remedy a program deficiency and prevent repeated deficiency in that area.



Things to watch out for

- Inspection Frequency
- Return to Compliance
- Violation Classification
- CME Data
- I&E Plan







Things to watch out for



- Permit-By-Rule Submittals
- Factual Basis and Observations
- Universe of Generators
- Training Requirements



Appendix of Deficiency Detail

See separate list of deficiency information with detail and limits to meet to avoid deficiencies.





Evaluations are helpful!

- ✓ Demonstrates your many efforts
- ✓ Assists to develop tools
- ✓ Roadmap for CUPA Manager/Staff
- ✓ Statewide Consistency





Suggestions



- Progress Reports Process
- Annual Self-Audit and I&E Plan Update
- Data Management Procedures
- Inspectors Preparing for an Inspection
- Use These Presentations During the Self-Audit!





Suggestions

- Emerging Issues:
 - Repeated Deficiencies
 - Sampling Capability
 - Evidence Documentation
 - Inspection Reports





Summary



- Purpose of DTSC Evaluation
- The Process and CERS CME Data
- Things to Watch Out For
- Suggestions
- Healthy Businesses and Communities Begin with Us!





Contacts for CUPA evaluation Staff

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- ➤ Brennan Ko-Madden: 510-540-3898 <u>brennan.ko-madden@dtsc.ca.gov</u>
- ➤ Jessica Harris: 916 591-4667 jessica.harris@dtsc.ca.gov
- ➤ Daniel Speer: 916 516-5602 <u>daniel.speer@dtsc.ca.gov</u>
- Ryan Miya (Supervisor): 510-292-9253 ryan.miya@dtsc.ca.gov
- ➤ Julie Pettijohn (Branch Chief): 510-516-5894 julie.pettijohn@dtsc.ca.gov
- Maria Soria (Division Chief): 510-540-3883 maria.soria@dtsc.ca.gov





Any Questions?







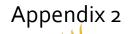
Appendix of Deficiency Detail



Information for Accomplishments and Challenges:

- > We are looking to describe your program efforts to implement the program
 - Changes since last evaluation
 - Impacts of external events
 - Staffing changes
 - Trainings given to regulated facilities
 - Working with other agencies and CUPA Forum initiatives
 - If we see outstanding efforts in your programs, we will feature that!
 - > Try to provide to us in Kick off meeting





Appendix for DTSC portion: Common Findings and Deficiencies

- ✓ CalEPA to release updated library of most common list on website
- ✓ Not a complete list





Appendix for DTSC portion: Common Findings and Deficiencies



- ✓ Important: CME Data must be in CERS as it is required. 27 CCR 15290(a)(3)
- CUPA should review/update it's data management procedures regularly, especially if any BDO issues a CME finding or observation.





Appendix 4

Common Deficiencies



- > #1 Inspection frequency for generators and tiered permitting.
 - ➤I and E Plan sets inspection frequency for generators
 - ➤ Use the Reports: CERS Inspection Report and Facilities data export scrutiny information for evaluation period and compare to Self Audit info.
 - > We are looking for one "Routine" inspection during the evaluation period
 - ➤ Self Audit often uses "in-house" data and can differ from CERS information.
 - *Corrective action is a plan to achieve I and E Plan inspection frequency requirements (and avoid repeating deficiency in next evaluation period).





Appendix 5

Common Deficiencies



>#2 Return to Compliance

- Review violation listings and CME data for RTC information
- ➤ Compare to violations with no RTC.
- * Corrective action is a plan to achieve greater than 90% RTC for violations in the evaluation period.
 - * RTC is the facility's responsibility. CUPA should document follow up actions in the facility file to demonstrate efforts in returning the facility to compliance.







>#3 Violation Classification.

➤ Review of CME data, facility file information, and I and E Plan description of proper violation classification.

➤ See CalEPA updated Violation Classification guide:

https://calepa.ca.gov/wp-content/uploads/sites/6/2020/06/Violation-Classification-Guidance-Document-accessible.pdf

* Corrective action typically includes training and submittal of inspections reports with properly classified violations.





Appendix 7

Common Deficiencies



>#4 Compliance Monitoring and Enforcement (CME) data.

- ➤ Done in conjunction with CalEPA, we review Self audits, facility file info and data quality. CERS CME reports to include inspection program type, violation codes, descriptions of violations, enforcement, and completeness of inspection data.
- ➤ Compare information to see if there are missing elements.

Corrective action required to correct missing data.



Appendix 8

Common Deficiencies



>#5 Inspection and Enforcement Plan.

- ►I and E plan review required elements from 27 CCR 15200(a) (1-14)
 - **≻**Complaints
 - Sampling processes and capabilities (new since 7/1/2018)
 - ➤ Inspection frequency
 - ➤ Inspection and Enforcement process
 - ➤ Violation classification
- Corrective action to update I and E Plan to meet regulatory requirements.







>#6 Complaints

- Check CalEPA database for referred complaints and compare to complaint and disposition information provided from CUPA.
- ➤ Check to see if CUPA followed up on complaints.
- ❖ Corrective action is to request the CUPA to address complaints and/or review internal processes to respond to complaints and provide feedback to CalEPA.
 - New database beginning April 2016, older complaints being uploaded to database for tracking. Need to check CUPA contacts info if there was turnover in who receives complaints.







>#7 Permit By Rule Submittals.

- ➤ PBR on-site treatment facilities must notify annually and CUPA must accept or reject in 45 days (22 CCR 676450.3(d)).
- Check CERS Submittal listing, export to excel and review dates for PBR submittals and approval or denial by CUPA.
 - ➤ Were the annual notifications submitted?
 - ➤ Did the CUPA accept or reject PBR submittal in 45 days?
- Corrective action to address PBR submittal deficiencies along with training.





scnoction

>#8 Incomplete Inspection – Oversight Inspection.

- ➤DTSC staff accompanies CUPA inspector during an inspection and evaluates preparation, walk through, document review and violations noted and correctly cited.
- Deficiency noted if inspector unable to correctly identify and classify violations, does not conduct complete inspection, inspection report/NOV doesn't include violation details and required corrective actions.
- ➤ DTSC may conduct an independent Verification inspection on a facility recently inspected by the CUPA, if DTSC finds violations that existed when the CUPA inspected, then an incomplete inspection deficiency would be issued.

Corrective action is additional training for staff.







#9 Factual Basis and Observations.

- ➤ Did the inspector provide a factual basis and corrective action for a violation?
- Check CERS CME data, inspection reports submitted and I and E Plan details.
 - ➤DTSC checks violations to see if violation descriptions are blank or if the default language adequately describes the violation.
 - Generic Codes should not be used when there is a specific violation to cite.
- ❖ Corrective action includes staff training and require facility inspection report submittals to show changes.



What we have planned...

10:45 - 10:55 10 Minute BREAK

10:55 - 11:25 APSA Program Assessment

11:25 - 11:45 Questions & Answers



TIME FOR A BREAK!

27th California Unified Program Annual Training Conference March 24-27, 2025





CAL FIRE Office of the State Fire Marshal Evaluation and Assessment Process March 24-27, 2025



27th California Unified Program Annual Training Conference March 24-27, 2025

APSA & HMMP-HMIS Programs Assessment

Denise Villanueva, Evaluator



CAL FIRE - Office of the State Fire Marshal



- Assessment **starts** at the Notification Letter date
 - APSA inspections are reviewed relative to this date
 - HMBP submittals (in lieu of tank facility statements [TFS]) are reviewed relative to this date
 - Open APSA violations (no return to compliance [RTC]) – the prior 4 years are reviewed



- Deficiencies/Incidental Findings may be considered as "Corrected During the Evaluation" if corrective actions/resolutions are achieved prior to this date
 - If not, corrective action efforts are tracked through the Progress Report cycle







Office of the State Fire Marshal
Unified Program Agency Evaluation Checklist
Hazardous Materials Management Plan (HMMP) and Hazardous Materials
Inventory Statement (HMIS)
and Aboveground Petroleum Storage Act (APSA) Programs

	ation Dates:	Evaluator Name:	
Important Dates Notify California Environmental Protection Agency (CalEPA) team lead of any missing or incomplete records in SharePoint: Preliminary Summary of Findings due to CalEPA:			
Preliminary Activities Review previous evaluation Does the UPA have any unresolved or uncorrected deficiencies or incidental findings from previous evaluation(s)? Yes No If yes, list:			
Does the Certified Unified Program Agency (CUPA) have any Participating Agency (PA)? Yes ☐ No ☐			
	e of PA(s) implementing AP act the CalEPA team lead i		165 140
(Inclu Notific Report July-S APSA APSA APSA	cation Date: rting Quarters: January-M September (Due October 3 A Facility List report (Faciliti A compliance monitoring an A Facility Information report eview facility files requested	or file name for each CERS dow arch (Due April 30) April-Ju 1) October-December (Due Jar es Tab) d enforcement (CME) report (Rep	ine (Due July 31)
General Information Total # of APSA tank facilities based on • CERS: Total # of APSA tank facilities with 10,000 gallons or more of petroleum, if known (excluding conditionally exempt tank facilities per Health and Safety Code (HSC), Section 25270.4.5(a)) • CUPA: PA (if applicable): Inspection Staff • Total # of UPA staff inspecting tank facilities for compliance with Spill Prevention, Control, and Countermeasure (SPCC) Plan requirements of APSA: CUPA: PA (if applicable):			
	OSFM CUPA Form 3	Page 1	Rev. 12/2023



27th California Unified Program Annual Training Conference March 24-27, 2025



CUPA Evaluations

×

California law requires the Secretary of CalEPA to periodically review the ability of each CUPA to carry out the requirements of the Unified Program. The goal is to assess whether the CUPA is effectively implementing all of the program elements and is continually improving to meet the intent of the law: coordination, consolidation, and consistency of all Unified Program elements. CalEPA assesses each CUPA triennially in coordination with three other state organizations with Unified Program responsibilities. The standards for the CUPA evaluation process are described in Title 27 of the California Code of Regulations and expanded in a variety of guidance documents. The CUPA evaluation schedule is found on the CalEPA website. CAL FIRE-OSFM participates in the CUPA evaluation process to ensure each CUPA is implementing the California Fire Code HMMP/HMIS and APSA programs for all regulated facilities within their jurisdiction as specified in state laws and regulations.

The following forms are utilized by the OSFM staff during the CUPA evaluation process.

- Form 1 Discussion Topics with the Fire Chief
- Form 2 Unified Program Agency (UPA) Facility File Review Checklist
- Form 3 CUPA Evaluation Checklist

https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency



27th California Unified Program Annual Training Conference March 24-27, 2025

- Determine CUPA's current inspection rate
 - APSA inspections at facilities storing 10,000 gallons or more of petroleum at least once every 3 years per Health and Safety Code (HSC) 25270.5(a)
 - Alternative APSA inspection frequency as identified in CUPA's Inspection and Enforcement (I&E) Plan per HSC 25270.5(b), 19 CCR Section 1609



Determine CUPA's current inspection rate

- <u>NEW</u>
- Inspect each APSA tank facility with less than 10,000 gallons of petroleum, including each tank facility with less than 1,320 gallons of petroleum and one or more tanks in underground areas, at least once every three years or in a frequency established by the CUPA (CCR Title 19, Section 1609)
- Inspect each tank facility that is conditionally exempt from preparing an SPCC Plan under APSA at least once every three years or in a frequency established by the CUPA (CCR Title 19, Section 1610)



- Review CUPA inspectors' training records
- Review CUPA's APSA inspection checklist(s)
- Review requested facility files
 - APSA compliance monitoring and enforcement (CME) information
 - Annual TFS or HMBP Submittals
- Review RTC for APSA violations



- Determine HMBP (in lieu of TFS) submittal percentage for APSA facilities
 - Inventory/Site Map
 - Emergency Response/Training Plans



APSA Compliance Inspections

- ➤ APSA mandated inspections at facilities storing 10,000 gallons or more of petroleum at least once every 3 years per HSC 25270.5(a)
 - Enclosure 1 Information Request: CUPA's list of applicable APSA facilities (from CUPA's database) that identifies the most recent routine APSA inspection date



APSA Compliance Inspections

- Alternative APSA inspection frequency as identified in CUPA's I&E Plan per HSC 25270.5(b)
 - Inspections more frequent than the mandated frequency
 - Inspections at tank facilities with less than 10,000 gallons of petroleum (or inspecting all APSA tank facilities)



Determining Percentage of Current Inspections

- Review CUPA's list of APSA tank facilities that store 10,000 gallons or more of petroleum:
 - Compare CUPA list to CERS information
 - Routine inspection date information is obtained from a CERS Facility Listing report and APSA CME report

 Determine % of facilities that are current with inspections, per CERS and CUPA list



Determining Inspection Currency Percentage

Review list of all APSA tank facilities and determine % of facilities that are current with inspections as established in the CUPA's I&E Plan

Deficiency (or incidental finding) considered if percentage of inspections is below OSFM minimum threshold



Inspection Deficiency Corrective Action

- A schedule to inspect facilities that were not inspected
- Future steps to ensure each APSA tank facility will be inspected at least once every three years (or in a frequency per the I&E Plan)
- Narrative about inspection progress



Training Records of CUPA Staff Conducting APSA Inspections

- Records provided by the CUPA
- When necessary, OSFM checks its master list to confirm certification of CUPA staff
- Refresher training per CCR, Title 19, Section 1615(a) (NEW)

Incidental finding considered if untrained inspector(s) performed inspections at APSA tank facilities per HSC



Untrained Inspector Incidental Finding Resolution

- The untrained inspector must take the APSA Basic Inspector Training course and pass the final exam
- Identify all inspections done by untrained staff and reinspect such facilities



Facility File Review: APSA CME

- >APSA inspection report
- > APSA CME review
 - Review CERS CME Data Download report with APSA Program Element selected
 - Review CERS history related to APSA inspections and enforcement during the evaluation period
 - Review outstanding APSA violations and violation details

Deficiency (or incidental finding) considered if CME data not properly reported to CERS

CME Reporting Deficiency Corrective Actions

- Identify and correct the cause of missing or incorrect APSA program CME information
- o Review and revise data management procedure or other procedure, if any
- Identify all APSA Program CERS CME information that has not been reported to CERS or has been reported incorrectly during the evaluation period
- Future steps to ensure all APSA program CME information is correctly and consistently reported
- Provide a statement confirming the complete entry of all prior APSA
 Program CME information to CERS that was not previously reported to CERS, or was previously reported incorrectly to CERS for the APSA
 Program

APSA Facility Information

- Effective April 1, 2019 APSA Facility Information submittal element was included in CCR Title 27 Data Dictionary
- APSA Facility Information is <u>required</u> to be completed and submitted to CERS 12 months following December 17, 2024, and annually thereafter (CCR Title 19, Section 1614(a))



Facility Files: What's in CERS?

- Review CERS APSA Documentation (TFS) submittals or HMBP submittals (in lieu of TFS)
 - Business Activities and Business Owner/Operator ID
 - Hazardous Materials Inventory and Site Map
 - Emergency response plans and procedures, and training plan

A Deficiency or incidental finding is considered if a substantial percentage of facilities have not submitted within the last year



Facility Files: What's CERS?





Unified Program Agency Facility File Review Checklist Hazardous Materials Management Plan and Hazardous Materials Inventory Statement and Aboveground Petroleum Storage Act Programs

Unified Program Agency: Evaluation Date(s):	
Evaluation Bate(s).	
Facility File Name:	
CERS ID:	
Hazardous Materials Management Plan & Hazardous Materials Inventory Statement Program	
Business Activities	
Submittal Date (W/In last 12 months):	
Accepted by UPA Date:	
Identification & Declaration:	
Additional local requirements:	
Business Owner/Operator ID	
Submittal Date (W/In last 12 months):	
Accepted by UPA Date:	
Identification:	
Business Owner:	
Environmental Contact:	
Emergency Contact: Additional locally collected information:	
Additional locally collected mormation.	
Hazardous Material Inventory – Chemical Description	
Submittal Date:	
Submittal Date: Accepted by UPA Date:	
Submittal Date: Accepted by UPA Date: Facility Information	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA: Fire Code Hazard Class: HazMat Type, Physical State, Fed. Hazardous Categories: Ave./Max. Daily Amounts:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA: Fire Code Hazard Class: HazMat Type, Physical State, Fed. Hazardous Categories: Ave./Max. Daily Amounts: Annual Waste Amnt./State Waste Code:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA: Fire Code Hazard Class: HazMat Type, Physical State, Fed. Hazardous Categories: Ave./Max. Daily Amounts: Annual Waste Ammt./State Waste Code: Storage Container, Largest Container:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA: Fire Code Hazard Class: HazMat Type, Physical State, Fed. Hazardous Categories: Ave./Max. Daily Amounts: Annual Waste Amnt./State Waste Code: Storage Container, Largest Container: Storage Pressure/Temperature: Storage Pressure/Temperature:	
Submittal Date: Accepted by UPA Date: Facility Information Business Name & Chemical Location: Chemical/Common Name: CAS #: Trade Secret, EHS, EPCRA: Fire Code Hazard Class: HazMat Type, Physical State, Fed. Hazardous Categories: Ave./Max. Daily Amounts: Annual Waste Ammt./State Waste Code: Storage Container, Largest Container:	



27th California Unified Program Annual Training Conference March 24-27, 2025

Facility Files: What's CERS?

CUPA Evaluations ×

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- Form 3 CUPA Evaluation Checklist

https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency





Do not submit an SPCC Plan to CERS!



- Tank Facility Statement is NOT the SPCC Plan
- SPCC Plans are not required to be uploaded to CERS and, therefore, should not be uploaded to CERS

Annual HMBP Submittal Percentage (in lieu of TFS): APSA Facilities Only

- Identify the total number of APSA tank facilities
- Determine number of facilities with current Inventory/Site Map submittals
- Determine number of facilities with current Emergency Response and Training Plans submittals

Deficiency or incidental finding considered if annual submittal percentage is below OSFM minimum threshold



Annual HMBP Submittal (in lieu of TFS) Corrective Action:

- Follow-up with non-compliant APSA tank facilities
- Provide a narrative on the CUPA's progress or spreadsheet with information for each noncompliant APSA tank, including any enforcement



Continued Review: Example Incidental Findings

Mary Wren-Wilson, Evaluator



CAL FIRE - Office of the State Fire Marshal



Determining RTC % for APSA Violations

- > CERS CME data review
 - CERS CME Data Download report (General/Regulator Report)
 with APSA Program Element selected
 - Data reviewed to examine 4-fiscal year time period covered by evaluation
 - Review AST Outstanding Violations and AST Violation Details





Determining RTC % for APSA Violations

➤ Determination of RTC%

Deficiency or Incidental Finding considered if RTC percentage is below OSFM minimum threshold or there are violation 4010001 (No SPCC Plan) instances without RTC





RTC Deficiency Corrective Action:

 Follow-up with non-compliant APSA tank facilities

 Provide a narrative on the CUPA's progress or spreadsheet with information for each non-compliant APSA tank, including any enforcement



Review of All APSA Violation 4010001 (No SPCC Plan) Instances

- > CERS CME Data Download Report
 - Violation 4010001 (No SPCC Plan) is <u>NOT</u> a minor violation (CCR, Title 19, Section 1612(d))
 - Facilities that operate without an SPCCC Plan present a significant threat to human health or the environment, and the violator benefits economically from noncompliance, either by reduced costs or competitive advantage
 - Classifying a violation for not having an SPCC Plan as Minor is inconsistent with and less stringent than USEPA

Incidental Finding is considered if any instance of violation 4010001 is misclassified as minor

No SPCC Plan Violation Misclassification Incidental Finding Resolution:

- > Train UPA inspectors on definition of minor violation, how to properly classify violations, and review:
 - 2020 Violation Classification Guidance for UPAs
 - SPCC Violations in the "U.S. EPA Civil Penalty Policy for Section 311(b)(3) and Section 311(j) of the Clean Water Act"
- > Provide a statement that training has been completed.



Other APSA Violations Shall Not Be Minor:

- Repurposing UST as an AST (CCR, Title 19, Section 1607(b))
 - Violation 4030012
 - tank compatible with stored materials
 - applies to facilities required to have an SPCC Plan
 - Violation # TBD
 - applies to **all** facilities, including conditionally exempt
- A rail car, tank car, or tank vehicle being used as a storage tank in a permanent or fixed installation (CCR, Title 19, Section 1607(c)
 - Violation # TBD





APSA & HMMP-HMIS Programs Assessment Appendices



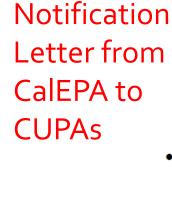
CAL FIRE – Office of the State Fire Marshal



Appendix 1 – Enclosure 1 Information Request

APSA Program Specific Documents:

- A sortable spreadsheet derived from the local data management system (e.g., financial, billing, or permitting system) identifying the following for each APSA tank facility:
 - CERS ID
 - Facility name
 - Date of the most recent routine APSA inspection, if applicable
 - Petroleum storage amount, or the Aboveground Storage Tank (AST) storage category, for example:
 - 10,000 gallons or more
 - 1,320 9,999 gallons
 - Less than 1,320 gallons with Tank in an Underground Area (TIUGA)
 - Whether the APSA tank facility has been determined to be conditionally exempt from having to prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan (farms, nurseries, logging or construction sites)
- If not already included with the facility inspection records, all APSA inspection checklist(s)/form(s) utilized by inspectors



CUPA

Refer to the

Evaluation

Appendix 2 –Generate APSA Facility Listing Report

Step 1:

Use Facility Search, select:

APSA Submittal Element,

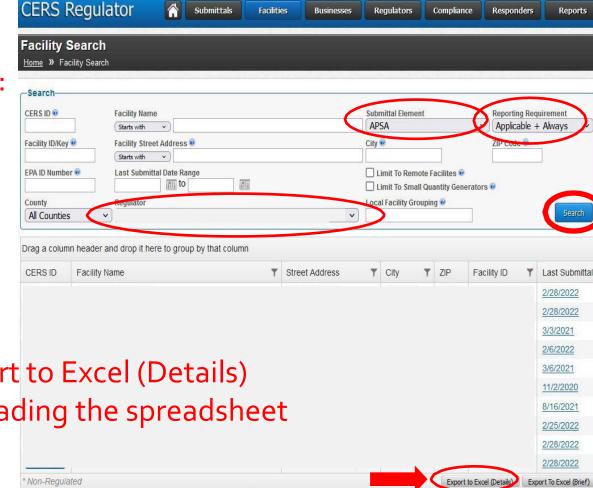
Reporting Requirement = Applicable + Always,

your CUPA as the

Regulator. Then press the

Search button.

Step 2: Use the Export to Excel (Details) button when downloading the spreadsheet



Facilities

Appendix 2 – Generate APSA Facility Listing Report

Export To Excel (Details)



Warning! The download you are requesting could take 5 - 10 minutes to process based on your selection criteria! The data in the spreadsheet is current as of 2/6/2019 9:55 AM. If you wish to proceed with the download select **Download Now** and please be patient.

Step 3: Press the Download Now button and wait.



Do you want to open or save FacilityListing(Details).xlsx from cersregulator2.calepa.ca.gov?



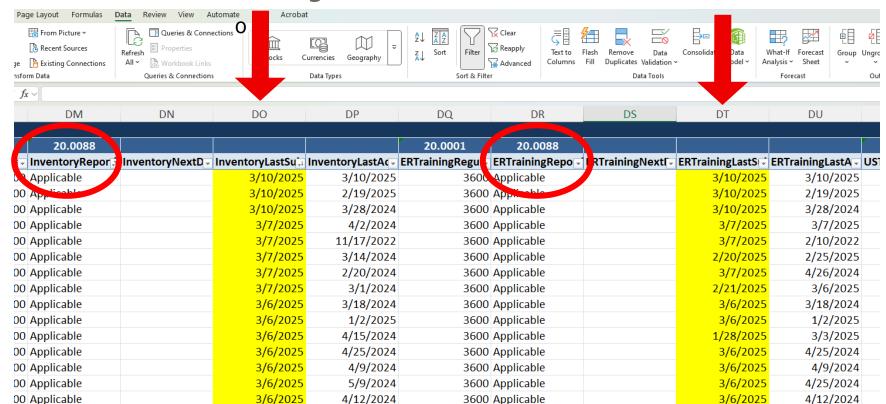
Step 4: Using the Save As option, save the file after customizing the name.

Last APSA Routine Inspection Date - Column FE

FB	FC	FD	FE	FF	FG	FH
CalARPNextDue 🕃	CalARPLastSubn =	CalARPLastAcce ↓	$APSARoutineInspectionDat_{\downarrow\downarrow}$	CalARPLastInspe	CALastInspectio	CELastInspection
			2/28/2025			
			2/27/2025			
			2/27/2025			
			2/26/2025			
			2/25/2025			
			2/24/2025	2/11/2022		
			2/11/2025			
			2/11/2025			
			2/11/2025			
			2/11/2025			
			2/7/2025			
			2/6/2025			
			2/6/2025			
			2/5/2025			
			2/4/2025	2/4/2025	2/4/2025	2/4/2025
			1/30/2025	2/4/2023	2/4/2023	2/4/2023
			1/30/2023			

HMBP Submittals (in lieu of TFS) –

- Column DO: InventoryLastSubmittedDate
- Column DT: ERTrainingLastSubmittedDate



Appendix 3 — Generate APSA CME Report

CERS Regulator



Submittals

Facilities

Businesses

Regulators

Compliance

Responders

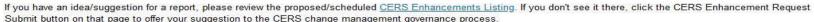
Reports

*

Reports

Home » Reports

② Instructions/Help



General Reports

Regulator Reports-

Unified Program Local Reporting Requirements Listing

View/search/download local reporting requirements for all CUPAs statewide.

CUPA Electronic Reporting Status

This report summaries by CUPA the count of facilities in CERS and how many have reported on various submittal elements during a specified time period. CUPAs and Cal/EPA can use this report to evaluate CUPA progress toward meeting the electronic reporting mandates.

Regional Inventory Materials Search

This report allows UPAs to search for specific materials in the last submitted inventories for all facilities in the user's CUPAs (or statewide for statewide viewers/regulators).

CUPA Evaluation Documents

Search/download CUPA Evaluation Documents by year.

New Facilities Added To CERS

View/search/download Facilities added to CERS within the last 30 days, or custom date range.

Facility Reporting Status

View the Reporting Requirements for all facilities in the selected CUPA, and search for facilities that have not reported to CERS since a specified date.

CME Data Download

Download Compliance, Monitoria and Enforcement information including RCRA Large Quantity Generator facilities.

Unified Program Agency Enforcement Summaries

Search/download Formal Enforcement Summary documents received from CUPAs.

-"Business Plan" Reports-

Hazardous Material Inventory Download

Download a set of the latest accepted or submitted hazardous material inventories for facilities regulated by your regulatory agency.

Accepted Facility Information Download

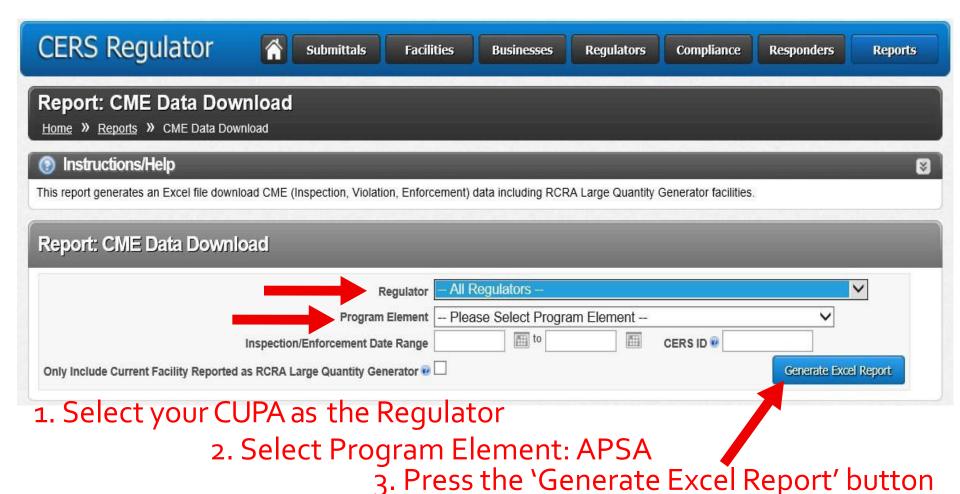
Download a set of the latest accepted facility information for facilities regulated by your regulatory agency.

-APSA Program Reports-

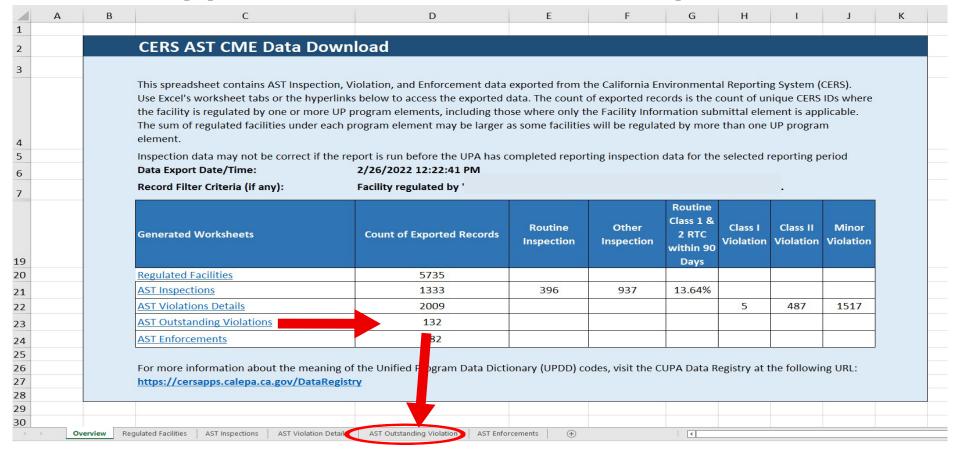
APSA Facility Information Report

Download the latest accepted or submitted APSA Facility Information data for regulated APSA facilities

Appendix 3 — Generate APSA CME



Appendix 3 — APSA CME Report



Violations without RTC are listed on AST Outstanding Violation tab

Appendix 4 – Generate APSA Facility Information Report



If you have an idea/suggestion for a report, please review the proposed/scheduled <u>CERS Enhancements Listing</u>. If you don't see it there, click the CERS Enhancement Request Submit button on that page to offer your suggestion to the CERS change management governance process.

General Reports

Regulator Reports-

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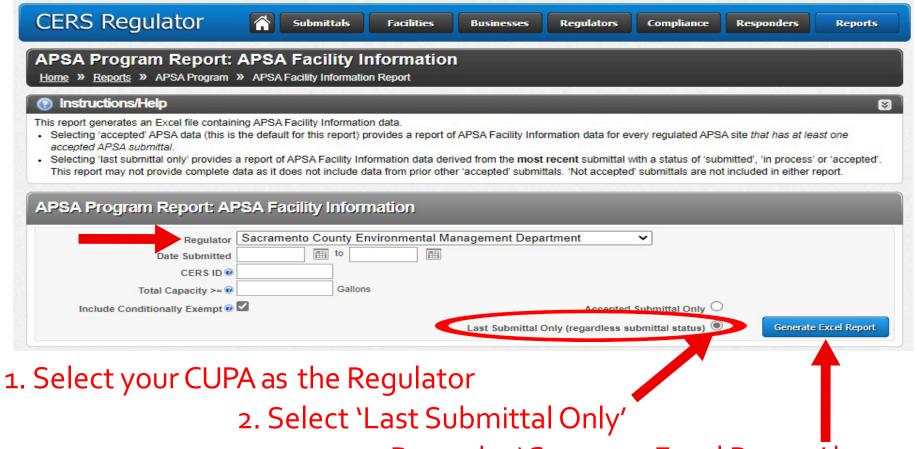
-APSA Program Reports-

APSA Facility Information Report

Download the latest accepted or submitted APSA Facilities

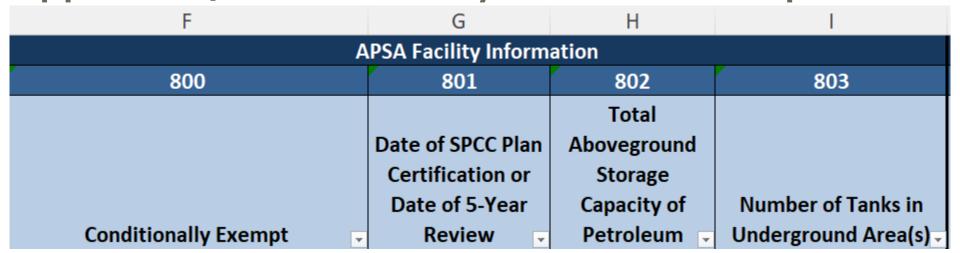
y Information data for regulated APSA facilities

Appendix 4 – Generate APSA Facility Information Report



3. Press the 'Generate Excel Report' button

Appendix 4 – APSA Facility Information Report



CCR, Title 19, Section 1614 now **requires** each facility to annually submit the following information:

- Conditionally exempt status (Yes or No)
- SPCC Plan certification date or 5-year review date (whichever is more recent)
- Total APSA petroleum storage capacity (gallons)
- Number of tanks in underground areas (TIUGA)



OSFM Evaluation Forms:

- Form 1- Discussion Topics with the Fire Chief
- Form 2- Unified Program Agency (UPA) Facility File Review Checklist
- Form 3- UPA Evaluation Checklist

https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency





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OSFM "CUPA" Program at <u>cupa@fire.ca.gov</u> (916) 263-6300





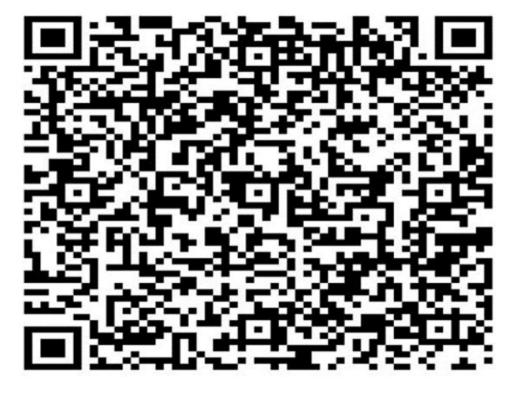
OSFM APSA Webpage







HMMP/HMIS Webpage







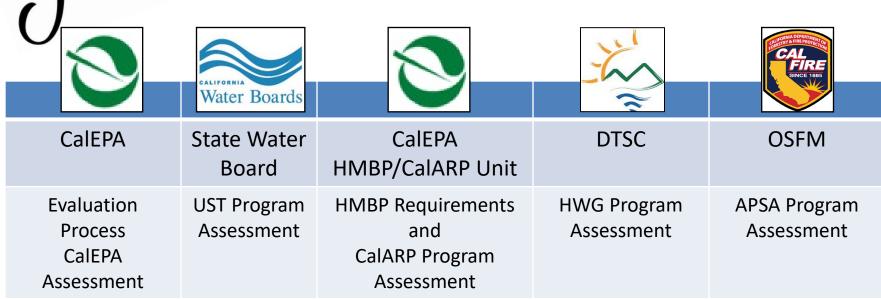
OSFM Evaluations Checklists







For your patience-Any Questions?...





27th California Unified Program Annual Training Conference March 24-27, 2025