

Customer Id:	APSA1
Title:	New Data Field: Date of SPCC Plan Certification or 5 year Review
Enhancement Id:	147
Workgroup Supported:	Yes
Description:	
<p>Field= Date of SPCC Plan Certification or 5 year Review Type= Alpha-numeric, Size= 8, Description/Usage= Current certification date or 5-yr review of the SPCC Plan, SampleValues= YYYYMMDD</p> <p>Required: Required if Data Element item 8 is marked "Yes."</p> <p>Justification: The hazardous materials business plan information, which is required to be submitted to the statewide information management system, doesn't contain sufficient information to implement the APSA program effectively, efficiently or consistently at the state and local UPA level. Completion of APSA data elements should be required if Data Element ID 8 is marked "Yes."</p> <p>A tank facility that is regulated under APSA is required to prepare and implement a spill prevention, control, and countermeasure (SPCC) plan pursuant to the CFR, Title 40, Part 112. Also, a complete review and evaluation of the SPCC Plan must be done at least once every 5 years. SPCC plans aren't required to be submitted to the statewide information management system; however, having the date of the SPCC plan certification or the last time the SPCC plan was reviewed, whichever is more current or recent, will indicate whether or not the tank facility has prepared an SPCC plan. Additionally, this date will indicate whether the review was performed within the required time limits (within the last 5 years). If the date entered for this field is more than 5 years ago, then it would indicate that a 5-year review of the SPCC plan has not been performed; a review of the SPCC plan is overdue. Knowing this information will enable the UPAs to determine whether a facility is in compliance or not since facilities that meet or exceed 1,320 gallons but less than 10,000 gallons of petroleum are not currently required to be inspected. This information will be essential for the State Fire Marshal's (OSFM) oversight of the APSA program, particularly when evaluating UPAs in their implementation of the APSA Program and determining whether or not the UPAs are ensuring facility compliance with APSA by having a current SPCC plan. A tank facility located on and is integral to a farm, nursery, or logging construction site that meets the conditions described in HSC Section 25270.4.5(b) is not required to fill out this data field.</p>	
Priority:	High

Comments:

3-10-15 CBUG Webinar Survey: 58 of 116 responded, 73% support adding the 3 fields, 9% don't

3 added fields would indicate SPCC Certification date/review date; total aboveground petroleum storage capacity and whether they own/operate aboveground tank in an underground area

3-10-15 CBUG Webinar Comment: If these fields are controlled by businesses, will that require them to update CERS every time they revise SPCC? We already spend a lot of time tracking SPCC plans, this would be one more place to keep track of data. It would just be one more think citizen groups could go after as it would be public info.

06/23/2015: Workshop- As Is. Supported. NOTE: per workshop discussion, need to include a Help Bubble by each field to note the definition of "tank" as a 55 gallon drum or other type of storage container.

Customer Id:	APSA2
Title:	New Data Field: Total Aboveground Petroleum Storage Capacity
Enhancement Id:	147
Workgroup Supported:	Yes.
Description:	
<p>Field=Total Aboveground Petroleum Storage Capacity Type= Numeric Size= 15 Description/Usage= Total aggregate storage capacity of all aboveground tanks, containers, or equipment with 55 gallons or more in shell capacity. The storage capacity of a tank, container, or equipment is the shell or design capacity of the tank, container, or equipment Sample Values= Maximum 15 digit number</p> <p>Required: Required if Data Element item 8 is marked "Yes."</p> <p>Justification: The hazardous materials business plan information, which is required to be submitted to the statewide information management system, doesn't contain sufficient information to implement the APSA program effectively, efficiently or consistently at the state and local UPA level. Completion of APSA data elements should be required if Data Element ID 8 is marked "Yes." Aboveground petroleum storage capacity of 1.320 gallons or more indicates the facility may be subject to the APSA Program. Knowing the total capacity would help in determining whether the tank facility is able to self-certify its SPCC plan or one that must have an SPCC plan certified by the CA licensed professional engineer. Knowing the total capacity gives information regarding the possible relative risk from the amount of petroleum on site at a facility. This information will also indicate whether or not the tank facility is required to be inspected by the UPA at least once every 3 years for compliance with APSA per HSC 25270.5(a). This information will be essential for the OSFM oversight of the APSA program particularly when evaluating UPAs in their implementation of the APSA Program, including whether or not the UPAs are meeting their mandated inspections. The storage capacity of a tank, container, or equipment means the shell or rated design capacity of the tank, container, or equipment. The minimum container/tank/equipment size is 55 gallons. A tank facility located on and is integral to a farm, nursery, or logging or construction site that meets the conditions described in HSC Sect. 25270.4.5(b) is not required to fill out this data field.</p>	
Priority:	High

Comments:

06/23/2015: Workshop- As Is. Supported. NOTE: per workshop discussion, need to include a Help Bubble by each field to note the definition of "tank" as a 55 gallon drum or other type of storage container.

Customer Id:	APSA3
Title:	New Data Field: Number of Tanks in Underground Area
Enhancement Id:	147
Workgroup Supported:	Yes.
Description:	
<p>Field = Number of Tanks in Underground Area Type= Numeric Size= 15 Description/Usage= Total number of tanks in an underground area (Refer to HSC 25270.2(o) for definition of a tank in underground area.) Sample Values= Maximum 15 digit number</p> <p>Required: Required if Data Element item 8 is marked "Yes."</p> <p>Justification: Proposed APSA regulations will require tanks in underground areas, as defined in HSC section 25270.2(o), that were formerly subject to HSC Ch. 6.7 and CCR Title 23 underground storage tank (UST) requirements, to be inspected at least once every 3 years by the UPA. Knowing this information will enable the UPAs to determine the scope of inspection and permitting. Additionally, OSFM will benefit from knowing this information to determine whether or not the UPA is meeting the mandated inspections of tank facilities with tanks in underground areas of at least once every 3 years pursuant to the proposed APSA regulations. A tank facility located on and is integral to a farm, nursery, or logging or construction site that meets the conditions described in HSC Sect 25270.4.5(b) is not required to fill out this data field.</p>	
Priority:	High
Comments:	
06/23/2015: Workshop- As Is. Supported. NOTE: per workshop discussion, need to include a Help Bubble by each field to note the definition of "tank" as a 55 gallon drum or other type of storage container.	

Customer Id:	APSA4
Title:	NEW APSA Submittal Element related to 3 NEW APSA Data Fields
Enhancement Id:	147, APSA6, APSA7
Workgroup Supported:	Yes
Description:	
<ol style="list-style-type: none"> 1. The current APSA UI screen is the document upload screen. This document upload screen needs to remain in case of a later requirement from the OSFM or a local ordinance that requires an upload of a pdf. (APSA 6) 2. Add 3 NEW data fields to the new UI screen and explanatory text. Make these fields minimally required fields. Update the Data Registry/Data Dictionary. (APSA 6) 3. Title 27 needs to be updated. 4. Revise the EDT schema to exchange the 3 new data fields with CUPA software providers and others consistent with current exchange agreements. (APSA 6) 5. Modify the existing FACILITY search function to return results that display these fields (APSA 7) 6. Modify the existing FACILITY search Excel export to include columns for these 3 new data fields. (APSA 7) <p>06/23/2015: Clarification-This enhancement is recommending to create a NEW APSA UI screen. Split up original enhancement into 3 enhancements.</p>	
Priority:	High
Comments:	
06/23/2015: Workshop-Recommendation to create a NEW APSA UI screen. Search criteria for APSA (APSA4)	

Customer Id:	APSA5
Title:	Modify DESCRIPTION for Data Field 8
Enhancement Id:	147
Workgroup Supported:	Yes.
Description:	
<p>Modify Title 27 description for existing Data Field #8 (Own or Operate Aboveground Petroleum Storage Tank). No change to actual data field, just the description.</p> <p>Edit Criteria/Codes= Y or N Length= 1 Type= Alpha-numeric Information Description= <i>Select if facility stores petroleum in aboveground storage tanks, containers, or equipment of 55 gallons or more in shell capacity and the facility's total aggregate storage capacity meets or exceeds 1.320 gallons of petroleum. "Petroleum" means crude oil or any fraction thereof, which is liquid at 60 degrees Fahrenheit temperature and 14.7 pounds per square inch absolute pressure [HSC 25270.2(h)]. An "aboveground storage tank" or "storage tank" does not include any of the following per HSC 25270.2(a) (Note: do not include these tanks, containers or equipment in the facility's aggregate petroleum storage capacity):</i></p> <ul style="list-style-type: none"> • <i>a pressure vessel or boiler which is subject to Division 5 of Labor Code,</i> • <i>a storage tank containing hazardous waste if a hazardous waste facilities permit has been issued for the storage tank by DTSC,</i> • <i>an aboveground oil production tank which is regulated by the Division of Oil, Gas and Geothermal Resources,</i> • <i>certain oil-filler electrical equipment including but not limited to transformers, circuit breakers or capacitors (refer to HSC 20270.2(a)(4) for additional details),</i> • <i>a tank regulated as an underground storage tank under HSC Ch. 6.7 and CCR Title 23 Ch. 16, or</i> • <i>a transportation-related tank facility (or tank or container) which is regulated by the US Dept. of Transportation.</i> 	
Priority:	High
Comments:	
06/23/2015: Workshop- As is. Supported.	

Customer Id:	APSA6
Title:	Update EDT Schema for 3 NEW APSA Data Fields
Enhancement Id:	147, APSA4
Workgroup Supported:	Yes
Description:	
<p>1. Revise the EDT schema to exchange the 3 new data fields with CUPA software providers and others consistent with current exchange agreements.</p> <ul style="list-style-type: none"> • The current APSA UI screen is the document upload screen. This document upload screen needs to remain in case of a later requirement from the OSFM or a local ordinance that requires an upload of a pdf. • Add 3 NEW data fields to the new UI screen and explanatory text. Make these fields minimally required fields. Update the Data Registry/Data Dictionary 	
Priority:	High
Comments:	
06/23/2015: Workshop-Supported. originated from APSA4	

Customer Id:	APSA7
Title:	Modify Search Function for 3 NEW APSA Data Fields
Enhancement Id:	147, APSA4
Workgroup Supported:	Yes
Description:	
<ol style="list-style-type: none"> 1. Modify the existing FACILITY search function to return results that display these fields 2. Modify the existing FACILITY search Excel export to include columns for these 3 new data fields for: <ul style="list-style-type: none"> • The current APSA UI screen is the document upload screen. This document upload screen needs to remain in case of a later requirement from the OSFM or a local ordinance that requires an upload of a pdf. • Add 3 NEW data fields to the new UI screen and explanatory text. Make these fields minimally required fields. Update the Data Registry/Data Dictionary 	
Priority:	High
Comments:	
06/23/2015: DSC Mtg- Approved	

Customer Id:	CME1
Title:	NEW Type or Status for a "Not Applicable" Violation / Inspection in CERS
Enhancement Id:	156, SAME AS 185
Workgroup Supported:	Yes. CERS 3

Description:

Requesting a new violation and/or inspection type or status for Regulators to use to label a Violation and/or Inspection as "Not Applicable" after finding out it really is a "non-applicable" violation and/or inspection and never should have been entered in CERS to begin with. Not sure which is the best solution, below are some ideas:

- Create new "Not Applicable" inspection type in data field 907 and explain why the inspection was entered or initiated incorrectly in data field 929
- Create new "Not Applicable" RTC qualifier in data field 935 and explain why the violation was entered or initiated incorrectly in data field 936 (Violation Comment)
- Create new "Not Applicable" Violation Type referenced in the Violation Library (Dictionary?) to use in data field 930 (Violation Type ID) and explain why the violation was entered or initiated incorrectly in data field 936 (Violation Comment)
- ***Data fields 929 and 936 should be made MANDATORY when the "Not Applicable" inspection type is selected to ensure the regulator provides a brief comment/explanation as to why the violation/inspection is set to "Not Applicable."***
- Instead of "Not Applicable," other suggested type/status titles are: "Determined N/A," "Rescinded," "VOID," "Error"

Rationale: Inspections and violations are public record. It is wise to note those that are issued however, not at the fault of the facility/business. An inspection/violation can be entered in CERS incorrectly or inaccurately. When an inspection and/or violation is entered incorrectly or inaccurately in CERS, there should be a new "Not Applicable" status for the regulator to indicate the violation/inspection record was entered or initiated incorrectly and is determined to be "Not Applicable." The current RTC options in data field 935 don't really apply to this type of a scenario (Documented, Observed, Not Resolvable, Unobserved).

Example: A violation is entered for a hazardous substance found upon inspection at the facility, lab tests determine the substance is not hazardous, no violation should have been documented upon inspection in CERS.

If a new "Not Applicable" violation and/or inspection type is not created, then the ability for the inspection and/or violation to be completely deleted or "hidden" should exist.

However, it is not wise to actually delete or hide "Not Applicable" inspections or

violations from CERS because:

- It is undetermined if it is possible to have the option to "Delete" information in real-time EDT exchange
- If deleted after entered in CERS, there might not be enough information to flow to the HWTS, ECHO and RCRA Info database systems to close out the violation or "delete" it from other databases. This could create on going issues.
- Records are never completely deleted, they are just "hidden" and able to archived.

Priority:

Low

Comments:

This was an action item from the 12-9-14 DSC meeting.

Need to have IT staff determine if it is feasible to have the option to "Delete" information in realtime EDT exchange, and also delete data fed to RCRA Info. Need to be able to change status to "ERROR/Not Applicable/Rescinded" if the inspection/violation can't be deleted.

06/23/2015: Workshop-Support- Change status to "ERROR/Not Applicable/Rescinded", do not delete the information.

WORKSHOP MB Notes: Possibly have 2 new status options, "Rescinded" *and if there is a 2nd new option:* "Not Applicable." "Rescinded" before "Not Applicable" if only one new option can be created. In the MS Excel Upload, Data Field 20.0041. Need to figure out exactly how this will be done with RCRA Info and such.

Customer Id:	CME3
Title:	NEW "Non Inspection Related" Violation Type
Enhancement Id:	84
Workgroup Supported:	Yes. CERS 3
Description:	
<p>It is not always accurate to link each CERS reported violation to an inspection. CME data should be able to create a violation without linking it to a specific inspection. Not all violations are related to an inspection.</p> <p>EXAMPLE: A type of non-inspection related violation is the "Failure to Report an HMBP."</p> <p>SOLUTION:</p> <ul style="list-style-type: none"> • A 'Non Inspection Related' option for entering violations that are not related to an inspection should be available for use in data field 907 (Inspection Type). • In addition to the options on the "Create an INSPECTION (Routine or Other)" screen, also provide the option to: "Create A Non Inspection Record" (or Violation.) <p>Data flow and prompts for remaining CME information will follow existing logic for Violation and Enforcement data entry.</p> <ul style="list-style-type: none"> • When the "Non Inspection Related" option is selected, there will need to be a prompt to enter a date, it can't be auto populated by field 906 (Inspection Date) because it would be for violation's that aren't related to an inspection. <p>CURRENTLY, violations not associated with an inspection are to be reported in CERS as an "other" inspection with a clarifying statement in the comment field. "Other" is being overused.</p>	
Priority:	Medium
Comments:	
<p>Proposed by Luke Mitchell (Dept. of Public Works, LA Co.)</p> <p>06/23/2015: Workshop.-Supported without discussion</p>	

Customer Id:	CME4
Title:	Create a Web-Based FILLABLE Page for UPAs to Complete and Upload Formal Enforcement Summary Reports directly in CERS
Enhancement Id:	98
Workgroup Supported:	Yes. CERS 3

Description:

CURRENTLY: A fillable template (MSWord/PDF) is used by CUPAs to complete Formal Enforcement Summaries. Then, CUPAs submit the Formal Enforcement Summary document to CalEPA via email. Then, CalEPA enters some information from the document into the CERS "Document Upload" screen for each CUPA and uploads the Formal Enforcement Summary document.

If CUPAs could enter the Formal Enforcement Summary information directly into CERS, there will be no need to complete a template and submit it as a PDF to CalEPA for posting and uploading, and there will be no need for CalEPA (or the UPA) to upload the Formal Enforcement Summary report into CERS either, as all information will be collected in the fillable form data fields.

However, we must ensure that the Formal Summary Enforcement information can be seen by the general public, and is accessible via the internet (as it is now) without logging into CERS as a business/regulator user.

1st PROPOSED SOLUTION:

- In the "ENFORCEMENT ACTION DETAILS" screen, for each CUPA, add NEW data fields and revise titles of existing data fields to mirror the Formal Enforcement Summary template.
- Create a report or MS Excel download of the information in the Formal Enforcement Summary that must exist for the public, without having to log into CERS.
- Existing field title: "Date" change to: Date of Violation
Existing field title: "Comments" change to: Description of Violation(s) Observed (mandatory data entry?)
Existing field title: "(CALENDAR) Date Referred Case Settled/Dropped" change to: Date of Final Disposition
NEW field title: Description of Final Disposition
NEW field title: Violation Summary (10 check box options- see template)
NEW field title: Total Costs Recovered

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Edit Enforcement: Jackson Valley Irrigation District Water Treatment Plant (CE...

Home > Facility > Enforcements > Edit

Your account has Unified Program Editor security privileges, and can create/edit CME data on behalf of any Regulator. Proceed with caution.

Edit Enforcement

Enforcement Action Details

<div style="font-size: 0.8em;"> Date: <input type="text" value="3/18/2015"/> </div> <div style="font-size: 0.8em;"> Regulator ID: <input type="text" value="Amador County Environmental Health"/> </div> <div style="font-size: 0.8em;"> Type: <input type="text" value="Notice of Violation (NOV) Only"/> </div> <div style="font-size: 0.8em;"> Formal Type: <input type="radio"/> Administrative <input type="radio"/> Civil <input type="radio"/> Criminal <input type="radio"/> Civil/Criminal </div> <div style="font-size: 0.8em;"> Docket Number: <input type="text"/> </div> <div style="font-size: 0.8em;"> Comments: <input style="width: 100%;" type="text"/> </div>	<div style="font-size: 0.8em;"> Data Entry Status: <input type="text" value="Approved"/> </div> <div style="font-size: 0.8em;"> Date Referred Case Settled/Dropped: <input type="text"/> </div> <div style="font-size: 0.8em;"> Final Fine/Penalty Assessed: \$ <input type="text"/> </div> <div style="font-size: 0.8em;"> Supplemental Environmental Projects Value: \$ <input type="text"/> </div> <div style="font-size: 0.8em;"> Red Tag Issued: <input type="checkbox"/> </div>
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Linked Violations

Occurred On	Type	Program	Class	Actual RTC	Violation Comment
3/18/2015	Hazardous materials inventory	Business Plan Program	Minor	3/18/2015	amend inventory to delete items no longer used at plant
3/18/2015	Business plan updates	Business Plan Program	Minor	3/18/2015	update inventory to delete items no longer at plant

Created By: Elena Williams on 4/1/2015 1:50 PM
 Last Updated By: Elena Williams on 4/1/2015 1:50 PM
 EDT Transaction: 4/1/2015 1:50 PM / 3591A255-6538-4326-87AF-045117882EE

2nd PROPOSED SOLUTION:

- In the "UPLOAD REGULATOR DOCUMENT" screen, for each CUPA, when "Enforcement Summary" is selected as the Document Type, add new data fields that will automatically pop-up and be made mandatory for completing, to mirror the information collected in the existing Formal Enforcement Summary template. This includes the fillable fields/checkbox options that the template has.
- Create a report or MS Excel download of the information in the Formal Enforcement Summary that must exist for the public, without having to log into CERS..
- Existing field title: "Document Title/Topic" change to: Business Name (?not sure this would be correct)
- Existing field title: "Document Date" change to: Date Submitted
- Existing field title: "Year" change to: Current Year
- Existing field title: "Description" change to: Narrative Description of the Violations Observed
- NEW field title: Business Site Address
- NEW field title: Business Site City
- NEW field title: Zip Code
- NEW field title: Violation Summary (10 check box options- see template)
- NEW field title: Type of Enforcement Action (3 check box options- see template)
- NEW field title: Date of Initial Enforcement Action
- NEW field title: Date of Final Disposition
- NEW field title: Cash Fines/Penalties Imposed
- NEW field title: Total Costs Recovered
- NEW field title: Value of SEP Penalties Imposed
- NEW field title: Description of Final Disposition

Priority:	
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Comments:

CONCERNS:

- Make sure information needed in the web-based form and CERS data fields are necessary per Title 27, 15290(c).
- If not all fields on the Formal Enforcement Summary template are listed specifically in statute/regulation (Title 27, 15290 (c)), can they still be available for population in CERS? Example: requiring the description of the final judgment?
- If fields aren't required to be populated, they won't be completed, and data reported is likely to not be uniform, consistent, or accurate throughout the state if data can be omitted.

06/23/2015:Workshop- Proposal #1 is supported (add extra fields). Defer to DSC to determine HOW to statewide enforcement cases will be handled/reported.

3Calibri3Should a field be added for Statewide cases?3

3

Customer Id:	CME6
Title:	Clarification of NTC, NOV, Informal/Formal Enforcement
Enhancement Id:	
Workgroup Supported:	Yes.

Description:

Information description box for field 914 states: A NOV is an INFORMAL enforcement action taken by a CUPA. A NOV is written documentation that informs a business of non-compliance and establishes a date by which the non-compliance is to be corrected. A CUPA takes formal enforcement action on non-compliant businesses by initiating administrative enforcement orders and/or referring the case to the State Attorney General, District Attorney, County Council or City Attorney, US Attorney, State Agency, Federal Agency, or other. A formal enforcement action mandates return to compliance by imposing punitive and criminal penalties to businesses that fail to comply. If more than one enforcement action is taken, the type and date of each action should be recorded.

There is unclear guidance on when a CUPA should create an "enforcement action" for issued NTC's (minor violation notices), because "NOV-Only" is the only category in data field 914 that would apply.

CalEPA and DSC please clarify the following:

1. Are UPAs supposed to issue an enforcement action for minor violations, such as issuing a NTC?
2. Are UPAs expected to create NOV Enforcement Actions in CERS?
3. Can CalEPA simply use the inspection/violation data that exists in CERS to generate a report of NOV's?
4. Can CalEPA ensure all UPA's understand that an NOV or NTC is always initially issued, whether Formal Action is taken or not:
 1. when a minor violation is cited, the facility is to be issued a NTC?
 2. when a Class I or II violation is cited, the facility is to be issued a NOV?
5. There may be situations when an NOV would need to be entered in CERS, such as a follow up to existing violations (as noted by an issued NOV). If Class II violation is initially cited during an inspection, the facility should be issued an NOV. If a follow up NOV is issued to the same facility 60 days later then that is an additional NOV, but it would not show up in the inspection/violation data so the UPA would have to enter the second NOV? If a follow up NOV is issued, should an "other" inspection type be associated with it, not citing any additional violations? If so, the NOV would not be counted when just looking at the inspection/violation data, would it?

6. When noting enforcement action, can there be any other options other than "NOV-Only, AEO," etc.? Add NEW options to data field 914 to clarify the NTC/NOV confusion? or to clarify formal vs. informal enforcement actions?
7. Should CalEPA and DSC consider developing a way to note NOV/NTC as separate, together, or the same?

Current options for data field 914:

- Notice of Violation (NOV) Only
- AEO- Local Ordinance
- AEO-UP
- Referral to State Attorney General
- Referral to District Attorney
- Referral to County Council or City Attorney
- Referral to US Attorney
- Referral to Sate Agency
- Referral to Federal Agency
- Referral to Other

Priority:

Comments:

COMMENT: Allow CUPAs to report CME Formal Enforcement data consistent with their I&E Policies. The current auto report function reports all inspections with violations as NOV's, which is not consistent with the regulations. An alternative process is manual, which is burdensome for an agency with approximately 400 NOV's last year. We request CalEPA assist us and Decade to develop an automatic function to count NOV's at the point of generation (database generated NOV) to provide EPA with accurate data.

Defer to CalEPA and DSC to issue guidance on this issue. A FAQ will be written and released by CalEPA once the documenting process is agreed upon by the DSC and CalEPA.

06/23/2015: Workshop-

SUPPORT: Add TEXT to CERS to clarify how to extract information for reporting. Remove all informal reporting NOV valid value.

Defer for Action other than CERS 3.0: Need to create FAQ for CUPAs using portals. DTSC needs to provide final agreement.

WORKSHOP (MB): CalEPA/DSC/CFB

1. Need to issue FAQ re: NEW POLICY that UPAs no longer have to enter NOV/NTCs into CERS. As violations are entered into CERS, they will be considered and counted as "informal" actions, because, in essence, a violation automatically triggers an informal action (which would be a NOV/NTC). This will also no longer

require UPAs to enter the number of informal actions in CERS.

2. Add text to CERS to clarify a violation can be/will be counted as an informal action AUTOMATICALLY, regardless of it being a NOV/NTC.

3. *Because UPAs will no longer be required to enter "NOV-Only" informal enforcement actions, should we remove or hide this field?/option in CERS?*

4. Need to clarify in CERS how:

- "corrected on site" should be addressed as a violation. Items corrected on site per 25187.6 need not be entered as no NTC/NOV/informal action is needed if corrected on site.
- to document violations that require multiple informal actions to obtain RTC, FOR BOTH inspection or not inspection related?
- to obtain reports for "Violations by Program Element," and "Inspections with violations," and "Inspections with no violations"

Customer Id:	CME8
Title:	Develop a Way to Note "Graduated Enforcement" in CERS When a NOV/NTC is Not Corrected Initially and Escalated to a Class 1 or 2 Violation
Enhancement Id:	
Workgroup Supported:	Yes.
Description:	
Should the Enforcement Steering Committee also be involved in developing this policy?	
Priority:	
Comments:	
<p>Defer to CalEPA and DSC to issue guidance on this issue. A FAQ will be written and released by CalEPA once the documenting process is agreed upon by the DSC and CalEPA.</p> <p>06/23/2015:Workshop-Already addressed, defer for action other than CERS 3.0 implementation. NEED to issue FAQ.</p> <p>WORKSHOP (MB):</p> <ul style="list-style-type: none"> • FAQ needs to clarify the current options to either create a new violation and comment OR go back in and change minor violations to "not resolved" RTC status and issue a NEW Class 2 violation and /or comment. • If violations aren't labeled as "not resolved" and a Class 2 violation is generated, duplicated counts of violations may exist. • Can CERS omit counting "non resolved" violations if they may be reentered as Class 2's? <p>³ For RCRA or LQG Program, graduated enforcement must be reported by UPAs. Otherwise, graduated enforcement "may" be entered in CERS.- ???</p>	

Customer Id:	CME10
Title:	"Delete" all related enforcement actions and violations when a single inspection is "deleted."
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3

Description:

This would also apply to "non-inspection" related violations and enforcement actions if that enhancement is implemented.

In CERS the **data status** of an **inspection** can be set to *Approved, Draft or Deleted*. (may default to Approved status?). CERS does not allow for actual complete deletion of the inspection, it only allows change of the data status. A drop down menu to change the data status is not available when deleting **violations**, but it is available when deleting **inspections**. **Violations** are simply "deleted." "Deleted" violations are "hidden" and "deleted" information doesn't show up or get reported in the normal processes. To find "deleted" violations, in the violation search filter, use "Data Status=Deleted."

Violations from the 'deleted' inspection should be processed exactly the same as deleted inspections. This would also apply to violations/enforcement actions not linked directly to an inspection (providing the enhancement to create a NEW option for "Non-inspection Related" violations is implemented).

CURRENTLY: For "deleted" **inspections** that have corresponding **violations**, those violations continue to show up as not being "deleted" and are searchable with the "approved" data status in the **violation search filter**. **Violations** corresponding to a "deleted" **inspection** show as not being "deleted." For a "deleted" **inspection**, each corresponding **violation** must be deleted individually/independently of the "deleted" **inspection** (even after the inspection is "deleted").

SOLUTION: If CERS will not allow for deletion of inspections and/or violations completely (not "deleted" as "hidden"):

- CERS should automatically set the data status of **violations** to "Deleted" when the data status of the **associated inspection** is set to "Deleted."
- If an **inspection** is "deleted," **all violations and enforcement actions associated** with that inspection should also be "deleted."
- ADDITIONALLY, a Pop-Up CHECKBOX should be added to prompt the user to confirm deletion: The "delete" confirmation checkbox should ask the user "Are you sure you want to delete this inspection and all associated violations and enforcement actions?"

Priority:	
Comments:	
06/23/2015: WORKSHOP-Supported.	

Customer Id:	CME13
Title:	Searchable & Sortable column with Citation/Law/Regulation in Violation Library
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2. Referred to the Violation Library Workgroup (email to Kareem Taylor, CalEPA 4/14/15)
Description:	
<ul style="list-style-type: none"> • When creating a violation on the search/select page, in the violation library, there should be a column with the citation/law/regulation that is sortable. It would be great to search all violation code lists, not just the violation codes that are associated with the inspection type or checklist type • Revise the inspection checklists to reference violation codes in the CERS Violation Library • Standardize the format of the violation code citations (CCR, HSC, etc.) 	
Priority:	Low
Comments:	
<p>Also should involve CFB to revise inspection checklists to reference violation codes in the Violation Library.</p> <p>06/23/2015: Workshop- UI->Create Violation: Search/Select Violation-1-2 columns for the violation dictionary codes. Low-Supported. WORKSHOP (MB): Violation Code citation should be sortable/searchable in CERS and in MS Excel download/export. Add column to show the citation code (statute, regulation). A small # of UPAs will use this feature, it could be done as an enhancement to CERS 3.0 once CERS 3.0 is up and running.</p>	

Customer Id:	CME15
Title:	CME data to follow same relocation logic as Submittal data in the event of a facility transfer or merge (for a duplicate record, and no change of ownership)
Enhancement Id:	197, CME 18
Workgroup Supported:	Yes.
Description:	
<p>CURRENTLY, in the event of a facility transfer and subsequent merge:</p> <ul style="list-style-type: none"> • for CME data: CME data is removed from the facility level and placed under the business/organization level. (Not sure if this happens during or after the transfer or the merge specifically). • for SUBMITTAL data: On a transfer approval page, CERS asks whether submittal data (and draft data) should be transferred. If you check the box, then the submittal data moves to that facility's submittal history. If you do not check the box, the submittal data still moves with the facility, but is placed under the archived section (at the business level?). A merge always keeps archived and non-archived (active) submittal data intact, as it was, before the merge. • CME data should transfer/merge the same exact way that submittal data transfers/merges if <i>the transfer is occurring because a duplicate organization record was created</i> (by a business, its CUPA, or CalEPA). In this situation, there is no actual change in ownership, and any user(s) under the organization that the facility is being transferred to should have access to all of the transferred facility's data. The CUPA approving the transfer should check the CERS prompt box for transferring submittals. • For situations when <i>the facility is being transferred to a completely separate organizational entity</i>, having no relation to the former, then the current CERS process should remain the same, and CME data should transfer/merge to the originating organization. 	
Priority:	
Comments:	
<p>CONCERNS:</p> <ul style="list-style-type: none"> • Don't want to transfer existing violations and enforcement to a new owner. Move CME history to business level or facility level? • Is there a difference between MERGE and TRANSFER? • How does CERS differentiate between MERGE and TRANSFER? • Can CalEPA IT clarify what is happening with actual information that is 	

transferred and/or merged?

PLEASE SEE SCREEN SHOTS BELOW

CURRENTLY: What happens to the CME data when facilities are merged? We created a facility so we could enter our inspections. The owner created duplicates of these sites in CERS.

- **Before merging the 2 facilities**, you can see the inspections for the facility being merged (the one we created).
- **After merging the 2 facilities**, the inspections we entered for the facility we merged **from** do not show up on the "Facility Inspections" screen for the facility we merged **to**. However, the inspections DO show up in the compliance section under "Inspections" for the BUSINESS.

SOLUTION: This may not be an enhancement, and may be a "fix" with the merge feature in CERS. Submitted to CERS Tech. support.

*If a facility is merged with another, the option to merge ALL of the CME info to the Facility level of the resulting Merged Facility should exist. **Just because inspection, violation or enforcement records are at the facility level in CERS does not in any way make an owner/operator responsible for violations or enforcement actions taken on the facility when they were not the owner/operator. The actual inspection records, documentation of who was responsible at the time of the violations, NOV's/letters, etc, is what should matter to anyone involved, not where CME records are in CERS.***

Facility: Burney Transfer Station (CERSID: 10593088)

Home » Facility Search » Facility Summary_10593088 » Inspections

Summary

Submittals

Reporting Requirements

Compliance

Notifications

Manage Facility

Inspections Create Inspection

	Date	Program	Type	# Viols	RTC Date	CERS ID	Facility Name	Status
Select	12/23/2014	HMRRP	Routine	1	12/23/2014	10593088	Burney Transfer Station	Approved
Select	12/23/2014	HW	Routine	1		10593088	Burney Transfer Station	Approved

[Export To Excel](#)

BURNEY TRANSFER STATION merged into BURNEY DISPOSAL, INC.:- In the "FACILITY" screen, inspections under Burney Transfer Station do not show up in Burney Disposal, Inc. after the merge.

Facility: Burney Disposal, Inc. Transfer Station (CERSID: 10619743)

Home » Facility Search » Facility Summary_10619743 » Inspections

Summary

Submittals

Reporting Requirements

Compliance

Inspections Create Inspection

Date	Program	Type	# Viols	RTC Date	CERS ID	Facility Name	Status
No items to display							

[Export To Excel](#)

Business: Burney Disposal, Inc. Shop

Home » Business Search » Burney Disposal, Inc. Shop » Inspections

Summary

Facilities

Submittals

Compliance

People

Action Required

Inspections Create Inspection

	Date	Program	Type	# Viols	RTC Date	CERS ID	Facility Name	Status
Select	12/23/2014	HMRRP	Routine	1	12/23/2014	10593088	Burney Transfer Station	Approved
Select	12/23/2014	HW	Routine	1		10593088	Burney Transfer Station	Approved

[Export To Excel](#)

1 - 2 of 2 items

The inspections from BURNEY TRANSFER STATION only show up in the Business level compliance screens of BURNEY DISPOSAL, INC.

06/23/2015: WORKSHOP-Supported.

Have CME data follow the same transfer path as the submittal for transfer or merge of ownership

- option for a check box to transfer info to a new owner, or it will be archived.
- If the check box is checked and the violations no longer apply to the facility's new owner, simply change RTC status of the violation to "Not Resolvable" OR complete violation/RTC BEFORE the transfer/merge of the facility.
- If check box is checked for submittals, CERS creates editable draft of the last submittal from the old owner for the new owner.
- Separate archive section for INSPECTIONS and VIOLATIONS of the previous owner will show up in the archive section of the new owner for transfer or merge.
- Process "How To" will be different for EDT & data uploading.

CERS Records know the transfer date and can differentiate owners of the violations. In addition, provide an archive view feature for history, similar archival submittal UI.

Probably should provide an FAQ to describe the process.

Customer Id:	CME16
Title:	Auto populate field 932 (Violation Date) by field 906 (Inspection Date)
Enhancement Id:	
Workgroup Supported:	
Description:	
<p>1. field 932 (Violation Date) should be auto populated by field 906 (Inspection Date), with the ability for the UPA to enter a different date if needed in field 932.</p> <p>2. EDT schema upload needs to pull field 932 (Violation Date) from field 906 (Inspection Date) unless a date is entered.</p>	
Priority:	
Comments:	
6/23 WORKSHOP: Supported without discussion	

Customer Id:	CME17
Title:	NEW check boxes for each Tiered Permitting Unit Type (PBR, CA, CE)
Enhancement Id:	
Workgroup Supported:	From HW workgroup

Description:

To more easily identify which Unit Types are being inspected during a TP inspection, instead of assuming all applicable Unit Types are being inspected, add a check box to the inspection page (similar to the SOC boxes), for each Unit Type inspected (PBR, CA, CE). SEE SCREEN SHOTS BELOW.

LOGIC:

- In CERS there are 3 separate Tiered Permitting inspection types and a HHW option to choose from.
- This gives the impression that a separate inspection needs to be entered for a facility that has multiple Unit Types for documenting TP inspections.
- In previous Annual Summary Reports, all TP type inspection and violation counts were reported together (PBR, CA and CE). If violations exist for one Unit type they often are also a violation of another Unit Type, so we end up entering the same violations for the different unit types.

Search Violation Library Definitions

Violation Program: Tiered Permitting Program

Violation Keywords:

Violation Type Number:

Search the Violation Library for the type of violation you want to add. Click the Violation Type # in the search results to create a Violation using that Violation Type.

Drag a column header and drop it here to group by that column

Type #	Name	Category	Description	Begin Date	End Date
3210	General	Administration/Documentation	Tiered Permitting Program - Administration/Documentation - General	7/1/2011	6/30/2014
3210	General	Administration/Documentation	Tiered Permitting Program - Administration/Documentation - General	7/1/2014	12/31/2099
3210001	Treatment: Operating without a Permit	Administration/Documentation	Failure to obtain/maintain an active hazardous waste treatment permit.	7/1/2011	12/31/2099
3210002	Permit by Rule: Treatment Notification	Administration/Documentation	Failure of the owner or operator of a FTU that treats hazardous waste to submit, in person or by certified mail with return receipt requested, the Onsite Hazardous Waste Treatment Notification-Facilit...	7/1/2011	12/31/2099
3210003	Conditional Abatement Treatment Notification	Administration/Documentation	Failure of the generator to submit, at least 60 days before commencing treatment of hazardous waste to submit a notification, in person or by certified mail, with return receipt requested.	7/1/2011	12/31/2099
3210004	Conditionally Exempt Treatment Notification	Administration/Documentation	Failure of the generator to submit, at least 60 days before commencing treatment of hazardous waste, notification, in person or by certified mail, with return receipt requested.	7/1/2011	12/31/2099
3210005	Household Permit by Rule: PHHWCF Operating without a Permit	Administration/Documentation	Failure of the PHHWCF to obtain a permit to operate	7/1/2011	6/30/2014
3210006	Household Permit by Rule: THHWCF Operating without a Permit	Administration/Documentation	Failure of the THHWCF to obtain a permit to operate.	7/1/2011	6/30/2014

You can see here that there are 2 violation types for the same thing. Below you can see that the code sections cited for both are the same. If we consolidate the TP inspections to 1, we could possibly also reduce the overall # of TP violations in the checklist (and Violation Library) by removing duplicates.

3210025	Conditional Authorization: Financial Assurance with Closure Costs	Administration/Documentation	Failure to prepare a written estimate of the cost of closing each unit which includes the cost that would be incurred for closing a treatment unit when using the owner or operator or generator's own s...	7/1/2011	12/31/2099
3210026	Permit by Rule: Financial Assurance with Closure Costs	Administration/Documentation	Failure to prepare a written estimate of the cost of closing each unit which includes the cost that would be incurred for closing a treatment unit when using the owner or operator or generator's own s...	7/1/2011	12/31/2099

Violation Type Definition

Type Number 3210025

Name Conditional Authorization: Financial Assurance with Closure Costs
Citations 22 CCR 45 67450.13(a)(1)
Program Tiered Permitting Program
Category Administration/Documentation

Violation Type Definition

Type Number 3210026

Name Permit by Rule: Financial Assurance with Closure Costs
Citations 22 CCR 45 67450.13(a)(1)
Program Tiered Permitting Program
Category Administration/Documentation

3

Priority:

Comments:

06/23/2015: Workshop- Supported, no discussion

Customer Id:	CME18
Title:	Transfer of Ownership- Archive CME Data and create report
Enhancement Id:	194, 197 CME15
Workgroup Supported:	Yes- CERS 2
Description:	
<p>When a facility is transferred to a new owner, the submittals are archived. This makes it easy for the CUPA (and possibly the public in the future?) to tell that there's been a change in ownership, and that the current owner is not responsible for those previous submittals. The same should be true for CME data, so that it's easy to tell whether a certain violation, enforcement, etc., is the responsibility of the current or previous owner.</p> <p>Solution:</p> <ol style="list-style-type: none"> 1. CME history should be archived when a facility is transferred to a new owner, following the same logic as the archiving of submittals with change in ownership. 2. Create CME reports that capture data previously reported in Annual Summary Reports 3 and 4. Provide the option for regulators to extract/download these CME reports from CERS in a MS Excel file. Each of the reports would include the date of each action, the facility name and the facility owner/operator. This will allow regulators to determine when the facility name changed and when/if the owner/operator has changed. Additional fields may need to be included on the report. The 1st worksheet of each report will be a cumulative summary, similar to Reports 3 and 4. The summary details of all CME actions (inspection, violation, enforcement actions) should be provided in the 2nd worksheet of each MS Excel downloaded report. 	
Priority:	
Comments:	
<p>Regulators are only required to upload CME data on a quarterly basis. Many change of ownership and facility name change transactions take place from quarter to quarter. These CME reports would:</p> <ul style="list-style-type: none"> -provide the regulator with the actual real-time owner more easily without having to query the submittal history for each program element or each submittal made -allow the regulator to quickly differentiate which owner at which point in time is responsible for generating any possible new or existing violations or enforcement actions -provide CalEPA (or any regulator) with the necessary statistics needed to evaluate the success and implementation of the enforcement, return to compliance and inspection 	

aspects of the Unified Program

CalEPA will look into developing a Help/Training feature (module) to place on the Regulator and Business portals of CERS Central intending to demonstrate how the "transfer of ownership" process should theoretically take place. Topics will cover creating a new business organization and new owner, changing the name/address of a business, transfer of a facility from one business to another, and transfer of a business from one owner to another. Also, help/training feature will address notifications to all parties sent when a transfer of ownership takes place, and if a CUPA is advised to wait to see if the previous business resolves the issue and when the CUPA should follow up with resolving the transfer of information.

Transfer of trade secret information from previous to new owners is also a concern.

From one CUPA:

I've looked into what happens in CERS when there's an ownership change. Submission information is archived and preserved to a facility's record, but CME data stays with the CERS ID. If business 1 has lots of violations and enforcement, and business 2 moves into the same location, business 2 inherits a CERS history of non-compliance (from business 1). If business 1 reopens at a new location, there is no record in CERS that the operator has a history of non-compliance. Internal records can allow us to track owner specific violations.

From Decade:

In EnvisionConnect, we capture a pointer to the owner of the facility at the moment a violation is cited. We do maintain a tie to the original owner even after the ownership changes. But that feature is not in CERS. The CERS ID/number should stay with the establishment – meaning that a business that just moves down the street would keep its number (thus preserving the history). The business that stays in place but gets a new owner keeps its number. Decade advocates for the practice of NOT changing IDs when changing ownership.

06/23/2015: Workshop-Related to CME 15 combined. Supported.

Customer Id:	CME19
Title:	Field 935: RTC Qualifier- Definition for "4-Unobserved"
Enhancement Id:	
Workgroup Supported:	Yes. But may not be appropriate to enter in Title 27.
Description:	
<p>Add definitions for existing "Violation Actual Return to Compliance Qualifier" status options 1-4 in FIELD 935 (and in Title 27?)</p> <p>1- DOCUMENTED 2- OBSERVED 3- NOT RESOLVABLE 4- UNOBSERVED</p> <ul style="list-style-type: none"> • Reference US EPA/ RCRA information in existing documents/definitions • The EPA defines "Unverifiable" as: Unverifiable Situations where it is not possible to verify whether or not the original violation still exists or if it was ever corrected and returned to compliance. This would apply to a variety of scenarios, including: (a) a site is closed and out of business; (b) a facility's permit has expired and the regulated activity is no longer being conducted; (c) a site's operational status has changed from active to inactive; and (d) a site appears to be in full physical compliance but correction of the original violation can not be validated (e.g., the violation was for an unlabeled drum and, based on subsequent inspection, all observed drums on-site are now labeled but it is not possible to determine if the original drum observed to be unlabeled is among the drums currently on-site). https://rcrainfo.epa.gov/rcrainfo/help/technical/ndv_rtc_qualifier.pdf • Does "Unobserved" = "Unresolvable," OR is there a different definition for each? • What is the exact definition of "4-Unobserved" <p>?- Should the US EPA definition of "Unverifiable" be included in the CalEPA definition of "Unobserved?" There currently is no definition for "Unobserved."</p> <p>May not be appropriate to enter in Title 27. Definition is not enforceable.</p> <ul style="list-style-type: none"> • Official guidance from CalEPA providing a definition of each option (1-4) in field 935 may be a better option for resolution. • Request Guidance Letter or FAQ to address this instead? 	
Priority:	
Comments:	
06/25/2015: Workshop- Would include EPA's definition. Supported.	
WORKSHOP NOTES (MB): Include reference of US EPA definition of "unresolvable"	

with "unobserved" to keep consistent with US EPA. Also, include US EPA
"unverifiable" definition in "unobserved."

Customer Id:	G1
Title:	Retain query results and filters when returning to SEARCH results from a selected "DETAIL" page
Enhancement Id:	37, 132
Workgroup Supported:	Yes.
Description:	
<p>Users have requested the search forms retain such settings to reduce the effort of re-executing the search/paging settings. Technically implementing such changes is specific to each search page and its relative complexity.</p> <p>OPTION 1: Automate the system, so that when selecting a returned search result, or returned detail page, CERS will automatically open the information in a new tab/window. Then, the user will navigate between windows of detail page search results, rather than return to the main search page from the detail result page, having to reset all search filters to obtain further results. Concern: Is it possible to fix the issue without making users open several to many new tabs? This is a cumbersome work around, whether it is automated or not. Having multiple tabs open at a time makes it more likely to mix up which site is in which tab.</p> <p>OPTION 2: Revise the text in the user agreement when signing on to CERS to address the issue of search results not being cached. Add something similar to the following statement: "I understand that search history cannot be stored on multiple pages. To view individual search results, I should right click on the resulting search link and choose to open the information in a new window or tab. Using the "Back" button in CERS, or in the chosen internet browser will clear all previously selected search filters and results and the search query parameters will be reset." CURRENTLY, the CERS User Agreement informs users to NOT use the Back button.</p> <p>OPTION 3: When a user selects a detail record from a search page, include a link at the top of that detail record that allows the user to return to the search result. Is this possible within CERS? Similar to the link provided to "Return to Preprepare Submittal" or the link included in the detail pages like: Prepare Submittal (CERS ID)</p>	
Priority:	High

Comments:

CURRENTLY:

- In some search screens a user setting one or more search filters, will execute the search, and then drill in and out of detail pages from the listed results. In many cases the search filters and/or records page settings may be lost when the user enters a detail screen.
- CERS cancels out a query when a reviewer attempts to return from a specifically selected item to a main query. In attempting to review inspection entries with violations uploaded from a CUPA, each time an individual inspection is selected, and then "cancel" is clicked, CERS returns to a blank page and the query parameters must be reset. This will occur for as many inspections that need to be reviewed.
- When navigating to-and-from a set of facility search results, the results should remain when navigating back to the page (like Google), we shouldn't have to click search again.
- When clicking on a site from a facility search, the link should automatically open in a new Tab of the current browser, or the CERS ID number link (on the left) should allow for the right-click option (currently only the date link, on the right, allows that).

Work Around Solution: Previously, a "quick fix" proposed by CalEPA was to encourage all users to right click on a resulting link and select the option to "open link in new tab/window." This is not an efficient fix. And is not a fix that addresses the issue of retaining search parameters.

3-10-15 CBUG Webinar Survey: 55 of 116 responded. 80% support ability to save or retain search or query information and feel this is beneficial to the entire state and all/majority of CUPAs and Businesses. 20% were neutral. SUPPORT QUERY RESULTS FOR THESE PGS: Facilities list- Business Org page (81%), Hazardous Materials Inv page (89%), Manage people page (37%), Search Businesses in CERS (54%), Other(s) not listed (9%).

06/23/2015: Workshop- Supported without discussion.

Customer Id:	G2
Title:	Email Notifications: Ability for Users and LEAD Users to set preferences on what types of notifications they automatically receive via CERS
Enhancement Id:	126, 57, HMBP14, S48, G21, G22, G18
Workgroup Supported:	Not CERS 3

Description:

Revise the email notification process for businesses and regulators and lead users so that:

1. One notification is received for multiple updates. Having the option to only receive one email per submittal would be nice, especially if the email could specify or summarize each of the notifications.

2. Each user can have the ability to select which specific notifications they wish to receive. This would allow users to choose to only receive notifications relative to their areas of geographic responsibility, especially for multi-jurisdictional users with multiple people having access to the organization's information. This could be based on specific facility, program/submittal element (both business and facility level), which user submitted the element, what the regulator status is.

3. Allow people other than lead users to receive notifications

4. Notifications to encompass submittal notifications and CME notifications
 For BUSINESSES: Users to manage/configure which of their users should receive CERS-generated emails as follows:

5. mirror the options currently available for regulators

6. Allow "approvers" to choose to receive the auto-generated emails. If Businesses are concerned, CERS could provide businesses with the option to Approve a User's request to receive emails

7. Allow users to receive email notifications for CME section (inspection and violations status, etc.)

8. businesses should have the option to opt out of courtesy notifications confirming a regulator has "Accepted" a submittal element in order to reduce volume of emails received. This would reduce the volume of emails received by businesses since most submittals are accepted, while ensuring emails are received by lead users for significant issues like submittals that are Not Accepted by a regulator.

9. Allow for emails to be sent to the submitter of a submittal element. For some large businesses, submittals may be submitted by users with Approver rights, but they don't receive follow-up emails when the submittal element is acted upon by the regulator since they are not the "lead user."

CURRENTLY:

- User accounts don't provide the option for the user to edit email receipt and notification settings.
- Users can only filter and view email notifications actively on screen
- UPAs don't need 4 emails per submittal
- A business with 3 lead users, currently all 3 lead users receive all blanket communications- we would like the notifications to go to the primary user, but then only the person getting the notifications can submit responses.
- CERS sends various auto-generated emails to ALL lead users of a business for events in CERS such as submittal approvals, access requests, etc.
- Some business users would like more control about whom and when such emails are sent to business users.
- **CalEPA Concerns:** if a business only configured one or a few users to receive emails, and the business did NOT actively manage its CERS user list, such emails may end up only being sent to a departed employee and no person in the business is alerted to the information in the email.

QUESTIONS:

- Are all notifications sent to the lead user(s)? **Notifications received should be defined in permissions for user settings.**
- How is it determined what email address is in receipt of what information automatically sent out through CERS? EXAMPLE: A lead user is not receiving email notification when inspection and/or violation information is entered, the lead user confirmed inspection and violation information was entered in CERS under the "Compliance" tab.
- Who can respond to the notifications, and where does the response go to?

Priority:

Medium

Comments:

3-10-15 CBUG Webinar Survey: 53 of 116 webinar attendees responded. 89% support adding notification options in user settings to allow businesses to designate which users will receive different types of email notifications.

5/5: Need additional information from CBUGS, then will need to have discussion with Program to determine all the affect elements and how this is being requested for implementation.

06/23/2015: Workshop- Agrees to recommended solution to add a field in the Lead User profile to allow additional recipients to receive notifications. Ability for individual business users to opt out from notifications is not resolved. **Supported** as listed below:

1. NO. **Not Feasible. Not Approved.**
2. YES Workshop - Recommends replicating the functionality in the Regulator Portal.

Lead User can identify the user that will receive notifications and ability to select which notifications they will receive.

3. YES

4. NO

5. YES- same as 2 & 3

6. YES-modified. Lead User will have that ability

7. NO-CME notifications do not exist

8. NO- many business want to receive those notifications

9. YES-related to 2 & 3

Customer Id:	G5
Title:	Format of Dates when manually keying in CERS
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2 or 3?
Description:	
<p>When a date is not selected from a calendar provided and is keyed into CERS manually, reformat each date field to auto populate in the date format needed (specified in the data dictionary) when keying in dates. Simplify the way "dates" are entered into CERS so that input masks for dates are not needed (no dashes - or slashes / or parentheses) - simplify so that only numbers need to be entered, not "-", /, (or)" <ul style="list-style-type: none"> • This may not be an issue experienced by a large number of users, but is largely experienced in terms of data entry, especially regarding CME data (inspection and violation dates). • There are 31 date fields in CERS. • This should be a User Interface change and should not affect EDT • Date format needed is provided in Data Dictionary. Enter as MM/DD/YYYY, and CERS displays as YYYY/MM/DD (?) <p>?: Will this create problems for other users who are used to keying in "-s," or "/s," or entering dates a certain way?</p> </p>	
Priority:	High
Comments:	
<p>06/23/2015: Workshop-Formatting across the system for date should be applied. Need to define in the Data Dictionary. Supported.</p> <p>This is similar to the "State" auto convert feature in G29</p> <p>(MB): Benefit is not worth the effort. There are approximately 160,000 regulated facilities in California. Of those, approximately 400 are CFATS facilities. Each time CFATS changes the list, CERS would have to be updated as well. Users can currently search by "chemical" in CERS. Data may not be reliable because of misspelled chemicals or errors based on entries made by businesses.</p>	

Customer Id:	G8
Title:	Make non-applicable or options not accepted by UPAs unavailable for businesses to select in all program/submittal elements
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2 or 3?
Description:	
<p>OPTION 1: "Grey Out" non-applicable submittal options, depending on options set by the UPAs. If an option is not acceptable for a UPA, the option should be unavailable for the business to select. <i>This was also requested for the UST program element.</i></p> <p>EXAMPLE: A certain UPA does not accept "Stored at Facility" for anything other than the APSA element.</p> <p>OPTION 2: Provide the following language under options that may not be approved by some UPAs: "Your local UPA may not accept this option."</p> <p>CalEPA recommends that the UPAs review the "Local Reporting Requirements" table in CERS, which can be used if a local ordinance exists for requiring businesses to report in excess of current regulation (Business Activities). This is of particular concern when a UPA does not approve the option for a business to select "stored at facility"- <i>there needs to be a legal justification for not allowing or not accepting this option.</i></p>	
Priority:	High
Comments:	
<p>QUESTIONS:</p> <ol style="list-style-type: none"> 1. Is this applicable to all places where documents can be uploaded? 2. Is this something that needs to be addressed via CERS, or can it be handled with the local reporting portal? 3. Can the CUPA pick which docs can be stored on site? 4. CERS probably won't be able to have certain options available for CUPAs to make available/unavailable for certain upload options for businesses. <p>? For CalEPA IT: Can document upload submittal options be customized for each type of submittal upload for each CUPA so that options that are not applicable to that submittal or upload</p>	

are 'greyed' out and the user cannot select the non-applicable option (similar to the SWRCB request to "grey" out the UST options)?

06/23/2015: Workshop- Option 1 was Supported, however, only options not required by Statue and regulation will be grayed out in each submittal or program element. This will help ensure businesses don't upload the wrong document in a way they aren't supposed to. Options greyed out according to statute/regulation can be "ungreyed"- Not supported to allow greying out of options according to each UPA's choices. EX) Grey out ability to upload SPCC plan for APSA.

TO DO: Need to figure out what options will be greyed out for each submittal element.

Customer Id:	G11
Title:	Verification of EPA ID Numbers with US EPA and CERS and the Local Agency
Enhancement Id:	
Workgroup Supported:	Yes (though may not be for CERS 3)
Description:	
<p>Mismatched EPA ID numbers between what is reported to US EPA, CalEPA and the local Agency.</p> <p>EPA ID numbers provided or downloaded from US EPA may or may not match what we have on file based on UPCFs or field inspections.</p> <p>EPA ID numbers provided to the local agency do not have matching addresses.</p> <p>Mismatched EPA ID numbers creates challenges in reporting – we may not report because EPA ID numbers from US EPA do not match EPA ID number or address on file.</p> <p>A possible solution is for CERS to cross reference the DTSC data.</p> <p>COMMENT: What about facilities with separate CERS IDs that are the same EPA ID# because they are contiguous? The various CERS IDs associated with that EPA ID can have distinct addresses.</p> <p>Which CERS ID(s) should list the EPA ID assigned to the larger contiguous facility? All of them? Only the ID with the address that matches the UPA or EPA database?</p>	
Priority:	High
Comments:	
<p>Perhaps verification of EPA ID's can be resolved with the Data Warehouse project when CERS will communicate with DTSC's Hazardous Waste Tracking System (HWTS) and US EPA's RCRA database. This is not within the current scope of CERS 3.</p> <p>How will sites without an EPA ID be handled?</p> <p>How will sites with multiple locations, and the same EPA ID # be handled?</p> <p>Some fire agencies consider a buliding a facility, in CERS, a facility has one CERS ID, but the facility can consist of multiple buildings. Different designations of</p>	

site/facility/business designation is common among PAs and UPAs, and should be addressed at the local level, not in CERS.

Information on DTSC issuance of EPA IDs:

http://www.dtsc.ca.gov/PublicationsForms/upload/OAD_EPA_ID_FS.pdf

06/23/2015: Workshop- Supported. HIGH priority.

(MB): this will be addressed by the Data Warehouse resolution and will be done automatically. HWTS and CERS will talk to each other and validate US EPA ID #'s. Duplicates, Military sites and campuses will be taken into consideration. Businesses are entering the #, not the regulators. This will help UPAs identify facilities with EPA ID #'s but no CERS ID #'s.

Customer Id:	G13
Title:	Improving Usability of CERS User Interface: Navigation
Enhancement Id:	
Workgroup Supported:	Yes, CERS 2.
Description:	
<p>Navigation: <i>Create a Side Navigation Pane with a Table of Contents.</i> The side panel should be constant, in other words, it is available from every screen within CERS, whether drafting or viewing information, entering submittal comments, etc. If a multi function search feature is included in the navigation pane, it could <i>potentially eliminate the return to search/"open in new tab" issue because selecting a detail record would not alter the search query in the side pane.</i></p>	
Priority:	Medium
Comments:	
<p><i>Workgroup requests CBUG establish a group to provide a more detailed request for this enhancement.</i></p> <p>06/23/2015: Workshop- Requesting functionality similar to the Regulator Portal. Need to go back to the work group and CBUG for design specifics. Contingency supported.</p>	

Customer Id:	G14
Title:	Improving Usability of CERS User Interface: Dashboard and Searchability for Businesses Plan Data
Enhancement Id:	
Workgroup Supported:	Yes, CERS 2.
Description:	
<p>³Dashboard and Searchability for Business Plan Data:</p> <p>³ Create a "CERS Dashboard" for businesses as currently exists on the "Regulator Only" side of CERS for smart, filtered searches of business plan data for rapid understanding of completeness.</p> <p>³ Workgroup requests CBUG establish a group to provide a more detailed request for this enhancement.</p>	
Priority:	
Comments:	
06/23/2015: Workgroup- Requesting functionality similar to the Regulator Portal. Need to go back to the work group and CBUG for design specifics. Contingency supported.	

Customer Id:	G15
Title:	Improving Usability of CERS User Interface: Drop Down Menus for Selections
Enhancement Id:	
Workgroup Supported:	Yes, CERS 2.
Description:	
<p><u>Drop Down Menu Selections:</u></p> <p>3 <i>Maximize the use of and options within “drop down” menus to complete data fields vs buttons, boxes etc., particularly in the Response Plan data field</i></p> <p><i>Workgroup requests CBUG establish a group to provide a more detailed request for this enhancement.</i></p> <p>3</p>	
Priority:	Medium
Comments:	
06/23/2015: Workgroup- Requesting functionality similar to the Regulator Portal. Need to go back to the work group and CBUG for design specifics. Contingency supported.	

Customer Id:	G16
Title:	Improving Usability of CERS User Interface -Develop a floating header to make certain information ALWAYS available when reviewing/drafting data
Enhancement Id:	
Workgroup Supported:	Yes, CERS 2.

Description:

3Make information ALWAYS visible when reviewing/drafting data entry with the creation of a floating header similar to the footer that already exists:

3
*Make the following information **always** visible when reviewing or drafting any of the UST (and other) Data entry forms:*

- *name of the facility;*
- 3
- *Edit/Save/Cancel buttons.*
- 3



• **FOR EXEMPLE:**

3For the Tank Information & Monitoring Plans specifically:

Calibri**3**The tank ID # (both the Unique CERS Generated ID # *(if approved)* and the Business ID #)**3**

33In order to figure out what site and tank is being reviewed and edited, a user has to scroll up to the top. When a user has multiple tabs open for different tanks or facilities, it is easy to confuse which page you are reviewing/drafting and information can easily be entered in the wrong form.

3 3
This could be adapted for the Inventory Data entry forms as well.

Priority:	Medium
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Comments:

2
3*Workgroup requests CBUG establish a group to provide a more detailed request for this enhancement.*
3
 06/23/2015: Workshop- Need to go back to the work group for design specifics.
 Contingency Supported.

Customer Id:	G18
Title:	Add "Local Facility Grouping" Number (registry field # 20.0404) to UPA "Submittal Notification" email
Enhancement Id:	220
Workgroup Supported:	Yes. CERS 2

Description:

Add "Local Facility Grouping Number" to the "New Facility Information Submittal" Email notification received by the UPA

Include the Local Facility Grouping Number (registry field # 20.0404) in the SUBJECT line and within the TEXT of the "Submittal Notification" email that is sent to UPAs.

This would improve ability for approximately 12 UPAs to more easily and quickly route the submittal notification to a particular technical staff member for screening before sending to the area specialist for processing. Specialists often operate by business/facility grouping number (inspection district). This will ultimately lead to faster submittal processing.

There is also a facility ID number field (field #1) that could be useful.

Data Element Detail: Local Facility Grouping

Field Name Local Facility Grouping	UPDD Identifier 20.0404
Registry Field Number 20.0404	Data Length 20
General Data Type Alphanumeric	
Dictionary CERS Supplemental Fields	
Grouping CERS Supplemental Fields	
Section Miscellaneous Identifiers	
Description Regulators can set this optional field to locally-relevant values that would group their facilities as necessary for local purposes. A possible implementation might include assigning some type of "district" identifier to group facilities for inspection purposes, or some kind of text indicating on what schedule groups of facilities should report their Business Plan submittal element(s). The text cannot exceed 20 characters, and is searchable on the Facility Search page. CUPA lead regulators can chose to add/edit values to this field from a facility's summary page, or using a bulk upload tool from the Tools menu.	
Instructions Regulators can set this optional field to locally-relevant values that would group their facilities as necessary for local purposes. A possible implementation might include assigning some type of "district" identifier to group facilities for inspection purposes, or some kind of text indicating on what schedule groups of facilities should report their Business Plan submittal element(s). The text cannot exceed 20 characters, and is searchable on the Facility Search page. CUPA lead regulators can chose to add/edit values to this field from a facility's summary page, or using a bulk upload tool from the Tools menu.	
Field Format	
Codes	

Priority:	Medium
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Comments:

3
34/27:For the Local Facility Grouping Data Field, does the regulator understand that this field will only be available

for an existing business and if the regulator has entered the information?

3

34/27: Need to add Local Grouping Field to the Submittal

306/23/2015: Workshop- Add the Local Facility Grouping information in the subject line of the notification. Email that gets sent to the regulator in the subject line. Supported. This will add to efficiency in UPA processing of submittals.

3

Customer Id:	G21
Title:	New Email Notification: PBR Annual Renewal 60-day and 5-day Reminder
Enhancement Id:	104, 146, G2, G22
Workgroup Supported:	Yes

Description:

An automatic reminder of PBR renewal

PBR INSPECTORS:

- The T22 regulations require all PBR sites to notify (renew) annually by January 1 each year.
- The CUPA will reauthorize each year after getting the acceptable notification.
- 67450.3(c) The owner or operator of a fixed treatment unit (FTU) deemed to hold a permit by rule pursuant to section 67450.2(b) shall do all of the following: (1) Submit, in person or by certified mail with return receipt requested, the annual Onsite Hazardous Waste Treatment Notification page, Business Activities Page, and the Business Owner/Operator Page of the Unified Program Consolidated Form (x/99), an alternative version or a computer generated facsimile as allowed pursuant to Title 27, CCR, Sections 15610 and 15620 to CUPA or authorized agency, by January 1, 1994, or by January 1 of each year following the first treatment of waste with the FTU, and by January 1 of each subsequent year unless CUPA or authorized agency notifies the owner or operator, in writing, of an alternate submittal date. Each annual notification shall be completed, dated and signed according to the requirements of Section 66270.11 as those requirements apply to permit applications and, except as provided by subsection (c)(9) of this section, shall contain all of the information specified in Section 67450.2(b)(3). Businesses may report this information electronically, if the CUPA or authorized agency agrees and the business complies with Title 27, CCR, Section 15187.

Related to G22

Priority:	Medium
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Comments:

Email to the Electronic Reporting TAG asking for support of a generic email that states:

"You have a submittal to CERS due in 60 days. (today). Please log into CERS (or your local portal) to provide the required information. If you have questions please contact your local UPA."

At present the message would likely go to the business organization lead user(s).

Second notice

Based on an entered next due date manually entered into CERS by the UPA.

Additional thought:

Can we automate or facilitate setting the next due date for UPAs-perhaps those that have one or two dates for all their regulated facilities?

Reviewed 12/4/14. Follow up with meeting to determine what options are feasible. DFirth

11/24/2014: Request for further discussion with IT staff prior to initiating any work as UPAs have requested feedback on this enhancement prior to development. DFirth.

Can a "Next Submittal Due Date" column with a filtering feature be added next to the "Last Submittal" column on the home page?

This may be especially helpful down the road for MJBs that have hundreds or thousands of facilities. I think notifying the business' lead user is also appropriate. On the other side of the aisle, I would think that some regulators would want to see the due dates for their assigned facilities, either through a search or report format.

However, if a UPA doesn't have next due date for ALL submittal elements, there will be some blanks which will imply that there is no next due date.

This might also be tied in with fields 100 (Beginning Date) and 101 (Ending Date) on the Business Owner/Operator Identification page, which is up for discussion at the HMBP TAG

06/23/2015: Workgroup- As described above except giving the CUPAs an opt out feature. Merge with G22, G2. Supported. 2 NOTIFICATIONS: 1 @ 60 days prior to "next due date" and 1 @ 5 days prior to "next due date" "Next due date" is set by the UPA. Can't be "+ 365 days" from last submittal date because if the submittal is 30 days late, then the "next due date" is constantly rolling. Notification should be generated by "next due date" entered. Auto advance "next due date" being "+ 365 days" should be from the date entered, not the submittal date. Need to have on/off option for UPAs to use the notifications based on the "next due date" field.

Customer Id:	G22
Title:	Submittals Due: Automated Email Notification to Regulated Facilities
Enhancement Id:	146, 104, G2, G21
Workgroup Supported:	Yes, CERS 2
Description:	
<p>CBUG and all four Regional CUPA Forum Boards have agreed that a 60 day advance notice of an upcoming submittal due date and a second reminder on the actual due date based on the 'next due date' field set by the regulator would be helpful for business lead users.</p> <ul style="list-style-type: none"> • The language in the automatic reminders should be generic so that UPAs sending their own reminders aren't sending mixed messages or contradicting information/direction to the business to meet the deadline/requirement. The email notice could be: 'Your facility has one or more submittals due (in 60 days) (due today)' • Some UPAs have asked for more customization such as specifying the submittal elements and providing additional text customized by the UPA for their facilities. • Some UPAs have only one submittal anniversary date for all their facilities, others have two to 12 different submittal dates (monthly, quarterly, etc), and others have different dates for each facility (perhaps based on the facility's original submittal date). • CUPAs have requested to have the 'next due date' fields auto populated if possible rather than manually entering all of the dates. <p>COMMENT: <i>For businesses with a large number of facilities with the same due date, receiving one email for each facility could be overwhelming and counterproductive, particularly if sent on the due date. Instead, could a single automated email be sent that lists all facilities subject to the same due date be sent? (see G2)</i></p> <p><i>Next Due Date is an optional field regulators can manually complete per submittal element to warn a business when the submittal element is next due.</i></p> <p>THIS IS PARTIALLY DEPENDENT UPON THE DSC DECISION FOR AUTO POPULATING Start/End Dates Related to G22, G2</p>	
Priority:	Medium
Comments:	

QUESTIONS AND CONCERNS:

Can a “Next Submittal Due Date” column with a filtering feature be added next to the “Last Submittal” column on the home page?

This may be especially helpful down the road for MJBs that have hundreds or thousands of facilities. Notifying the business’ lead user is also appropriate. Some regulators would want to see the due dates for their assigned facilities, either through a search or report format.

However, if a UPA doesn't have next due date for ALL submittal elements, there will be some blanks which will imply that there is no next due date.

SUGGESTED BY: Kevin Yang, kevinyang@santafesprings.org

Notification to lead user (business and regulaor? Just business?) if it's been 1 year since their last submittal?

What constitutes a submittal? All 3 elements? Facility info only? Facility and Inventory? If each part is submitted on different dates, which date is the one chosen for the annual reminder?

If the facility ignores the reminder email for a few months before making the submittal, could that essentially push back their due date further and further each year- going more than 12 months between submittals? Telling facilities when their next HMP is due may be more complicated than simply sending an email stating it's due 12 months from the last submittal-

06/23/2015: Need to discuss opt out function. Supported. UPAs should have the ability to determine if they want to use this reminder notification or if it is not needed because they do reminders a different way.

"Next due date" is set by the UPA. Can't be "+ 365 days" from last submittal date because if the submittal is 30 days late, then the "next due date" is constantly rolling. Notification should be generated by "next due date" entered. Auto advance "next due date" being "+ 365 days" should be from the date entered, not the submittal date. Need to have on/off option for UPAs to use the notifications based on the "next due date" field.

Customer Id:	G24
Title:	This is CERS 3
Enhancement Id:	105
Workgroup Supported:	Yes

Description:

This is a description for actual development and implementation of CERS 3.

A detailed DRAFT summary of tasks/activities:

We will need to make sure “changes” are desired by the community and are collected and adopted as one package (or a few packages for those that are interrelated).

Collection and Community Adoption of Changes

- Changing Existing Data Dictionary Fields: field lengths, types, and/or codes. Insist on good field descriptions and Field Help text.
- Deleting Data Dictionary Fields: Deletions must be accompanied by decisions of what (if anything) the deleted data is being superseded by, as well as what retention policy should apply to the old data.
- Adding new Data Dictionary Fields: Beyond the field attributes/description, field additions must be accompanied by what submittal element the field belongs to, on what form in the CERS UI it should be portrayed upon (and how depending upon the complexity), and a good field help description.
- CERS Minimally-Required Fields: Do they want to add or remove any?
- CERS Data Registry: to capture/track the proposed Data Dictionary changes.
- Submittal Element Resources: These are the forms and supplement documents in each submittal element. Would we want to add or remove any of these, and what happens to the fields and old data as discussed above. For forms, we may need direction on the UI if it is not obvious/apparent. Also, any business rule changes related to resources. A typical example might be something like “you can’t submit the element unless resource X is provided.”
- Submittal Elements: Do we want to add or remove any? Submittal Element changes effect of the previous items above.
- Impacts on Existing Reports, Data Exports, etc. (Features): Depending upon the nature of the changes, there may be changes that need to be made to existing features. In some cases changes could be incorporated into the existing feature, or we may need to create a separate copy of the feature for old/new submittals, or the feature just might not make sense any longer in relation to the changes.

Development Efforts

It will take a good deal of effort to implement changes. There will be some time-consuming architecture changes we will have to invest in as part of the first data/XML

Schema version change.

An abbreviated list of the concerns/efforts involved include:

- Update the Unified Program Data Dictionary as needed.
- Create the new versions of the XML Schemas.
- Revise XML Translator architecture to handle generation of new XML to comply with new XML schema versions.
- Update the middle tier business objects to be able to correctly handle both old and new data schema versions. Also includes modifying the EDT XML processors that create/store submittal XML in the database in advance of requests for this data.
- Update the UI as necessary with revised/new forms and document uploads that correctly display for old and new submittals.
- Update reports and other UI features that need modifications (e.g., Regulator Home and EDT Dashboard pages, etc.).
- Develop scripts that migrate any metadata into the new system.
- Develop scripts that translate data in existing Draft submittals to the new version and generate guidance/validation messages. Add versioning mechanism to guidance/validation to distinguish old/new versions. We may not be able to handle all situations with these translators.
- Revise our EDT documentation as necessary and publish the new XML Schemas.
- Internal and trusted external client testing of EDT and UI changes.
- Regulator Portal “EDT Dashboard” may need some tweaks to handle any structural changes made to XML Schemas beyond the Data Dictionary impacts.

EDT Client Adoption Testing

A completely separate EDT test environment will need to be created for CERS 3, along with at least a copy of the Regulator Portal that allows viewing of the version 2 test data submitted via EDT.

UI Client Testing

Depending upon the amount/severity of the changes, we may need to deploy a separate version 2 Training environment for regulator and business clients to test/train upon.

New Version Deployment

- Shut down CERS completely for some period of time (probably a 3-5 business days).
- Will need to run migration scripts to “transform” the data in existing draft submittals to the new schema and run guidance/validation against them.
- Other efforts to migrate updated/new metadata

Priority:

Comments:

06/23/2015: DSC Mtg- General Description not an enhancement.

Customer Id:	G25
Title:	Develop FILLABLE FORMS and/or TEMPLATES for Plans/Statements to upload into CERS
Enhancement Id:	124
Workgroup Supported:	Yes. CERS 3
Description:	
<p>In addition to the option for document uploading, <i>develop an electronic fillable form for the following:</i></p> <ul style="list-style-type: none"> • HMBP Emergency Response Plan- already exists- see HW 7 • Contingency Plan- already exists- see HW 7 • Employee Training Plan • UST Response Plan (UST) • Owner Statement of Designated UST Operator Compliance (UST) • Other documents for any other program element or submittal element <p>Most agencies could live with standardized forms.</p> <p>Forms would reside only in CERS or local portals. See HW 7</p>	
Priority:	Medium
Comments:	
<p>06/23/2015: Workshop-Data entry screens are not supported, but having DSC/TAGs develop fillable PDFs is supported. Action Item for DSC to develop fillable PDFs. Not Approved. Links to fillable forms can be added to CERS 3 as an enhancement when they are ready for use</p> <p>(MB): Forms aren't required to be in a specific format by regulation. Medium priority to make fillable forms available.</p>	

Customer Id:	G26
Title:	"Next Item" button when reviewing the Chemical Inventory
Enhancement Id:	108
Workgroup Supported:	
Description:	
<p>When working with the Chemical Inventory:</p> <ul style="list-style-type: none"> • If search result pages can not be "cached" add a "next item" button at the bottom of the resulting search page to use instead of the "back" button. That way, a review of the search results can continue without having to go "back" and begin the search all over again. • When reviewing chemical inventory submissions, using a "NEXT ITEM" button on the detail page of an inventory item would be very efficient, instead of going back to the initial listing to choose another item to view in detail. 	
Priority:	High
Comments:	
06/23/2015: Workshop- Supported as is. High priority	

Customer Id:	G27
Title:	Provide Program Element AND Submittal Element search filters in all "Search" and "Report" locations where one or the other is currently provided (including NEW APSA data fields)
Enhancement Id:	147
Workgroup Supported:	
Description:	
<p>Regulator and Business users should be able to search for information in CERS, especially CME related data, by either Program Element or Submittal Element. This is a key issue for the Hazwaste program. Currently, drop down elements (valid values) to select from are different than the actual Program Elements.</p> <p>This should be effective for all submittal elements/program elements throughout CERS.</p> <ul style="list-style-type: none"> • Search parameters to include options to search by PROGRAM ELEMENT and/or SUBMITTAL ELEMENT at all places where search options for these categories is applicable. • Modify existing facility/program element/submittal element search functions (including Excel export options and reports). Set up MS Excel to allow sorts, delete or hide columns, remove duplicates, etc. <p>Please see attachment showing drop down selections to be provided for program and submittal elements.</p>	
Priority:	High
Comments:	
<p>06/23/2015: Workshop- Improve search and reporting capabilities. High-Supported. Currently, a CERS "Program element" isn't an actual "program element" as defined by statute/regulation.</p>	

Customer Id:	G28
Title:	"Action Required" for Businesses
Enhancement Id:	
Workgroup Supported:	Yes

Description:

1. "Hide" (or Delete) "Action Required" section.
2. Send "Action Required" access request's to lead user under "Notifications"
3. Add NEW column for "type" of notification in CERS user interface, this is currently reflected in the notification "Subject"
4. Add filter to "Notifications" to filter for anything & everything (EX: by type or status).
5. Create a MS Excel download of "Notifications," including any comments from the regulator

The screenshot displays the CERS user interface. At the top, there is a 'Common Tasks' section with four tiles: 'Start Facility Submittal', 'Add Facility', 'People/Users', and 'Contact Your Local Regulator(s)'. Below this is the 'Facilities' section, which includes a table with columns for Facility Name, Address, Last Submittal, and CERS ID. The table contains one entry for 'Stardust Donuts' with address '1255 Imperial Ave, San Diego 92101' and last submittal date '6/23/2014'. Below the table is a pagination control showing 'Page 1 of 1' and '10 items per page'. At the bottom, there are sections for 'Action Required (None)' and 'Notifications for my Business (18)'.

Priority:	Medium
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Comments:

06/23/2015: Workshop-This gives the businesses more flexibility. Supported- Medium.

Customer Id:	G29
Title:	Auto translation of "State" data field to all CAPS
Enhancement Id:	
Workgroup Supported:	Yes

Description:

1. Change fields: 108c, 115, 121, 14 and 176 to accept text, and then auto translate it to all capital letters for valid values.
2. For all "state" fields, revise text notification in the "Submittal Guidance" error window FROM "The field 'Mailing Address State Code' contains an invalid value" TO "***The field 'xxx Address State Code' contains an invalid value. Capital letters must be used, i.e. CA for California.***". ***The fields should also be highlighted for reference in the guidance window.***



Priority:	High
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Comments:

Also check the UST facility operating permit.

06/23/2015: Workshop- Supported. If OPTION 1 is done, OPTION 2 is not needed.

Customer Id:	HMBP1
Title:	Add Fields For Hazardous Substances Listings (Chemical Library)
Enhancement Id:	71
Workgroup Supported:	PARTIALLY SUPPORTS CERS 3
Description:	
<p>Add fields to identify the following for each chemical record REPORTING THRESHOLD:</p> <ul style="list-style-type: none"> • CCR 19 2770.5 (State) List of Substances (Used to trigger CalARP submittal element) • 40 CFR Table 302.4 (Federal) List of Hazardous Substances (Used to trigger EPCRA Release Reporting Responsibility) <p>POSSIBLE SOLUTION :</p> <p>The US EPA Substance Registry Services has a search function including automated services that may be linked to from CERS to provide this capability. If these automated services may be easily <i>linked</i> to CERS and the results are understandable to the user, this may be a cost-effective enhancement.</p> <p>LINK:</p> <p>http://ofmpub.epa.gov/sor_internet/registry/substreg/home/overview/home.do</p>	
Priority:	Medium
Comments:	
<p><i>Existing Chemical Library to be replaced by Washington State University Chemical Library, right??</i></p> <p>06/23/2015:Workshop- Add the field, then the threshold quantity will trigger a pop-up for the business to contact local CUPA to confirm that they are subject CalARP reporting requirements. Also, set flag/notification to CUPA that this business is possibly subject to CalARP. Look at the recommended solution for the business to verify the requirements. Supported.</p> <p>There are over 277 chemicals in the library currently. Need to identify threshold quantities to enter in the new field in CERS.</p>	

Customer Id:	HMBP10
Title:	Add Pop-Up Bubble for guidance when "WASTE" is selected: Chemical Inventory – Material vs. Waste
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>CURRENTLY: When facilities fill out inventory forms – either: (1) use the same fields from the chemical library for either materials or waste and then select a separate box to indicate either pure, mixture, or waste. OR (2) indicate separate chemical information for wastes (some thing like waste oil, waste antifreeze, etc.).</p> <p>PROPOSE: First, the user indicates if it is a material or a waste, then the user is presented with either the materials library or the waste library.</p> <ul style="list-style-type: none"> • See DRAFT "Recommendations for Reporting Hazardous Waste" which sets forth potential procedures for reporting. • Recommend considering adding the CA Hazardous Waste Codes and Hazardous substances in 49 CFR table §172.101 (DOT) to Chemical Library. • Add a bubble or pop-up when "Waste" is selected to provide guidance. Recommend that guidance only instruct business to add the word "Waste" preceding the Common Name only if this does not add to complexity or variability. <p><i>From Sacramento County 12-12-14</i></p>	
Priority:	Medium
Comments:	
<p>Workshop: The library doesn't have a waste/hazmat entry for each material. This would be duplicative of all entry records. Supported Either:</p> <ul style="list-style-type: none"> • Add pop-up to put "waste" "TYPE", or • Add "Pure mixture" or "waste" column to haz mat inventory review screen. 	

Customer Id:	HMBP12
Title:	Auto Populate Fields 100 (Beginning Date) &101 (Ending Date)
Enhancement Id:	possibly: 15, 73, 104, 146, 206
Workgroup Supported:	Yes.

Description:

Have the BEGINNING DATE (field 100) and END DATE (field 101) on the Business Owner/Operator Identification screen auto-populate in CERS.
The "submit" process in CERS clearly identifies the "submittal date."
These two fields are included in Title 27.
Auto populate with the anniversary submittal date set by the CUPA or the submission date +365 days, or Jan1-Dec31 of the year of submission.
Submittal date is likely to be different than the "start" or "end" date.

CURRENTLY: CERS auto populates field 100 with "today's date" and field 101 with "today's date +365 days."

- CalEPA is seeking an update of the 7/27/01 USEPA letter ("Equivalency Letter") stating that the HMBP submittal satisfies the federal reporting requirements under §312 of the Emergency Planning and Community Right-To-Know-Act (EPCRA). Based on the results of that inquiry, a decision may be made regarding fields 100 and 101. If it is acceptable to either delete or auto populate these dates, it would be possible to establish a single certification of the previous years submission.
- DSC needs to determine a consensus to auto populate Jan 1 - Dec 31, OR Anniversary date +365, OR Submittal date +365. This will also enable the "No Change" submittal process to work (S 15).

If US EPA confirms start and end dates are federal requirements for EPCRA and Start/End dates are used to maintain equivalence between the business plan program and EPCRA, fields 100 and 101 should be auto populated in CERS based on the UPA's set anniversary date for start/initial and + 365 for end/final.

If US EPA confirms start and end dates are NOT federal requirements, HMBP subcommittee can recommend fields 100 and 101 be deleted or hidden (or auto populated as if they were required above).

Priority:	High
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Comments:

06/24/2015: Workshop- Provide options on the Owner/Operation Page Date Fields for the CUPA to select either Anniversary Date or Submittal Date for the effective, then

+365 for the end date. **Supported.**

06/24/2015: Workshop-Need to work out concerns if the business submits earlier than the due date.

DSC agrees approach that there is a reporting window prior to the due date when a business submits that is acceptable, but if it is too early that may not count as acceptable reporting for the submittal.

The "effective" dates can show up incorrectly if the business submits too early- **so, HOW do we make sure that the wrong "effective" date (reporting period) isn't displayed?**

- allow businesses to change "effective" date if they are late with a submittal rather than early?
- Regulator will manually change the next due date?
- Is automating the next due date and effective date more trouble than it's worth?

Need to review the automation approach.

MB Notes:

- Tier 2 US EPA Reports want a report of what was at the facility last year by March 1st this year.
- CA doesn't want last year's info- CA wants current info for emergency response- what is at the facility now, and what is expected in the coming year?
- Submittal date has to be tied to the anniversary date, not to the date of the last submittal.
- "Next Due Date"- controls date-auto date forward +365 days and pre populates beginning date of reporting period for the business

Customer Id:	HMBP14
Title:	Email Notification: Business Plan Due Dates
Enhancement Id:	G2
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Can the system flag business plan “due dates” to businesses as a 60 day notice, then 5 days?</p> <p><i>UPAs should designate which of a list of commonly accepted methods of determining "anniversary due dates" the business should follow (e.g., 365 days from prior submission, 60 days prior to permit renewal date, March 1st of each year, etc.).</i></p> <p>The due date for the next submittal could be automatically calculated using the criteria specified by the UPA and be displayed on a dashboard for each business organization.</p> <p><i>Logical locations for businesses to look up these would be the "Local reporting Requirements" or "Unified Program Regulator Directory" links at CERS Central. I</i></p>	
Priority:	Medium
Comments:	
06/24/2015: Workshop- As is. Supported.	

Customer Id:	HMBP15
Title:	Trade Secrets
Enhancement Id:	
Workgroup Supported:	

Description:

06/24/2015: TIE TRADE SECRET Confirmation Warning POP-UP when YES box is checked.

Refinements to the statewide information system are required to effectively handle confidential business and security-sensitive information.

Once we have a plan for how to implement the technical aspects of the process, we can come up with the relatively minor necessary amendments to Art. 1 or T 19 and create the necessary forms (which later have to be adopted into the data dictionary in T 27).

Work efforts to identify necessary changes are being carried out by: Danielle Stefani, Joel Martens, Jim Bohon, John Paine, Vince Mendes, Bill Jones, Kristen Riegel, Mike Vizzier

FROM THE HMBP WORKGROUP & JOEL MARTENS:

There are only a few data fields eligible to be withheld as TRADE SECRETS under the federal EPCRA program.

- Chemical name
- CAS number
- % of mixture components
- others?

In California HMBP program, HSC Sect. 25512 requires the UPA to release all hazardous material inventory submittals, including information that a business has claimed as trade secret, unless:

- the business has notified the UPA of the trade secret, and
- the business files an action in an appropriate court for a declaratory judgment that the information is subject to protection under subdivision (b), or
- the business files for an injunction prohibiting disclosure of the information to the public, and promptly notifies the UPA of that action.

The electronic records act requires that records be provided in an electronic format if maintained in that format. If HMBP had the same interpretation as EPCRA, there is no way to presently redact only these specific fields from a CERS hazardous material inventory submittal. So, unless the requestor agrees to change the scope of the requested information to exclude the entire chemical for which a trade secret claim was

made, the UPA has to go through the notification process. For a Phase 1 Assessment, the requestor would probably prefer to receive the redacted information rather than wait the 30-day period.

Does HSC Section 25512 authorize the UPA to decide whether a trade secret claim is warranted? If a TRADE SECRET is claimed, public information requests for that information need to be handled as required in that section.

Priority:

High

Comments:

UPAAG has identified the following needs and CalEPA has been tasked with the following Action Items:

1. CalEPA will identify the capabilities of CERS to generate an electronic file/listing that can omit out trade secrets. (Completed: see Trade Secret Redacted Reports.pdf)
2. CalEPA will establish a guidance document how to handle with trade secrets. (Completed: see Trade Secret Redacted Reports.pdf)
3. Jim Bohon will coordinate internally with CalEPA legislative and legal staff to determine whether or not a legislative proposal is necessary or warranted to add state agencies to the process for protecting trade secrets. (Not added to SB 612 as yet)
4. CalEPA will discuss the establishment of a policy and guidance for handling requests for information in CERS with the other Unified Program State Agencies. (see No. 3 above)

06/24/2015: Workshop- Updated enhancement request and action items still need to be addressed. Supported.

MB NOTES:

Only actions possible now:

- have the "YES" radial button to trigger a pop-up to confirm Trade Secret should be noted for the chemical entered.
- CalEPA will work with businesses to verify current Trade Secret entries and remove any that are not legitimate. (currently over 24,000 entries)
- All items identified by UPAAG above

Substantiation requirement is needed when regulation package is finalized.

Possibly look at strengthening current language for existing pop up that warns of trade secret notification disclosure.

We don't have authority to omit trade secret info from CERS yet.

Customer Id:	HMBP18
Title:	Require a complete HMBP submission.
Enhancement Id:	
Workgroup Supported:	Partially
Description:	
<p>Businesses sometimes only submit contact information with no inventory or site map. CalEPA currently discourages partial submissions. See "Partial submittals of only the facility information" in What are the most common CERS reporting errors.pdf (CERS Business Users FAQ)</p>	
Priority:	Low
Comments:	
<p>06/23/2015: Workshop- Currently relying on a FAQ. Propose to use a pop-up warning.</p> <p>Supported If new HMBP submittal process is developed and implemented, a pop-up can be created to remind businesses of what is included in an annual submittal. EX) "If this is an Annual Submittal, the following elements are required...."</p>	

Customer Id:	HMBP20
Title:	Bulk Upload of auto populated start/end dates
Enhancement Id:	HMBP12, S35
Workgroup Supported:	yes
Description:	
<p>As a result of discussions during the WORKSHOP (6/23-25/15), this enhancement was suggested and supported:</p> <p>Is there a way UPAs can do a mass upload for auto populating dates (start and end dates, next due dates, etc.) in CERS?</p> <p>This is a seeding request. And not necessarily a CERS 3 enhancement.</p>	
Priority:	
Comments:	

Customer Id:	HW1
Title:	Revise Title and Definition of Small Quantity Generator (SQG) Facility Indicator
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3

Description:

1. Revise "Small Quantity Generator (SQG) Facility Indicator" to "HMBP Exempt Hazardous Waste Generator."
As it stands, the use of the term "SQG" is often confused with the CESQG/SQG/LQG terms already used in the hazardous waste program.

2. Clarify the intent of the field is for facilities to satisfy the one-time electronic notification to the CUPA.
Revise the definition that comes up in the HELP field for this title. (Confirm language with DTSC).
In such a case, do not require facilities to complete facility information in the HMBP Business Activities Page (at all), but instead *use a separate interface* to collect the necessary information to create the CERS ID only for:

- one-time notification to the CUPA, and
- CME reporting only for the facility.

Existing HW generators at below state reporting thresholds that previously met the one-time CUPA notification requirement (prior to CERS) do not need to report (again) in CERS as they have already met the requirement. New small quantity HW generators have to do the one-time reporting and per 6.11 it must be done electronically.

The separate interface could be in CERS, or it could send the user to the new DTSC HWTS to collect that information, apply for EPA ID number, etc. It is strongly recommended that CalEPA work closely with DTSC on the new HWTS for CERS and HWTS to be integrated with each other. Since DTSC collects information on businesses/facilities when they issue an EPA ID #, maybe businesses/facilities shouldn't be required to notify the CUPA, since the information could be shared between DTSC and the CUPA, possibly through CERS (or the HWTS). Is this information already available on DTSC's HWTS and can it be extracted for CalEPA on a periodic basis?

3. Make it clear that facilities with less than a state reporting quantity do not complete a HMBP at all, with the one exception being if the local CUPA requires it at a lower amount or at any amount under a local ordinance.
In those cases, and in those cases only, do they answer yes to the question "Do you generate Hazardous Waste?" of the Business Activities Form (and complete a full HMBP)??

Priority:	
Comments:	
Information on DTSC issuance of EPA IDs: http://www.dtsc.ca.gov/PublicationsForms/upload/OAD_EPA_ID_FS.pdf 06/23/2015: Workshop- 1) On the Business Activities page: Revise "Small Quantity Generator (SQG) Facility Indicator" to "HMBP Exempt Hazardous Waste Generator."-> Supported. 06/23/2015: Workshop- 2) Based on the answers to the questions 1-Haz Materials (no) & 3-Haz Waste (yes). DSC Recommended solution for auto populated prompting eliminates the need for a separate interface, recommendation is as follows: Reporting below threshold quantity for Business Plan, asks business if a HWG?- answer NO to business plan- Clarify that "Small Quantity" is not "SQG" in data field 20.0403. If business hasn't previously reported, if business has to report thresholds below state required amounts due to UPA local ordinance, they would click YES. CERS would auto populate to small quantity facility. Supported.	

Customer Id:	HW7
Title:	Consolidated Emergency Response/ Contingency Plan (New Field and Revise Text on FILLABLE FORM)
Enhancement Id:	G25
Workgroup Supported:	Yes. CERS 3 and CERS 2
Description:	
<p>Add new field and change text on FILLABLE FORM.</p> <p>Section A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW (CERS 3) ADD NEW FIELD for EMERGENCY COORDINATOR(S) to comply with 66265.52(d), primary and secondary/alternate with names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator.</p> <p>Section C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS (CERS 2) 1st paragraph (3): Change: "Notify the California Emergency Management Agency at (800) 852-7550" to "Notify the California Office of Emergency Services at (800) 852-7550."</p> <p>EMERGENCY RESPONSE PHONE NUMBERS: (CERS 2) Change "California Emergency Management Agency (CAL/EMA)" to "CALIFORNIA OFFICE OF EMERGENCY SERVICES (CAL OES)" Change "California Dept of Fish and Game (DFG)" to "California Dept. of Fish and Wildlife."</p> <p>Section E. FACILITY EVACUATION (CERS 3?) ADD evacuation route map to comply with 66265.52(f): This plan shall describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). revise language to read: EVACUATION ROUTE MAP(S) ATTACHED AND POSTED AS REQUIRED. Intent is for map to be uploaded at the same time as the business plan inventory.</p> <p>"Section K. SIGNATURE/CERTIFICATION" (CERS 2?) DELETE from CERS as it is not required by statute or regulations for HW or HMBP.</p>	
Priority:	Low
Comments:	
06/23/2015: Workshop- This will be part of the effort G25. This is a HMBP Steering	

committee effort and they will determine how this will be implemented. This is being re-directed. Supported- but not a true CERS 3 effort.

- Defer to DSC/TAGs to develop fillable forms and revise existing ones.
- Add links to the fillable PDF forms in CERS 3 (as an enhancement to CERS 3)

Customer Id:	HW8
Title:	NEW FIELD: Schools Hazardous Waste Collection, Consolidation and Accumulation Facilities Notification (SHWCCAF)
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Add NEW FIELD: to the Business Activities page that will allow schools to "check off" to indicate they are notifying [per T22 67450.43(b)]</p> <p>67450.3(b) says: The owner or operator of a SHWCCAF shall submit to the CUPA or authorized agency, in person or by certified mail with return receipt requested, a notification of intent to operate a SHWCCAF. The notification shall consist of the Business Activities page and the Business Owner/Operator Page of the Unified Program Consolidated Form (UPCF)(1/99 Revised) found in T27, CCR Div.1, SubDiv 4, Ch 1, Appx E (after section 15620) and all of the facility information listed below. "Facility information listed below: can be uploaded as a separate document into CERS so there is no need to include the list of items as fields.</p> <p><i>How should /how do UPAs track this information currently in CERS 2?</i></p>	
Priority:	Medium
Comments:	
06/23/2015: Workgroup- Need to update Title 22 & 27 (Data Dictionary). Facility Activity elements would need to be provided. Supported.	

Customer Id:	HW10
Title:	DTSC Haz Waste ID Numbers vs USEPA EPA ID Numbers
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3 or CERS 2?
Description:	
<p>ID numbers issued by USEPA are known as EPA ID numbers. ID numbers issued by DTSC are known as Hazardous Waste Identification numbers. DTSC will be issuing both types of numbers beginning April 2015.</p> <p>1. Change the text in the first and fourth blocks of the Hazardous Waste section in the Business Activities page to read: "If yes, provide a Hazardous Waste Identification Number or an EPA Identification Number (EPA ID)."</p> <p>2. Amend the HELP button as follows: A hazardous waste "generator" is the person or business whose acts or processes produce a hazardous waste, or who causes a hazardous substance or waste to become subject to State hazardous waste law. If your facility generates "hazardous waste," you must provide your facility's Hazardous Waste Identification Number or EPA Identification number (EPA ID) you use to properly transport and dispose of your hazardous waste. "Hazardous waste" means a waste that meets any of the criteria for the identification of a hazardous waste adopted by Department of Toxic Substances Control pursuant to HSC 25141, and includes, but is not limited to, federally regulated hazardous waste, extremely hazardous waste, and acutely hazardous waste unless explicitly stated otherwise.</p>	
Priority:	High
Comments:	
<p>US EPA ID # field is used to transfer information to US EPA RCRA Info database.</p> <p>Information on DTSC issuance if EPA IDs: http://www.dtsc.ca.gov/PublicationsForms/upload/OAD_EPA_ID_FS.pdf</p> <p>06/23/2015: Workshop- Action Item - Need text from DTSC. Need to review HELP BUTTON to update text. This is Q3 on the Business Activities Page. Supported.</p>	

Customer Id:	HW11
Title:	Amend text in Block 6 of the Business Activities page
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2
Description:	
<p>Block 6 of the Business Activities page is to Determine if a Facility is a LQG.</p> <p>HSC 25123.3(h)(1)(C) allows SQGs 90 days to accumulate over 1 kg of acutely hazardous waste and to remain SQGs.</p> <p>Amend text in Block 6 to say: <i>Does your facility generate in any single calendar month equal or grater than:</i> 1. 1,000 kilograms (kg) (2,200 pounds) or more of RCRA hazardous waste, or 2. kg (2.2 pounds) of RCRA acutely hazardous waste? <i>Do not check the box if:</i> 1. your generation rates of RCRA hazardous waste does not exceed either of the two preceding criteria, or 2. you generate only non-RCRA hazardous waste(s).</p>	
Priority:	
Comments:	
06/23/2015: Workshop- Text change only. -in CERS UI. Supported.	

Customer Id:	R2
Title:	New Report: Basic facility and APSA submittal information
Enhancement Id:	147
Workgroup Supported:	Yes. CERS 2
Description:	
<p>The report should list in an MS Excel spreadsheet for export basic facility and APSA submittal information:</p> <ul style="list-style-type: none"> • CERS ID • facility name • address • NEW APSA Field: Date of SPCC Plan Certification or 5 Year Review • NEW APSA Field: Aboveground Petroleum Storage Capacity • NEW APSA Field: Number of Tanks in Underground Area • date of last submittal • submittal status • regulator user name • date submittal status changed • comments <p>This report can be generated by UPA or for all UPAs (statewide).</p> <p>? : Should we also generate a report similar to this for each submittal element, to give a summary status of all submittals per facility/business by UPA or all UPAs (statewide)? (refer to SUBMITTALS PPT)</p>	
Priority:	
Comments:	
06/23/2015: DSC Mtg - As written. Approved.	

Customer Id:	R3
Title:	Consolidated Reporting options for businesses and regulators to create reports
Enhancement Id:	154
Workgroup Supported:	Yes
Description:	
<p>Create ability for Regulator and Business Users to generate unique reports based on their varying needs (similar to Crystal Reports or Ad Hoc Report building feature). It would be great if users could find and perform all the different reports/data exports for their entire business/jurisdiction- including inspections and violations (for business users and regulators).</p> <p>CURRENTLY: There is no method for regulatory staff to mine data from CERS. CERS collects a wealth of information that could be extremely beneficial to regulatory staff even to use in such menial tasks as mail merges. However, regulators are completely reliant on CalEPA's ability and progress of creating reports in order to extract any data within CERS.</p> <p>Adding a new category to the regulator and business users permissions group would allow a user to be assigned read-only permissions for a tool such as SSRS or ReportBuilder, which would allow authorized users to create custom queries direct from the CERS database without the need to involve CalEPA IT staff.</p> <p>The ability for businesses and regulators to have READ ONLY access so that they could create custom reports (in whatever way is easiest for CalEPA and CERS) could answer so many questions, and identify so many more additional trends with the data entered in CERS. Though it will be a lot of work, it could greatly benefit all and out way the costs of effort.</p>	
Priority:	High
Comments:	
<p>Things to consider:</p> <ul style="list-style-type: none"> • Which group of users will have access to which type of information to run/generate reports? lead users, business vs. regulator? • Will reports (the data used to generate the report) be able to be saved as a template for easy re-use with NEW data? Can you "re-run" a saved report? • Can all regulators access all information to run all or any type of report? 	

- Development would need new permission levels for R & B to access the information in the reports.
- IF WE CREATE AN AD-HOC REPORT OPTION IN CERS 2, THERE IS NO NEED TO REDESIGN THE USER INTERFACE.

The DATA WAREHOUSE project might be able to help with this enhancement. Ad Hoc reporting would help with establishing the US EPA reports and obtaining data for evaluators as well as Unified Program statistics. Evaluators, Dan and John P. will provide development team with more details regarding what specific data elements are needed in the reports.

EXAMPLE: US EPA quarterly report: Should we only limit access to Unified Program state and BDO staff? Similar to the BARRT report builder in RCRA Info.? Then develop more simple reporting for "regulator" and "business" users?

06/23/2015: Workgroup- Read-only rights to access to the data in an ad hoc manner. Defer to DSC Committee for guidelines. Supported.

(MB)- additional notes:

- Highly desired by state agencies
- object is not to generate reports for individual UPAs, but to provide the ability for access to the data so that UPAs can download the data and generate their own reports.
- ability to access raw data will help UPAs verify information in CERS in comparison with their local systems. this will identify what data needs to be corrected or is potentially missing and not uploaded correctly through EDT
- WARNING: you have to know how to mine data and what data you're looking for in order for reports to be accurate and reflect a true picture
- If what is provided isn't enough, specialized data downloads could be developed at local portals if data is not able to be obtained from CERS
- An option is to create a monthly SQL data report for UPAs to use to verify data
- DSC needs to DEFINE reporting parameters and contents for ability of business and regulator users to make reports. DETERMINE what is needed and what is not.

Customer Id:	R4
Title:	Add REGULATOR KEY and AGENT to all CERS Reports and spreadsheet outputs, when applicable
Enhancement Id:	
Workgroup Supported:	Yes. Possibly CERS 2
Description:	
<p>REGULATOR KEY is a minimally required field.</p> <ul style="list-style-type: none"> For all available CERS reports to Regulators, add the REGULATOR KEY in conjunction with the AGENT to all spreadsheet outputs, when applicable. <p>Currently, the Regulator Key has to be looked up per regulator.</p> <p>FACILITY REGULATOR KEY: Field 20.0084 On summary screen, not a required field, unique ID #, unique to the facility.</p> <p>REGULATOR CODE: Field 20.0001 Code of the regulator, set by CERS, a 4 digit # that is a county code.</p> <p>? : 3is the regulator key used by a reasonable number of UPAs?</p>	
Priority:	Medium
Comments:	
<p>06/23/2015: Workshop- Add columns to export for spreadsheet use. In addition, add to the RCRA LQG CME Data Download Report. Supported. This will help ensure accuracy of data reported in CERS by the inspector.</p>	

Customer Id:	R6
Title:	Add "Local Facility Grouping" number (registry field # 20.0404) to the submittal download report
Enhancement Id:	R4
Workgroup Supported:	
Description:	
3 3Add "Local Facility Grouping" number (registry field # 20.0404) to the submittal download report 3	
Priority:	
Comments:	
06/30/2015:Workshop- Supported as is. Merge with R4.	

Customer Id:	R7
Title:	UST Reporting Tool for Business Users
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>Create reports or a Reporting Tool (ad hoc report generator?) for all UST data for business use.</p> <p>ALTERNATIVE: create Excel export tables of all UST data for business use. Use similar regulator UST reports as examples- Include any fields added for CERS 3. NOTE: If canned reports are needed work will need to be done to determine what business users need.</p>	
Priority:	Medium
Comments:	
<p>This would be useful for consultants and businesses with multiple UST facilities.</p> <p>06/23/2015: Workshop- provide business users Access to download same information regulators see that apply to that business they have authority over. Supported.</p>	

Customer Id:	R8
Title:	Create Report or Excel Export to Show Submittal Comments Chronologically for One or More Facilities
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2
Description:	
<p>Create Report or Excel Export to show submittal comments, current and historical, who made them, chronologically for one or more facilities. Include ability for a report of all the comments or reviews by a single user (under the same agency) or by all the users of an agency.</p> <p>NOTE: The current Excel Submittals search export includes all comments within a date range. This table could be modified to add the commenter name.</p>	
Priority:	Medium
Comments:	
06/23/2015: Workshop- Add column / field to the report. Name of the commenter may not be 100% accurate due to the portal. Supported.	

Customer Id:	S1
Title:	Email Notification: Submittal "Status" (and/or comments) sent to Businesses from Regulators should automatically include Regulator contact information
Enhancement Id:	78
Workgroup Supported:	Yes- CERS 2
Description:	
<p>When regulators review a submittal element and set the status to "Not Accepted" or "Not Applicable," CERS requires the regulator to provide comments explaining the status and what a business should do to resolve any issues. Not all regulators consistently provide clear contact information the business user can use to contact the UPA. This is frustrating/confusing for business users, and also often results in business users asking for assistance from CalEPA's CERS Technical Support staff who have no information or capability to assist the business.</p> <p>Solution: The Regulator Portal Submittal Processing Page "Change Status" pop-up should be modified to automatically provide good contact information for the CUPA, whether it be the general inspector or some general technical staff, that the business can contact regarding the "Not Accepted" or "Not Applicable" submittal. The contact information should include the inspector or technical staff name, email address (as a direct email link) and phone number. This will ensure meaningful (valid) contact information for regulators is provided to business users, in addition to the warning text added to the "Regulator Portal Submittal Processing Page" in January 2014.</p> <p>Additional Questions:</p> <ol style="list-style-type: none"> 1. The business receives an email for each "not accepted" submittal element. Can this email be sent per program element, not per submittal element? Businesses don't like receiving multiple emails and notifications for the same submittal element. 3. Is there a way to "consolidate" notifications businesses receive? Search all submittals and send one email to the business? 3. When a submittal is "Not Accepted" who on the business side gets the email notifications? Lead users only? Business correspondence can be seen in the Regulator Portal. 	
Priority:	High
Comments:	
<p>3-10-15 CBUG Webinar Survey: 55 of 116 responded. 98% support a requirement for regulators to include contact information (e.g. name, phone, email) at least when submittals are "Not Accepted" or</p>	

when a response/submittal is required from the business.

3-10-15 CBUG Webinar Comments: great idea, CUPAs are not consistent, not all regulators provide contact info, front desk clerks for one agency make the determination if the submittal is accepted or not, we should have a contact name of the specialist to discuss the issue rather than the front desk clerk.

06/24/2015: Workshop- Add link to the reviewer name with name and email address ONLY in submittal history and notification email. **Supported.** Additional Questions are **Not Supported.**

NOTE: If business replies to the notification, it goes to the CERS helpdesk, not the regulator. The email link should be a clickable link and automatically pop up with an email draft (window) to begin the email. The email will be tied to the regulator contact, no phone numbers (other than the general office line) are to be included. Should put the email contact on the submittal history page as well.

Customer Id:	S6
Title:	Site map - Clarify Map Uploading Instructions
Enhancement Id:	196 (In progress of being completed?)
Workgroup Supported:	Yes- CERS 2
Description:	
<p>Clearer instructions are needed in the Business Portal. In cases where business has a multi-page site map, they need to be instructed to upload the map as a single document, not one document per page. (CERS Enhancement 196) Site maps - Clearer instructions needed in Business Portal. In cases where business has a multi-page site map, they need to be instructed to upload the map as a single document, not one document per page. EX) Submit 1 20-page pdf document, instead of 20 1-page pdf documents.</p>	
Priority:	Low
Comments:	
<p>Same as Enhancement ID 177</p> <p>06/24/2015: Workshop -Clarify instruction. Supported.</p>	

Customer Id:	S8
Title:	Additional Options for Submittal "Status" (field 20.0005), Define/clarify use of each status
Enhancement Id:	118, 155, 182, 169, 203
Workgroup Supported:	Yes CERS 3

Description:

- 1. Improve directions for use of "Not Applicable/Not Accepted" submittal status**
 - **NOT Applicable** - should be rarely used- use ONLY when the facility is no longer regulated. If "**Not Applicable**" is over used change *statue* to "**Not Accepted.** "
 - **NOT APPLICABLE:** *status should only be used to indicate the facility is no longer regulated under the specified submittal element. And when it is applied to the Facility Information element, then the assumption in CERS is that the facility is fully not-regulated under ANY submittal element (i.e., all Reporting Requirements are "Not Applicable")- Chris Allen.* The submittal element has been received and reviewed by the regulator, and has been determined the business is not required an should not submit the data to the regulator for the facility. Submittals will not be included in CERS 3 statistical reports, and businesses/organizations will not receive future reminders/alerts for the submittal element.
 - **???** "**Not Applicable**": do we want to delete this status and use "**Not Accepted**" in its place? Would it be better to use "Not Accepted" in place of "Not Applicable"? If we delete the "Not Applicable" option, the regulator would simply select "Not Accepted" and comment that the submittal is "not applicable" or "not regulated" when applicable.
- 2. Create the following new submittal status selections:**
 - **SUBMITTED ANNUAL CHANGES:** An annual HMBP submittal is being made to the regulator and there *have been* changes/modifications to the data that was last submitted.
 - **SUBMITTED ANNUAL NO CHANGES:** An annual HMBP submittal is being made to the regulator and there *have not been* any changes/modifications to the data that was last submitted.
 - **ANNUAL ACCEPTED:** (this would be a type of 'Accepted' without having to do an inspection to verify the information): The annual HMBP submittal has been reviewed by the regulator and finds the data/documents meet state and/or local reporting requirements for completeness, **but NOT yet field verified for accuracy. Submittals with this status will be included in any CERS 3 statistical reports.**
-UPAs are reluctant to 'Accept' a submittal if it hasn't been verified with a 1-3 year inspection cycle. It is unrealistic for UPAs to conduct inspections whenever a

submittal is made, or to not process a submittal for long periods of time until they can do an inspection.

-There needs to be a way that CERS distinguishes for a business whether it's plan submittal has been "administratively accepted" as an office review vs. "field reviewed and verified."

-This will note an office review has been done

- **ANNUAL VERIFIED**: an inspection was conducted at the facility to confirm the submittal information was correct. The annual HMBP submittal has been field verified for both completeness and accuracy. ***Submittals with this status will be included in any CERS 3 statistical reports.***
 - **ANNUAL CONDITIONALLY ACCEPTED**: The annual HMBP submittal has been reviewed by the regulator and finds the data/documents to meet state and/or local reporting requirements for completeness. ***However, slight modification(s) need to be made clerically, but not yet field verified. Submittals with this status will be included in any CERS 3 statistical reports. A comment by the reviewing regulator is required before setting this status.***
 - **SUBMITTED UPDATE**: A correction or change to the previous submittal has been submitted to the regulator.
 - **UPDATE ACCEPTED**: The corrected submittal element has been reviewed by the regulator and finds the data/documents meet state and/or local reporting requirements for completeness, ***but not yet field verified for accuracy. Submittals with this status will be included in any CERS 3 statistical reports.***
 - **UPDATE CONDITIONALLY ACCEPTED**: The correction has been accepted by the regulator, however slight modifications need to be made clerically. The information has not been field verified. Submittals with this status will be included in any CERS 3 statistical reports. ***A comment by the reviewing regulator is required before setting this status.***
 - **UPDATE VERIFIED**: The correction has been made to the regulator and has been field verified for both completeness and accuracy. Submittals with this status will be included in any CERS 3 statistical reports.
 - **SUPERSEDED (Un-reviewed)** : May be used if the regulator decides to only review and act upon the most recent submittal for each element to take away the time-consuming burden of reviewing all prior submittals. Submittals with this status will NOT be included in any CERS 3 statistical reports. *possibility for a script to be written for legacy submittals?*
- use when a facility makes multiple submittals before the regulator can review them, "un-reviewed" due to a more recent submittal. Only the most recent submittals should be reviewed. Currently, submittals that are superseded can only be "Not Accepted," even though they may have been acceptable at the time of the submittal. This helps address situations when businesses submit the same information multiple times on the same day or within a short period of time.

-This would be helpful for businesses. The majority of auto-generated emails received are "not accepted" with a comment that this submittal is being disregarded due to a more recent submittal.

- **CERS AUTO-ACCEPTED (Based on "NO CHANGE" Certification):** A submittal was made with no changes and the previous submittal has been **VERIFIED**. (Update or Annual). If the previous submittal was Conditionally Accepted, Not Accepted, Under Review or Superseded, the status will NOT be set to CERS Auto-Accepted. Submittals with this status will be included in any CERS 3 statistical reports.

ltr

-status for annual submittals submitted with "no change", status is automatically set by CERS and submittal is automatically accepted by CERS

-Without the ability to provide a simple certification that information previously reported in an accepted submittal has not changed, means regulators will have to review and set the status of every submittal element for every facility required to report in CERS, every year. The submittal processing comparison tool in CERS is helpful to see if certain information has changed but is very incomplete when looking at changes to inventory, which is one of the more time consuming elements to review. Even if there are no reviews completed, spending the time to set the status of every submitted element is much more time consuming than simply filing a certification that indicates no changes.

-Facilities should be provided with an option to resubmit/recertify reporting information that, if the previous submittal had been accepted, would then be automatically set as accepted, without the CUPA needing to go through the process of reviewing, or even just setting the status, of the submitted information, since the exact same information has already been reviewed and accepted. This would make things easier and more efficient for both businesses and regulators.

-This parallels with the ability for a business to "recall" a submittal that has not yet been reviewed by the UPA or has not had the status changed from "submitted"

-A separate enhancement addresses the use of "no change" submittals

- **NO STATUS CHANGE:** -A "NO CHANGE" comment should be added/directed to regulators to know that there were no changes made to the business' submittal. That would cut down on regulator review of submittals. Right now the businesses know they didn't make changes, but the regulators do not know that they didn't make changes.
- **UNDER REVIEW:** The regulator has received the submittal by the business user and is in the regulator's queue for review and has not yet been checked for completeness or accuracy. This is an option status a regulator can use to express to the facility's business (and other regulators) they are or intend to review a submittal. NOTE: This would not allow the business to "recall" the submittal, because the review is in process (also, a submittal would not be able to be recalled if the regulator changed the submittal status to any other status).
- **RECALLED:** A submittal was recalled from the regulator's queue to review for completeness and accuracy in light of a mistake noticed by the business user (the business doesn't want to be held legally liable for what was previously submitted).

A submittal may only be recalled if the status has not been changed by the regulator. It may still be available to be viewed in the submittal history, but no action will be taken- a resubmittal (update or annual) must be made by the business user. Submittals with this status will NOT be included in any CERS 3 statistical report.

ltr

-this status allows the business to recall a submittal if, and only if, the regulator has not changed the status of the submittal, and the status remains "submitted." An understanding between the business and the regulator regarding liability for legal enforcement on a "recalled" submittal would have to be established. This status would notify the regulator that the business has recalled the previous submittal with the intent of re-submitting. For the future, we would have to ensure details in "recalled" submittals could not be accessed by the general public.

3. Revise search tool to search for each of these NEW submittal status categories.

Priority:

High

Comments:

We have received a number of help tickets from LA County businesses who can't start their submittals because their "Facility Information" submittal is not visible (see first screen snap below). This is occurring because LA County regulators are using the "Not Applicable" status on the Facility Information submittal elements (and others as well) when they instead should be using the "Not Accepted" status with some note as to the fact they are ignoring the older submittal and reviewing a newer one. Should we add text in CERS Central to clarify?

Is this still what happens? Is this consistent with the most recently released FAQ?

I had hoped these businesses reporting problems reflected legacy problems from the past, but I used the "Submittal Search" for your CUPA (see second screen snap below) and it appears the "Not Applicable" status is still being used regularly. When we first identified this misunderstanding of the statuses around 9-10 months ago, we added extra descriptive text in the screen regulators use to set the status, and this text states the implications of using the status (see third screen snap).

HAS THIS BEEN DONE?

- modify the Business Portal's Draft Submittal page to ensure there is always a way to start a Facility Information submittal element, regardless of the current Reporting Requirements for the Facility Information submittal element. This is important since a business can't really proceed with the submittal process without having a Facility Information element present.
- implement what we had intended previously such that if the Facility Information

element is set to "Not Applicable", then the Reporting Requirements for ALL other submittal elements will immediately be set to "Not Applicable" as well.

- Inform UPAs to:
 - immediately stop using the "Not Applicable" status, except when it is truly relevant (facility is not regulated)
 - go into the Regulator Portal's Submittal Search filtered on the "Not Applicable" status, and start changing to "Not Accepted" where "Not Applicable" was misapplied.

CONCERNS:

Too many submittal options will create more issues than resolution. Some concern remains with CERS auto acceptance of no change submittals. SWRCB will need to review to determine if any acceptance (such as completeness review) could be done by non-ICC staff.

06/24/2015: Workshop- Supported- based on KERN County Presentation. Per Workgroup discussion, change "VERIFIED" to "FIELD VERIFIED"

Customer Id:	S12
Title:	Set Status of Multiple Submittal Elements Simultaneously, even with a different status for each selected
Enhancement Id:	13?
Workgroup Supported:	Yes CERS 3

Description:

In the Regulator Portal, provide ability for reviewer to

- check a box next to each submittal (element) that they want to Accept (not checking those they don't want to Accept), or they may check the "Select All" box which will check the boxes next to all of the submittals (elements),
- then click the "**Accept** Selected" (or Set Status of Selected if more than **Accept** is an option).

-Having the option to choose a different status for multiple submittal elements with one click. i.e. Accept, Not Accept or Under Review, then check the box (as shown below) in each element header to set that Status for and have another "Set Status of Selected" button.

-A comment must be added to submittals with Not Accepted status, so doing multiple Not Accepts at one time may not be appropriate for this function.

-More flexibility is usually better but limiting the option to just being able to select an "**Accept**" check box for each submittal element and confirm that status with one button for multiple submittal elements may be simpler.

- see screen shots below:

Similarly, set the status of a submittal with one click, similar to how a business can submit all elements with one click in the business portal. All options for submittal status settings available to regulators would need to be available/included. Each submittal would still be reviewed, but the status could be set for multiple at the same time.

Submitted by: Christie Coleman, Marin Co.

Facility Submittal : SPEEDY VALERO (10468642)

[Print Submittal](#)

[Home](#) » [Submittal Search](#) » [Submittal: 4/22/2015 \(10468642\)](#)

Submittal: Apr. 22, 2015 6:25 PM

Select All

Accept Selected

Facility Information

Accept

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Business Activities](#)
- [Business Owner/Operator Identification](#)

Hazardous Materials Inventory

Accept

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Hazardous Material Inventory \(4\)](#)
- [Site Map \(Official Use Only\): Upload Document\(s\)](#)

Emergency Response and Training Plans

Accept

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Emergency Response/Contingency Plan: Upload Document\(s\)](#)
- [Employee Training Plan: Provided Elsewhere in CERS](#)

Underground Storage Tanks

Accept

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [UST Facility Operating Permit Application](#)

Facility Submittal : SPEEDY VALERO (10468642)

[Print Submittal](#)

[Home](#) » [Submittal Search](#) » [Submittal: 4/22/2015 \(10468642\)](#)

Submittal: Apr. 22, 2015 6:25 PM

Accepted

Not Accepted

Under Review

Set Status of Selected

Facility Information

Set to Status Selected above

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Business Activities](#)
- [Business Owner/Operator Identification](#)

Hazardous Materials Inventory

Set to Status Selected above

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Hazardous Material Inventory \(4\)](#)
- [Site Map \(Official Use Only\): Upload Document\(s\)](#)

Emergency Response and Training Plans

Set to Status Selected above

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [Emergency Response/Contingency Plan: Upload Document\(s\)](#)
- [Employee Training Plan: Provided Elsewhere in CERS](#)

Underground Storage Tanks

Set to Status Selected above

Submitted Apr. 22, 2015

[Set Submittal Status](#)

Submitted for CERS ID [10468642](#) on 4/22/2015 6:25PM by [Sukhwinder Khatkar](#) of [DJS PARTNERS LLC \(Redding, CA\)](#)

- [UST Facility Operating Permit Application](#)

Priority:

Medium

Comments:

Related to Enhancement ID 13 in CERS Central, noted as "Completed" (details below):

On the regulator portal "submittal search page", add a link on each submittal element, and include each available submittal status to select (EX: "**Submitted**" or "**Under Review**") allowing authorized regulators to automatically set the submittal element's

status to "**Accepted**" with just one click. Any other submittal status or comments would require the regulator to select the submittal element and use the "Set Submittal Status" button.

06/24/2015: Workshop- As is. Supported.

Customer Id:	S15
Title:	NO CHANGE Submittals: Automate the Process for submittal/acceptance of Annual Submittals with "No Changes" From Previous Accepted Submittal
Enhancement Id:	
Workgroup Supported:	Yes, with concern CERS 3
Description:	
<p>Automate the acceptance and submittal process for annual submissions with "no changes" based on the previous accepted submittal:</p> <ul style="list-style-type: none"> • Business User checks '<i>no change from previous submittal dated xx/xx/xxxx</i>' • CERS provides a certification statement, 'I certify that there have been no changes...' • Business user confirms • CERS completes the submittal, and automatically sets the status to "CERS Auto Accepted- No Change Submittal- Pending Field Verification" (See TFS S8 for "no change" submittal/accepted status title and description). UPA doesn't get bogged down with accepting a "no change" submittal and will verify it with field inspection during regularly scheduled inspection schedule. • Business gets notified its an automated CERS accepted "No Change" acceptance submittal (status of submittal includes this description) <p>Rationale:</p> <ul style="list-style-type: none"> • It may only be an option for HMPB/HMIS submittal elements only. • current process has more steps: start submittal, select previous submittal date, enter new start and end dates, hit submit button, confirm. • This will reduce the number of submittals we need to process and help us reach our goal of processing submittals within 30 days. <p><u>If the above is NOT approved:</u></p> <ul style="list-style-type: none"> • Regulator won't be able to distinguish between submittals with changes to prioritize inspection scheduling and verification of submittals • Regulator user selects "Accepted- no change submittal pending regular inspection" • Any data in a submittal that is "submitted" won't be counted in CERS Reporting 	
Priority:	High
Comments:	
CONCERNS:	

- Not sure the submittal should automatically change to the "**Accepted- No change**" status, without being looked at by the UPA.
- ??? Could the "No Change" submittal process include a list of all facilities with a check box that the user can check? Then when they click the "No change from previous submittals" button, those facilities would be submitted. This was suggested by a user with a large number of facilities at the 2015 CUPA Conference (during the Questions for CUPAs, Answers for Industry session). The current "No Change" process is very time consuming since each facility has to be selected, the dates entered, and the elements submitted. Even if the dates are auto-populated, it would still be a long process to submit 100+ individual facilities.
- Please also see suggestion for "Bulk changes for Basic Info." and Uploads of documents that apply to multiple/all facilities.
- Provide Regulators the ability to review one facility before accepting all similar submittals for other facilities for that business.
- **REGARDING THE UST PROGRAM ELEMENT:**
 - If there is not required annual submission (similar to the HMIS) then the Automatic Acceptance feature may not apply to UST submittals.
 - Not supported for CERS to automatically accept a submittal on behalf of a regulator in the UST program element. CERS has no way of knowing if there has been a physical change at the site. As part of the integrated comparison tool, there should be a message stating there was No Change, or a way to turn on/off the "Automatic Acceptance" of each section (Facility Info, Inventory, Plans, UST, etc.)
- Would it be possible for a UPA to not allow the "No Change" submittal option. if the UPA doesn't want to allow for the option of a No Change submittal

06/23/2015: Workshop- **Approved** based on the KERN County Presentation. This is for HMBP submittals only.

Customer Id:	S20
Title:	Inform Businesses of Submittal Errors Using ATTACHED COMMENTS
Enhancement Id:	54?
Workgroup Supported:	Yes, with concern CERS 3

Description:

OPTION 1: In the Business Portal, staging comments entered (for regulator) when the submittal is made are not displayed on the "Prepare Draft Submittal" page. Comments are shown on the "Submittal History" screen for that submittal. **Comments made to businesses by regulators are worth noting and should be made available to view prior to the facility going to "Start Submittal."** If the business goes straight to "Start Submittal," the comments won't be seen. I suggest that when the business chooses to start a new submittal and selects "based on ..." the the comments made in that submittal should be displayed, at least until the new draft submittal is started for that element. (Obviously you wouldn't want previous comments to automatically be part of the new submittal).

- What if we included text reminding the business to review the comments from the previous submittal status? It would be much easier than adding a new feature that copies the submittal status comment from one submittal and displays it somewhere else.
-Many are likely to not take the time to navigate to the Submittal History to see the Regulator comments as well the comments they made. Regulators leave comments regarding what changes are needed to make a submittal acceptable, and also comments when submittals are accepted, requesting that the business make certain changes, or add info at the time of the next submittal (such as: relatively minor inaccuracies, or added info that we are requesting, but missing it doesn't warrant rejecting the submittal, etc.) If the last submittal was accepted, the business is more unlikely to check the "Submittal History" for comments on the last submittal, when completing a new submittal.
- With a large number of facilities, it can be easy to miss previous comments, especially if they were provided as part of an "Accepted" submittal. That would not prompt a user to check if comments were issued.

OPTION 2: If the previous submittal of an element has not been accepted or reviewed by the regulator, CERS should automatically (or give business users the option to) attach all previous submittal comments provided by a business user to all further submittals until the element is accepted or rejected. Often the submittal comments attached to the previous submittal includes important information or explanations about the changes made, which the inspector/regulator should be aware of upon review of the most recent submittal. This would reduce the number of questions or comments

regarding revisions made in prior submittals.

OPTION 3: Allow Businesses to attach notes, which can be marked for internal visibility or regulator visibility, to drafts, comments, inspections, violations, etc. (Similar to Enhancement ID #54)

Priority:

Medium

Comments:

06/24/2015: Workshop- Option 1 is acceptable. Show only the most current comments. **Supported.**

Customer Id:	S25
Title:	Comment Field (20.009)- "Submit" button
Enhancement Id:	143
Workgroup Supported:	Yes. This can be done in CERS 2.
Description:	
<p>Change the location of the "Submit" button from the bottom of the field to the side of the field so that the person entering a comment does not have to scroll all the way down to the bottom of the comment box to enter "Submit."</p> <p>CalEPA does not support making the "Comments to Business" field smaller. (Enhancement ID 143).</p>	
Priority:	Low
Comments:	
<p>06/24/2015: Workshop- As is. Supported. However, if HMBP Submittals PPT goes through, this is no real point.</p>	

Customer Id:	S27
Title:	NEW Comment Field in Regulator Portal for "Not Applicable" status
Enhancement Id:	
Workgroup Supported:	Yes ?? CERS 3
Description:	
<p>Add an OPTIONAL comment field in the Regulator Portal for Regulators to use to communicate with each other and provide comments regarding when a business/facility submittal element has been changed to the "Not Applicable" status. The comment field would allow for noting when the status was changed to "Not Applicable," why, and who (which regulator) made the change.</p>	
Priority:	Medium
Comments:	
06/24/2015: Workshop- As is. Supported.	

Customer Id:	S28
Title:	Create a Warning Pop-Up box to confirm when "Business Activities" change from NO to YES/YES to NO
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>On the Business side, if a business changes their "Business Activities" to a "NO" from a "YES" (or "YES" to "NO"), a warning pop-up box should automatically generate to ask the business to confirm that crucial data has been changed. The WARNING pop-up box will be auto populated with the business' EPA ID# and will provide an <i>optional</i> comment box to use to notify the regulator of why the change occurred.</p>	
Priority:	Medium
Comments:	
<p>06/24/2015: workgroup- Pop-up approved only. Today, they have options to provide comments. Supported. NOTE: No need for additional comment box. Pop-up will direct businesses to put comment as to why the change in the existing comment box provided at the bottom of the screen. This will avoid impacting EDT Schema.</p>	

Customer Id:	S30
Title:	REVISE Submittal Process and Develop a SUMMAY OF SUBMITTAL STATUS for all Program Elements
Enhancement Id:	
Workgroup Supported:	Yes. Some can possibly be done in CERS 2

Description:

Please see PPT presentation by Kern Co.

1. Develop a SUMMARY OF SUBMITTAL STATUS for all program elements that the CUPA can review.

- This would allow the UPA to be able to identify if a business has submitted all elements reported and those still missing. It would simplify review of submittal elements!
- Submittal elements wouldn't be broken down further, but the UPA could look at the facility and see all program elements applicable and see a check-box indicating whether or not submittals have been made by the businesses, or the status would be reflected as to whether the submittal had been "accepted," "not accepted" etc.
- Businesses could submit everything all at once, but they wouldn't be required to submit everything all at once.
- *This may be possible in CERS 2 as the information is already present. We just need to create a summary page.*

??? Is it possible to require the facility to only be able to submit the entire HMP (not including UST forms) all at once? The comparison tool can easily point out each field that has been changed. This would make reviewing submittals much easier. Various elements coming in at different times makes it difficult to determine whether or not a full HMP submittal has been completed by the business/facility. This shouldn't create additional work for facilities but will save UPAs a lot of time.

2. Allow for option to submit "UPDATE" to a previously submitted submittal.

This would clarify to the UPA the intent of the business to send "updated" information to existing submittals instead of the re-submittal appearing as an entire submittal element again. Providing an "update" to a submittal wouldn't change the beginning and ending dates of the submittal, it just would allow the business to update simple information previously provided. This may be possible in CERS 2.

3. Add option to "RECALL SUBMITTAL"- The submittal status on the regulator portal would be automatically set to "RECALLED" when the business chooses to recall the submittal. The submittal can only be recalled if the status in the regulator portal is still "SUBMITTED" and the UPA has not yet started to review the submittal or has not changed the status of the submittal (the status can not be anything other than

"SUBMITTED"). A warning triangle box could appear with each "RECALLED" submittal status to set it apart from all others pending review by the UPA. The UPA wouldn't need to review the "RECALLED" submittal. Enforcement actions could not be held to "recalled" submittals, only to the absence of an actual valid submittal. If the business recalls the submittal, the date it was originally submitted is null and void. The only date valid for the submittal would be the future submittal date. This will prevent businesses submitting inaccurate data just to secure a submittal date.

Priority:

Comments:

333Glenda Kierstead, Belshire Environmental Services, Inc.:

3The ability for a business to notify the UPA to disregard a submission or to take back a submission. I think it would save everyone time. For example if I accidentally submitted an incomplete item. Rather than having the agencies notify me that the submission was rejected due to incomplete items it would be efficient for everyone to rescind my submission. Also perhaps to indicate if we are updating due to a renewal or an update, so before we can edit we'd choose editing due to a renewal or update.

3

3Tod Ferguson, CBUG:

3I believe that the only mechanism at this time is to make a new submission trumping all earlier submissions with either the corrected/completed information or a note in the comment field asking that the submission(s) be discarded.

3

306/25/2015: Workshop- Supported based on the KERN Presentation ->

1. Develop a SUMMARY OF SUBMITTAL STATUS for all program elements that the CUPA can review. Take the 15 proposed statuses and cut down by combining annual and updated submittal status. **Supported.**

2. Allow for option to submit "UPDATE" to a previously submitted submittal.

Supported.

3. Add option to "RECALL SUBMITTAL"- The submittal status on the regulator portal would be automatically set to "RECALLED" when the business chooses to recall the submittal. **Supported.**

NOTE: For UPAs that have the "Next Due Date" dependent upon the "last submittal" date, the "update" feature may not apply. Need to determine how/what will happen in this situation. Complete (annual) full submittal VS. update (change info, partial info change).

On the homepage, list all submittal elements and the "next due date" or "as update is required."- for businesses? for regulators? for both?

SUGGESTION FROM J.GATES @ WORKSHOP:

Add column on PPT Slide 8, which is what the business sees (submittal history) submitted | update or annual | accepted |

Then, for the status:

annual | accept | conditionally accepted | field verified | CERS auto populated and we'd need to consider "updates" simultaneously too.

3

Customer Id:	S33
Title:	Bulk Changes and Submittals For Basic Info
Enhancement Id:	168
Workgroup Supported:	Yes. CERS 3

Description:

Provide ability for business to do bulk changes to basic information or upload the same submittal document for many facilities at once rather than one at a time for hundreds of facilities/sites under the business organization, *including those businesses that may have facilities in multiple jurisdictions*. Examples include:

- company contact name, email
- owner/operator
- address
- phone number
- site plan
- environmental contact
- Cert of Financial Assurance
- 140 Billing Contact Name
- 141 Billing Contact Phone
- 142 Billing Contact Email Address
- 143 Billing Address
- 144 Billing Address City
- 145 Billing Address State
- 146 Billing Address ZIP Code
- 147 Billing Address Country
- 111 Business Owner Name
- 112 Business Owner Phone
- 113 Business Owner Mailing Address
- 114 Business Owner City
- 115 Business Owner State
- 116 Business Owner ZIP Code
- 116a Business Owner Country
- 117 Environmental Contact Name
- 118 Environmental Contact Phone
- 119 Environmental Contact Mailing Address
- 119a Environmental Contact Email Address
- 120 Environmental Contact City
- 121 Environmental Contact State
- 122 Environmental Contact ZIP Code

- 122a Environmental Contact Country

Example: 3000 facilities need to be updated with the new environmental contact. Instead of going into all 3000 records, there would be a way to make the change at the organizational level.

SOLUTION: A set up similar to MJB data management can be used. Create some sort of wizard in "tools" that will allow mass changes to specific information/data.

Priority:

High

Comments:

Is this an EDT or CERS issue or both?

Are the fields connected in any way?

COMMENT: *Would it also be possible to allow businesses to bulk submit those facilities that were part of the bulk upload? This would be incredibly helpful for businesses, particularly those with a large number of facilities, as well as MJBs. If the submittal process is automated and that information is attached to each submittal, it would be clear to regulators that the changes are limited to those that were uploaded and are consistent across all facilities in the jurisdiction. **This would allow regulators to review the changes for just one of the facilities before approving the same submittal for all facilities.***

06/24/2015: Workshop- Upload. Developers to consider a direct submittal instead of a draft. Develop FAQ. Tie to KERN Presentation. **Supported.**

MB NOTES: Make sure there is an option to "select all" and also the option to deselect certain/specific entries by simply clicking/selecting the entries you wish to deselect, and all others will remain selected.

For this enhancement specifically: 1) tie in "facility upload template" with "update" options in PPT. Uploading the updated template creates a DIRECT submit. Change CERS to allow for a DIRECT submit instead. 2) Develop an FAQ to explain the process.

Customer Id:	S35
Title:	Auto Populate Next Due
Enhancement Id:	187 (possibly), 73 (possibly), 15, 104, 146, 206
Workgroup Supported:	YES. Currently being looked at by DSC, ESC and CalEPA to resolve in CERS 2

Description:

For Annual Submittals: Have the START DATE and NEXT DUE DATE fields auto-complete in CERS.

- This would apply to any submittal elements that require annual recertification: Facility Information, Hazardous Materials Inventory, Emergency Response and Training Plans.
- EDT to be able to enter/update the "Next Submittal Due Date" to link to CERS without having to log into CERS and manually change them for each facility, each element, each year.

START DATE:

- to be either Jan1, Mar 1 or anniversary date set by CUPA
- **to be decided by DSC**
- Submittal date is likely to be different than the "start" or "end" date

NEXT DUE DATE - END DATE:

- to be auto populated in CERS as a date +365 days from whatever START DATE is **decided by DSC**
- CURRENTLY, Regulators can set the "Next Due Date" field manually in 2 different portions of the Regulator Portal, but the data is not displayed, reportable, or used in any other way.
- **Future features** related to the NEXT DUE DATE include:
 - Sending email reminders to businesses with upcoming or overdue facility reports
 - How far in advance of deadline?
 - 1 or more follow-up emails after deadline?
 - Do all UPAs need/want this option?
 - Improving the CERS2 business portal interface to more specifically direct users toward submittal elements needing attention.
 - Developing reports for regulators to view upcoming/overdue facility submittal reporting.

Rationale:

- When selecting the 'no changes' option in CERS to make a new submittal, CERS currently leaves the beginning and ending date fields blank on the Business Owner/Operator Identification page. CUPAs are rejecting submittals when these fields are blank. There needs to be a followup screen for the user to either enter the

dates or CERS needs to autopopulate with the CUPAs established anniversary dates for the facility.

- When reviewing a submittal, UPAs can set the "Next Due Date" field manually.
- Some UPAs have requested the "Next Due Date" be calculated automatically by CERS, with the ability for the regulator to manually override the calculated value.
- Some CUPAs are setting recertification dates based upon when a submittal is received, which can change the "next due date" if the submittal is received early or late, rather than right on time. The "NEXT DUE DATE" should not be a continuously changing or evolving date. It should be the same date each year, INDEPENDENT of the date the business/facility provides a submittal to the Regulator (via CERS).

CURRENTLY: There is not a consistent set of business rules applied statewide for setting due dates for most/all submittal elements. The DSC needs to develop a set of business rules for each submittal element type that could be implemented in CERS.

Priority:

High

Comments:

COMMENT:

Our recommendation would be to establish a recurring date function that is either pre-programmed in the background once a submittal is made by the business, or can be manually set by the regulator as in its current form and place on the website. The reasoning behind this is that since HMBP submittals have either an annual inventory reporting deadline [as required by HSC 25505(d)] or a triennial business plan review deadline [as required by HSC 25505(c)] that begins once a submittal is made, it would lessen the burden on the CERS Regulator user(s) to have to set the due date every time when processing a submittal, and potentially reduce confusion as to what the actual due date is. Based on the information I gathered from Joel Martens of the HMBP TAG, the reporting due date should be based on the date when the original business plan certification was made. However, I am also aware that different agencies have many different interpretations of reporting due dates.

COMMENT:

On the regulator portal when accepting submittals in the update status/comments window have the next reporting due date automated. Maybe a setting so the CUPA can set this date. It will have to be changed every year but at least you won't have to fill this in with every submittal elements for every facility.

06/24/2015: Workshop- Auto Population of next due date. **Supported.** Also need to ADD DISPLAY for "Next Due Date" for each applicable submittal on the business side- this is different than the submittal date.

MB NOTES: Next Due Date is March 1st, or date set by UPA. Start/End dates automatically relate to Next Due Date. UPA will have option to auto populate based on Mar 1st or ability to change it manually.

Customer Id:	S37
Title:	Transfer of Ownership- Option for Regulator to clear/reset "Next Reporting Due Date"
Enhancement Id:	
Workgroup Supported:	YES. Currently being looked at by DSC, ESC and CalEPA to resolve in CERS 2

Description:

Add option for Regulator to clear or reset "next reporting due date" for a business/facility when change of ownership occurs.

- When CalEPA, DSC, ESC, CFB decide on **WHEN and HOW** EPCRA start/next due-end dates will be auto populated, and **HOW** the yearly anniversary date is auto populated, it is requested that the option exist for regulators to clear the auto populated date, and reset it to a new origin date, especially in the occurrence of a transfer of ownership.
- The "Next Due Date" /"End Date" field can be cleared by regulators now, but it would be nice if the option were to pop up or if a check box existed for the option to reset/clear the date. This would allow regulators the ability to manually go in and make a change to the auto population date.

Priority:	Medium
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Comments:

06/23/2015: Workshop- DSC is supporting this if a submittal element is set to not applicable, we could clear the due date field. **Supported.**

NOTES: UPAs have ability to change next due date currently. No check box is needed- just automatically clear all reporting dates and next due dates when the facility is transferred and submittal elements are set as "NOT APPLICABLE"

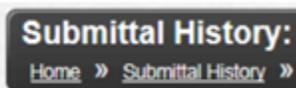
Customer Id:	S40
Title:	Change "Submittal History" link to Show Only the History of the Specific Facility
Enhancement Id:	
Workgroup Supported:	

Description:

OPTION 1: Currently, in a submittal overview page or detail page for a specific facility, the Submittal History link takes the user to a list of all submittals for all the facilities under that business.

Since the user is already within a specific CERS ID, change that link so that it shows only the submittal history for the specific CERS ID the user is viewing when the link is selected.

If the button shows information specific to the facility, it will make it easy to navigate for businesses with multiple facility locations. Text would need to reflect the path of information shown. We want to make the button lead to facility specific submittal history, not submittal history for the entire business. This would involve changes to the CERS Interface.



OPTION 2: In the regulator portal, provide a hyperlink on Facility summary screen to Facility history screen and inspection information for CME. Can we also provide a hyperlink on a Facility history screen to take us back to the Facility summary screen? The same would needed/nice to have when entering an inspection (have a link on the inspection page to go to the inspection summary/history page for that facility).

California Environmental Reporting System: Regulator

CERS Regulator

Facility: Marin Municipal Water District - Corporation Yard (CERSID: 10032343)

Submittal History for Marin Municipal Water District - Corporation Yard

Note: Submittal data is current as of 4/9/2015 at 10:54 AM.

CERSID	Address	Submitted	Facility	Inventory	Plans	UST	TP	RMR	Remote	Tank	APSA
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015								Accepted 4/9/2015
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015			Accepted 4/9/2015					
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015			Accepted 4/9/2015					
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015	Accepted 3/20/2015	Accepted 3/20/2015	Accepted 3/20/2015					
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015	Accepted 3/20/2015	Accepted 3/20/2015	Accepted 3/20/2015	Accepted 3/20/2015				Accepted 3/20/2015
10032343	Marin Municipal Water District - Corporation Yard 220 Tamaul Vista Boulevard Corte Madera, 94025	3/19/2015 4:08 PM	Accepted 4/9/2015	Accepted 3/20/2015	Accepted 3/20/2015	Accepted 3/20/2015	Accepted 3/20/2015				Accepted 3/20/2015

1 - 6 of 6 items

Submittal Hist

This facility falls under 5 reporting elements with 3 different submittal dates/times. To see the 3 different submittals I'd have to toggle between the facility submittal page and facility summary page to get back to the submittal history page.

California Environmental Reporting System: Regulator

CERS Regulator

Facility: Marin Municipal Water District - Corporation Yard (CERSID: 10032343)

Facility Summary for CERS ID: 10032343

Facility Name: Marin Municipal Water District - Corporation Yard
Business Name: Marin Municipal Water District (Corte Madera, CA)
CUPA: Contra Costa County Dept of Public Works, Waste Mgmt, CUP

Facility Information: Marin Municipal Water District - Corporation Yard
220 Tamaul Vista Boulevard
Corte Madera, CA 94925
(415) 945-1432

Owner Information: Marin Municipal Water District
220 Nellen Avenue
Corte Madera, CA 94925
(415) 945-1162

Primary Emergency Contact: MMWD - Distribution Center
24 hours per day
(415) 945-1162
(415) 945-1162 (24-hour)

Secondary Emergency Contact: David Peery
Safety & Risk Manager
(415) 945-1432
(415) 250-1155 (24-hour)

Environmental Contact: David Peery
(415) 945-1432
dpeery@mmwd.net

Other Identifiers: Local Facility ID: 21-000-600167
EPA ID: CAL000138318
Facility Regulator Key: MRN 21-000-600167
County: Marin
Local Facility Grouping: No Local Facility Grouping

Submittal and Compliance Data: Last Submittal Date: 3/19/2015 2:08 PM
Submitted Element Count: 15
Inspections: 2
Enforcements: 0

FacInfo	Inventory	Plans	UST	TP	RMR	Remote	APSA
Accepted 03/19/2015 Next Due: 12/31/2015	Accepted 12/15/2014 Next Due: 12/31/2015	Accepted 12/15/2014 Next Due: 12/31/2015	Accepted 03/19/2015 Next Due: 03/19/2015				Accepted 03/19/2015 Next Due: 03/19/2015

Inventory Summary: Unique Location Summary Count

Facility Summ

From the facility summary page I then click the Submittals link on the left margin which will take me to the submittal history page (below).

Facility Submittal

CERS Regulator - Internet Explorer
 egulator.ca.gov/SubmitalDetails/995590
 Facility Submittal Details: CE... x

California Environmental Reporting System: Regulator
 Christie Coleman's Account Sign Out Tools Reports Help

CERS Regulator | Submittals | Facilities | Businesses | Regulators | Compliance | Responders | Reports

Facility Submittal: Marin Municipal Water District - Corporation Yard (100323...
 Home | Submittal Search | Submittal: 3/19/2015 (10032343) | Print Submittal

Submittal: Mar. 19, 2015 2:08 PM

Facility Information | Accepted Apr. 8, 2015 | Set Submittal Status
 Submitted for CERS ID 10032343 on 3/19/2015 2:08PM by David Plooy of Marin Municipal Water District (Corte Madera, CA)
 Submittal was Accepted on 4/8/2015 by Christie Coleman for Marin County Dept of Public Works, Waste Mgmt. CUP
[Business Activities](#)
[Business Owner/Operator Identification](#)

Aboveground Petroleum Storage Act | Accepted Apr. 8, 2015 | Set Submittal Status
 Submitted for CERS ID 10032343 on 3/19/2015 2:08PM by David Plooy of Marin Municipal Water District (Corte Madera, CA)
 Submittal was Accepted on 4/8/2015 by Christie Coleman for Marin County Dept of Public Works, Waste Mgmt. CUP
[Aboveground Petroleum Storage Act Documentation Stored at Facility](#)

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 CERS Technical Support: Request Technical Assistance

I feel adding a button on the submittal page to take me directly to the submittal history page will not only save me a step or 2 but will let me toggle back and forth when I need to review submittal elements submitted at different times/dates, especially when out in the field.

Actually, you could probably remove this Submittal Search button because if I want to do a submittal search then I'll click the Submittal tab at top.

Priority: Low

Comments:

06/24/2015: Workshop- As is. **Supported.** J Gates understands this request well.

Customer Id:	S41
Title:	Editing & Reviewing UST Submittal Data
Enhancement Id:	ust5
Workgroup Supported:	Yes. CERS 2?
Description:	
<p>1. Develop a comparison tool to allow side by side reviewing and editing of UST submittal info and/or Monitoring Plans for multiple tanks at a facility. The comparison tool should be available to business and regulator users. It would also be helpful if the comparison tool could be used by businesses to compare draft and previous submittals.</p> <p>Often changes to the Information or Monitoring Plan for 1 UST will require changes to other USTs. Being able to review and edit the Info and/or Monitoring Plans at the same time in the same view would simplify the process to enter and verify that all the data entered is correct before submitting. This would help prevent comment issuance for small errors.</p> <p>2. Revise tank information screens so the Tank ID #(s) are always visible. This helps the viewer know what they are viewing.</p>	
Priority:	Medium
Comments:	
<p>Should this be two requests?</p> <p>06/24/2015: Workshop - #1 As Is. Supported. #2 As Is. Supported. Is the Tank ID # in the existing field the # the business uses to ID tanks? The "NEW" Tank ID # is the one proposed by SWRCB (Enhancement ID UST5) This is going to be beneficial to multiple facilities with multiple tanks.</p>	

Customer Id:	S43
Title:	New CERS ID not issued unless CERS verifies physical location change
Enhancement Id:	
Workgroup Supported:	

Description:

To ensure a consistent use of the CERS ID number to businesses, going forward, we need to prevent CERS from issuing a new CERS ID to any existing facility in CERS **unless there is a physical location change**. Address changes should be confirmed to be a location change by CERS, before CERS issues a new CERS ID.

Propose to make the issuance of a new CERS ID only dependent upon:

- verification of a different address, or
- only allow new CERS IDs to be issued to new addresses, or

Some CUPAs issue a new CERS IDs to sites when there is a business name or ownership change but no physical location change in spite of the field definition (A CERS ID is a CalEPA-assigned, 8 or 0 digit ID to uniquely identify a facility in CERS. The CERS ID should remain unchanged across different owners/cooperators of a facility.). facility does not equal physical location. We could have many instances where a single location has multiple CERS IDs which will be a problem going forward in responding to public records act requests.

We will need to revisit previously issued FAQ guidance to ensure and clarify the following:

- 1. when a new CERS Id is issued**
- 2. how to look up archived CME data for active/non-active facilities that have multiple/different owners and possibly different locations**

- **NO NEW CERS ID if:**
 - Name Change of Business (staying at same location)
 - Name Change of Business and New Owner (staying at same location).
 - New Owner (no change to Business Name, no change to location)
 - if address is changed by city/county, but actual physical location site is not not changing
- **NEW CERS ID if:**
 - Name Change of Business and New physical location of the Business (changing location)
 - Name Change of Business and New Owner (changing location)

We will also need to:

- Clarify how business information can be easily transferred to the new address of the same business.
- Clarify how CME data is transferred to the new owner.

- Revise Title 27 definition: CERS ID is a site identifier, not a business identifier.
- The CERS ID should pertain to the physical location (the dirt) only. Business name and ownership changes should ***not*** result in a new CERS ID.

Priority:

High

Comments:

- When owner closes one business and opens another business in a different location, no CME history or history regarding the prior owned business follows the owner in CERS. Tracking this information would not be considered so much as "reporting" related, but rather data management related. There is no way CERS can link previous CERS IDs (issued for prior physical locations) of businesses that are opened in new locations by the same/different owners.
- When facility is transferred to a new location, no records are transferred. All records stay with the PREVIOUS locations, which had a different CERS ID.
- Business & CME data about the business/facility are archived.
- "Business Organization" tool is not always used in CERS. All facility locations should show up under the "Business Organization" if it is the same business with multiple locations.

???'s:

Are current controls effective enough to prevent issuance of additional CERS IDs for the same site?

06/24/2015: Workshop- Add more controls to avoid creating duplicating businesses within CERS. **Supported.** Possible solution is S45.

NOTE: DSC needs to determine what controls currently exist to prevent duplicate CERS ID #'s, AND what controls can be implemented to ensure duplicate's aren't entered.

Customer Id:	S45
Title:	CERS to compare multiple fields to prevent NEW/DUPLICATE CERS IDs being issued (Combine with S43)
Enhancement Id:	
Workgroup Supported:	Yes
Description:	
<p>Require multiple fields for CERS to use as an auto-comparison, to avoid multiple CERS IDs being issued to the same business/facility, and prevent NEW duplicate facilities being created/entered in CERS. Basically, improve intelligence of CERS to catch more potential existing duplicate facilities when a business user or regulator tries to enter a new facility or new business.</p> <p>Example: UPA creates a facility to enter inspection data at the end of the year. The owner then also creates the facilities in CERS. Now, there are duplicate facilities.</p> <p>SOLUTION:</p> <ul style="list-style-type: none"> • Add "search existing facilities" tool on Business home page. • Hide the "Add new facility" option. This shouldn't be an option until trying to search for an existing facility. • On the Business side, is there a way to alert businesses that there is an existing CERS ID for businesses addresses? The address has to be entered the exact same way it is in CERS for CERS to recognize it. This is an ineffective tool when common things are entered differently, such as N vs. North, Ave. vs. ave, etc. • Improve the search functionality. CERS already pops up with potential duplicates if similar (not exact) to what's been entered. Need to put in street, #, city, zip, "contains"... Add intelligence to search function to allow for partial searches on both pages, initially when looking for facility, and returned values when "add" facility. • Returning user screen and New User screen should be the same. • 1st screen: "Search Existing: business/facility Name, Address, CERS ID. ..."My address isn't here, add new facility... takes user to 2nd screen. • 2nd screen: "Add New facility" enter address, city, zip code. Returned results should be a smart search like used in the 1st screen. <p>If CERS recognizes the address entered, there are 3 options the business can do:</p>	

Priority:	
Comments:	
06/24/2015: Workshop- This is a recommended solution for S43. Supported	

Customer Id:	S46
Title:	Certification Boxes for Facility Information Business Owner/Operator Identification (FIELDS 134-137)
Enhancement Id:	
Workgroup Supported:	Yes.

Description:

OPTION 1:

A) CERS should auto populate data field 134 (*Date Identification Signed*) with the submittal date. CURRENT Description of data field 134: *This field will auto populate the date the electronic submittal was started. The business user can manually overwrite this date with the date the submittal is being made.*

B) Data field 135 (*Document Preparer Name- Identification*) should be deleted, or "hidden." CURRENT Description of data field 135: *Full name of person who prepared the submittal information. Does it matter who entered the data in CERS if we know who the submitter (lead user or approver) is?*

C) The CERS ID of the submitter should auto populate data fields 136 (*Name of Signer of Identification*) and 137 (*Title of Signer of Identification*). CURRENT Description of data field 136: *Full name of person signing the page. The signer certifies to a familiarity with the information submitted and that based on their inquiry of those individuals responsible for obtaining the information, all the information submitted is true, accurate and complete. CURRENT Description of data field 137: *Title of person signing the page.**

OPTION 2:

A) Delete or hide fields 134-137 on the Facility Information Business Owner/Operator Identification screen as the 'submit' process in CERS clearly identifies the business user responsible for the data submitted and the date of submittal is captured.

B) Create a "Review Certification Statement" check box for any necessary changes: "Based on my own knowledge and/or my inquiry of those individuals responsible for obtaining the information, I, John Doe (CERS Account username jdoe) certify on dd/mm/yyyy under penalty of law that I have personally examined an am familiar with the information submitted and believe the information is true, accurate and complete." ***It might be harder to take enforcement action if we don't make them do something affirmative to certify that the data is true and current when submitted.***

Based on considering each submittal as a certification. This would be applicable to ALL submittal certifications in CERS for each submittal element.

Will state agencies need to review/revise regs to drop the certification statements from CERS/forms, etc.?

Fields 134-137 aren't thought to be critical as they identify the person making the submittal (and responsible for its validity) and the time/date of the submittal are known. Submissions should not be rejected if these fields aren't updated.

What is missing in CERS is the certification statement that was on the UPC Form when the person had previously signed and submitted with additional documents, which is between field 136 and 137 at the bottom of the form.

From Chris Allen:

- *We discussed having some type of certification text on the Submittal Summary page but wondered how many people who would use CERS would be clerical staff, and should they be held to that level of legal liability. There is differentiation in the Data Dictionary fields between "preparers" (field 135) and "signers" (field 136). It is a possibility that UST and TP forms might be "prepared" or "signed" by someone other than the submitter.*
- *Adding certification language to the submit screen is probably the best and most realistic approach. Followed by removal of the following fields from the CERS forms, and advise EDT clients that there is no need to collect data in these fields:*
 - UST FACILITY FORM
 - UST TANK FORM
 - UST MONITORING PLAN
 - UST INSTALLATION/MODIFICATION
 - TP FACILITY FORM
 - TP CERTIFICATION OF FINANCIAL RESPONSIBILITY
 - RMR FORM
 - REMOTE WASTE CONSOLIDATION SITE ANNUAL NOTIFICATION
 - HW TANK CLOSURE (RELEVANT??)

Priority:

Comments:

06/24/2015: Workshop- Recommending hiding the fields instead of deleting. Need to consult with legal. CalEPA (John P.) will clarify best option with legal. Supported.

Customer Id:	S47
Title:	Delete fields 603, 605, 703, 731, 732: relative to names/titles/dates of Haz Waste submittals
Enhancement Id:	
Workgroup Supported:	
Description:	
<p>Delete or HIDE fields 603, 605, 731 and 732. Any others? These are names and titles of document signers for data entry screens and dates documents were signed by these individuals. Since all are data fields in data entry screens completed by business users, CERS identifies the business user and the dates of submittal.</p> <p>603: Date Certified (Onsite Hazardous Waste Facility)- date the page was signed. 605: Owner/Operator Title (Onsite Hazardous Waste Facility)- Title of person signing the page. 731: Owner/Operator Name (Remote Consolidation)- Full name of business owner/operator, or officially designated representative of the owner/operator. The person signing this page must be an owner or officer of the company who is authorized to make decisions for the facility and who has operational control. In most companies, this is not the environmental compliance or technical staff. The signer certifies to a belief that all the information submitted is accurate and complete. 732: Owner/Operator Title (Remote Consolidation)- title of person signing the page.</p> <p>Other fields?</p>	
Priority:	
Comments:	
<p>From the HMBP workgroup: See the following analyses of UPCF Form Fields, UPCF Instructions, and citations of statutes and regulations governing fields being considered for deletion or auto-population.</p> <ol style="list-style-type: none"> 1. Certifications in CERS 3.0.xlsx 2. Signatories to Permit Applications and Reports.docx 3. EPCRA Certification Requirements.pdf 4. Annual Hazardous Materials Inventory Certification.pdf (CERS Business Users FAQ) <p>06/24/2015: Workshop- Recommending hiding the fields instead of deleting. DTSC will need to consult best option with DTSC legal. Supported.</p>	

Customer Id:	TTS5
Title:	Fields 111 and 117- Environmental Contact
Enhancement Id:	
Workgroup Supported:	
Description:	
<p>1. Change T27 information description for FIELD 117 (Environmental Contact Name) from current language "<i>Name of person, if different from the business owner/operator, who receives all environmental correspondence and will respond to enforcement activity.</i>" to "<i>Name of person who receives all environmental correspondence and will respond to enforcement activity. May be the business owner/operator.</i>"</p> <p>OR</p> <p>If Field 117 is the same as Field 111 (Business Owner Name), change T27 language to instruct the business to enter "Same" in Field 117.</p> <p>2. Sync this language with the rest of the data fields that have changed descriptions... "If different than owner."</p>	
Priority:	Low
Comments:	
06/23/2015: Workshop- Text clarification with HELP BUTTON without changing Title 27. Supported.	

Customer Id:	TTS6
Title:	Business Owner Name (field 111)- what if owner is a Corporation?
Enhancement Id:	
Workgroup Supported:	
Description:	
<p>It would be helpful if the information description for Business Owner Name (field 111) included the possibility that the facility might be owned by a corporation or partnership, etc.</p> <p>Currently the information description for field 111 is "First & Last name of business owner", which leads many of our facilities to put an individual's name even though it is actually owned by a corporation.</p> <p>May not need a change to the description in Title 27, may only need to change DESCRIPTION in CERS user interface.</p> <p>SOLUTION: Change the field description in the CERS UI to read: "First & last name of business owner. CORPORATION may be provided in lieu of First and Last name of business owner." "Name of Business Owner. Specify if CEO, Vice President, First and Last Name"</p>	
Priority:	Low
Comments:	
<p>06/23/2015: Workshop -Convert to Help Text Bubble. Supported. According to the Supreme Court, corporations are people too.</p>	

Customer Id:	UST1
Title:	Auto Complete SOC Status Based on Selected Violations
Enhancement Id:	110
Workgroup Supported:	YES CERS 3
Description:	
<p>Revise field 913a, "Significant Operational Compliance" to be auto completed based on selected violations for all 'Routine' UST inspections. Do not display field or allow data entry in field 913a for 'Other' types of UST inspections. Use existing valid value choices</p> <p>Requires change to Violation Library (UST 2)</p> <p>Current manual process allows errors and omissions for SOC determination or failure to report. SOC violations have been specifically identified.</p> <p>Envision Connect provides this feature.</p>	
Priority:	HIGH
Comments:	
06/25/2015: Workshop - As is. Supported	

Customer Id:	UST2
Title:	Violation Library- Identify RD and RP SOC Related Violations
Enhancement Id:	
Workgroup Supported:	YES CERS 3
Description:	
<p>Revise Violation Library entries to identify all UST Release Detection and UST Release Prevention violations. Use these violations to auto determine Significant Operational Compliance (SOC) for all "Routine" UST inspections for reporting in field 913a.</p> <p>New on 6/23/15: A list of the 37 Release Detection (RD) and Release Prevention (RP) violations that are used to determine the SOC status has been attached. These are existing violations in the UST section of the CERS Violation Dictionary. Dfirth.</p>	
Priority:	High
Comments:	
06/25/2015 - Workshop - As is. Supported.	

Customer Id:	UST3
Title:	Increase Field Lengths for UST Monitoring Devices
Enhancement Id:	122
Workgroup Supported:	YES CERS 3
Description:	
<p>Increase field lengths to 50 characters to allow facilities to report multiple monitoring equipment sensors.</p> <p>For facilities that utilize multiple and/or differing monitoring equipment for underground storage tanks, it is important that each piece of equipment be disclosed within the Monitoring Plan.</p> <ul style="list-style-type: none"> • Address situations where there are 3 or more devices to report. • Add Help Bubble text to explain how to report. • UDC Leak Sensor Model and Manufacturer (field # 490-58) • Tank Monitoring: Leak Sensor Model (Field # 490-10) 	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As Is. Supported.	

Customer Id:	UST4
Title:	Modify UST Field 437 to be a Minimally Required Field
Enhancement Id:	166
Workgroup Supported:	YES CERS 3
Description:	
<p>Require UST field #437 (Number of tank compartments) to be a minimally required field if field 434 is selected to be "one in a compartmented tank." Require that all entries in field 437 be greater than or equal to '2' or use a drop down menu allowing selection of 2 to 9. Modify field 434, tank configuration, so if 'stand alone tank' is selected the number of 'compartments' in field 437 defaults to '1' and is not editable by the user.</p> <p>This will prevent businesses from reporting "0" compartments.</p>	
Priority:	HIGH
Comments:	
06/25/2015: Workshop - As Is. Supported,	

Customer Id:	UST5
Title:	Develop CERS Generated Unique UST ID numbers (field 432)
Enhancement Id:	167
Workgroup Supported:	YES CERS 3
Description:	
<p>1. Create a new field to be use for unique CERS generated UST Tank ID # for all new USTs. maintain user defined UST Tank ID #s (field 432) for business and UPA USE</p> <p>2. Generate a new CERS UST Tank ID # for all existing USTs in CERS.</p> <p>RATIONALE: User generated tank ID is not unique. EX) UST #3 is removed and a new UST is installed. Business user numbers the new UST as Tank #3.</p>	
Priority:	HIGH
Comments:	
<p>3-10-15 CBUG Webinar Survey: 50 of 116 responded, 68% support a CERS generated unique UST #, 21% don't</p> <p>3-10-15 CBUG Webinar Comments:</p> <ul style="list-style-type: none"> • opposed to CERS UST ID # because BOE already has a unique number. • Don't see the value in generating another number. • Can the existing BOE number be used? • Will the CERS UST ID# be the same as the UST Permit ID#? Facility ID# is different than CERS ID# and often it causes confusion. <p>06/25/2015: Workshop- DSC Needs to determine how the ID #'s will be generated and how it affects EDTs. Need to determine how the IDs will be defined and how to deal with previously submitted tank information. Supported. All of form B, D info is tied to the new tank ID#.</p>	

Customer Id:	UST8
Title:	Change the Name of Monitoring Site Plan
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
1. Change the name of the "UST Monitoring Site Plan" to "UST Monitoring Site Map" 2. Revise Title 27 accordingly. Reference Title 23, 2632.d.1.c, 2711.a.8 and App. 6 3. Revise Help Bubble text	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As Is. Supported.	

Customer Id:	UST13
Title:	Modify BOE Help Bubble
Enhancement Id:	
Workgroup Supported:	Yes CERS 2
Description:	
<p>Modify help bubble to link or reference CERS FAQ re: BOE reporting. The BOE# section on the Facility Form is a required field. A guidance link to the existing CERS FAQ would be helpful because it includes the generic numbers that exempt facilities are permitted to use and it has a link to an extensive BOE guidance document.</p>	
Priority:	Low
Comments:	
06/25/2015: Workshop- As Is. Supported.	

Customer Id:	UST14
Title:	Add Help Bubble: UST Tank Form- UDC Monitoring Stops Flow of Product at Dispenser Help Bubble)
Enhancement Id:	
Workgroup Supported:	Yes CERS 2
Description:	
Add help bubble next to “UDC Monitoring Stops Flow of Product at Dispenser” that explains that "yes" applies only to stand alone leak detection or mechanical leak detection (float & chain) monitoring systems.	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As is. Supported.	

Customer Id:	UST17
Title:	Prevent Deletion of Valid UST Records
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>When a UST is permanently closed or removed, have CERS default to hide that UST record from business and regulator searches, reports and exports unless the user checks a "show closed/removed" box.</p> <p>NOTE: Consider how this will be displayed/not displayed in Report 6 and the UST Facility/Tank data download reports.</p> <p>The UST documents for a particular tank should be greyed out when the tank is closed. There should be a way to easily SEE that the site has a closed tank as office staff (who may not be familiar with the site) easily recognized the closed tank, i.e. for public records requests. The greyed out information, though no longer alterable, should remain printable.</p>	
Priority:	High
Comments:	
<p><u>NEVER DELETE A VALID TANK RECORD!!</u></p> <p>Proposed by Jay Maille, AT&T 1-29-15</p> <p>06/25/2015: Workshop- As Is. Supported.</p>	

Customer Id:	UST19
Title:	Modify UST Red Tag Fields (913 b-e) (914)
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>1. Add valid value "Red Tag Issued" to field 914 (Type of Enforcement Action).</p> <p>2. Make the following fields minimally required when "Red Tag Issued" is selected in field 914:</p> <ul style="list-style-type: none"> • 913 b= Red Tag Issued • 913c= Red Tag Number • 913d= Violations Causing Red tag • 913e= Date Red tag Affixed 	
Priority:	High
Comments:	
06/25/2015: Workshop- As Is. Supported.	

Customer Id:	UST20
Title:	Convert UST Unauthorized Release Form to Data Entry Screen & Create new reporting process
Enhancement Id:	
Workgroup Supported:	Need Further Discussion- CalEPA/SWRCB
Description:	
<p>1. Convert the “Unauthorized Release Form” into data fields. <i>Approx.. 17 NEW data fields will need to be created.</i> The remainder are fields that already exist in CERS. Use existing drop down menu choices from GeoTracker for 5 of the new fields.</p> <p>2. Create new or duplicate reporting process outside of the existing submittal process to allow either Business or Regulator to report.</p> <p>NOTE:</p> <ul style="list-style-type: none"> • Approx.. 150 URFs prepared annually. • Can we avoid affecting EDT by requiring reporting only to CERS rather than a portal? • Most but not all URF related to inspections • Does Title 23 require all data currently on the form? • URF= Unauthorized Release Form 	
Priority:	High
Comments:	
<p>Itr3-10-15 CBUG Webinar Survey: 50 of 116 responded, 62% support converting form fields to data fields, 26% don't</p> <p>06/25/2015: Workshop- This does not belong in CERS nor in GeoTracker. Agreement to eliminate the PDF. Option 2 is recommended. Dan F. to document business process before providing solutions. Supported. Concept is SUPPORTED, however development and implementation is within CERS 3.0. is not supported by the DSC.</p> <p>ItrNOTES: DSC needs to document business process. Will the form be housed in CERS Central as a web based form? Data submitted on the form needs to be searchable.</p> <p>ItrCost is extremely significant for 17 new data fields. Also need new permissions for non-regulated facilities to complete the form without logging into CERS as a business or regulator user- they won't need access to all the info, just the form for completing. CUPAs support the effort outside of being associated with CUPAs and the Unified Program- state should pay for the development outside of Unified Program and CUPA funds.</p> <p>?- Could we create the same thing on the CERS Central page so a user won't need a special permission, make the form not part of the CERS Submittal process?</p>	

The Unauthorized Release Form is part of the Unified Program and is subject to electronic reporting.

Customer Id:	UST21
Title:	Convert "Certification of Installation" data entry screen back to a PDF for upload in new "3rd Party UST submittal element"
Enhancement Id:	
Workgroup Supported:	3/5/15- Yes, support for general concept
Description:	
<p>1. Convert "Certification of Installation" data entry screen back to a PDF for upload in new 3rd party UST submittal element.</p> <p>Also see:</p> <ul style="list-style-type: none"> • UST 27 • UST 28 • UST 29 <p>2. Hide existing fields.</p> <p>NOTE:</p> <ul style="list-style-type: none"> • Sample PDF document to be provided • No need for a data entry screen, PDF submittal process is more efficient for businesses. 	
Priority:	Medium
Comments:	
<p>06/25/2015: Workshop- #1 As is. #2 need to determine if hide or delete. Supported.</p> <p>NOTE: If fields are hidden or deleted, portals can't send PDFs up to CERS.</p>	

Customer Id:	UST22
Title:	Modify fields 430 & 430a, Create 2 new fields for Regulators to report UST Tank closure
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>06/25/2015-DELETE- Keep for businesses to complete -Workshop->1. Revise field 430 to remove "Permanent Tank Closure" and "Tank Removed" valid values. (this field is used by businesses)</p> <p>06/25/2015-DELETE -Keep for businesses to complete - Workshop-> 2. Remove or hide field 430a.</p> <p>3. Create new field for Regulators to report valid values: "Permanent Tank Closure" and "Tank Removed"</p> <p>4. Create new date field and move existing date field 430a to regulator portal for regulator to enter permanently closed or removed.</p> <p>No change to CERS for all UPAs that use EDT Tiers 5 & 6 Need a solution for UPAs that don't use EDT Tiers 5 & 6</p> <p>1. 06/25/2015-ADD - Workshop- If data existing in 430 and 430a, auto-populate the 2 new fields in the regulator portal. Report 6 will be created (auto-generated) from these 2 new fields. These two new fields can be edited by the regulator if necessary.</p> <p>Need to add optional fields for the regulator portal.</p>	
Priority:	High
Comments:	
<p>06/25/2015: Workshop- See comments above. Supported. Business has to report to CUPA. CUPA has to verify what the business enters and report to SWRCB, regardless of if a business is closed or not. SWRCB compiles Report 6 for US EPA.</p> <p>?- Will inactive tanks in Decade transfer thru EDT in the same way?</p>	

Customer Id:	UST24
Title:	Transfer of Ownership- Provide UST Tank Information/Monitoring Plan for Each Tank as DRAFT to New Owner
Enhancement Id:	195
Workgroup Supported:	Yes. CERS 3
Description:	
<p>When a UST facility is transferred to a new owner, all the UST submittals could be archived and the drafts deleted with the exception of the draft of the UST Tank Information/Monitoring Plan for each tank. This information could then be available to the new owner. it would help the facility because they wouldn't have to start that part of the submittal from scratch (especially since some of the information may be difficult to determine), and it would help the CUPAs because there should be consistency in the submissions between the prior and new owners and they wouldn't have to re-verivy all the details about the tank that had already been checked.</p> <p><i>Draft to include unique computer generated tank ID # if UST 5 is approved.</i></p>	
Priority:	Medium
Comments:	
<p>CalEPA will not be responsible for transferring the information, it is not the role of the state to provide information from one business to another. CUPA may take responsibility of providing the information to the new owner, so long as no confidential information is passed on.</p> <p>06/25/2015: Workshop- Add a pop up that states the business is responsible for verifying the information. Supported.</p>	

Customer Id:	UST27
Title:	Split Existing UST Submittal Element Into 3; Modiy submittal element rules for submitting
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p><u>1. Split the existing UST Submittal element into 3 submittal elements:</u></p> <p>ELEMENT 1 - UST Facility/Tank Information to include: UST facility operating permit information UST tank information/monitoring plan</p> <p>ELEMENT 2 - UST Business Document Upload to include: UST Monitoring Site Plan (if not included in the HMIS Site Plan) UST Response Plan (if not included in the HMBP Emergency Response Plan and Training Plan) Owner Statement of Designated Operator Compliance UST Owner/Operator agreement UST Certification of Financial Responsibility</p> <p>ELEMENT 3 - UST 3rd Party Document Upload to include: Annual Monitoring Certification & Spill Bucket Test Report Annual Secondary Containment Test Report Tank & Line Integrity Test Report Enhanced Leak Detection Test Report Tank Lining and/or Bladder Test Report UST Certification of Installation Statistical Inventory Reconciliation Report Temporary Closure Liquid Sampling Report</p> <p><u>2. Allow each UST submittal element to be submitted independent of the other two.</u> Allow 3rd party submittal element to submit without the Facility submittal element (the over arching facility submittal element for existing for submittal elements)</p> <p><u>3. In Business and 3rd Party submittal elements, allow one or more documents to be selected and uploaded.</u></p>	
Priority:	High
Comments:	
Necessary to streamline the UST submittal process, especially for "3rd Party" generated documents. Existing process is more cumbersome than the original paper	

process.

Document names in 3rd party Document Upload form.

3-10-15 CBUG Webinar Survey: 50 of 116 responded, 64% support multiple submittal/data elements, 33% don't

Related to UST 28

06/25/2015: Workshop - As is. **Supported.**

Customer Id:	UST28
Title:	Create a New Business User Permission Level
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>Create a new business user permission level: UST technician. The UST technician permission user would <u>be able to</u>:</p> <ul style="list-style-type: none"> o View existing or upload some (not all) UST Secondary Submittal element only. To be set by SWRCB. o Alternative: If not possible, split secondary submittal element in two with technician related documents in one and all the others in the other. Then create new permission level only for the technician to submit technician related documents. 	
Priority:	High
Comments:	
<p>Necessary to streamline the UST submittal process, especially for 3rd party generated documents. Existing process is more cumbersome than the original paper process.</p> <p><i>Related to UST 21</i></p> <p>3-10-15 CBUG Webinar Survey: 50 of 116 responded 58% support new user level for 3rd party tech. permission, 49% don't</p> <p>3-10-15 CBUG Webinar Comments: hard to control the 3rd party in terms of committing to doing the submittal and the "associated" cost of creating the permission</p> <p>06/25/2015: Workshop - As is. Supported.</p>	

Customer Id:	UST29
Title:	Create a New Alert Notification
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
<p>Create new alert notification to alert Business Lead Users and to Regulator user that a UST technician made a submittal. Provide text explaining recommended action.</p> <p>UST 27 & 28 need to be completed first.</p>	
Priority:	High
Comments:	
06/25/2015: Workshop - As is. Supported	

Customer Id:	UST31
Title:	Modify UST Facility/Tank Data Download Report Overview Page
Enhancement Id:	216
Workgroup Supported:	Yes. CERS 2
Description:	
Modify UST Facility/Tank data download report Overview page to show how many facilities, how many active UST Tank & Monitoring Plan Info, how many closed UST Tank & Monitoring Plan Info, and how many UST Cert of Installation & Mods.	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As is. Support.	

Customer Id:	UST32
Title:	Modify Petroleum Tank Contents valid values (field 440)
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Proposed list developed by Greg Breshears & Gabe Hererra. Changes suggested based on practical UPA experience and a review of UST reported data in CERS. Intent is to make selections easier for business and to provide SWRCB with data needed.</p> <p>Petroleum Tank Contents Selections for field 440:</p> <p>Regular Unleaded Premium Unleaded Midgrade Unleaded E85 (NEW) Diesel Biodiesel B6 - B99 (NEW) Biodiesel B100 (NEW) Jet Fuel Aviation Gas Kerosene (NEW) Used Oil Petroleum Blend Fuel (REMOVE) Other Petroleum Ethanol (REMOVE) Other Non Petroleum Other Petroleum Contents Other Non Petroleum Contents</p>	
Priority:	High
Comments:	
06/25/2015: Workshop -Adding a couple and deleting a couple list items. Supported.	

Customer Id:	UST33
Title:	Allow Selection of Multiple Options for Piping System (field 458)
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Must be able to pick more than 1 option for Piping System Type (e.g., Pressure & Conventional Suction) since some systems supply both motor vehicle fuel dispensers and standby generators.</p> <p>Add new valid values or allow multiple choices to be selected.</p>	
Priority:	High
Comments:	
6/25/15- Workshop Supported.	

Customer Id:	UST34
Title:	Allow Selection of Multiple Options for Piping Monitoring (field 490-29)
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
Must be able to pick more than 1 option for pipe monitoring method (e.g., vacuum & liquid).	
Add new valid values or allow multiple choices to be selected.	
Priority:	High
Comments:	
06/25/2015: Workshop - Supported.	

Customer Id:	UST36
Title:	Create Model PDF Form for UST Owner/Operator Agreement
Enhancement Id:	
Workgroup Supported:	Yes. CERS 2
Description:	
<p>Create model PDF form UST owner/operator agreement.</p> <p><i>UST Steering Committee to review. optional DRAFT form. When we have a consensus document we will post to CERS as an optional or model form.</i></p>	
Priority:	High
Comments:	
<p>Proposed by Greg Breshears, Santa Clara County, 3/16/15 4/1/15: Gabe reviewed, current certification statement in UST submittal is adequate. Committee agreed a model form would be helpful.</p> <p>06/25/2015: Workshop - Need to provide a link in CERS to link to the PDF Template. SWRCB has already created the template. Need to obtain template and create the link. Supported.</p>	

Customer Id:	UST38
Title:	Hide Document Upload Option for: UST Letter from Chief Financial Officer
Enhancement Id:	
Workgroup Supported:	Yes
Description:	
Hide or Delete the document upload option for the UST letter from Chief Financial Officer.	
Per SWRCB, the Letter from Chief Financial Officer is not required to be submitted.	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As is. Supported.	

Customer Id:	UST39
Title:	Delete fields: 424-427, 470-472, 490-76, 490-77, 490-78, 490-79. Names and Title of Preparer and Signature Dates
Enhancement Id:	
Workgroup Supported:	Yes CERS 3
Description:	
Remove or hide these fields on the UST Facility Operating Permit Application and the UST Tank Information/Monitoring Plan screens as the 'submit' process in CERS clearly identifies the business user responsible for the data submitted and captures the dates of submittal. If needed revise Certification statement on the submit screen to consolidate responsibility to the business user that submits.	
Priority:	High
Comments:	
06/25/2015: Workshop- As is. Supported . SWRCB already ran by legal for approval. Ok to delete. Doesn't have to affect local portal or EDT, the info just won't go to CERS.	

Customer Id:	UST40
Title:	Make "Petroleum Financial Responsibility Code" (Field 422) a Minimally Required Field.
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
To ensure that all UST businesses report at least one financial responsibility option.	
Priority:	High
Comments:	
06/25/2015: Workshop- As is. Supported.	

Customer Id:	UST42
Title:	Multiple Facility Bulk Upload UST Documentation &Data
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Provide ability to bulk upload UST documents and submittal data for multiple facilities similar to the upload feature for facility data and HMIS within a business organization.</p> <p>Does not include proposed 3rd Party Document Upload submittal element.</p>	
Priority:	High
Comments:	
06/25/2015: Workshop- As is. Supported. Upload is ready to submit.	

Customer Id:	UST48
Title:	Make Field 435 (Date UST Installed) a Minimally Required Field.
Enhancement Id:	
Workgroup Supported:	Yes. CERS 3
Description:	
<p>Make field 435 (date UST installed) a minimally required field if field 400 (type of action) is set to =1 (new tank).</p> <p>CalEPA/SWRCB to propose an approved entry date for reporting when date is not known.</p> <p>Need to add a pop up window to explain.</p>	
Priority:	High
Comments:	
<p>Required to make UST Facility/Tank Data download report complete. Currently the report will ignore entries with no date unless the date filter in the report is left blank.</p> <p>06/25/2015: Workshop - As Is. Supported. Need pop up window to instruct user to go to SWRCB or local regulator for a date.</p>	

Customer Id:	UST50
Title:	Multiple Facility UST Submittals
Enhancement Id:	
Workgroup Supported:	Yes
Description:	
<p>Allow businesses to submit first and/or second submittal elements (UST Facility/Tank Information Submittal Element and UST Business Document Upload Submittal Element) for multiple facilities at one time. Related to UST 27</p> <p>Would benefit businesses with multiple UST facilities.</p>	
Priority:	High
Comments:	
<p>06/25/2015: Workshop- As Is. Supported. Allow for submitting bulk upload- Similar to how HMBP process works (mirror HMBP process)</p>	

Customer Id:	UST51
Title:	Create DRAFT UST facility and tank data by copying another tank facility dataset
Enhancement Id:	
Workgroup Supported:	Yes
Description:	
<p>Copy or Draft UST facility, tank information and Monitoring Plan information from an existing dataset created by the business, or from another facility for that business organization.</p> <p>This would be helpful to businesses with more than one UST facility.</p> <p><i>Is this in regards to submittals only??</i></p>	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As Is. Supported	

Customer Id:	UST52
Title:	Combine Misc. UST PDF forms
Enhancement Id:	
Workgroup Supported:	Yes
Description:	
<p>Combine Misc. UST PDF Forms for proposed submittal element for "3rd Party" Proposed List:</p> <ul style="list-style-type: none"> • Annual Monitoring Certification & Spill Bucket Test Report • Annual Secondary Containment Test Report • Tank and Line Integrity Test Report • Enhanced Leak Detection Test Report • Tank Lining and/or Bladder Test Report • Statistical Inventory Reconciliation Report • Temporary Closure Liquid Sampling Report <p>Related to UST 27 & UST 28</p>	
Priority:	High
Comments:	
<p>06/25/2015: Workshop- In CERS, create links for uploading documents above. Supported. NOTES: <i>Create specific ability to upload each of 8 documents. 8 documents now represent 17 forms that were listed out in the released FAQ. In CERS, we need to rename the documents for upload. Need to be able to upload "site plan" pdf in the UST submittal element. Create specific documents to be uploaded per submittal element. Incorporate into UST27.</i></p>	

Customer Id:	UST54
Title:	UST Element View and Organization
Enhancement Id:	
Workgroup Supported:	Yes, CERS 2
Description:	
<p>List the Monitoring Plan as a separate item on the "Submittal Overview" and "Prepare Submittal" pages for independent editing. On the "Prepare Submittal" page, the Edit & Discard buttons on the right side of the page must be included. Provide same for viewing for Regulators.</p> <p>BENEFIT: Remove the additional step to go through the Tank Info page to view or edit.</p>	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As Is. Supported.	

Customer Id:	UST55
Title:	Revise Tank Information screens so the tank ID number(s) are always visible.
Enhancement Id:	
Workgroup Supported:	
Description:	
Revise Tank Information screens so the tank ID number(s) are always visible. This will help the viewer know what they are viewing.	
Priority:	High
Comments:	
06/25/2015: Workshop- As is. Supported.	

Customer Id:	UST56
Title:	Change "owner" to "owner or operator" in Titles 23 and 27
Enhancement Id:	
Workgroup Supported:	
Description:	
Request that SWRCB change reference to "owner" in 23 CCR §2715(a) to "owner or operator."	
The definition/reference of the data field in Title 27 will have to be changed if the reference is changed in Title 23.	
Priority:	
Comments:	
6/25/15- Workshop- Supported.	

Customer Id:	UST57
Title:	Arrangement of Print Submittal results and tank information on the Monitoring Plan
Enhancement Id:	222
Workgroup Supported:	
Description:	
<p>When printing a submittal using the "Print Submittal" button, the monitoring information for each tank should come directly after the appropriate tank.</p> <p>Also, the tank number and brief description (name, contents, material, construction, enstallation date, etc) should appear at the top of each monitoring page.</p> <p>Currently only the tank number appears in the upper right hand corner.</p>	
Priority:	Medium
Comments:	
06/25/2015: Workshop- As is. Supported.	