



Gavin Newsom  
Governor

Jared Blumenfeld  
Secretary for Environmental Protection

Certified Mail: 7015 1660 0000 1619 0324

December 10, 2019

Mr. Jerry Sipe, Director  
Plumas County Environmental Health  
270 County Hospital Road, Suite 127  
Quincy, California 95971-9871

Dear Mr. Sipe:

During April through June, 2019, CalEPA and the state program agencies conducted a performance evaluation of the Plumas County Environmental Health Certified Unified Program Agency (CUPA). The CUPA evaluation included a remote assessment of administrative documentation, review of regulated facility file documentation, California Environmental Reporting System data, and oversight inspections.

Upon completion of the evaluation, a preliminary report was developed to identify various findings: program deficiencies and associated corrective actions with timeframes for correction, program observations, recommendations and examples of outstanding implementation are also noted. Enclosed, please find the final report.

Based upon review and completion of the evaluation, CalEPA has rated the CUPA's overall implementation and performance of the Unified Program as Satisfactory with Improvements Needed.

To demonstrate progress towards the correction of any program deficiencies identified in the final report, the CUPA must submit a corrective action progress report. The first progress report is due within 60 days from the date of this letter or February 17, 2020, and every 90 days thereafter. Progress reports are required until all corrective actions are accepted by CalEPA. Each progress report should be emailed as a Microsoft Word document file to the CalEPA supervisor, Melinda Blum, at [Melinda.Blum@calepa.ca.gov](mailto:Melinda.Blum@calepa.ca.gov).

Thank you for your continued commitment to the protection of public health and the environment through the implementation of the Unified Program.

Mr. Jerry Sipe  
Page 2

If you have any questions or need further assistance, please contact Melinda Blum at (916) 327-9560 or John Paine, Unified Program Manager, at (916) 327-5092.

Sincerely,

Original signed by Jason Boetzer

Jason Boetzer  
Acting Assistant Secretary  
Local Program Coordination and Emergency Response

Enclosure

cc sent via email:

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State Water Resources Control Board  
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Mr. Jerry Sipe  
Page 3

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Mr. John Paine  
Unified Program Manager  
California Environmental Protection Agency

Ms. Melinda Blum  
Senior Environmental Scientist, Supervisor  
California Environmental Protection Agency

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**CUPA:** Plumas County Environmental Health

**Evaluation Period:** April – June 2019

**Evaluation Team Members:**

<b>CalEPA Team Lead</b>	<b>DTSC</b>	<b>Cal OES</b>	<b>State Water Board</b>	<b>CAL FIRE - OSFM</b>
Marc Lorentzen	Matt McCarron	Denise Gibson	Lisa Jensen	Glenn Warner

This Final Summary of Findings includes:

- Deficiencies requiring correction
- Incidental findings requiring resolution
- Observations and recommendations
- Examples of outstanding program implementation

The findings contained within this evaluation report are considered final.

Based upon review and completion of the evaluation, the CUPA's Unified Program implementation and performance are considered to be: satisfactory with improvements needed.

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

The CUPA is required to submit a Deficiency Progress Report 60 days from the receipt of the Final Report, and every 90 days thereafter, until all deficiencies and incidental findings have been acknowledged as corrected or resolved.

Each Deficiency Progress Report must include a narrative stating the status of all deficiencies and incidental findings identified in the Final Summary of Findings Report.

Deficiency Progress Report submittal dates for the first year following the evaluation are as follows:

- Update 1: February 17, 2020
- Update 2: May 18, 2020
- Update 3: August 18, 2020
- Update 4: November 23, 2020

Each Deficiency Progress Report must be submitted to the CalEPA Team Lead.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**DEFICIENCIES REQUIRING CORRECTION**

Program deficiencies identify specific aspects regarding inadequate implementation of the Unified Program. The CUPA must complete the corrective action(s) indicated to demonstrate sufficient implementation of the Unified Program as required by regulation or statute.

**1. DEFICIENCY:**

The CUPA is not consistently ensuring that APSA tank facilities comply with the tank facility statement reporting requirements.

The majority of APSA tank facilities submit a Hazardous Materials Business Plan (HMBP) in lieu of the tank facility statement to the California Environmental Reporting System (CERS). The CUPA is not consistently ensuring that HMBP submittals include site maps that contain all applicable required elements.

Review of CERS identified the following five (5) of 10 APSA tank facilities missing various required elements in recently accepted HMBP site map submittals:

- CERS IDs 10172669 and 10172783: missing the locations of emergency shutoffs, evacuation staging areas and emergency response equipment.
- CERS ID 10207066: missing the locations of emergency shutoffs, evacuation staging areas, emergency response equipment, and hazardous materials handling and storage areas.
- CERS IDs 10176099 and 10170141: missing the locations of evacuation staging areas and emergency response equipment.

Note: This deficiency was identified in the 2016 CUPA performance evaluation.

**CITATION:**

California Health and Safety Code (HSC), Chapter 6.67, Section 25270.6 (a)(1) and (a)(2)  
2016 California Fire Code (CFC), Chapter 50, Sections 5001.5.1, 5001.5.2, and Appendix H  
HSC, Division 12, Part 2, Chapter 1, Section 13143.9  
[OSFM]

**CORRECTIVE ACTION:**

By Update 1, the CUPA will develop, implement, and provide CalEPA with an action plan to ensure that future HMBP submittals are thoroughly reviewed to ensure site maps contain all required elements. The action plan will include steps to follow-up with rejected or incomplete site map submittals.

By Update 2, the CUPA will thoroughly review new hazardous materials business plan submittals to ensure site maps contain all required elements, and take appropriate action related to rejected (not-accepted) or incomplete site map submittals.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**DEFICIENCIES REQUIRING CORRECTION**

**2. DEFICIENCY:**

The CUPA is not inspecting all UST facilities annually.

Review of the Significant Operational Compliance Report (Report 6) finds:

- In fiscal year (FY) 2016/2017
  - 11 of 19 UST facilities were inspected (58%)
- In FY 2015/2016
  - 14 of 19 UST facilities were inspected (74%)

**CITATION:**

HSC, Chapter 6.7, Section 25288(a)

California Code of Regulations (CCR), Title 23, Section 2712(e)

[State Water Board]

**CORRECTIVE ACTION:**

By Update 1 the CUPA will develop and provide CalEPA with an action plan that shall include but not be limited to:

- A list of UST facilities that have not been inspected within the last 12 months. Identification of UST facilities shall include, but not be limited to, CERS ID, facility name, and last inspection date;
- A schedule to inspect those facilities, prioritizing the most delinquent inspections to be completed prior to any other annual UST compliance inspection; and
- Steps to ensure that all UST facilities will be inspected annually.

By Update 2, and with each subsequent Deficiency Progress Report until considered corrected, the CUPA will provide an updated list of the UST facilities that have not been inspected within the last 12 months.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**INCIDENTAL FINDINGS REQUIRING RESOLUTION**

Incidental findings identify specific incidents or activities regarding implementation of the Unified Program. Though incidental findings do not rise to the level of program deficiencies or inadequate implementation of the Unified Program, the CUPA must complete the resolution(s) indicated as required by regulation or statute.

**1. INCIDENTAL FINDING:**

The CUPA is not consistently ensuring UST facility documentation required in CERS is accurate and complete.

Review of UST facility submittals in CERS finds the CUPA is accepting inaccurate or incomplete UST facility documentation as follows:

- CERS ID: 10158031, submittal accepted March 21, 2019
  - Monitoring Site Plan does not include all required components
  - Financial Responsibility is identified only as State Fund, while the selected financial responsibility is identified as State Fund and Chief Financial Officer Letter.
- CERS ID: 10159563, no submittal
  - Monitoring Site Plan is missing, a Monitoring Plan is provided
- CERS ID: 10190359, submittal accepted January 13, 2019
  - Monitoring Site Plan does not include all required components
- CERS ID: 10339573, submittal accepted March 21, 2019
  - Monitoring Site Plan does not include all required components

Note: The examples provided above may not represent all instances of this deficiency.

Note: Please reference the following CERS FAQs: “General Reporting Requirements for USTs”; “When to Issue a UST Operating Permit”; “Common CERS Reporting Errors”; “Setting Accepted Submittal Status”; and “Which Forms Require Uploading to CERS.” Please reference State Water Board correspondence dated November 29, 2016, “When to Review Underground Storage Tank Records.”

**CITATION:**

HSC, Chapter 6.7, Section 25286  
[State Water Board]

**RESOLUTION:**

By Update 2, the CUPA will consistently implement procedures for accepting or not accepting CERS UST submittals. State Water Board will review five (5) submittals accepted in CERS after Progress Update 1 to verify resolution.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**INCIDENTAL FINDINGS REQUIRING RESOLUTION**

**2. INCIDENTAL FINDING:**

The CUPA's Inspection and Enforcement (I&E) Plan is missing the following required components:

- Provisions for administering all program elements which includes inspection procedures that delineate specific actions taken prior to, during, and after an inspection.
- An inspection frequency for PBR, CA, and CE facilities that indicates the initial inspection will occur within two (2) years of notification and every three (3) years thereafter.
- Procedures for addressing complaints, including but not limited to the receipt, investigation, enforcement, and closure of a complaint.
- Provisions for ensuring the CUPA has sampling capability and ensuring the analysis of any material shall be performed by a state certified laboratory pursuant to HSC, chapter 6.5, section 25198.

**CITATION:**

CCR, Title 27, Section 15200(a), (a)(13), and (14)  
[CalEPA, DTSC]

**RESOLUTION:**

By Update 1, the CUPA shall update the I&E Plan to include the required elements and train staff on the procedures resulting from the updated information. The CUPA will provide CalEPA with a copy of the updated I&E Plan and training documentation such as: an outline of the training conducted and a list of CUPA personnel in attendance.

**3. INCIDENTAL FINDING:**

The CUPA is not consistently requiring UST facilities to submit UST testing and leak detection documents.

Review of CERS submittals and facility files identified the following example where UST testing and leak detection documents were not found:

- CERS ID: 10190459 is missing the following:
  - 2016 Annual Monitoring Certification test results
  - 2018 Secondary Containment test results
  - 2018 Overfill Prevention Inspection results

Note: The examples provided above may not represent all instances of this deficiency.

**CITATION:**

HSC, Chapter 6.7, Section 25288(b)  
CCR, Title 23, Sections 2637(e), 2638(d), 2643(g), and 2644.1(a)(5)

[State Water Board]



**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**INCIDENTAL FINDINGS REQUIRING RESOLUTION**

**RESOLUTION:**

By Update 1, the CUPA will train personnel on the I&E Plan or procedure and provide training documentation to CalEPA. Training documentation will include, but not be limited to an outline of the training conducted and a list of CUPA personnel attending the training.

By Update 2, and with each subsequent Deficiency Progress Report until considered corrected, the State Water Board will select and review records for five (5) facilities. If not available in CERS, the CUPA will provide the facility records to CalEPA. The selected records reviewed for each facility will include, but not be limited to, monitoring certifications results, secondary containment test results, spill bucket test results, and any other testing or leak detection documents showing the date the testing and leak detection documents were received by the CUPA.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**OBSERVATIONS AND RECOMMENDATIONS**

Observations and recommendations identify areas of Unified Program implementation that could be improved and provide suggestions for improvement. Though not required by regulation or statute, the CUPA would benefit in applying the recommendations provided, to improve the overall implementation of the Unified Program.

**1. OBSERVATION:**

The CUPA uses four (4) types of APSA inspection checklists, depending on facility type (Tier I qualified facility, Tier II qualified facility, full SPCC Plan facility or Conditionally Exempt facility), which may be outdated relative to recent CERS violation library updates. The CERS APSA violation library currently contains approximately 99 APSA violations. Significant APSA revisions from the 2017 and 2018 updates include the addition of at least seven (7) new violations (2017 - 4010054, 4010055, 4010056, 4010057, 4030041 and 4030042; 2018 – 4030043) and the deletion of five (5) violations (2017 – 4010046, 4010049, 4010053, 4030004 and 4030024). In addition, many existing violations were modified in the name and description fields. The CUPA has been provided the 2017 APSA Technical Advisory Group (TAG) inspection checklists, for use at each of the four (4) types of facilities (Tier I qualified, Tier II qualified, full SPCC Plan, and Conditionally Exempt).

**RECOMMENDATION:**

OSFM recommends that the CUPA utilize comprehensive APSA inspection checklists and ensure that the checklist used is applicable to the type of facility being inspected.

**2. OBSERVATION:**

The CUPA regulates some farms. Effective January 1, 2016, Senate Bill (SB) 612 aligned the applicability threshold for farms with that of the Federal SPCC rule, which has increased to 2,500 gallons of oil or 6,000 gallons of oil (with no reportable discharge history) , per the Federal Water Resources Reform and Development Act (WRRDA) of 2014.

**RECOMMENDATION:**

OSFM encourages the CUPA to review its list of conditionally exempt tank facilities at farms, verify if the total oil storage capacity at each farm meets the WRRDA thresholds, and determine if each farm is still regulated as a conditionally exempt tank facility under APSA.

Farms that are no longer regulated under APSA due to SB 612 oil applicability thresholds should be identified in CERS as “APSA Not Applicable.” The CUPA is encouraged to change the CERS APSA facility reporting requirement from “Applicable” to “Not Applicable” for such farms.

UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT

**OBSERVATIONS AND RECOMMENDATIONS**

**3. OBSERVATION:**

The CUPA's Aboveground Storage Tank (AST) webpage (<http://ca-plumascounty.civicplus.com/index.aspx?NID=2407>) contains various resources and information for the regulated community and public, though the following information is outdated:

- The statement, "If your facility has a cumulative aboveground storage capacity of petroleum products that reach or exceed 1,320 gallons then the facility is regulated by the Aboveground Petroleum Storage Act (APSA)," does not reflect the current storage capacities for the APSA program. Additionally, tank facilities with a tank in an underground area (TIUGA) are regulated under APSA if the tank is stationary, contains petroleum, and has a minimum shell capacity of 55 gallons, regardless of the facility's total petroleum storage capacity.
- The TIUGA fact sheet is outdated. It was last revised December 2018.
- The definitions related to Tier I and Tier II qualified facilities incorrectly reference petroleum storage volumes. These definitions are derived from the SPCC rule, which references total oil storage volumes.
- The OSFM APSA link is no longer valid due to reconfiguration of all OSFM websites for state accessibility requirements per Assembly Bill 434.

**RECOMMENDATION:**

The CUPA should update its APSA link to the OSFM website, and provide a link to the U.S. Environmental Protection Agency website to provide more information on SPCC requirements.

OSFM recommends the CUPA also include information related to tank facilities with TIUGAs that are now regulated under APSA, and update the Tier I and Tier II qualified facility descriptions to identify total oil storage volumes.

**4. OBSERVATION:**

Review of the "Number of Businesses and Frequency of Inspections" (Table 1) in the I&E Plan indicates that if the CUPA implements an alternative to the triennial statutory inspection frequency for APSA facilities storing 10,000 gallons or more of petroleum, as per HSC 25270.5(a), it is appropriate to also reference HSC 25270.5(b). An example alternative would be inspecting all APSA facilities including those storing less than 10,000 gallons of petroleum triennially.

**RECOMMENDATION:**

OSFM recommends that the CUPA update the APSA program information in the CUPA's I&E Plan.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**OBSERVATIONS AND RECOMMENDATIONS**

**5. OBSERVATION:**

Review of facility files for CERS ID: 10170069 finds the annual monitoring certification test results report for 2016 – 2018 has a different name and a different address than the annual compliance inspection report for 2016-2018 for this facility. Additionally, CERS has a different address than either report for this facility.

- Annual monitoring certification test results for 2016 – 2018 have an address of 696 Main Street
- Annual compliance inspection report for 2016 – 2018 have an address of 690 HWY 36
- CERS shows this facility is at 690 HWY 36

**RECOMMENDATION:**

State Water Board recommends the CUPA ensure official documentation for testing and inspections reflects the same name and address as used in CERS for the applicable facility,

**6. OBSERVATION:**

Review of CERS finds that there are one (1), or more, UST systems in the CUPA's jurisdiction which may need to be permanently closed by December 31, 2025 in accordance with HSC, Chapter 6.7, Section 25292.05.

The following are examples of facilities that may be subject to the 2025 Single Walled requirements for permanent closure:

- CERS ID: 10190459
  - CERS Tank IDs: 10190459-001, 10190459-002, 10190459-003, and 10190459-004
- CERS ID: 10397443
  - CERS Tank IDs: 10397443-001 and 10397443-002)
- CERS ID: 10397755
  - CERS Tank IDs: 10397755-001, 10397755-002, 10397755-003, 10397755-004, and 10397755-005

Note: The examples were identified during the CUPA evaluation and may not represent all UST systems which may need to be permanently closed by December 31, 2025 in accordance with HSC, chapter 6.7, section 25292.05. The United States Environmental Protection Agency (U.S. EPA) and the State Water Board now fund two (2) full-time contractors to specifically assist single-walled tank owner/operators. By encouraging UST owners to remove and replace single-walled tanks and piping well in advance of California's December 2025 deadline, we all hope to prevent contractor shortages, unmanageable permitting workloads and UST abandonment.

**RECOMMENDATION:**

The State Water Board recommends the CUPA continue to provide verbal reminders to UST facility owners/operators and consider providing written notification of the December 31, 2025 requirements for permanent closure of single-walled USTs. The written notification should inform the facility owners/operators that, to stay in compliance with the law and avoid fines, owners/operators must replace or remove their single-walled USTs by December 31, 2025. Additional information about the single-walled UST closure requirements may be found at:

[http://waterboards.ca.gov/water\\_issues/programs/ust/single\\_walled/](http://waterboards.ca.gov/water_issues/programs/ust/single_walled/)

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**OBSERVATIONS AND RECOMMENDATIONS**

**7. OBSERVATION:**

Review of CERS UST facility information finds facilities are improperly located in CERS Location Map.. The following are examples where no latitude or longitude coordinates are provided, or the coordinates are 0, 0 placing the facility in South Atlantic Ocean off the coast of the African continent:

- CERS ID 10170069,
- CERS ID 10190459, and
- CERS ID 10195705.

Note: The examples provided above may not represent all instances of this observation.

Note: U.S. EPA expects the CERS Location Map data for each facility to accurately reflect the geographic location of the facility. The reference point for each facility should be located in the center of the parcel map and is not required to be directly on top of the UST system.

**RECOMMENDATION:**

State Water Board recommends the CUPA ensure geolocation of facilities is correctly reflected in CERS. The CUPA or the facility owner/operator may do this by relocating the location drop pin in Location Map in CERS.

**8. OBSERVATION:**

DTSC conducted oversight inspections at two (2) facilities on April 23, 2019.

The first inspection was at CERS ID 10001572. This facility maintains vehicles and equipment for highway maintenance and is a small quantity generator. The inspector was well prepared, asked for consent to inspect and built a rapport with the facility staff. The inspector identified all existing violations and properly classified them. The inspector also provided assistance and followed up on some outstanding issues of concern.

The second inspection was conducted at CERS ID 10401214. This facility is a lumber mill with a vehicle and equipment maintenance shop, operational machinery and a power production plant. This facility is a large quantity generator. The inspector was well prepared, asked for consent to inspect and built a rapport with the facility staff. The inspector identified all existing violations and properly classified them. There were two (2) locations and possibly a third that had active releases, the inspector noted the violations and required corrective action to be taken, but did not take samples.

**RECOMMENDATION:**

DTSC recommends that the CUPA staff continue to conduct thorough inspections. DTSC recommends that the CUPA staff be prepared to take samples of releases in order to substantiate a release of a hazardous waste so that the CUPA will be able to provide evidence in a formal enforcement action if necessary.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT**

**OBSERVATIONS AND RECOMMENDATIONS**

**9. OBSERVATION:**

The CUPA's I&E Plan does not reflect the new statutory increase in hazardous waste penalty amounts. In January 2018, HSC section 25189.2 was updated and raised the maximum penalty amount to \$70,000 per day per violation. 22 CCR section 66272.60-69 was also updated as of July 5, 2018, updating the administrative penalty regulations and matrices to determine penalty amounts.

**RECOMMENDATION:**

DTSC recommends the CUPA incorporate the new penalty information into the I&E Plan.

## CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

### UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

#### EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

Examples of outstanding program implementation highlight efforts and activities of the CUPA that are considered above and beyond the standard expectations for implementation of the Unified Program.

- 1. CERS REVIEW PROCESS:** The CUPA recently implemented a March 1 deadline for the regulated business community to make annual CERS HMBP submittals, and took proactive steps to support the regulated business community in maintaining compliance. Prior to March 1, 2019 CUPA staff sent a letter informing each regulated business of the new March 1 HMBP submittal deadline, then CUPA staff followed up with an additional notification email to each business. CUPA staff then monitored facility compliance, and provided courtesy reminders by phone and/or email to the contact person at non-compliant facilities.
- 2. CERS TRAINING:** The CUPA provides annual CERS training to local emergency responders through the Plumas County Fire Chief's Association. This training helps ensure local responders are able to access and navigate CERS in case of a hazardous materials incident at regulated facilities. The last training was held on March 23, 2019. This annual activity shows the CUPA's close interaction with emergency responders which leads to improved communication and response time.
- 3. TRAINING GRANT:** Plumas County CUPA received a rural CUPA training grant from the CUPA Forum Board to improve implementation of the CalARP program. The CUPA utilized the grant to provide classroom and field inspection training for the CalARP Program on December 3 and 4, 2018. Training was provided by Dennis Karidis of Sacramento County CUPA. He is an experienced CalARP Program lead. The application for the grant and the arranged CalARP Program training demonstrates that the CUPA is willing to put forth effort into ensuring staff are well equipped and educated for implementation of the complex CalARP Program.