

2021

Environmental Compliance & Enforcement Report





Office of the Secretary
California Air Resources Board
State Water Resources Control Board
Department of Toxic Substances Control
Department of Pesticide Regulation
Department of Resources Recycling and Recovery
Office of Environmental Health Hazard Assessment

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Governor

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Secretary for Environmental Protection



The mission of the California Environmental Protection Agency is to restore, protect, and enhance the environment to ensure public health, environmental quality, and economic vitality.

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This report provides summary information on the California Environmental Protection Agency’s enforcement and compliance initiatives for 2021. It highlights major program priorities and summarizes cross-media enforcement and training efforts.

Equity-Centered Enforcement Coordination

The California Environmental Protection Agency (CalEPA) seeks to restore, protect, and enhance the environment and to ensure public health, environmental quality, and economic vitality in the state of California. Central to that mission is an equitable and forward leaning enforcement and compliance program. California enjoys some of the most robust environmental protection laws in the country. But without effective and equitable enforcement, these laws risk losing meaning. This 2021 Environmental Compliance and Enforcement Report provides an overview of CalEPA’s enforcement activities, with a focus on the Office of the Secretary’s actions to coordinate enforcement across CalEPA’s boards, departments, and offices (BDOs) and to advance environmental justice.



CalEPA and the Boards, Departments, and Offices

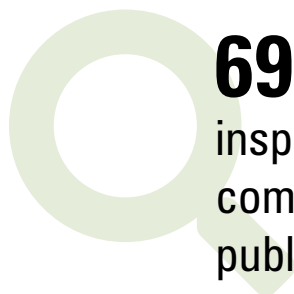
Five BDOs within CalEPA have inspection and enforcement authority: the California Air Resources Board (CARB), the Department of Pesticide Regulation (DPR), the Department of Resources Recycling and Recovery (CalRecycle), the Department of Toxic Substances Control (DTSC), and the State Water Resources Control Board (SWRCB), along with its Regional Water Quality Control Boards (RWQCB) (together Water Boards). Collectively, these boards and departments enforce environmental laws that regulate air pollution; water quality and drinking water; hazardous waste and other toxic substances; the registration, sale, and use of pesticides; and solid waste recycling and source reduction.

As the parent agency to these BDOs, CalEPA is charged with ensuring consistent, effective, and coordinated compliance and enforcement actions to protect public health and the environment. A key aspect of CalEPA's role is enforcement coordination. Complex pollution problems often impact multiple environmental media and require enforcement responses from several BDOs. For example, a release from a facility that impacts the air, water, and soil might require a response from CARB, Water Boards, and DTSC. Federal partners and local regulatory entities such as air districts, county agricultural commissioners, and Certified Unified Program Agencies often play a key role in enforcement responses as well. CalEPA helps to coordinate multi-media enforcement responses across its BDOs and with local and federal partners to ensure environmental problems are timely and effectively addressed.

In addition to its important coordination role, CalEPA spearheads a multi-agency Environmental Justice Task Force to ensure equity is central to the enforcement work occurring at CalEPA and its BDOs. The Agency also manages a training program that includes cross-training of inspection and enforcement personnel and operates an integrated complaint system that helps to ensure environmental concerns are addressed quickly and effectively. Additionally, it administers the Unified Program, facilitates funding for projects with tangible public health and environmental benefits through the Supplemental Environmental Projects program, and administers a grant program to support environmental enforcement and training.

Below are some highlights from CalEPA's 2021 enforcement efforts.

Enforcement Snapshot



69,000

inspections to ensure compliance with laws that protect public health and the environment.



\$31,000,000

in penalties for environmental violations.



\$8,500,000

dedicated to supplemental environmental projects that benefit impacted communities.

In 2021, CalEPA's BDOs conducted more than 69,000 inspections to ensure compliance with laws that protect public health and the environment. The BDOs held polluters accountable, with enforcement actions that resulted in assessment of more than \$31,000,000 in penalties for environmental violations. More than \$8,500,000 derived from settlement of environmental violations was dedicated to supplemental environmental projects that benefit impacted communities.

CalEPA's Environmental Justice Task Force

CalEPA spearheads the Environmental Justice Task Force (EJ Task Force). Formed in 2013, the EJ Task Force is made up of representatives from regulatory agencies at all levels of government that implement and enforce environmental laws in California. The EJ Task Force identifies vulnerable communities that suffer multiple pollution burdens and focuses enforcement and compliance efforts in those communities. The EJ Task Force has three primary goals:

- to create opportunities for residents in disadvantaged communities to provide input regarding local environmental problems;
- to integrate input from community residents into environmental inspections and enforcement work; and
- to promote interagency coordination to ensure that pollution burdens in disadvantaged communities from multiple sources are effectively addressed.

In 2021, the EJ Task Force continued to focus its efforts on four sectors that raise environmental justice concerns across the state: compost, agricultural worker protection standards, oil and gas, and metal shredders. For each sector, a workplan was established to identify potential environmental and public health issues associated with noncompliance in the sector, interagency enforcement coordination efforts, and community partner involvement.

Compost Initiative



Organic materials management: compost and mulch

The EJ Task Force’s compost initiative focused on understanding existing compliance and assessing best management practices at composting facilities to help ensure that expansion of California’s composting infrastructure does not negatively impact already environmentally burdened communities.

Methane is a potent greenhouse gas and landfills are the third largest source of methane in California. To reduce methane emissions from landfills, SB 1383 (2016) requires a 75 percent statewide reduction in the disposal of organic waste by 2025. The implementation of this important target will require the expansion of composting and anaerobic digestion infrastructure throughout the state to handle the increased diversion of compostable and digestible materials from disposal.

While compost facilities serve a critical purpose, they can have environmental and health impacts on surrounding neighborhoods if not managed well. Organics recycling facilities can cause odors, dust, emissions from engines, traffic, surface and ground water contamination, and issues associated with rodents and birds. Problematic land use decisions have historically led to the siting of compost and similar facilities in disadvantaged communities.

Although compost facilities are inspected regularly by CalRecycle and the local enforcement agencies (LEAs), baseline compliance data and best management practices were needed to evaluate changes in compliance and to assist facilities in maintaining compliance as the infrastructure expands. In addition, sustainable

expansion is critical to ensuring that these facilities are “good neighbors” within their communities.

Prior to the start of the initiative, a pilot including multi-agency inspections was conducted in Monterey County. Through the pilot, issues with odors in the Marina area were noted and actions were taken by the City of Marina. In 2021, the initiative focused in two counties—Kern County and Santa Clara County.

Kern County is home to nine composting facilities, seven of which are in areas that CalEnviroScreen identifies as being among the 25% most environmentally vulnerable and burdened communities in California. CalEnviroScreen is a tool that compiles information on environmental burdens and vulnerabilities and helps to identify communities that are disproportionately impacted by pollution. Representatives from CalRecycle, the Kern County Environmental Health Division, CARB, and the Water Boards compiled and reviewed compliance and inspection history related to solid waste, air, and water quality for all nine facilities. Based on this information and community feedback, six composting facilities were selected for joint inspections by CalRecycle and the Kern County Environmental Health Division. During the inspections, staff observed and noted numerous helpful best management practices utilized by these operations, including using parasitic wasps as vector control, limiting the amount of water added for moisture control to minimize the generation of leachate, and utilizing technology for constant temperature monitoring.

In addition, CARB staff conducted more than 50 on-road and off-road heavy-duty diesel vehicle inspections at four of the facilities to ensure diesel trucks and construction equipment operating in and out of the composting facilities complied with CARB’s diesel regulations. No emissions violations were observed, but labeling issues were noted and corrected by all operators.

In Santa Clara County, task force participants conducted nine multi-agency inspections to ensure compliance and observe facility best management practices. Participating agencies included CalRecycle, Santa Clara County LEA, City of San Jose LEA, CARB, Bay Area Air Quality Management District, and the Water Boards. Staff once again observed and noted numerous best management practices utilized by these operations that could be helpful as facilities expand across the state. These included the use of mulch to absorb ponded water to minimize odors and vectors along sides of windrows, organizing piles and windows with different markers so it is easy for staff and

inspectors to know what phase they're in, utilizing a mobile vacuum cleaner for film plastics in windrows, and the use of an undercarriage truck wash to reduce tracking soil/compost out during wet weather.

The initiative's efforts resulted in a suite of recommended best management practices that CalRecycle is integrating into its ongoing work to implement SB 1383.

Worker Protection Standards Initiative



An agricultural worker wearing personal protective equipment.

The EJ Task Force's worker protection standards initiative focused on implementation of regulations intended to reduce pesticide poisonings and injuries among agricultural workers and pesticide handlers.

Farmworkers are essential workers. They are central to safe, bountiful, and nourishing food supply, yet economic disadvantage, immigration status, linguistic isolation, and racism make farmworkers some of the most vulnerable workers in the United States. For this reason, coupled with the health risk posed by pesticide exposures, effective enforcement and strict compliance with laws intended to protect workers are critically important.

In 2017, DPR updated its regulations to be consistent with new federal worker protection standards. Additionally, in March of 2018, pesticide safety training topics for fieldworkers and pesticide handlers were expanded and employer responsibilities were clarified. The EJ Task Force's worker protection standards initiative has focused on assessing and ensuring compliance with these new requirements, as well as identifying fieldworker concerns and providing education and outreach to workers and farm labor contractors.

The initiative focused its efforts in Imperial County in 2021. Workers cross the border every day to work in the agricultural fields of Imperial County, with over 75% of the fieldworkers coming from Mexicali, Mexico. According to DPR data, total pesticide use in Imperial County was approximately 4,084,755 pounds in 2020. Annually, the Imperial County Agricultural Commissioner approves roughly 4,000 Notices of Intent to apply restricted use pesticides.

Several ongoing challenges affecting farmworkers in Imperial County were identified by community partners and shared with DPR. These challenges included (1) inadequate training on pesticide safety because workers are hired daily; (2) limited outreach from the Agriculture Commissioner to inform fieldworkers and residents about pesticide safety; (3) predictable questioning during inspections that allows farm labor contractors to coach workers on how to answer questions; and (4) workers seeking medical care in Mexicali because they are not aware of California laws requiring employers to provide medical care for work-related injuries.

To better understand community concerns and assess compliance with worker protection standard requirements, DPR conducted fieldworker interviews and oversight inspections in Imperial County. DPR also provided training and outreach material to farm labor contractors, fieldworkers, and promotores de salud, who are community-based health educators and advocates.

To evaluate fieldworker and pesticide handler knowledge on pesticide safety, workers' rights, and protections, DPR collaborated with local partners to conduct 106 fieldworker interviews (following COVID-19 safety protocols) at Calexico gas stations and grocery stores, the Calexico Mexican Consulate farmworker appreciation breakfast, and in the agricultural fields of Imperial County. According to participant responses to interview questions:

- 52 percent of the fieldworkers did not receive pesticide training as a part of their job in the last 12 months;
- 90 percent of the fieldworkers were not aware of the County Agricultural Commissioner; and
- 92 percent of the fieldworkers were not aware of the California's System for Pesticide Incident Reporting (CASPIR), DPR's mobile app that provides a quick and easy way to report pesticide incidents.

In addition to the surveys, DPR staff conducted ten unannounced oversight inspections with Imperial County Agricultural Commissioner staff between October 2021 and December 2021. During an oversight inspection, DPR assesses the County Agricultural Commissioner inspector to ensure they are properly assessing and documenting compliance with applicable regulations. The unannounced fieldworker inspections were conducted on farm labor contractors that employ fieldworkers to pick or pack crops, pull weeds, or fix irrigation canals in a field that could have been treated with pesticides within the last 30 days. During the oversight inspections, the agricultural commissioner's staff sought to determine if the fieldworkers had received proper training for the detection of pesticide symptoms and seeking of medical attention. The inspectors also sought to ensure that emergency medical care information was posted, and that decontamination facilities for fieldworkers included water, soap and single-use paper towels when workers are in a treated field. Four of the 10 oversight inspections resulted in the agricultural commissioner issuing a Notice of Violation to the farm labor contractor. Violations included failure to post required information, handlers not being adequately trained, and failure to register as a farm labor contractor in the County.

As a part of this initiative, multi-agency training and outreach for pesticide safety was also provided by DPR, the Imperial County Agricultural Commissioner, the California Division of Occupational Safety and Health, and the Department of Agriculture Labor Relations Boards to educate farm labor contractors and growers of their responsibilities to annually train employees working in treated fields. Regulatory agencies also shared pesticide safety information with farmworkers at both a Farmworker Health and Resource Fair and a Farmworker Appreciation Breakfast. During these events, workers were provided with face masks and outreach information related to the bilingual CASPIR app.

The initiative resulted in a suite of concrete recommendations for the Imperial County Agricultural Commissioner, including a recommendation that the Agricultural Commissioner obtain a list of all licensed/registered farm labor contractors in the county and send them outreach information and reminders about their responsibility to annually train their fieldworkers in the language they speak. The initiative also highlighted a disparity between information obtained through fieldworker surveys and information obtained through oversight inspections related to compliance with training requirements—the surveys suggested a significantly lower rate of compliance than was

found during the oversight inspections. Several approaches to addressing this disparity were discussed, including the possibility of modifying requirements so that growers and farm labor contractors keep training records on site rather than at their headquarters.

Oil and Gas Initiative

A multi-agency inspection at a regulated facility with a vapor recovery unit.



Activities related to oil and gas production impact communities that already suffer from extremely high pollution burdens. The EJ Task Force's oil and gas initiative sought to foster cross-agency collaboration to ensure compliance with a broad range of environmental laws at oil and gas operations.

The first phase of the initiative was focused in Kern County, one of the primary oil and gas production regions in California. Facilities were prioritized for multi-agency inspections based on numerous factors, including CalEnviroScreen scores, permitting and regulatory requirements, complaints, compliance history, aerial surveillance for methane leaks, and leak detection and repair surveys. Initiative participants also met with community leaders in Kern County to better understand local oil and gas challenges and community concerns. Residents expressed concerns about odors, health impacts from emissions, visible smoke at refineries, and visible oil spills.

The initiative brought together regulators from a broad range of federal, state, and local agencies, including US EPA, CARB, California Geologic Energy Management Division (CalGEM), Water Boards, DTSC, and San Joaquin Valley Air Pollution Control District (San Joaquin Valley APCD). Each of these agencies has a role in regulating the oil and gas industry and

cross-agency coordination is critical to ensuring compliance with environmental laws. In addition to ensuring compliance with laws related to water quality, air quality, and hazardous waste, the initiative was particularly focused on ensuring compliance with CARB's 2017 oil and gas methane regulations.

Through this initiative, participating agencies inspected 14 oil and gas extraction sites, one produced water pond, and four refineries. To survey oil and gas components for leaks, air inspectors from US EPA, CARB, and San Joaquin Valley APCD utilized state of the art portable emissions analyzers and specialized cameras. The initiative's inspections surveyed over 26,000 oil and gas components. Enforcement action was taken for all leaks found to exceed allowed limits. All leaks discovered during the joint facility inspections have been repaired and re-inspected for compliance with District, state, and federal requirements. The initiative's air-focused inspections strengthened relationships across levels of government and also highlighted the possible need for participating agencies to strengthen methane regulations to provide the agencies with enforcement authorities at currently exempt oil and gas facilities.

The initiative's efforts also touched on issues related to produced water ponds. During crude oil production, a liquid by-product called produced water is generated at high volumes. One method of disposal is to filter and transfer the water to unlined ponds that allow the water to evaporate. Produced water usually contains higher concentrations of total dissolved solids and volatile organic compounds than are acceptable for most beneficial uses. There are an estimated 933 of these ponds within the Central Valley, and if they are not managed properly, unlined ponds can pose a risk to groundwater and raise air quality concerns. To share information and better understand air quality issues associated with produced water ponds, US EPA, CARB and San Joaquin Valley APCD staff inspected a produced water pond in the midway-sunset oil field. An investigation regarding air emissions from produced water ponds remains ongoing. Independent of the initiative, the Central Valley Regional Water Quality Control Board is also in the process of evaluating produced water ponds for compliance with water quality requirements and enforcement efforts are underway to ensure the ponds either come into compliance or cease operations.

Finally, the initiative sought to ensure compliance with environmental laws at Kern County refineries. The Water Boards inspected four refineries as part of the initiative. They identified

several areas of concern at three refineries and continue to investigate and work with the refineries to correct deficiencies. The Water Boards also identified an unreported oil spill at one refinery and instructed the facility to report the incident to the California Governor’s Office of Emergency Services. In addition to correcting identified deficiencies, the Water Boards are assessing whether the facilities need to enroll under applicable stormwater permits. DTSC inspected three refineries to ensure compliance with hazardous waste generator requirements during the initiative. Violations were identified at two of the refineries and both returned to compliance.

Through joint inspections and enforcement coordination, the oil and gas initiative created an important forum for collaboration among agencies that regulate oil and gas facilities. After the initiative’s efforts in 2021, a growing awareness of methane leaks occurring near communities in Kern County emerged. Relationships and expertise developed through the initiative facilitated a fast and effective enforcement response. These collaborations between regulatory agencies will provide a solid foundation as California continues to prioritize addressing methane leaks, particularly near communities.

Metal Shredders Initiative

Scrap metal in process of being loaded into shredding equipment.

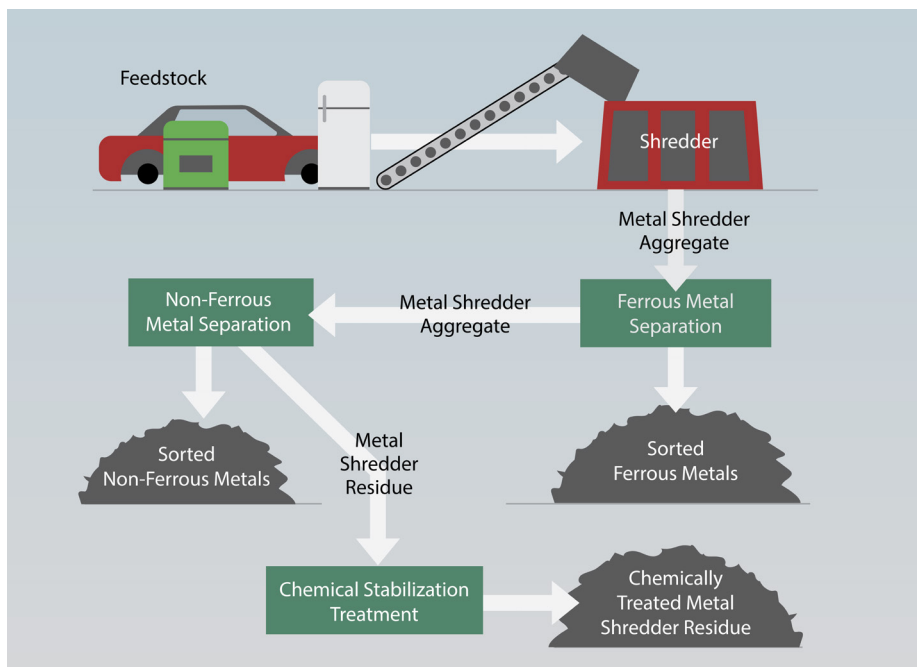


The EJ Task Force’s metal shredders initiative sought to focus multi-media enforcement resources on this important sector to reduce environmental burdens in communities surrounding metal shredders and also to assess and bridge regulatory gaps.

The initiative is part of a broader effort spearheaded by DTSC to ensure metal shredders are in compliance with the Hazardous Waste Control Laws, thus protecting human health and the environment.

Metal shredders are facilities that use a shredding technique to process end-of-life vehicles, appliances, and other forms of scrap metal to facilitate the separation and sorting of ferrous metals, nonferrous metals, and other recyclable materials from non-recyclable materials. There are nine metal shredders in California, and most are located in densely populated communities. Three of California’s metal shredders are in communities with CalEnviroScreen scores that place them in the top tenth percentile for environmental burden and vulnerability.

The metal shredding process creates substantial waste, known as Metal Shredder Residue (MSR) which contains light fibrous material (LFM). Through sample collection at the facilities, DTSC has demonstrated that LFM contains hazardous components and contaminants, including lead, copper, and zinc. This waste can contaminate the soil in unpaved areas of a facility’s yard and also can migrate offsite into adjacent neighborhoods and waterways, if not managed properly. Items shredded at these facilities (such as vehicles and appliances) may also contain volatile organic compounds (VOCs) that are released during shredding and material separation processes.



DTSC Metal Shredding Facilities and Wastes Flowchart.

DTSC has cited all nine shredders in the past for failure to minimize the possibility of release of hazardous waste and/or hazardous waste constituents onsite. Most of the facilities have also been cited for the release of hazardous waste offsite. Some of the facilities have made significant improvements in their operations through enclosing shredders, covering conveyors, installing containers under conveyors, implementing more frequent wetting of dust-producing processes, and housekeeping (sweeping the yard).

Besides failure to minimize the possibility of release of hazardous waste/constituents, all facilities have been cited by DTSC for other Class I violations (the most serious type of violation), associated with mismanagement of appliances/hazardous waste in appliances, mismanagement of hazardous waste (including illegal storage and disposal), and/or recordkeeping deficiencies.

The EJ Task Force's metal shredder initiative complimented DTSC's ongoing enforcement work with a new, multi-media enforcement perspective. Participants in the metal shredder initiative included DTSC, US EPA, CARB, Water Boards, CalRecycle, and Air Districts.

As a part of the metal shredder initiative, CARB and Air Districts have participated in onsite inspections at six metal shredder facilities, and a virtual inspection at one facility. US EPA also participated in inspections at facilities that have the potential to be, or are, major air pollution sources under federal law. Since the initiative began, the San Joaquin Valley APCD has issued four Notice of Violations to SA Recycling in Bakersfield, which include: operating two unpermitted volatile organic liquid (gasoline) storage tanks, operating two unpermitted compression ignition engines, failure to remove fluids and other toxic material prior to shredding, and operating as a major source without a Title V permit, and failing to install Best Available Control Technology. US EPA has also issued a Notice of Violation to SA Recycling in Bakersfield for violations of the federal Clean Air Act. Specifically, US EPA's Notice of Violation alleges violations (a) of the San Joaquin Valley APCD portion of the federally enforceable California State Implementation Plan, and (b) for operating the facility as a major source with the potential to emit at least 10 tons per year of volatile organic compounds but failing to submit a timely application for a Title V permit. In December 2021, the facility applied for an Authority to Construct (ATC) for a modification of its current metal shredding operation to include a regenerative thermal oxidizer, a wet scrubber, and a permanent full enclosure to the metal shredder. San Joaquin Valley APCD completed their

engineering evaluation in early September and issued the final ATC permit on October 3, 2022. Construction of the project is expected to begin in 2023.

Air Districts, CARB, and US EPA are continuing to coordinate to evaluate facility air emissions, assess federal Title V permitting requirements, support efforts to enhance facility emission control systems, and evaluate offsite LFM emissions.

The initiative also focused on potential water quality impacts from metal shredders. The Water Boards inspected all metal shredder facilities that are required to have a stormwater permit. Most of the shredder industry is regulated through the Industrial Stormwater General Permit, but facilities located in the Santa Ana River Basin are regulated through a sector-specific permit (scrap metal permit). Individual National Pollutant Discharge Elimination System (NPDES) permits or Waste Discharge Requirements (WDRs) may also be required for shredders that discharge waste, other than to a municipal sewer system, that could affect the quality of the waters of the State. As a result of these inspections, the San Francisco Bay Regional Water Quality Control Board issued a Notice of Violation to Sims Metal Management in Redwood City for violations of the Industrial Stormwater General Permit. All violations at Sims Metal Management have been corrected and the facility is currently operating in compliance.

CalRecycle participated in the metal shredders initiative and conducted inspections at all nine metal shredders. Waste tire requirements apply to metal shredder facilities because they have equipment that, when serviced, generate used or waste tires. CalRecycle issued a Notice of Violation to one facility for manifesting errors. All other facilities were found to be in compliance with waste tire requirements. The one non-compliant facility was re-inspected and found to be in compliance.

The EJ Task Force's metal shredders initiative encouraged new collaborations and brought a multi-media lens to compliance and enforcement efforts. As DTSC, US EPA, CARB, Water Boards, CalRecycle, and Air Districts continue to work so that metal shredders are appropriately regulated and operating in compliance with legal requirements, they will build upon the cross-agency relationships that developed through the initiative to ensure metal shredders operate in a manner that is protective of human health and the environment.

Collaborating with US EPA on Enforcement in Overburdened Communities

On September 10, 2021, CalEPA and US EPA Region 9 entered into a Memorandum of Understanding on Collaborative Efforts on Enforcement and Compliance Assurance in Overburdened Communities (MOU). The MOU emerged from a joint state-federal interest in enhanced coordination and prioritization of enforcement in overburdened communities. The MOU describes the agencies' partnership and their commitment to expand collaborative activities related to enforcement, inspections, compliance assistance, communication, community engagement, and training to benefit public health and the environment in overburdened communities. In 2022, CalEPA will coordinate with US EPA Region 9 to engage with residents and leaders in overburdened communities to inform development of a workplan to implement the MOU.

Enforcement Coordination Spotlight: Vehicle Dismantling Industry Strike Team

On October 6, 2021, Governor Newsom signed SB 366 which requires the Department of Motor Vehicles (DMV) Vehicle Dismantling Industry Strike Team (VDIST) to collaborate with the California Department of Tax and Fee Administration, CalEPA Enforcement, DTSC Office of Criminal Investigations, SWRCB Office of Enforcement, CalRecycle Tire Enforcement Unit, and CARB Aftermarket Parts Enforcement Unit to review and coordinate enforcement and compliance activity related to unlicensed and unregulated automobile dismantling, tax evasion related to those activities in addition to environmental and public health impacts. SB 366 is a continuation of the initial effort that resulted from AB 1858 (2016). Some of the key differences between AB 1858 and SB 366 are as follows:

- SB 366 gives the DMV authority to declare a building or place used for the purpose of automobile dismantling that is determined to be in violation of operational requirements a public nuisance, as specified, and would authorize a public body, as defined, to seek certain remedies.
- SB 366 gives the DMV authority to investigate unlicensed automobile dismantlers involved in the theft of catalytic converters including the purchase, receipt, possession, or sale of a stolen catalytic convertor.

VDIST was scheduled to initiate its multi-agency operations after January 1, 2022. With the assistance of CalEPA, VDIST will host a multi-agency training and operational planning meeting with its state agency partners as a kick-off to this collaborative effort.

Multimedia and Cross-Media Enforcement Training

In 2021, CalEPA provided training to environmental inspectors from various state and local environmental regulatory agencies through the Basic Inspector Academy (BIA) program. BIA is a three-day class that provides regulatory inspectors and investigators with the core knowledge and skills necessary to perform and document quality environmental inspections. The BIA curriculum consists of general inspection, investigation, and enforcement processes as well as an interactive mock inspection and mock courtroom testimony.

The BIA program continued to be held virtually throughout 2021. From January 2021 to December 2021, regulatory staff from the Water Boards, CARB, and DTSC joined virtual forces with local environmental prosecutors and successfully trained 256 inspectors and investigators from various state and local regulatory agencies throughout the State of California.

CalEPA also hosts an online Fundamental Inspector Course (FIC) that is free and available for anyone to take, including industry. The Fundamental Inspector Course provides a functional overview of CalEPA's BDOs and the local environmental agencies that the boards and departments oversee. It also includes an overview of environmental laws and regulations, environmental science, and basic field health and safety protocols. In 2021, approximately 435 individuals completed the online Fundamental Inspector Course.

CalEPA's Environmental Complaint System

CalEPA maintains an online environmental complaint system that allows any member of the public to report environmental concerns related to mobile and stationary sources of air pollution, water rights and water quality, alleged pesticide use violations, illegal dumping of solid waste and/or hazardous waste, and other environmental problems. Users can submit complaints from mobile devices and upload photos, videos, and other documentation as evidence of the alleged violations.

CalEPA's Environmental Complaint System serves as an early warning system by alerting regulatory enforcement agencies of potential violations of environmental laws and regulations. This helps CalEPA's BDOs and external enforcement partners address and resolve environmental concerns in a timely manner. Further, it provides regulatory agencies that may not have the resources to establish and maintain their own environmental complaint system and the communities they serve with a free platform to report their environmental and public health concerns.

In 2021, CalEPA received 3,086 complaints through its online reporting system across several environmental enforcement areas:

- 1,250 were related to air pollution
- 95 were related to pesticides
- 374 were related to recycling or solid waste management
- 596 were related to toxic substances/hazardous waste
- 544 were related to water pollution/water quality
- 221 were related to water rights
- 103 were related to cannabis/marijuana
- 105 were related to refineries

Of the total complaints received in 2021:

- 163 were multi-media complaints, meaning they involved more than one of the categories listed above and required additional referrals to State or local regulatory agencies;
- 174 resulted in findings of environmental violations and/or compliance issues; and
- 557 were identified as being in an Environmental Justice area.

For general information about the complaint system go to the [*CalEPA Environmental Complaint System*](#) website. To access the CalEPA Environmental Complaint System public intake form, go to: calepacomplaints.secure.force.com/complaints/.

Using CalEnviroScreen to Center Equity in Enforcement

CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) does not directly enforce environmental laws, yet it plays a key role in CalEPA's enforcement efforts. In October 2021, OEHHA released CalEnviroScreen 4.0, which is the latest iteration of the California Communities Environmental Health Screening Tool. The tool provides a clear picture of cumulative pollution burdens and vulnerabilities in communities throughout the state.



As a part of CalEPA's continued efforts to focus enforcement resources in overburdened communities, several BDOs are using CalEnviroScreen 4.0 when choosing where to dedicate inspection resources. For example, CARB has established a goal of conducting at least 50% of heavy-duty diesel inspections in areas with a CalEnviroScreen score of 70 or greater, which are areas that are among the 30% most affected by and vulnerable to pollution. In 2021, CARB conducted 80% of its heavy-duty diesel inspections in such areas. DTSC also uses CalEnviroScreen as a tool to prioritize inspections in disadvantaged communities, seeking to conduct at least 80% of hazardous waste generator inspections in communities with a CalEnviroScreen score of 80 or greater, which are areas that are among the 20% most affected by and vulnerable to pollution.

Conclusion

Moving forward, CalEPA will continue to focus on ensuring consistent, effective, and coordinated compliance and enforcement actions to protect public health and the environment, with a focus on equity and environmental justice. We look forward to sharing more information about our continued efforts in our 2022 CalEPA Enforcement Report.



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