

January 20, 2026

Nichole Williamson  
Director, Health and Human Services  
Alpine County Health Department  
75 Diamond Valley Road  
Markleeville, California 96120-9532

Dear Ms. Williamson:

During April 2025, through October 2025, CalEPA and the Unified Program state agencies conducted a performance evaluation of the Alpine County Health Department Certified Unified Program Agency (CUPA). The CUPA evaluation included a remote assessment of administrative documentation, review of regulated facility file documentation, and California Environmental Reporting System information.

Upon completion of the evaluation, a preliminary Summary of Findings report was developed to identify program deficiencies and incidental findings with corrective actions, as well as acknowledgement of accomplishments, challenges, and examples of outstanding Unified Program implementation. Enclosed, please find the final Summary of Findings report.

Based upon review and completion of the performance evaluation, CalEPA has rated the CUPA's overall implementation of the Unified Program as satisfactory. Considering the CUPA consists of one part-time staff to implement the entire Unified Program, the extreme effort put forth to obtain a satisfactory rating upon conclusion of the 2025 Performance Evaluation in comparison to the unsatisfactory rating upon conclusion of the 2021 Performance Evaluation is an incredible achievement.

To demonstrate progress towards the correction of program deficiencies and incidental findings identified in the final Summary of Findings report, the CUPA must submit an Evaluation Progress Report approximately 90 days from the date of this letter. Thereafter, the CUPA will submit up to two subsequent Evaluation Progress Reports to CalEPA in accordance with the specified date provided in the Evaluation Progress Report response. An Evaluation Progress Report template will be provided by the CalEPA Team Lead. Each Evaluation Progress Report must be submitted to the CalEPA Team Lead, Timothy Brandt, via email at [Timothy.Brandt@calepa.ca.gov](mailto:Timothy.Brandt@calepa.ca.gov), or uploaded to the established SharePoint website.

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

To ensure the CUPA Performance Evaluation process is as effective and efficient as intended, I kindly request the included evaluation survey to be completed and returned

to Melinda Blum, at [Melinda.blum@calepa.ca.gov](mailto:Melinda.blum@calepa.ca.gov). If you would like to have specific comments remain anonymous, please indicate so on the survey.

If you have any questions or need further assistance, please contact Melinda Blum at [Melinda.Blum@calepa.ca.gov](mailto:Melinda.Blum@calepa.ca.gov).

Sincerely,



Jason Boetzer  
Deputy Secretary  
Local Program Coordination and Emergency Response

Enclosure

cc sent via email:

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California Environmental Protection Agency

## UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

CUPA: Alpine County Health Department

2025 Evaluation Assessment: April 2025 through October 2025

Timeframe Evaluated: January 1, 2022, through December 31, 2024

Note: Timeframe evaluated by OSFM is July 1, 2021 through  
December 31, 2024

Evaluation Team Members:

- CalEPA Team Lead: Tim Brandt
- DTSC: Mia Goings, Jessica Harris
- CalEPA: Garett Chan
- State Water Board: Magnolia Busse
- CAL FIRE-OSFM: Denise Villanueva

The Unified Program implementation and performance of the CUPA is considered **Satisfactory**.

The CUPA shall submit the first Evaluation Progress Report to CalEPA 90 days from receipt of this report and up to two subsequent Progress Reports in accordance with the specified due date.

The submittal date for the 1<sup>st</sup> Evaluation Progress Report is **May 4, 2026**.

With each Progress Report, the CUPA will continue to revise and/or submit any plan, policy, document, or facility information required for any Deficiency or Incidental Finding.

Each Progress Report must be submitted to the CalEPA Team Lead via email or uploaded to the established SharePoint website. Questions or comments regarding this evaluation should be directed to the CalEPA Team Lead.

Tim Brandt  
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## CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

#### ACCOMPLISHMENTS, EXAMPLES OF OUTSTANDING IMPLEMENTATION, AND CHALLENGES

Various accomplishments and outstanding efforts, as well as challenges that impact the CUPA's overall ability to implement the Unified Program.

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##### **1. SIGNIFICANT IMPROVEMENT IN OVERALL UNIFIED PROGRAM IMPLEMENTATION:**

As the smallest CUPA in the state, the Alpine County Health Department regulates a total of 34 facilities within its 743 square mile jurisdiction. The CUPA has consistently struggled with maintaining adequate staffing levels due to budgetary limitations which has, at times, significantly limited the ability of the CUPA to implement the Unified Program. Considering the CUPA consists of one part-time staff to implement the entire Unified Program, the extreme effort put forth to obtain a Satisfactory rating upon conclusion of the 2025 Performance Evaluation in comparison to the Unsatisfactory rating upon conclusion of the 2021 Performance Evaluation is an incredible achievement.

The 2021 Performance Evaluation identified 15 Deficiencies and 7 Incidental Findings, 2 of which were considered corrected during the evaluation. To ensure progress was made towards correction and resolution, the CUPA frequently collaborated with the State Evaluation Team in preparation of each of the 6 Evaluation Progress Reports, resulting in only 1 remaining Deficiency and 1 remaining Incidental Finding being carried through to the 2025 Performance Evaluation.

During the 2025 Performance Evaluation, sustainable improvement of overall Unified Program implementation was undoubtedly apparent as demonstrated by the resulting assessment, which identified 1 Deficiency and 5 Incidental Findings, 3 of which were considered corrected during the evaluation. The CUPA has already made progress towards completing training as part of the correction of the identified Deficiency and will likely fully address the Corrective Actions with the first Progress Report.

As of December 18, 2025, the CUPA has met the inspection frequency for each of the 34 regulated facilities within the Hazardous Materials Business Plan (HMBP), Aboveground Petroleum Storage Act (APSA), Hazardous Waste Generator (HWG) and Underground Storage Tank (UST) Programs, and has obtained return to compliance (RTC) for 142 of 160 (89%) violations cited during inspections conducted within the last three years.

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##### **2. HWG PROGRAM IMPLEMENTATION:**

The CUPA inspected 13 of 13 HWG facilities, achieving an inspection frequency of 100%. Additionally, the CUPA ensured 100% of cited HWG violations obtained RTC. Communications between the CUPA and facility representatives following inspections are courteous and professional, and CUPA personnel offer guidance to facility representatives to obtain compliance that is easy to understand.

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##### **3. APSA PROGRAM IMPLEMENTATION:**

Since the 2021 CUPA Performance Evaluation, the CUPA met the mandated triennial inspection frequency for APSA tank facilities storing 10,000 gallons or more of petroleum, as well as the triennial inspection frequency for other APSA tank facilities in accordance with the Inspection and Enforcement (I&E) Plan.

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The CUPA ensured APSA tank facilities annually submitted a tank facility statement or a HMBP in lieu of a tank facility statement to the California Environmental Reporting System (CERS). The CUPA also ensured APSA tank facilities submitted its APSA Facility Information to CERS.

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#### **4. TITLE 27 ADMINISTRATIVE, PROCEDURAL, AND REPORTING REQUIREMENTS:**

Since the 2021 CUPA Performance Evaluation, the CUPA updated and revised its Unified Program administrative and procedural documents to meet the requirements set forth in California Code of Regulations, title 27. The CUPA is also consistent in adhering to the requirements for reporting information to both CERS and CalEPA. As a result of these efforts, CalEPA cited no Deficiencies or Incidental Findings relating to the administrative, procedural, and reporting requirements of California Code of Regulations, title 27 during this Performance Evaluation.

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#### **5. CUPA FUNDING LIMITATIONS:**

The CUPA continues to experience funding limitations. With oversight of only 34 regulated facilities, fees collected through the CUPA's single fee system do not cover the reasonable costs to implement the Unified Program. The CUPA does not currently receive assistance through the Rural Reimbursement Grant due to being certified prior to July 2001.

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#### **6. CUPA OUTREACH AND CERS ASSISTANCE:**

The CUPA provides outreach and support to regulated facilities through education and compliance assistance. The CUPA routinely provides training to small business owners within its jurisdiction and assists them with entry of required program information into CERS.

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#### **7. 2021 CUPA PERFORMANCE EVALUATION DEFICIENCY CORRECTED**

Deficiency #7 from the 2021 CUPA Performance Evaluation is considered corrected and no longer requires further action: *The CUPA is not certifying to CalEPA every three years that a complete review of the area plan has been conducted, and any necessary revisions have been made.*

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**DEFICIENCIES REQUIRING CORRECTION**

Deficiency "is a major deviation in implementation of one or more Unified Program elements from the expected standards set forth in statute or regulation. It is a systemic problem that could impact the safety and protection of human health and the environment." (Cal. Code Regs., tit. 27, § 15100, subd. (k).) In addition, recommendations may be provided.

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**1. DEFICIENCY:**

The CUPA has not inspected 1 of 1 (100%) facility (CERS ID 10480996) subject to the California Accidental Release Prevention (CalARP) Program at least once every three years.

**CITATION(S):**

Health & Saf. Code, § 25537, subd. (a); Cal. Code Regs., tit. 19, § 5140.4; [CalEPA]

**CORRECTIVE ACTION:**

Inspect the CalARP facility identified above.

During each Progress Report, information reported to CERS will be reviewed to determine whether the facility identified above has been inspected.

CalEPA recommends that the CUPA determine why the inspection frequency was not met and establish processes and/or secure resources to prevent this from reoccurring.

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**INCIDENTAL FINDINGS REQUIRING RESOLUTION**

“Incidental finding is a minor deviation in implementation of one or more Unified Program elements from the expected standards set forth in statute or regulation. It is a limited, non-systemic problem.” (Cal. Code Regs., tit. 27, § 15110, subd. (f).) In addition, recommendations may be provided.

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**1. INCIDENTAL FINDING:**

The I&E Plan is incomplete and/or inaccurate:

- An inspection process for each program element that includes pre-inspection, on-site and off-site inspections, post-inspection procedures, and re-inspections.
  - Page 33, section B.1. states “Upon notification by the owner or operator that the significant violation has been corrected Alpine CUPA shall inspect the underground storage tank system with five (5) calendar Days to determine whether the system continues to be in violation.”
    - The correct reinspection timeframe is five business days. (Cal. Code Regs., tit. 23, § 2717.2, subd. (a).)
- Uniform and coordinated application of enforcement standards that includes identification of penalties and enforcement actions that are consistent and predictable for similar violations and no less stringent than California statutes and regulations
  - Page 36, section 1(a) cites “HSC Chapter 6.7 Section 25299...Any operator of an underground storage tank system shall be liable for a civil penalty of nor less than \$500 or no more than \$5,000 for each underground storage tank, for each day of violation, for any of the following violations:”
    - The list of violations is missing violation “(9) Tampering with or otherwise disabling automatic leak detection devices or alarms.”
  - Page 36, section 1(b)4 states violation “Knowing failure to take reasonable and necessary steps to assure compliance”
    - Knowing failure to take reasonable and necessary steps to assure compliance is not a violation under Health and Safety Code, section 25299, subdivision(b)
  - Page 37, section 3 states “HSC Chapter 6.7 Section 25299.02 Every civil action brought under this chapter shall be brought by the city attorney, the district attorney, or the Attorney General.”
    - The section is missing that any actions related to the same violations may be joined or consolidated.
  - Page 37, section 4 states “HSC Chapter 6.7 Section 25299.03 Any civil action brought pursuant of this chapter shall be brought to the county in which the violation occurred”
    - Health and Safety Code section 25299.03 states “Any civil action brought pursuant to this chapter shall be brought in the county in which the violation occurred, the county in which the principal office of the defendant is located, or the county in which the Attorney General has an office nearest to the county in which the principal office of the defendants, or any of them, in this state is located.”

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The following citations are inaccurate:

- Page 2, Section 3 cites "...UST Program Authority: H&SC, Division 20, Chapter 6.7 and Title 23 CCR"
  - The correct citations are Health and Safe Code sections 25280-25296 and 25298-25299.6 and California Code of Regulations, title 23, sections 2610-2717.7
- Page 32, Section 14.A.2 cites HSC Section 2715.3.
  - The correct citation is California Code of Regulations, title 23, section 2717.4

Note: This Incidental Finding was identified during the 2021 CUPA Performance Evaluation and was partially corrected during the Evaluation Progress Report process.

**CITATION(S):**

Cal. Code Regs., tit. 27, § 15200; Health & Saf. Code, §§ 25280-25296, 25296-25299.6; Cal. Code Regs., tit. 23 §§ 2610-2717.7; tit 27. § 15200, sudb. (a) [State Water Board]

**RESOLUTION:**

By the 1st Progress Report, submit a revised I&E Plan that addresses the incomplete and inaccurate information identified above.

State Water Board recommend that the CUPA:

- Revise the I&E Plan to include training, identification of sampling equipment, and methods to preserve physical evidence obtained through sampling and testing information.
- Train staff on the revised I&E Plan once the Incidental Finding is acknowledged by CalEPA as being corrected.

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## 2. INCIDENTAL FINDING:

The CUPA has not consistently included all observations, citations, factual basis, and corrective actions for each violation cited in inspection reports:

- CERS ID 10448170: Inspection report dated May 1, 2023
  - Observations lack specificity including:
    - "Used oil last removed 3/16/22. Used oil filters last removed 3/22/22."
    - "Accumulation date added to crushed oil filters drum (corrected)."
    - "Clean up floor sweep used to sop up oil spill at transfer station crusher."
  - No corrective action for 3 of 3 cited violations
- CERS ID 10473220: Inspection report dated June 1, 2022
  - The comment for the cited violation only included the statement:
    - "Label 5-gal buckets dedicated for waste oil."
- CERS ID 10477582: Inspection report dated April 13, 2022
  - Observations lack specificity including:
    - "No manifests available—copies of invoices were at main office."
    - "Recap waste oil tank when not in use. Corrected on site."
  - No corrective action for 2 of 3 cited violations
- CERS ID 10477588: Inspection report dated May 29, 2024
  - Observations lack specificity including:
    - "Observed bucket with waste oil beneath oil filter crusher. Empty to proper storage container."
    - "Label drums with contents. Remove 'empty' label when re-used"
    - "Promptly clean up spills and absorbents"

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- “Properly label used filter container drum, remove annually.”
- CERS ID 10490788: Inspection report dated October 18, 2023
  - Observations lack specificity including:
    - “Maintain records for 3 year for all waste streams”
    - “Retain copy of battery exchange receipts manifest for 5/18/2023 petroleum naptha complete”
    - “Outside waste oil tank needs proper date & label”
    - “Outside tank needs overfill protection”

#### **CITATION(S):**

Health & Saf. Code, § 25185, subd. (c)(2)(A); Cal. Code Regs., tit. 27, § 15185, subds. (a) & (e); [DTSC]

#### **RESOLUTION:**

By the 1st Progress Report, train inspection staff on inspection report writing training to include observations, factual basis, citations, and corrective actions for each violation cited in an inspection report:

- CUPA Report Writing Training from the 2023 California CUPA Conference:  
<https://calcupa.org/CMS15/upload-manager/presentations/CUPA-2023/1866-3768-cupa-conference-2023-report-writing.pdf>

By the 2nd Progress Report and with each subsequent Progress Report, submit an inspection report citing at least one HWG Program violation for one HWG facility that was inspected after inspection report writing training was completed and within the last three months. The inspection report will contain observations, citations, factual basis, and corrective actions to correctly identify and classify each observed HWG violation.

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### **3. INCIDENTAL FINDING: CORRECTED DURING EVALUATION**

The CUPA has not reported CME information correctly to CERS for the HWG Program:

#### Missing or inaccurate entries in CERS

- CERS ID 10476493
  - An inspection report dated June 3, 2021, cites one Class 2 and 1 Minor violation that was corrected on site. CERS reflects only the Class 2 violation.
- CERS ID 10477588
  - An inspection report dated May 29, 2024, is dated May 28, 2024, in CERS.

#### **CITATION(S):**

Health & Saf. Code, §§ 25404, subd. (e)(4), Cal. Code Regs., tit. 27, § 15185, subd. (e), 15186, subd. (a), 15187, subds. (a) & (c), 15290, subd. (d); [DTSC]

#### **RESOLUTION: COMPLETED**

During the evaluation, the CUPA corrected the CME information in CERS for the facilities listed above. This Incidental Finding is considered corrected.

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**4. INCIDENTAL FINDING: CORRECTED DURING EVALUATION**

The CUPA has not consistently followed up and documented RTC information in CERS for an APSA tank facility cited with a violation. As of June 27, 2025, there is no documented RTC for:

- CERS ID 10477480: Violation Library Type Number 4010010 (Minor violation) issued December 19, 2024

**CITATION(S)**

Health & Saf. Code, §§ 25270.4.5, subd. (a), 25404.1.2, subd. (c); Cal. Code Regs., tit. 27, § 15200, subds. (a) & (g); Cal. Code Regs., tit. 19, § 1612, subds. (e) & (f); [OSFM]

**RESOLUTION: COMPLETED**

During the evaluation, as of September 9, 2025, RTC was obtained for the APSA violation identified above. This Incidental Finding is considered corrected.

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**5. INCIDENTAL FINDING: CORRECTED DURING EVALUATION**

The CUPA has not consistently conducted complete annual compliance inspections.

Non-compliance not cited as a violation in an inspection report:

CERS ID: 10476493

- Overfill Prevention Equipment (OPE) Inspection Report Form dated August 20, 2024, was completed outside the 36-month inspection frequency. Violation Library Type Number 2030036 (USEPATCR 9b) was not cited.

UST testing results include incomplete or inaccurate information:

- CERS ID: 10476493
  - Monitoring System Certification Forms dated August 25, 2022, August 22, 2023, and August 20, 2024, do not include results in section 6 for UDC electronic stand-alone sensors.

UST construction and inspection information was inconsistent with that which was reported to CERS:

- CERS ID: 10476424
  - Monitoring System Certification Forms dated August 25, 2022, August 22, 2023, and August 20, 2024, marked "Yes" for "Does the turbine automatically shut down if the piping secondary containment monitoring system detects a release?," however, CERS states "No" for "Leak Alarm Triggers Automatic Pump Shutdown"
- CERS ID: 10476493
  - OPE Inspection Report Form dated August 20, 2024, included results for fill-tube shut off valves, however, CERS cites fill-tube shut off valves and audible/visual alarms

The UST facility files indicate the service technician had no training and/or the ICC certification of the technician was missing prior to conducting the UST testing:

- CERS ID: 10476493
  - OPE Inspection Report Form was completed on August 20, 2024, by a technician with no training for OPW.

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**CITATION(S):**

Health & Saf. Code §§ 25288, subd. (b), 25289, subd. (b), 25299; Cal. Code Regs., tit. 23, §§ 2637.2, 2638, 2715, subd. (f)(2); Cal. Code Regs., tit 27, § 15290, subd. (d); [State Water Board]

**RESOLUTION: COMPLETED**

During the evaluation, the CUPA provided UST facility records, including annual UST compliance inspection reports and associated testing and leak detection documents for CERS ID 10476493. This Incidental Finding is considered corrected.

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