

December 1, 2025

Jovan Diaz  
Principal Fire Environmental Safety Specialist  
Glendale City Fire Department  
780 Flower Street  
Glendale, California 91201-3057

Dear Mr. Diaz:

During February 2025, through October 2025, CalEPA and the Unified Program state agencies conducted a performance evaluation of the Glendale City Fire Department 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 information, and oversight inspections.

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.

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, Jessica Snow, via email at [Jessica.Snow@calepa.ca.gov](mailto:Jessica.Snow@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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## **UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT**

CUPA: Glendale City Fire Department

2025 Evaluation Assessment: February 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: Jessica Snow
- DTSC: Brennan Ko-Madden
- CalEPA: Andrea Moron-Solano
- State Water Board: Kaitlin Cottrell
- 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 **March 13, 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.

Jessica Snow  
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E-mail: [jessica.snow@calepa.ca.gov](mailto:jessica.snow@calepa.ca.gov)

# 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. STAFFING CHALLENGES:**

Since the 2021 CUPA Performance Evaluation, the CUPA has experienced several staffing and organizational changes. In April 2023, the CUPA Manager was promoted to Fire Marshal, and the Fire and Life Safety Manager was reassigned to serve as the interim CUPA Manager, while simultaneously maintaining existing responsibilities. In January 2024, the Fire and Life Safety Manager officially fulfilled the CUPA Manager position full-time. In August 2024, a long-standing administrative employee, whose invaluable and extensive knowledge of front office operations, CUPA billing, and related functions, retired.

Beyond core responsibilities, CUPA staff continue to play a vital role in several other critical environmental programs, including developing the Industrial Wastewater Pretreatment Program (IW) in alignment with Code of Federal Regulations, title 40, section 403 – General Pretreatment Regulations for Existing and New Sources of Pollution, operating a Permanent Household Hazardous Waste Collection Facility (PHHWCF) under Permit by Rule, and managing used oil and oil filters as part of the Used Oil Curbside Pick-up Program.

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#### **2. JOINT INSEPTIONS WITH DTSC:**

During the evaluation, the CUPA collaborated with DTSC on the inspection of a plating facility. The inspection was easily coordinated and professionally conducted. Such collaboration has benefited the implementation of the Unified Program and DTSC looks forward to future collaboration.

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#### **3. ABOVEGROUND PETROLEUM STORAGE ACT (APSA):**

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.

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

The CUPA successfully enforced requirements of the APSA Program and obtained a high rate of compliance for tank facilities that were cited with violations since the 2021 CUPA Performance Evaluation.

A CUPA staff is an active member of the APSA Advisory Committee and worked closely with OSFM to develop the APSA Program regulations.

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CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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**4. 2021 CUPA PERFORMANCE EVALUATION DEFICIENCY CORRECTED – UNDERGROUND STORAGE TANK (UST) PERMIT:**

Deficiency #5 from the 2021 CUPA Performance Evaluation is now considered corrected and no longer requires further action: *The UST operating permit, and UST operating permit conditions, issued under the Unified Program Facility Permit (UPFP), are inconsistent with UST Regulations and HSC.*

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**5. IMPLEMENTATION OF HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) AND CALIFORNIA ACCIDENTAL RELEASE PREVENTION PROGRAM (CALARP):**

The CUPA collaborates effectively with the community it serves, conducting inspections and providing assistance to businesses beyond its core programs. The inspectors demonstrate a vast and diverse range of expertise across multiple programs, extending beyond the regulated CUPA initiatives with limited staffing and a growing program.

Inspectors perform plan reviews and construction inspections related to Fire Prevention for new and existing facilities, CUPA elements, industrial wastewater components, as well as Vegetation Management and Brush Clearance permits and inspections. Each inspector is responsible for overseeing inspections across all CUPA-managed programs.

The CUPA maintains a strong, organized process for reminding and encouraging annual HMBP submissions to CERS.

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**6. REGIONAL ENFORCEMENT TRAINING:**

The CUPA has been awarded a grant from CalEPA to conduct a regional enforcement training. In collaboration with the CalEPA Environmental Enforcement and Training Program and EnviroServices, the CUPA will host a CUPA Formal Enforcement Training in September 2025 for a total of 50 attendees. This specialized training is designed for CUPA inspectors and staff who are involved in preparing for and navigating the Formal Enforcement process.

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# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

### 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: CORRECTED DURING EVALUATION

The CUPA has not inspected 77 of 420 (18%) facilities subject to the Hazardous Waste Generator (HWG) Program at least once every three years as required by the inspection frequency established in the Inspection and Enforcement (I&E) Plan. See the list of facilities that were not inspected in Attachment 1.

#### CITATION(S):

Health & Saf. Code, § 25201.4, subd. (b)(2); Cal. Code Regs., tit. 27, §§ 15185, subd. (a), 15200, subd. (a)(2)(A), (a)(2)(B), & (e); [DTSC]

#### CORRECTIVE ACTION: COMPLETED

During the evaluation, the CUPA inspected 72 of 77 facilities identified in Attachment 1; 5 facilities remain uninspected. This Deficiency is considered corrected.

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#### 2. DEFICIENCY: CORRECTED DURING EVALUATION

The CUPA has not consistently followed up and documented return to compliance (RTC) information in CERS for HWG facilities cited with violations. See the list of facilities with violations having no documented RTC in Attachment 2.

As of May 1, 2025, there is no documented RTC for:

- 71 of 358 (20%) cited violations, consisting of:
  - 4 of 16 (25%) Class I
  - 43 of 170 (25%) Class II
  - 24 of 172 (14%) Minor

#### CITATION(S):

Health & Saf. Code, §§ 25185, subd. (c), 25110.8.5, 25117.6, 25187.8, subds. (a)-(b) & (g)-(i); Cal. Code Regs., tit. 27, §§ 15185, subds. (a) & (c), 15200, subds. (a), (e), & (g); [DTSC]

#### CORRECTIVE ACTION: COMPLETED

During the evaluation, as of August 20, 2025, RTC was obtained for 47 HWG violations identified in Attachment 2; 24 have no documented RTC. This Deficiency is considered corrected.

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#### 3. DEFICIENCY: CORRECTED DURING EVALUATION

The CUPA has not consistently conducted complete annual UST compliance inspections.

Noncompliance not cited as a violation in an inspection report:

- CERS ID 10403446
  - No violation for late Annual Monitoring System Certification (AMC) testing performed August 24, 2023, when the annual date is in May

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UST construction and inspection information was inconsistent:

- CERS ID 10129558
  - AMCs dated February 9, 2023, and February 8, 2024, section 5 cites "Yes" for "Does the turbine automatically shut down if the piping secondary containment monitoring system fails to operate or is electrically disconnected?" and "Does the turbine automatically shut down if the piping secondary containment monitoring system detects a release for sumps and UDCs" however, CERS states suction systems
    - Note: There is no option on the testing report forms to cite violations for suction systems.
- CERS ID 10129567
  - AMC dated February 10, 2022, section 5 cites "NA" for "Does the flow of fuel stop at the dispenser if a release is detected in the under dispenser containment?", however, CERS states "Yes"
- CERS ID 10133116
  - AMC dated June 18, 2024, section 5 cites "No" for "Does Flow of fuel stop at the dispenser if a release is detected in UDC?", however, CERS states "Yes"
- CERS ID 10400827
  - AMCs dated April 27, 2022, April 17, 2023, and April 24, 2024, section 7 cites "Yes" for both Mechanical and Electronic Line Leak Detectors (LLD) tested, however, CERS states mechanical for tanks -001, -003, and -004, and states "No" for both LLD types for tank -002
- CERS ID 10457398
  - Overfill Prevention Equipment (OPE) dated October 17, 2024, states Diesel Tank (-003) "Shuts off Flow", while CERS states only A/V
    - Note: CERS information corrected August 12, 2025
- CERS ID 10133116
  - OPE dated June 18, 2024, diesel tanks (-001, -002, and -003) state "Yes" for vent and tank riser piping secondarily contained, while CERS states "None" for vent and riser secondary containment
    - Note: CERS information corrected August 20, 2025
- CERS ID 10166761
  - OPE dated October 16, 2024, tanks (-001, -002, -003, -004) state "Ball Float", while CERS states only A/V
    - Note: CERS information corrected August 13, 2025
- CERS ID 10195642
  - OPE dated April 3, 2024, tanks (-001, -002, -003, -004) state "Shuts off Flow", while CERS states only A/V
    - Note: CERS information corrected August 9, 2025
- CERS ID 10470190
  - OPE dated April 14, 2025, tank (-005) states "Shuts off Flow", while CERS states only A/V
    - Note: CERS information corrected August 1, 2025

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- CERS ID 10594075
  - OPE dated September 5, 2024, tank (-001) states "Shuts off Flow", while CERS states only A/V
    - Note: CERS information corrected August 28, 2025
- CERS ID 10410325
  - AMC dated May 29, 2025, section 7 states "Yes" for ELLD tested, while CERS states "No" for both MLLD and ELLD
    - Note: CERS information corrected August 5, 2025.
- CERS ID 10460578
  - AMC dated November 7, 2024
    - Tank ID -001
      - Section 7 cites "Yes" for ELLD tested, while CERS states "No" for both MLLD and ELLD
      - No testing of continuously monitored VPH system, while CERS states tanks installed October 15, 2005
        - Note: CERS information corrected for LLDs and installation year August 28, 2025.
    - Tank ID -002
      - LLDs are installed, and the tank is conventional suction, while CERS states pressurized
        - Note: CERS information corrected August 12, 2025.
- CERS ID 10594075
  - AMC dated September 6, 2024, section 7 states "Yes" for ELLD tested, however, CERS states "No" for both MLLD and ELLD
    - Note: CERS information corrected August 12, 2025.

The CUPA has not consistently cited violations or has missed violations as evidenced by the CUPA's Technical Compliance Rate (TCR). As identified below, the CUPA's TCR was consistently higher than the California average, which is indicative that the CUPA is either not citing or not observing violations:

- January – June 2022
  - CUPA: **72.2%**
  - CA Avg.: 60.4%
- July – December 2022
  - CUPA: **68.2%**
  - CA Avg.: 60.5%
- January – June 2023
  - CUPA: **84.9%**
  - CA Avg.: 60.4%
- July – December 2023
  - CUPA: **77.3%**
  - CA Avg.: 60.0%
- January – June 2024
  - CUPA: **82.9%**
  - CA Avg.: 61.8%
- July – December 2024
  - CUPA: **86.4%**
  - CA Avg.: 59.4%

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

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**CITATION(S):**

Health & Saf. Code §§ 25288, subd. (b), 25289, subd. (b), 25299; Cal. Code Regs., tit. 23, §§ 2638, 2711, subd. (d), 2713, subds. (c) & (d); Cal. Code Regs., tit. 23, § 15290, subd. (d); [State Water Board]

**CORRECTIVE ACTION: COMPLETED**

During the evaluation, the CUPA required UST Owners/Operators to correct information in CERS and provided facility files for additional UST compliance inspection review. This Deficiency is considered corrected.

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# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

### 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.

#### 1. INCIDENTAL FINDING:

The CUPA has not ensured each HMBP submittal contains all required elements before being accepted in CERS:

- CERS ID 10481092:
  - Inventory submitted on January 18, 2024
    - Site map is missing evacuation staging areas and emergency response equipment
- CERS ID 10687504:
  - Inventory submitted on October 10, 2024
    - Site map is missing evacuation staging areas
- CERS ID 10645765:
  - Inventory submitted on October 8, 2024
    - Site map is missing evacuation staging areas and emergency response equipment
- CERS ID 10947211:
  - Inventory submitted on March 13, 2024
    - Site map is missing evacuation staging areas

#### CITATION(s):

Health & Saf. Code, §§ 25505, subd. (a), 25508, subds. (a)(3) & (4); Cal. Code Regs., tit. 19, § 5030.3, 5030.9, 5030.10; [CalEPA]

#### RESOLUTION:

Ensure each HMBP submittal contains all required elements before being accepted in CERS.

During each Progress Report, CalEPA will review 5 recently accepted HMBP submittals to verify each HMBP contains all required elements.

CalEPA recommends that the CUPA:

- Use the HMBP checklist in Attachment 4 to ensure each HMBP submittal contains all required elements before being accepted in CERS.
- Have CUPA staff complete refresher training on HMBP submittal requirements.

#### 2. INCIDENTAL FINDING:

The CUPA has not consistently included all observations, citations, factual basis, and corrective actions for each violation cited in HWG & TP Program inspection reports.

- CERS ID 10132924: Inspection report dated February 24, 2022
  - No observations for 3 of 4 cited violations
  - No corrective actions for 3 of 4 cited violations
- CERS ID 10133953
  - Inspection report dated February 16, 2022
    - No violation classification for 2 of 3 cited violations

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
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- Observations lack specificity including:
  - "According to evidence, last pickup was more than 180 days ago."
    - No description initial accumulation date, how long the container(s) were on-site, the number of containers in violation, nor a description of the containers (ex: size, location, contents)
- Corrective actions lack specificity including:
  - "all hazwaste must be shipped off within 180 days of accumulation start date"
- Inspection report dated March 17, 2022
  - Observations lack specificity including:
    - "Owner/Operator is a small quantity generator and failed to send hazardous waste offsite for treatment, storage, or disposal within 180 days (or 270 days if waste is transported over 200 miles), or has failed to comply with the conditions of CCR 66262.34(d) and has stored hazardous waste over 90 days."
      - No description of initial accumulation date, how long the container(s) were on-site, the number of containers in violation, the containers (ex: size, location, contents)
    - "[DESCRIBE CONTAINER] of [HAZARDOUS WASTE] located in the [LOCATION] was observed without a hazardous waste label."
- CERS ID 10443439: Inspection report dated February 10, 2022
  - No observations or factual basis for 6 of 6 cited violations
- CERS ID 10461793: Inspection Report dated August 15, 2022
  - No violation classification for 4 of 4 cited violations
  - Observations lack specificity including:
    - "Facility needs to dispose of all expired and unwanted chemicals properly"
  - No observations for 3 of 4 violations

**CITATION(s):**

Health § Saf. Code, § 25185, subd. (c)(2)(A); [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 three HWG facilities that were inspected after inspection report writing training was completed and within the last three months. Each inspection report will contain observations, citations, factual basis, and corrective actions to correctly identify and classify each observed HWG violation.

## CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

#### **3. INCIDENTAL FINDING:**

The CUPA has not consistently cited and/or required the correction of construction UST violations identified in State Water Board Local Guidance (LG) Letter 150-3 dated February 2021.

The UST Facility/Tank Data Download report (April 30, 2025) indicates:

- USTs with single-walled vent or riser piping utilizing the OPE exemption:
  - CERS Tank ID 10133116-004
    - Note: Tank removed April 21, 2025. No violations reported for exemption issues in annual inspections prior to removal.
  - CERS Tank ID 10459309-004
    - Note: Tank removed July 17, 2025. No violations reported for exemption issues in annual inspections prior to removal.
  - CERS Tank ID 10470193-005
- USTs indicate "No" for audible/visual alarms, ball floats, fill tube shut-off valve, and exempt:
  - CERS Tank ID 10396369-004
    - Note: Tank removed May 22, 2025. No violations reported for incorrect CERS information, or utilization of OPE exemption

#### **CITATION(s):**

Cal. Code Regs., tit. 23, §§ 2635, subd. (d), 2636, subd. (a), and/or 2665, subd. (c); [State Water Board]

#### **RESOLUTION:**

Ensure UST owners/operators of each facility identified above installs the correct OPE or secondarily contains vent and fill piping and apply enforcement (e.g., revocation of UST Permit and issuance of red tag) as established in the I&E Plan for facilities that do not obtain compliance. Ensure RTC and enforcement actions are reported to CERS.

By the 1<sup>st</sup> Progress Report, and each subsequent Progress Report, submit a list of UST facilities utilizing the incorrect or incomplete OPE construction including CERS Tank IDs.

During each Progress Report, the State Water Board will review information provided by the CUPA and in CERS to verify each UST has the correct method of OPE installed or vent and fill piping is secondarily contained.

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#### **4. INCIDENTAL FINDING:**

The CUPA's Financial Management Procedure does not include the criteria for waiving the state surcharge and single fee. The CUPA waived the state surcharge and single fee as follows:

- Fiscal Year (FY) 2021/2022
- FY 2022/2023
- FY2023/2024

#### **CITATION(s):**

Cal. Code Regs., tit. 27, §§ 15180, subd. (e)(4), 15210, subd. (b)(1)(D), 15250(a)(3); [CalEPA]

#### **RESOLUTION:**

By the 1<sup>st</sup> Progress Report, submit a revised Financial Management Procedure that addresses the issue identified above.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

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The CUPA will train its staff on the revised Financial Management Procedure once the Incidental Finding is acknowledged by CalEPA as being corrected.

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

The CUPA has not consistently implemented proper UST temporary closure requirements:

- CERS Tank ID 10459309-004
  - Placed into temporary closure on September 16, 2024
  - Accepted information to CERS with intent to permanently close the tank
  - Did not report temporary closures to Report 6:
    - January – June 2024
- CERS Tank ID 10133116-004
  - Placed into temporary closure on March 27, 2024
    - Temporary Closure Permit expiration date of June 30, 2025, exceeds the 12-month limit without conducting a site assessment or being brought back into compliance by the end of the temporary closure duration
  - Accepted information to CERS with intent to permanently close the tank

**CITATION(s):**

Health & Saf. Code §§ 25293, 25298, subd. (b); Cal. Code Regs., tit. 23, §§ 2670, subd. (b), 2671, subd. (c), 2672, subd. (d); [State Water Board]

**RESOLUTION: CORRECTED**

During the evaluation, the CUPA required UST Owners/Operators to correct information in CERS, rescinded temporary closure permits, and accurately reported the status of each facility in Report 6. This Incidental Finding is considered corrected.

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