

August 4, 2026

Amy Harbert
Director
San Diego County Department of Environmental Health and Quality
P.O. Box 129261
San Diego, California 92112-9261

Dear Ms. Harbert:

From November 2025, through June 2026, CalEPA, in coordination with the Department of Toxic Substances Control (DTSC), Office of the State Fire Marshall (OSFM), and State Water Resources Control Board (State Water Board), conducted an evaluation of the San Diego County Department of Environmental Health and Quality Certified Unified Program Agency (CUPA) to assess the CUPA's performance and implementation of the Unified Program (2025 CUPA Performance Evaluation).

During the 2025 CUPA Performance Evaluation, a Preliminary Summary of Findings Report was provided to the CUPA that identified the initial findings. Upon completion of the evaluation, no program deficiencies were identified. Please find the enclosed Final Summary of Findings Report.

Based upon review and completion of the performance evaluation, CalEPA has determined the CUPA meets or exceeds overall implementation of the Unified Program. I commend you and your team for the successful implementation of the Unified Program despite the numerous challenges faced over the past several years. The CUPA has done an exemplary job of maintaining a strong and commendable Unified Program.

Pursuant to California Code of Regulations, title 27, section 15330, subdivision (b)(6), the CUPA shall submit each Evaluation Progress Report to CalEPA in accordance with the specified due date. 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. An Evaluation Progress Report template will be provided by the CalEPA Team Lead. Each Progress Report must be submitted to the CalEPA Team Lead via email 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. 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.

Sincerely,



Jason Boetzer
Deputy Secretary
Local Program Coordination and Emergency Response

Enclosure

cc sent via email:

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UNIFIED PROGRAM PERFORMANCE EVALUATION REVISED FINAL SUMMARY OF FINDINGS REPORT

CUPA: San Diego County Department of Environmental Health and Quality

2025 Evaluation Assessment: November 2025 through June 2026

Timeframe Evaluated: September 30, 2022, through September 30, 2025

Note: Timeframe evaluated by OSFM is July 1, 2021, through September 30, 2025

Evaluation Team Members:

- CalEPA Team Lead: Kaeleigh Pontif
- CalEPA: Andrea Moron-Solano
- DTSC: Jessica Harris, Pheleep Sidhom
- State Water Board: Michelle Suh
- CAL FIRE- OSFM: Mary Wren-Wilson

Rating: The Unified Program implementation and performance of the CUPA is considered *to meet or exceed* Unified Program standards.

In accordance with California Code of Regulations, title 27, section 15330, subdivision (b)(6), **the CUPA shall submit the first Evaluation Progress Report to CalEPA on November 16, 2026.** An Evaluation Progress Report template will be provided by the CalEPA Team Lead.

Any required subsequent Progress Report shall be submitted to CalEPA in accordance with the specified due date. With each subsequent 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:

Kaeleigh Pontif
Phone: (916) 803-0623
E-mail: Kaeleigh.pontif@calepa.ca.gov

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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.

1. HAZARDOUS WASTE GENERATOR (HWG) PROGRAM IMPLEMENTATION:

The CUPA inspectors produce inspection reports that are very high quality, demonstrating consistent documentation of facility information, consent to inspect, violation citations, detailed observations, inspection dates, and corrective actions with specified timeframes. Details of inspection reports are accurately reported to the California Environmental Reporting System (CERS).

Of the facilities identified in the DTSC Hazardous Waste Tracking System (HWTS), 93% are also in CERS. In addition, 93% of all HWG Program facilities were inspected once every three years and 96% of HWG Program cited violations have successfully returned to compliance. Finally, 100% of Permit-By-Rule Notifications were reviewed within the requisite 45 days during the evaluation timeframe.

2. ABOVEGROUND PETROLEUM STORAGE ACT (APSA) PROGRAM IMPLEMENTATION:

Since the 2021 Performance Evaluation, the CUPA met the mandated triennial inspection frequency for APSA tank facilities storing 10,000 gallons or more of petroleum. Additionally, the CUPA met the triennial inspection frequency for APSA tank facilities with an aboveground petroleum storage capacity greater than or equal to 1,320 gallons and less than 10,000 gallons 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 CERS. The CUPA also ensured APSA tank facilities submitted APSA Facility Information to CERS.

The CUPA's APSA tank facility records, including follow-up documentation, are comprehensive and well-organized. APSA inspection reports contain detailed observations of violations, guidance, and corrective actions. Since the last evaluation, the CUPA resolved at least 10 administrative enforcement orders (AEO) against APSA tank facilities.

The CUPA has been an active participant in committees and workgroups including:

- APSA Technical Advisory Group (TAG), with two CUPA staff fulfilling the co-chair role for the southern region
- APSA Advisory Committee
- Unified Program Violation Library Workgroup
- Unified Program Training Framework

The CUPA's attendance and participation in these meetings and workgroups demonstrates commitment to consistency in implementing the APSA Program. The CUPA also offered, and continues to offer, registered environmental health specialist (REHS) credits for members attending the APSA TAG meetings.

The CUPA provided quarterly training to its staff on a variety of Unified Program and related topics, including a refresher on requirements of the APSA Program, enforcement, battery energy storage systems, spill reporting, etc. Select CUPA staff received the SP001 aboveground tank system inspector training in fiscal year 2024-2025.

3. OUTSTANDING UNDERGROUND STORAGE TANK (UST) PROGRAM IMPLEMENTATION:

Between January 1, 2022, and December 31, 2025, the CUPA conducted 100% of annual UST compliance inspections for 950 UST facilities, which includes over 2,700 tanks. Additionally, review of the Semi-Annual Report (Report 6) Technical Compliance Rate (TCR) finds CUPA inspectors note United States Environmental Protection Agency TCR criteria violations at a rate consistent with the California average TCR of 60%. This demonstrates that inspectors are conducting thorough annual compliance inspections and appropriately citing UST Leak Detection violations when non-compliance is identified.

Additionally, the CUPA's UST I&E Plan is exemplified by the high rate of return to compliance (RTC) obtained and reported to CERS. On average 96% of leak detection violations cited between January 1, 2022, and December 31, 2025, were resolved with RTC reported to CERS, of which, over 80% obtained RTC within 60 days of being cited as required by the California Health and Safety Code (HSC), Section 25288(d).

The CUPA provided ample enforcement documentation in CERS for 40 AEOs, totaling \$211,479 in fines.

4. NEW UST REGULATIONS:

Changes to California Code of Regulations, title 23, division 3, chapter 16, went into effect January 1, 2026. For additional information, see https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/rewrite.html. It is anticipated that this will result in additional workload for the CUPA. For example, the CUPA will need to update all documents related to UST regulations, including but not limited to, the I&E Plan, UST Operating Permits, applicable local ordinances, internal procedural documents, and documents issued to owner/operators. Additionally, UST inspectors will need to be trained on new inspection and enforcement procedures as a result of the regulatory changes.

5. STATEWIDE LEADERSHIP:

The CUPA continues to actively participate in several regulatory workgroups, committees, and TAGs including:

- Generator Improvement Rule (GIR) Phase I
- Pharmaceutical Rule
- APSA Regulations
- Hazardous Waste TAG
- HMBP TAG
- APSA TAG
- UST TAG
- California Accidental Release Prevention (CalARP) TAG
- Enforcement TAG
- Emergency Response TAG

Participating in these groups demonstrates the CUPA's commitment to ensuring coordinated and consistent implementation of the Unified Program.

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6. TRAINING AND OUTREACH:

The CUPA continues to build resiliency through its training and outreach efforts. As emergency responders, the CUPA trains annually to ensure the department is ready to respond to environmental and health emergencies and recovery efforts. In addition, the CUPA works to continually increase community outreach and public engagement to provide more education, awareness, and expertise. Between 2022-2025, the CUPA met regularly with various professional organizations and major stakeholders and participated in over 100 outreach and training events.

7. ENFORCEMENT EFFORTS:

The CUPA has a robust enforcement program that pursues a graduated series of enforcement throughout San Diego County, ensuring proper classification and escalation for violations observed during inspections. Since the last CUPA Performance Evaluation, the CUPA initiated a total of 446 enforcement cases, and issued \$2,263,405.00 in associated enforcement costs.

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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.

No Deficiencies were identified during the San Diego CUPA 2026 Performance Evaluation.

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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.

1. INCIDENTAL FINDING:

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

UST testing results include incomplete or inaccurate information:

- CERS ID 10363729
 - Monitoring System Certification Forms dated March 16, 2023, March 18, 2024, and March 3, 2025, do not include results in Section 6 for the UDC float and chains
- CERS ID 10366888
 - Monitoring System Certification Forms dated May 24, 2023, May 22, 2024, and May 13, 2025, do not include results in Section 6 for the UDC float and chains
- CERS ID 10373845
 - Monitoring System Certification Forms dated September 19, 2023, September 5, 2024, and September 18, 2025, do not include results in Section 6 for the UDC float and chains

UST construction and inspection information was inconsistent:

- CERS ID 10386019
 - Monitoring System Certification Forms dated July 20, 2023, July 11, 2024, and July 23, 2025, marked "Yes" to "Does the flow of fuel stop the dispenser if a release is detected in the under dispenser containment", however, CERS cites 208 sensors.
- CERS ID 10361716
 - Monitoring System Certification Forms dated November 30, 2023, November 14, 2024, and November 19, 2025, marked "Yes" to "Does the flow of fuel stop the dispenser if a release is detected in the under dispenser containment", however, CERS cites 208 sensors.
- CERS ID 10373308
 - Monitoring System Certification Form dated October 27, 2025, marked "Check this box if tank gauging is used only for inventory control", however CERS cites 2 single-walled USTs.
- CERS ID 10358734
 - Monitoring System Certification Forms dated February 7, 2023, February 6, 2024, and February 3, 2025, states the 87 fill with 420 sensors, however, CERS cites 208 sensors.
- CERS ID 10368229
 - Overfill Prevention Equipment Inspection form dated March 31, 2021, cites audible and visual alarm, however CERS cites audible and visual alarm with ball floats.

CITATION(s):

Before January 1, 2026: Health & Saf. Code, § 25288; Cal. Code Regs., tit. 23, §§ 2637.2, subd. (d), 2638, subds. (a) & (c), 2713; [State Water Board]

As of January 1, 2026: Health & Saf. Code, § 25288; Cal. Code Regs., tit. 23, §§ 2663, subds. (a) & (e), 2665, subd. (c), 2692; [State Water Board]

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RESOLUTION:

By the 1st Progress Report, and with each subsequent Progress Report submit UST facility records, including the most recent annual UST compliance inspection report, and associated testing and release detection documents, and all enforcement correspondence between the CUPA and the UST owner/operator for the 4 most recently inspected UST facilities.

State Water Board recommends that the CUPA:

- Revise the I&E Plan or other applicable procedure to establish a process for:
 - Conducting complete annual UST compliance inspections at all UST facilities
 - Reviewing and following up with UST testing and release detection documents submitted by UST owners or operators as part of the annual UST compliance inspection.
 - Documenting observed noncompliance identified during annual UST compliance inspections in UST compliance inspection reports.
 - Rejecting documentation that is incomplete or requires correction before accepting.
-

2. INCIDENTAL FINDING:

The local ordinance, *Chapter 10. Certified Unified Program Agency, Underground Storage of Hazardous Substances*, is inconsistent with state law:

- Sections 68.1001, 68.1002, and 68.1001 reference HSC Chapter 6.75
 - The CUPA does not have the authority to implement cleanup of USTs as a Local Oversight Program agency, and therefore cannot cite HSC, Chapter 6.75
- Sections 68.1016 and 68.1017 use the words "suspend" and "suspension"
 - The UST permit cannot be suspended

CITATION(s):

Before January 1, 2026: Health & Saf. Code, §§ 25299.2, 25299.3, 25404.2, subd. (a)(2); Cal. Code Regs., title 23, § 2620, subd. (c); [State Water Board]

As of January 1, 2026: Health & Saf. Code, §§ 25299.2, 25299.3, 25404.2, subd. (a)(2); Cal. Code Regs., title 23, §2621; [State Water Board]

RESOLUTION:

Do not implement the provisions of the local ordinance that are inconsistent with state law as identified above. If the CUPA plans to amend the ordinance, provide the State Water Board with an opportunity to review.

During the evaluation, the CUPA provided a revised draft ordinance, addressing the inconsistencies identified above. The revised draft ordinance will be reviewed by the County of San Diego Board of Supervisors in Fall 2026.

By the 1st Progress Report, submit an update on the status of the local ordinance being amended, or repealed.

State Water Board recommends that the CUPA:

- Develop an action plan and timeline to amend or repeal the local ordinance.
- Review the State Water Board guidance document outlining the new requirements for local ordinances and regulations as a result of the revisions to California Code of Regulations, title 23, chapter 16.

3. INCIDENTAL FINDING:

The CUPA has not ensured all USTs are in compliance with design and construction requirements.

UST Facility Tank/Data Download report (February 17, 2026) indicates:

- UST systems installed between July 1, 1987, and June 30, 2003, with single-walled vent and/or riser/fill piping and equipped with only audible/visual alarms with no ball float or fill tube shut-off valve:
 - See Attachment 2

CITATION(s):

Before January 1, 2026: Cal. Code Regs., tit. 23, §§ 2635, subd. (d), 2636 subd. (a), 2665, subd. (c), 2638(a), 2641 (j)]; [State Water Board]

As of January 1, 2026: Cal. Code Regs., tit. 23, §§ 2640, subds. (b)(10)(A) & (f); [State Water Board]

RESOLUTION:

Note: As of January 1, 2026, all Type 1 USTs must be equipped with appropriate overfill.

Ensure each UST identified above is in compliance with design, construction, monitoring, and testing requirements, 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 1st Progress Report, and with each subsequent Progress Report, submit a list of USTs utilizing the incorrect or incomplete design and construction that includes the CERS UST Tank IDs and a narrative describing the follow-up actions and applied enforcement taken to ensure USTs are in compliance with the requirements described above.

4. INCIDENTAL FINDING: CORRECTED DURING EVALUATION

The I&E Plan is inaccurate:

- Pages 11, 84, 85, 86, 88 through 91, and 138 references HSC Chapter 6.75 and California code of Regulations (CCR) Chapter 18
 - The CUPA does not have the authority to implement cleanup of USTs as a Local Oversight Program agency, and therefore cannot cite HSC, Chapter 6.75 and CCR Chapter 18
- Page 35 states "Cease and Desist Notice is used when the UST Operating Permit is to be revoked, modified or suspended."
 - The UST permit cannot be suspended
- The CUPA does not have the authority to issue a "Notice to Cease and Desist" for the UST program.
- Page 88 through 91 use the words "suspend" and "suspension"
 - The UST permit cannot be suspended
- 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 84 states "The amount of the penalty shall not be more than five thousand dollars (\$5,000) for each day of violation. Any person who knowingly violates any

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provision of the County Code or State law, after reasonable notice of the violation, is liable for an administrative civil penalty of not more than ten thousand dollars (\$10,000) for each day of violation. Where the violation would otherwise be an infraction, the amount of the administrative civil penalty shall not exceed the maximum fine or penalty amounts of infractions set forth in County Code or State law."

- This combines components within HSC 25299. The CUPA should cite the exact penalties in HSC 25299.

CITATION(s):

Health & Saf. Code, §§ 25285.1, 25292.3, subd. (c), 25299; Cal. Code Regs., tit. 27, § 15200; [State Water Board]

RESOLUTION: COMPLETED

As of January 1, 2026, all documentation that cites Chapter 16, including the I&E Plan, must be reviewed and updated to ensure compliance and align with the 2026 UST Regulation amendments.

During the evaluation, the CUPA provided a revised I&E Plan that addresses all issues identified above. This Incidental Finding is considered corrected.

5. INCIDENTAL FINDING: CORRECTED DURING EVALUATION

The CUPA has not consistently followed up and documented RTC information in CERS for APSA tank facilities cited with violations:

- CERS ID 10981480
 - Violation Library Type Number 4010001: Inspection report dated December 11, 2024
- CERS ID 10359307
 - Violation Library Type Number 4010001: Inspection report dated May 2, 2025
- CERS ID 10357918
 - Violation Library Type Number 4010001: Inspection report dated August 4, 2025
- CERS ID 10630789
 - Violation Library Type Number 4010001: Inspection report dated September 10, 2025
- CERS ID 10981840
 - Violation Library Type Number 4010001: Inspection report dated September 18, 2025
- CERS ID 10956934
 - Violation Library Type Number 4010001: Inspection report dated September 30, 2025
- CERS ID 10376065
 - Violation Library Type Number 4010001: Inspection report dated September 30, 2025

CITATION(S):

Health & Saf. Code, § 25270.4.5, subd. (a); Cal. Code Regs., tit. 19, § 1612, subds. (e) & (f); Cal. Code Regs., tit. 27, §§ 15185, subds. (a)-(c), 15200, subds. (a), (e), & (g); [OSFM]

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RESOLUTION: COMPLETED

During the evaluation, as of April 22, 2026, RTC was obtained for the APSA violations identified above. This Incidental Finding is considered corrected.

6. INCIDENTAL FINDING: CORRECTED DURING EVALUATION

The CUPA has not properly classified each APSA violation. Violation improperly classified as minor violation:

- Failure to prepare a Spill Prevention, Control, and Countermeasure (SPCC Plan)
 - Inconsistent with California Code of Regulations, title 19, section 1612, subdivision (d) and enforcement guidance
 - CERS ID 10376065: Inspection dated September 30, 2025
 - CERS ID 10978231: Inspection dated July 30, 2025

CITATION(S):

Health & Saf. Code, § 25404, subd. (a)(3); [OSFM]

RESOLUTION: COMPLETED

During the evaluation, the CUPA amended the violations incorrectly classified as minor. Follow-up training was provided for staff. This Incidental Finding is considered corrected.

7. INCIDENTAL FINDING: CORRECTED DURING EVALUATION

The CUPA has not ensured each facility subject to HMBP reporting requirements has annually submitted an HMBP or no-change certification to CERS as identified in Attachment 1. In summary:

- 2,094 of 10,156 (21%) HMBP facilities have not submitted an inventory or a no-change certification
- 1,733 of 9,984 (17%) HMBP facilities have not submitted emergency response and employment training plans or a no-change certification.

CITATION(S):

(1) Health & Saf. Code, §§ 25505, subd. (a), 25508, 25508.2; [CalEPA]

RESOLUTION: COMPLETED

During the evaluation:

- 1,940 of 2,094 HMBP facilities submitted an inventory or a no-change certification; 154 have not submitted or certified.
- 1,431 of 1,733 HMBP facilities submitted emergency response and employee training plans or a no-change certification; 302 have not submitted or certified.

By May 5, 2026, the CUPA obtained a 93% compliance rate of HMBP certification in CERS. This Incidental Finding is considered corrected.

ATTACHMENT(S)

To obtain a copy of any attachment(s) identified in the Final Summary of Findings Report, please contact CUPA@calepa.ca.gov.