November 6, 2026

Jordan Paul
Division Chief, Fire Marshal, CUPA Manager
Roseville City Fire Department
317 Vernon Street, Suite 480
Roseville, California 95678-2653

Dear Mr. Paul:

From February 2026 through September 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 Roseville City Fire Department Certified Unified Program Agency (CUPA) to assess the CUPA's performance and implementation of the Unified Program (2026 CUPA Performance Evaluation).

During the 2026 CUPA Performance Evaluation, a Preliminary Summary of Findings Report was provided to the CUPA that identified the initial findings. Please find enclosed the Final Summary of Findings Report.

Pursuant to California Code of Regulations, title 27, section 15330, subdivision (b)(6), the CUPA shall submit an 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.

I commend you and your team for the successful administration of a strong Unified Program.

Thank you for your continued commitment to the protection of public health and the environment.

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
FINAL SUMMARY OF FINDINGS REPORT

CUPA: Roseville City Fire Department

2026 Evaluation Assessment: February 2026 through September 2026

Timeframe Evaluated: January 1, 2023, through December 31, 2025
(Note: Timeframe evaluated by OSFM is July 1, 2021, through December 31, 2025)

Evaluation Team Members:

- CalEPA Team Lead: Jessica Snow
- DTSC: Mia Goings
- CalEPA: Andrea Moron-Solano
- State Water Board: Michelle Suh
- CAL FIRE- OSFM: Denise Villanueva

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 February 1, 2027.** 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:

Jessica Snow
Phone: (916) 460-2394
E-mail: jessica.snow@calepa.ca.gov

ACCOMPLISHMENTS AND CHALLENGES

Various accomplishments and challenges relative to the CUPA's overall implementation of the Unified Program.

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

Since the 2022 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 has 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 has ensured that APSA tank facilities annually submitted APSA Facility Information to CERS.

The CUPA successfully enforced requirements of the APSA Program and obtained a high rate of compliance from tank facilities that were cited with violations since the 2022 CUPA Performance Evaluation. The CUPA completes multiple reinspections, as necessary, to ensure facilities cited with violations return to compliance (RTC).

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2. HAZARDOUS WASTE GENERATOR (HWG) INSPECTION FREQUENCY:

The CUPA achieved a 99% HWG inspection frequency and has demonstrated commendable efforts to ensure that HWG facilities cited with violations obtain RTC. The CUPA continues to conduct follow-up inspections at each facility until all violations are corrected.

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3. UPDATED CHAPTER 16 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 an 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.

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4. STAFFING CHALLENGES:

The Roseville Fire Department has experienced significant staffing challenges within the Fire & Life Safety Division. Over the past ten years, the Division has experienced approximately 81% voluntary attrition, while its inspection workload has increased approximately 45%. As a result, the majority of current inspectors have fewer than four years of experience with the City.

This turnover has required the Division to continually recruit, onboard, train, and certify new personnel while maintaining mandated inspection and enforcement responsibilities across multiple complex Unified Program elements. The resulting loss of institutional knowledge and

ongoing training demands have created challenges with consistency, documentation, data management, and supervisory oversight.

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 conducted complete annual underground storage tank (UST) compliance inspections.

Violation not reported to CERS:

- CERS ID 10206679
  - Inspection report dated May 15, 2024, cites Violation Library Type Number 2030025 (USEPATCR 9d)
- CERS ID 10188013
  - Inspection report dated May 24, 2023, cites Violation Library Type Number 2030043 (USEPATCR 9d)
- CERS ID 10440847
  - Inspection report dated December 10, 2025, cites Violation Type Numbers 2030043 (USEPATCR 9d) and 2030001(USEPATCR 9d)
- CERS ID 10444699
  - Inspection report dated December 11, 2024, cites Violation Type Number 2030043 (USEPATCR 9d)

As identified below, the CUPA's technical compliance rate (TCR) has been higher than the California average in 2025, which is indicative that violations are not reported to CERS:

- January – June 2025
  - CUPA: 61.2%
  - CA Avg: 82.6%
- July – December 2025
  - CUPA: 64.2%
  - CA Avg: 83.3%

UST testing results include incomplete or inaccurate information:

- CERS ID 10197085
  - Spill Containment Testing Report Form dated January 1, 2024, does not include the following:
    - CERS ID, facility name, facility address, city, and zip code in Section 1
    - Phone, mailing address, service technician performing test, contractor/tank tester license number, ICC number, and ICC expiration date in Section 2
    - Service technician's signature in Section 5
- CERS ID 10444699
  - Monitoring System Certification Form dated December 11, 2024, does not include results in Section 6 for the under dispenser containment (UDC) sensors.

UST construction and inspection information was inconsistent:

- CERS ID 10505968
  - Monitoring System Certification Forms dated June 21, 2023, June 13, 2024, and June 18, 2025, marked "Check this box if tank gauging is used only for inventory control", however, CERS indicates the facility has three single-walled USTs.
- CERS ID 10206679
  - Overfill Prevention Equipment Inspection Form dated May 24, 2023, cites audible/visual alarm as the overfill prevention method, however CERS cites fill tube shut
- CERS ID 10440837
  - Monitoring System Certification Forms dated December 13, 2023, December 9, 2024, and December 10, 2025, marked "Yes" for "Does the flow of fuel stop at the dispenser if a release is detected in the UDC?" in Section 5, however, CERS cites 208 sensors.

UST testing records were not maintained:

- CERS 10197085
  - 2020 Secondary Containment Testing Report Form
- CERS ID 10206679
  - 2020 Secondary Containment Testing Report Form
- CERS ID 10166171
  - 2024 Monitoring System Certification Form
  - 2024 Spill Containment Testing Report Form
- CERS ID 10440847
  - Overfill Prevention Equipment Inspection Form
- CERS ID 10917160
  - Overfill Prevention Equipment Inspection Form
- CERS ID 10399666
  - 2023 Monitoring System Certification Form
  - 2023 Spill Containment Testing Report Form
- CERS ID 10444699
  - 2023 Monitoring System Certification Form
  - 2023 Spill Containment Testing Report Form
  - 2020 Overfill Prevention Equipment Inspection Form
  - 2021 Secondary Containment Testing Report Form

CITATION(S):
Before January 1, 2026: Health & Saf. Code, § 25288; Cal. Code Regs., tit. 23, §§ 2632, subds. (b) & (d), 2637, subd. (e) & (f), 2637.1, subd. (d) & (e), 2637.2, subd. (d) & (e), 2638, subds. (a), (c) & (d), 2712, 2713, 2715, subds. (b) & (f); [State Water Board]

As of January 1, 2026: Health & Saf. Code, § 25288; Cal. Code Regs., tit. 23, §§ 2613, 2633, subd. (c), 2644, subd. (d), 2650, subds. (b) & (e), 2660, 2663, subds. (a) & (e), 2664, subd. (d), 2665, subd. (c), 2666, subd. (e), 2692; [State Water Board]

CORRECTIVE ACTION:
By the 1st Progress Report, and with each subsequent Progress Report, submit UST facility records, including the most recent annual UST compliance inspection report, associated testing

and release detection documents, and all enforcement correspondence between the CUPA and the UST owner/operator for three most recently inspected UST facilities.

State Water Board recommends that the CUPA:

- Determine why complete annual UST compliance inspections have not been consistently conducted.
- Establish procedures and develop tools to ensure complete annual UST compliance inspections are conducted, and CME information is correctly reported to CERS.
- Identify types and frequency of training for conducting complete UST inspections. The CUPA may also request additional training from the State Water Board.
- Revise the I&E Plan or other applicable procedure to establish a process for:
    - Conducting complete annual UST compliance inspections at all UST facilities.
    - Maintaining records, including UST compliance inspection reports and testing and release detection records for all UST facilities.
    - Review and revise the Data Management Procedure or other applicable procedure to ensure the establishment of a process, which addresses collecting, retaining, managing, and reporting CME information in CERS, and how UST compliance information is accurately reported in Report 6.

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2. DEFICIENCY:

The CUPA has not correctly reported compliance, monitoring and enforcement (CME) information to CERS for the APSA and HWG Programs.

Cited violation in inspection report and CERS are inconsistent:

- CERS ID 10338934
    - Inspection report dated April 24, 2024: 3 violations cited
        - CERS: 1 violation cited
- CERS ID 10396339
    - Inspection report dated August 15, 2024: 4 violations cited
        - CERS: 1 violation cited
- CERS ID 10419415
    - Inspection report dated September 29, 2025: 2 violations cited
        - CERS: 1 violation cited
- CERS ID 10501558
    - Inspection report dated April 29, 2025: 4 violations cited
        - CERS: 2 violations cited
- CERS ID 10412188
    - Inspection report dated January 23, 2024: 2 violations cited
        - CERS: 1 violation cited
- CERS ID 10152127
    - Inspection report dated February 20, 2024: 2 violations cited
        - CERS: 1 violation cited
- CERS ID 10412800
    - Inspection report dated October 26, 2023: 2 violations cited
        - CERS: 1 violation cited

- CERS ID 10590463
  - Inspection report dated May 24, 2024: 10 violations cited
    - CERS: 14 violations cited
      - 4 violations in CERS are repeat entries
      - 1 violation cited in the inspection report and not in CERS
- CERS ID 10454692
  - Inspection report dated May 15, 2025: 7 violations cited
    - CERS: 3 violations cited
- CERS ID 10865572
  - Inspection report dated March 7, 2025: 1 violation cited
    - CERS: 0 violations cited
  - Inspection report dated December 5, 2024: 4 violations cited
    - CERS: 0 violations cited
- CERS ID 10453432
  - Inspection report dated March 7, 2024: 7 violations cited
    - CERS: 5 violations cited
- CERS ID 10406161
  - Inspection report dated July 8, 2024: 9 violations cited
    - CERS: 7 violations cited
- CERS ID 10449463
  - Inspection report dated April 4, 2025: 1 violation cited
    - CERS: 0 violations cited
- CERS ID 10212577
  - Inspection report dated September 12, 2025: 8 violations cited
    - CERS: 7 violations cited
      - 4 violations in CERS are repeat entries
      - 4 violations cited in the inspection report and not in CERS
- CERS ID 10422115
  - Inspection report dated April 25, 2024: 5 violations cited
    - CERS: 5 violations cited
      - 4 violations in CERS are repeat entries
      - 2 violations cited in the inspection report and not in CERS
- CERS ID 10401847
  - Inspection report dated January 21, 2025: 2 violations cited
    - CERS: 6 violations cited
      - 6 violations in CERS are repeat entries
  - Inspection report dated January 23, 2024: 5 violations cited
    - CERS: 1 violation cited

No record of inspection in CERS:

- CERS ID 10619398
  - Inspection report dated May 23, 2024
  - Inspection report dated June 13, 2024
- CERS ID 10936945
  - Inspection report dated October 4, 2024
- CERS ID 10152127
  - Inspection report dated April 17, 2025
  - Inspection report dated May 28, 2025

- CERS ID 10412800
  - Inspection report dated November 15, 2023
  - Inspection report dated March 27, 2024
- CERS ID 10454692
  - Inspection report dated June 26, 2025
- CERS ID 10449463
  - Inspection report dated May 6, 2025
- CERS ID 10422115
  - Inspection report dated June 28, 2025
- CERS ID 10767163
  - Inspection report dated June 25, 2024

Date of inspection is incorrect in CERS:

- CERS ID 10464475
  - Inspection report dated December 18, 2025
    - CERS: Inspection is dated December 19, 2025

Note: This Deficiency was identified as Deficiency 1, regarding the APSA Program in the 2022 CUPA Performance Evaluation and was corrected during the Progress Report process.

CITATION(S):
Health & Saf. Code, §§ 25270.4.5, subd. (b)(2); tit. 19, §§ 1609, 1610; [OSFM]
Health & Saf. Code, § 25404, subd. (e)(4); Cal. Code Regs., tit. 27, §§ 15187, subds. (a)(2) & (c), 15290, subd. (d); [DTSC]

CORRECTIVE ACTION:
During each Progress Report, OSFM and DTSC will review information in CERS to verify the CME information for the facilities identified above has been corrected.

By the 2nd Progress Report and with each subsequent Progress Report:

- Submit an inspection report dated between July 1, 2021, and December 31, 2025, for three APSA tank facilities requested by OSFM.
- Submit an inspection report citing at least one HWG Program violation for 3 HWG facilities that were inspected within the last 3 months.

OSFM and DTSC recommend that the CUPA:

- Identify and correct the cause(s) for incorrectly reporting CME information to CERS and establish processes and/or secure resources to prevent this from reoccurring.
- Implement a quality assurance and quality control process to ensure CME information is correctly reported to CERS.
- Ensure CUPA personnel and inspectors review the most current violations and citations in the Violation Library.
- Review and revise APSA tank facility inspection checklists to include applicable Violation Library Violation Type Number for each violation observed.

3. DEFICIENCY:

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

- CERS ID 10466233: Inspection report dated October 28, 2025:
  - No observations, citations, factual basis, or violation classification for 7 of 7 cited violations.
- CERS ID 10590463: Inspection report dated May 24, 2025:
  - No observations, citations, factual basis, or violation classification for 11 of 11 cited violations.
  - Corrective actions lack specificity, including:
    - "Have the used oil filters removed by an approved hazardous waste hauler. They have been on-site longer than 90 days."
      - No mention of the accumulation start date on the label
    - "Properly dispose of the used oil that has accumulated in the oil catch pans on top of all three maintenance bays."
      - No description of what is meant by proper disposal
    - "The oily rags throughout the shop need to be cleaned and handled properly."
      - No description of what is meant by proper handling
- CERS ID 10406161: Inspection report dated July 8, 2024
  - No observations, citations, factual basis, or violation classification for 9 of 9 cited violations.
- CERS ID 10399567: Inspection report dated January 23, 2024:
  - No corrective actions, citations, factual basis, or violation classification for 11 of 11 cited violations.
- CERS ID 10422115: Inspection report dated April 29, 2025:
  - No observations, citations, factual basis, or violation classification for 2 of 2 cited violations.
  - Corrective actions lack specificity, including:
    - "Batteries can't be on the ground."
      - No further description of how batteries must be stored
- CERS ID 10401847: Inspection report dated January 23, 2024:
  - Limited or no observations, no citations, factual basis, or violation classification for 5 of 5 cited violations.
  - Corrective actions lack specificity, including:
    - "Store metal break shavings in a container with a lid."
      - No description of labeling or disposal requirements
    - "Clean all the break shavings off the ground and around the break lathe"
      - No description of additional handling and disposal requirements
- CERS ID 10865572: Inspection report dated December 5, 2024:
  - Limited or no observations, no citations, factual basis, or violation classification for 4 of 4 cited violations.
  - Corrective actions lack specificity, including:
    - "Label 55-gallon drum in shop area that contains full-synthetic motor oil and ensure it is managed properly. Currently full-synthetic motor oil is being disposed of in an unlabeled drum along with garbage items."
      - No description of labeling or disposal requirements or what is meant by proper management

Note: This Deficiency was identified as Deficiency #5 in the 2022 CUPA Performance Evaluation and was not corrected.

CITATION(S):
Health & Saf. Code, § 25185, subd. (c)(2)(A); [DTSC]

CORRECTIVE ACTION:
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 Unified Program Annual Training 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.

DTSC recommends that the CUPA:

- Document consent in each inspection report. Consent was not documented in any of the inspection reports identified above,
- Revise the current inspection report template to include:
    - An indication as to whether a facility is a Small Quantity Generator (SQG) or Large Quantity Generator (LQG).
    - Citations pertinent to California Code of Regulations, title 22 and Health and Safety Code provisions.
    - The violation classification for each violation.
    - Separate fields for observations and corrective actions pertaining to each violation

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 CUPA has not ensured all USTs are in compliance with the design, construction, monitoring, and testing requirements.

UST Facility Tank/data Download report (April 21, 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:
  - CERS Tank IDs 10189849-001, -002
  - CERS Tank IDs 10212631-001, -002, -003

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.

During each Progress Report, the State Water Board will review information submitted by the CUPA and in CERS to verify each UST is in compliance with design, construction, monitoring, and/or testing requirements as described above, or enforcement has been applied for USTs that do not obtain RTC (e.g., revocation of UST Permit and issuance of red tag).

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2. INCIDENTAL FINDING:

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

- Failure to obtain/maintain a written tank assessment certified by a professional engineer (Cal. Code Regs., tit. 22, § 66265.192, subd. (h))
  - Could result in a failure to prevent releases of hazardous waste or constituents to the environment if tank system not fit for use

    - Economic benefit: delayed cost of not hiring an independent professional engineer to assess the tank system
        - 15 of 25 (60%) violations cited were classified as minor
- Illegal disposal (Health & Saf. Code, § 25189.5)
    - Significant threat to human health, safety, or environment
    - Could result in failure to ensure that hazardous waste is destined for, and delivered to, an authorized hazardous waste facility
    - Economic benefit: avoided cost of disposal
        - 7 of 10 (70%) violations cited were classified as minor
- Exceedance of authorized accumulation time (Cal. Code Regs., tit. 22, §§ 66262.15, subd. (a)(9), 66262.16, subd. (b), 66262.17, subd. (a))
    - Economic benefit: delayed or avoided cost of transportation and/or disposal
        - 10 of 31(32%) violations cited were classified as minor

CITATION(S):
Health & Saf. Code, §§ 25110.8.5, 25117.6, 25404, subd. (a)(3); Cal. Code Regs., tit. 22, § 66260.10; [DTSC]

RESOLUTION:
Ensure each violation is properly classified and apply enforcement as established in the I&E Plan.

By the 1st Progress Report, train inspection staff on:

- The definitions of Class I (Health & Saf. Code, § 25110.8.5, subd. (a)), Class II (Cal. Code Regs., tit. 22, § 66260.10), and minor (Health & Saf. Code, § 25117.6) violations
- The definition of minor (Health & Saf. Code, § 25404)
- How to properly classify HWG Program violations as Class I, Class II, and minor violations, including a review of:
    - Violation Classification Guidance for Unified Program Agencies: https://calepa.ca.gov/wp-content/uploads/2020/06/Violation-Classification-Guidance-Document-accessible.pdf
    - Violation Classification – Focus on Hazardous Waste (and in particular, slides 7, 21-27, 29-36, and 135-137): https://calcupa.org/CMS15/upload-manager/presentations/CUPA-2022/6152-20542-e-3-23-violation-classification.pdf
    - Violation Classification Training Video (1 of 2): https://www.youtube.com/watch?v=yfm3_nXXiPY&list=PLC6C167034352AA02
    - Violation Classification Training Video (2 of 2): https://www.youtube.com/watch?v=cuKbIKkhQcA

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 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 Program violation.

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

- FY 2022/2023
- FY 2023/2024

- FY 2024/2025

Note: This Incidental Finding was identified as Deficiency 12 in the 2022 Performance Evaluation and was corrected during the Evaluation Progress Report process.

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

RESOLUTION:
By the 1st Progress Report, submit a revised Financial Management Procedure that includes the criteria for waiving the state surcharge and single fee.

The CUPA will train its staff on the revised Financial Management Procedure once the Incidental Finding is corrected.

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4. INCIDENTAL FINDING:
The CUPA has not properly implemented an efficient and cost-effective fee accountability program.

The Financial Management Procedure does not include the following fee accountability program components:

- Discrete billable services, categorized as either site specific or general.
- Direct program expenses including durable and disposable equipment.
- Indirect program expenses including overhead for facilities and administrative functions.
- The number of regulated businesses in each program element.
- Quantity and range of services provided.
- Non-recurring activities.
- Other funding sources that assist in covering the costs of implementing the Unified Program.

The Annual Self-Audit Reports for FYs 2022/2023, 2023/2024, and 2024/2025 do not include the complete annual review and update of the Fee Accountability Program.

CITATION(S):
Cal. Code Regs., tit. 27, §§ 15210, 15220, subd. (a); [CalEPA]

RESOLUTION:
By the 1st Progress Report, submit a revised administrative procedure to address the issues identified above.

By the 1st Progress Report, submit a Self-Audit Report for FY 2025/2026 that includes the annual review and update of the Fee Accountability Program.

CalEPA recommends that the CUPA train staff on the administrative procedures once the Incidental Finding is corrected.

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5. 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:

- 72 of 612 (12%) HMBP facilities have not submitted an inventory or a no-change certification
- 77 of 612 (13%) HMBP facilities have not submitted emergency response and employee training plans or a no-change certification

CITATION(S):

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

RESOLUTION: COMPLETED

During the evaluation:

- 51 of 72 HMBP facilities submitted an inventory or a no-change certification; 21 have not submitted or certified
- 66 of 77 HMBP facilities submitted emergency response and employee training plans or a no-change certification; 11 have not submitted or certified

This Incidental Finding is considered corrected.

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6. INCIDENTAL FINDING: CORRECTED DURING EVALUATION

The CUPA did not submit a Formal Enforcement Summary report for each formal enforcement case after a final judgement:

- CERS ID 10421860
- CERS ID 10505968
- CERS ID 10212523
- CERS ID 10865572

CITATION(S):

CCR, Title 27, Section 15290(c); [CalEPA]

RESOLUTION: COMPLETED

During the evaluation, the CUPA submitted the Formal Enforcement Summary Reports listed above. 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.