

**REPORT TO THE LEGISLATURE**

**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)  
PROGRAM STATEWIDE STANDARDS**

Prepared by  
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State of California**

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# California Environmental Protection Agency

## EXECUTIVE SUMMARY

This report has been prepared in response to the Supplemental Report of the 2000 Budget Act requirement that the Secretary of the California Environmental Protection Agency (Cal/EPA) report to the Legislature on the statewide standards that have been developed, or are planned to be developed, for local service levels for implementation of the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) by local government agencies known as Certified Unified Program Agencies (CUPAs).

Cal/EPA, in conjunction with the other state agencies responsible for overseeing the Unified Program, has established the necessary performance standards for CUPA local service levels and also has a process in place to implement those standards consistently throughout the state. These CUPA performance standards have been established in state law and regulations and include requirements in each of the following areas:

- ' CUPA self-audit
- ' Permitting of regulated businesses
- ' Enforcement of program elements
- ' Reporting
- ' Information management
- ' Program administration
- ' Inspections of regulated businesses
- ' Single Fee system operation and fee accountability
- ' Staff training/continuing education

The established CUPA performance evaluation process assesses a CUPA's ability to adequately meet the Unified Program requirements and statewide standards. If the evaluation identifies deficiencies in CUPA implementation of the Unified Program, Cal/EPA works with the CUPA to correct those deficiencies in a timely manner, or may take actions to withdraw a CUPA's certification to implement the Unified Program.

Cal/EPA and the other Unified Program oversight agencies assist CUPAs in meeting the established standards through 1) development of written guidance materials and training classes for CUPAs on specific requirements and program elements; 2) state agency staff technical support via telephone hotlines, E-mail, and direct calls; and 3) consultation and coordination with CUPAs through advisory groups such as the Unified Program Administration and Advisory Group (UPAAG).

In addition to existing performance standards, the following new and/or revised performance standards are planned for development in 2000/01.

- U Regulations establishing standards for hazardous waste clean-up, including criteria for CUPA implementation of the environmental assessment and corrective action portions of the Unified Program.

- U Regulations establishing improved performance standards for CUPA inspection and enforcement programs, including minimum inspection frequencies for hazardous waste generators and criteria for enforcement response.

# TABLE OF CONTENTS

Executive Summary.....	i.
Table of Contents.....	iii.
I. Introduction.....	1.
II. Background.....	1.
III. CUPA Certification Process and Standards.....	3.
IV. CUPA Evaluation Process.....	4.
V. Existing CUPA Performance Standards.....	6.
A. CUPA Compendium of Performance Standards.....	6.
1. Self-Audit Performance Standards.....	6.
2. Administrative Performance Standards.....	7.
3. Permitting Performance Standards.....	7.
4. Inspection Performance Standards.....	8.
5. Enforcement Performance Standards.....	8.
6. Single Fee System Performance Standards.....	9.
7. Reporting Performance Standards and Information Management....	9.
8. Training Performance Standards.....	10.
B. Examples of Recent Performance Standard Regulatory Actions.....	11.
VI. Management Support Tools and Information Communication.....	12.
VII. CUPA Performance Standards - Planned or Under Development.....	13.
VIII. Conclusion.....	14.
Appendix 1. CUPA Compendium of Performance Standards.....	15.

## **I. INTRODUCTION**

This report has been prepared in response to Provision 1, Item 0555-001-0044 of the Supplemental Report of the 2000 Budget Act, which requires:

The Secretary for Environmental Protection shall report, by March 1, 2001, to the Chairs of the Joint Legislative Budget Committee and the fiscal and pertinent policy committees of both houses on statewide standards that have been developed, or are planned to be developed in 2000-01, for local service levels for the Unified Program (CUPA) program. It is the intent of the Legislature that the Secretary, in conjunction with the other state agencies responsible for overseeing the Unified Program, develop an appropriate set of performance standards to assist the Secretary in performing the statutorily required evaluations of how well Certified Unified Program Agencies (CUPAs) are meeting program requirements, including local fee accountability.®

The purpose of this report is to briefly document for the Legislature 1) the existing CUPA statutory and regulatory standards; 2) processes developed and activities undertaken to implement and enforce those standards; and 3) standards planned for future implementation.

## **II. BACKGROUND**

In 1993, Senate Bill (SB) 1082<sup>1</sup> assigned to Cal/EPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management regulatory program (known as the Unified Program) under Health and Safety Code (HSC) Chapter 6.11. The purpose of the Unified Program is to consolidate, coordinate, and make consistent, both locally and statewide, six different hazardous materials and hazardous waste regulatory programs. (Table 1 lists the specific programs, state oversight agencies, and associated program statutes and regulations.)

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<sup>1</sup> Calderon, Chapter 418, Statutes of 1993. Effective January 1, 1994.

**Table 1.**

<b>Unified Program Regulatory Program Element</b>	<b>State Oversight Agency</b>	<b>Statutes and Regulations</b>
Hazardous Waste Generators and Hazardous Waste Onsite Treatment Permit Programs	Department of Toxic Substances Control (DTSC)	HSC, Chapter 6.5  Title 22, California Code of Regulations (CCR), Division 4.5
Aboveground Storage Tanks	State Water Resources Control Board (SWRCB)	HSC, Chapter 6.67
Underground Storage Tanks	SWRCB	HSC, Chapter 6.7  Title 23, CCR, Division 3, Chapter 16
Hazardous Material Release Response Plans and Inventories (Business Plans)	Office of Emergency Services (OES)	HSC, Chapter 6.95  Title 19, CCR, Division 2, Chapter 4
California Accidental Release Prevention (CalARP) Program <sup>2</sup>	OES	HSC, Chapter 6.95  Title 19, CCR, Division 2, Chapter 4.5
Uniform Fire Code Hazardous Material Management Plans and Inventories	State Fire Marshal (SFM)	HSC, Section 13143.9  California Fire Code (CFC), Section 8001.3

Prior to creation of the Unified Program, the above six program elements were implemented by over 1,300 state and local agencies. Enforcement of program elements was inconsistent and ineffective, and regulated facilities were subjected to multiple fees, permits, inspections, and reporting requirements.

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<sup>2</sup> formerly known as the Risk Management and Prevention Program (RMPP).

Under the provisions of SB 1082, Cal/EPA was required to adopt implementing regulations for the Unified Program by January 1, 1996 and prescribe the responsibilities and criteria for local agencies to implement the Unified Program as CUPAs. While the general CUPA responsibilities, certification, and program implementation criteria are established in Title 27, CCR, Subdivision 4 (State Delegation), Chapter 1, Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Section 15100 et seq.), CUPA performance standards specific to each of the six program elements are also found within the specific laws and regulations applicable to those program elements (see citations in Table 1).

The Unified Program is currently overseen by Cal/EPA with support from the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), the Office of Emergency Services (OES), and the State Fire Marshall (SFM). In conjunction with DTSC, SWRCB, OES, and SFM, Cal/EPA has established performance standards for CUPA local service levels and also has a process in place to implement those standards consistently throughout the state.

### **III. CUPA CERTIFICATION PROCESS AND STANDARDS**

Prior to certification as a CUPA, local agencies are required to submit an application for certification to Cal/EPA. While each California county is required by law to submit an application for CUPA certification, cities or other eligible local agencies may also apply. In order to provide for consistency in application submittal and review, Cal/EPA has established CUPA certification application standards and requirements in Title 27, CCR (starting with section 15120).

While counties are required by law to apply for CUPA certification, it should be noted that certification is not automatic. Applicant local agencies must also meet the application evaluation criteria standards established by Cal/EPA in Title 27, CCR (starting with section 15170) in order to be certified as a CUPA. Successful applications must, among other things, demonstrate that the local agency has adequate resources and expertise with which to implement the Unified Program within the agency's jurisdiction.

At this time Cal/EPA has certified a total of 69 CUPAs covering 43 of the 58 counties in California. Most CUPAs have been established as a function of a local environmental health or fire department. In addition, some CUPAs may have contractual agreements with another local agency, known as a participating agency or PA, to implement one or more Unified Program elements in coordination with the CUPA.

To assist local agencies with application development and provide for consistent application evaluation, Cal/EPA developed the CUPA Application Reviewer's Manual.

This manual is available upon request from Cal/EPA. In addition, Cal/EPA has developed a draft ACUPA Model Application Package<sup>3</sup> to further assist the 15 remaining non-CUPA counties in submitting successful CUPA certification applications.

#### IV. CUPA EVALUATION PROCESS

Existing law<sup>3</sup> requires that Cal/EPA periodically review the ability of each CUPA to meet established performance standards and adequately implement the Unified Program within its jurisdiction. In carrying out the CUPA review mandate, Cal/EPA has established a triennial review cycle for CUPAs<sup>4</sup> and has developed the ACUPA Evaluation Process Guidance Manual<sup>3</sup> to provide for consistency and coordination in the review process. In addition to assessing CUPA implementation of the Unified Program to ensure community compliance with environmental regulations, the evaluation process is designed to enhance state and local agency/CUPA partnerships, recognize unique CUPA abilities and resources, and provide feedback for continuous improvement of the Unified Program.

Each CUPA evaluation is conducted by an evaluation team composed of representatives from each of the State oversight agencies. The evaluation consists of 1) a records review; 2) a field review of a regulated facility inspection; and 3) an evaluation report that documents the findings of evaluation and makes recommendations for CUPA improvements where necessary.

The records review evaluates the quality, completeness, and maintenance of CUPA required documents, records, and procedures to determine whether CUPA practices meet the established performance standards. The field review examines the ability of CUPA staff to effectively ensure that regulated businesses within the CUPA's jurisdiction are complying with hazardous materials and hazardous waste management requirements. The field evaluation consists of evaluation team members observing CUPA staff during an inspection of a regulated facility. The evaluation team focuses on how the inspection is conducted and documented, whether CUPA staff adequately identify facility compliance, and what violations (and necessary enforcement actions) are identified by CUPA staff during the inspection and post-inspection follow-up with the regulated facility.

Upon completion of the records and field reviews, the evaluation team prepares a draft of its preliminary findings based on the review information generated and the established performance standards. The evaluation team shares these preliminary findings with the CUPA to point out areas of noncompliance by the CUPA or regulated businesses, explain the reasons for noncompliance, identify questions that remain to be answered, and discuss

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<sup>3</sup> HSC Section 25404.4(a)(1).

<sup>4</sup> Title 27, CCR, Section 15290(a).

tentative findings that need further review and/or resolution.

After meeting with the CUPA on the preliminary findings, the evaluation team prepares a draft evaluation report identifying any minor and/or major<sup>5</sup> deficiencies in the CUPA's implementation of the Unified Program. The report includes recommendations on how to address any minor deficiencies, and may propose a Program Improvement Agreement (PIA) to address any major deficiencies identified. In cases where major deficiencies present a significant impact to the coordination, consolidation, and consistency of the Unified Program, the evaluation team may recommend that the final report include a Notice of Intent to Withdraw Certification (NOI)

Cal/EPA, in its implementation of the CUPA evaluation process, has recognized the need to streamline the evaluation process to improve its timeliness and effectiveness. To accomplish this, Cal/EPA has instituted the following changes:

1. Tasked fewer individuals with the responsibility to conduct the evaluations, thus allowing for more consistency between evaluations and ensuring that staff with more evaluation experience are involved.
2. Committed to follow evaluation time schedules more closely, rather than providing extensions for CUPAs to respond to initial evaluation results and draft evaluation reports.
3. Improved tracking efforts to follow the progress of evaluations through the process and to recognize when delays are occurring.
4. Reworked the evaluation tools so that a singular, standardized format is being used. These tools are available not only for those conducting the evaluations, but also for CUPAs to use in self-evaluation efforts.
5. Modified the CUPA Compendium of Performance Standards to make it a more useful reference document and make it easier to find the applicable standards.

These changes, along with consistent feedback from CUPAs and evaluators, will help to improve the evaluation process and make it more effective at ensuring that the CUPAs are meeting program requirements.

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<sup>5</sup> Major deficiencies are those deficiencies that may adversely impact 1) public health and safety and the environment; 2) coordination, consolidation, and consistency within the Unified Program; or 3) federal authorization of state environmental programs.

## V. EXISTING CUPA PERFORMANCE STANDARDS

### A. *CUPA Compendium of Performance Standards*

To date, CUPA implementation of the Unified Program is guided by **182 statutory performance standards** and **295 regulatory performance standards**.

The attached *CUPA Compendium of Performance Standards* (Appendix 1) provides a comprehensive listing (organized by performance standard subject area) of the existing CUPA performance standards.

The Compendium has been developed by Cal/EPA for use as both a guidance document and CUPA performance tracking tool for CUPAs and state oversight agencies alike. The Compendium is arranged so that the established performance standards for all Unified Program elements are grouped and displayed according to the following subject areas. (A brief description of the standards addressed in each subject area and subject area location in the Compendium is provided below.)

#### 1. Self-Audit Performance Standards (Compendium pages 1- 2)

Each CUPA is required to perform an annual self-audit of Unified Program activities at the end of each fiscal year. The purpose of the self-audit is twofold: 1) to foster continued improvement in CUPA implementation of the Unified Program through CUPA internal review and assessment of Unified Program activities; and 2) document for Cal/EPA that the CUPA is adequately implementing the Unified Program within its jurisdiction.

Among other things, the CUPA self-audit is required to include narrative summaries/documentation of activities in the following areas:

- single fee system and fee accountability activities;
- effectiveness and efficiency of permitting, inspection, and enforcement activities;
- changes in local ordinances, resolutions, and agreements affecting the Unified Program;
- annual, biennial, and quarterly program activity reports; and
- Unified Program implementation deficiencies and a plan for correction of those deficiencies.

CUPA self-audit reports must be kept on file by the CUPA for at least 5 years

and forwarded to Cal/EPA (or other state oversight agency) upon request. CUPA self-audit reports are also reviewed by Cal/EPA during CUPA performance evaluations to determine whether the CUPA has satisfied established performance standards.

## 2. Administrative Performance Standards (Compendium pages 3 - 15)

Each CUPA is required to maintain the administrative procedures and activities necessary to carry out the requirements of implementing the Unified Program, including requirements to:

- consolidate, coordinate, and make consistent any local regulations, ordinances, requirements, or guidance documents related to implementation of the Unified Program within the CUPA's jurisdiction;
- provide for public participation procedures, including procedures for responding to public information requests and community right-to-know issues;
- collect, retain, and manage data and information gathered from regulated businesses, including consideration of electronic data management systems;
- develop and maintain a financial management system to include a single fee system and mechanism for fee accountability; and
- develop and maintain necessary records retention and filing systems.

## 3. Permitting Performance Standards (Compendium pages 16 - 20)

Consistent with the goals of the Unified Program, each CUPA is required to develop a coordinated and consolidated permit process which provides regulated businesses with a single point of contact for obtaining information on, the requirements for, and the application process for a Unified Program consolidated permit. In so doing, CUPAs utilize the established Unified Program Consolidated Form (UPCF), or an equivalent form, to identify regulated businesses and to document or authorize business activities subject to Unified Program requirements. In addition to acting as a consolidated permit, the UPCF also serves as the main data collection mechanism for Unified Program regulated business tracking and reporting.

Furthermore, each CUPA must develop the necessary procedures for permit application tracking, permit processing, and permit review or renewal.

These procedures must also include processing timelines, dispute resolution or appeal provisions, and mechanisms for authorization

notifications.

**4. Inspection Performance Standards (Compendium pages 21 - 25)**

Each CUPA must provide for inspection of Unified Program regulated businesses to ensure facility compliance with program requirements. CUPAs must also develop a written, unified Inspection and Enforcement Program Plan, and to update the plan as needed. The plan's inspection component must include the number of regulated businesses, a schedule of inspection frequencies that is consistent with statutory minimum frequencies, provisions for joint, combined and multi-media inspections, assurance of adequate inspector training and staff cross-training, and coordination between the CUPA and its Participating Agencies.

Among other things, CUPAs must provide for regulated business compliance inspections in the following program element areas:

- hazardous waste generators and onsite hazardous waste treatment facilities;
- underground storage tank systems;
- aboveground storage tank Spill Prevention Control Countermeasure (SPCC) Plans;
- business plan program and Hazardous Materials Inventory Statements/Hazardous Materials Management Plans;
- California Accidental Release Prevention (CalARP) Program;

**5. Enforcement Performance Standards (Compendium pages 26 - 30)**

In conjunction with the inspection requirements noted above, each CUPA must provide for enforcement of Unified Program standards through:

- uniform and coordinated application of requirements and standards;
- issuance of requirement violation notices;
- application of consistent and predictable penalties; and
- use of escalating levels of enforcement actions based on severity of the violation.

Each CUPA must also establish the appropriate mechanisms, procedures, or provisions to address:

- use of integrated, joint, combined, and multi-media enforcement whenever possible;
- violation classification, based on nature, circumstances, extent, and

- gravity of the violation;
- complaint response; and
- administrative, civil, or criminal enforcement actions.

**6. Single Fee System Performance Standards (Compendium pages 31 - 33)**

Each CUPA is required to implement a single fee system within its jurisdiction to replace all other fees charged to regulated businesses to fund activities subject to Unified Program requirements. Prior to implementation of the Unified Program, regulated businesses were subject to multiple fees from multiple agencies. The single fee system is meant to consolidate those fees into a single fee payable to one agency, the CUPA. Each CUPA is responsible for establishing their fee based upon the necessary and reasonable costs for CUPA implementation of the Unified Program. In addition, the CUPA must also include in the single fee a surcharge established by Cal/EPA to fund State agency oversight of CUPAs and statewide administration of the Unified Program.

In developing the single fee system, each CUPA must implement a fee accountability program designed to encourage more efficient and cost-effective operation of the program for which the single fee and state surcharge are assessed. Required elements of the fee accountability program include:

- a procedure of accounting for the fee schedule, the actual amount billed, and the revenue collected;
- discrete billable services, categorized as either site specific or general;
- staff work hours required to implement the program;
- indirect program expenses including overhead for facilities and administrative functions;
- number of regulated businesses within the CUPA jurisdiction subject to regulation under the Unified Program; and
- quantity and range of services provided by the CUPA, including frequency of facility inspections.

In addition, each CUPA must annually review and update the fee accountability program.

**7. Reporting Performance Standards and Information Management (Compendium pages 34 - 39)**

CUPAs must keep records and report to Cal/EPA on all aspects of CUPA

implementation of the Unified Program within their jurisdiction. In order to meet reporting requirements, CUPAs must also develop and maintain procedures and processes for collection of the data necessary for each report. Reports due to Cal/EPA (CUPA-to-State Reports) include:

- annual Single Fee Summary Report;
- annual Inspection Summary Report;
- annual Enforcement Summary Report;
- biennial Tiered Permitting Release Report;
- quarterly Underground Storage Tank Program Report.

In addition to CUPA-to-State reporting requirements, CUPAs must also develop procedures for and maintain data received from regulated businesses, including information on hazardous materials business plans, hazardous waste generator and onsite treatment activities, and unauthorized releases of hazardous wastes or materials.

Most notably, CUPAs must meet the comprehensive Unified Program Information Collection and Reporting Standards that have been established by Cal/EPA in Title 27, CCR. These standards include requirements for a Unified Program Consolidated Form (UPCF) and Unified Program Data Dictionary. The UPCF provides CUPAs with a standardized format for consolidation of information required of regulated businesses. The UPCF consolidates the information regulated businesses are required to provide for the different program elements into one form. Furthermore, the Unified Program Data Dictionary standardizes over 900 data elements (including data field size, type, and edit criteria) for the regulatory data that CUPAs must collect and retain from regulated businesses.

## **8. Training Performance Standards (Compendium pages 40 - 42)**

CUPA technical program staff and supervisors are required to meet minimum education, experience, and training requirements. Minimum education/experience requirements include a college degree (or a combination of course work and experience) in one or more of the following disciplines:

- biology or microbiology;
- chemistry or chemical engineering;
- physics or physical science;
- geology or soil science;
- environmental health;
- environmental or sanitary engineering;
- toxicology;
- industrial hygiene;

- hazardous materials management;
- fire science or fire technology

CUPAs must also ensure and document that staff meet applicable training requirements in the following areas:

- regulatory overview;
- classification, identification, and chemistry of hazardous materials and hazardous waste;
- health and environmental effects of hazardous substances, including chemical exposure and route of entry;
- sampling methodologies and use of instrumentation for detection and sampling of hazardous substances;
- conducting inspections and enforcement actions, and writing inspection reports and notice of violation;
- interviewing, case development, and collection and preservation of evidence.

## **B. *Examples of Recent Performance Standard Regulatory Actions***

Two examples of recent performance standard regulatory actions are provided below.

### **1. Unified Program Information Collection and Reporting Standards**

The Title 27 Unified Program regulations were amended on May 14, 1999 to include new regulations to consolidate existing business to CUPA reporting requirements, and create new CUPA-to-State summary reports. One significant element of these new regulations was the adoption of the UPCF (noted above), which combined and streamlined 15 previously required State forms into one form to be used by all businesses regulated under the Unified Program. The Unified Program Data Dictionary was also adopted to establish the information to be collected by CUPAs and provide consistent data elements for electronic submittal of data by both businesses and CUPAs. In addition, the regulations established six new summary reports for CUPA to State reporting of CUPA regulatory activities and detailed requirements for CUPA collection, retention, and management of information received from businesses.

To facilitate understanding and implementation of the new CUPA-to-State reporting requirements, Cal/EPA staff prepared detailed instructions for completion of each new report and provided daily telephone support to CUPAs and regulated businesses with questions on report elements. Extensive training classes were developed and provided to CUPAs on

implementation of the new reporting requirements, along with a comprehensive CUPA-to-State reporting guidance manual.

**2. California Accidental Release Prevention (CalARP) Program - Local Program Evaluation Requirements**

OES promulgated regulations for Phase I of the CalARP Program on November 16, 1998, thus merging the federal and state programs for the prevention of accidental releases of regulated toxic and flammable substances and eliminating the need for two separate and distinct chemical risk management programs. In addition to establishing the list of regulated substances, threshold quantities, and accident prevention requirements, the regulations provide performance standards for evaluation of CUPA implementation of the CalARP program.

## **VI. MANAGEMENT SUPPORT TOOLS AND INFORMATION COMMUNICATION**

Cal/EPA and the other Unified Program oversight agencies assist CUPAs in meeting the established standards in a variety of ways, including use management support tools such as total quality management teams and workgroups, and use of information communication technologies such as the Internet.

Examples of agency support activities include:

- 1) development of written guidance materials and training classes for CUPAs on specific requirements and program elements;
- 2) state agency staff technical support via telephone hotlines, E-mail, and direct calls;
- 3) consultation and coordination with CUPAs through the California CUPA Forum Board and advisory groups such as the Unified Program Administration and Advisory Group (UPAAG);
- 4) use of total quality management teams to evaluate program needs and suggest program improvement methods; and
- 5) use of electronic information technologies, such as Internet websites (both Cal/EPA and California CUPA Forum) and E-mail, to provide for easy access and

dissemination of Unified Program information and guidance materials.

## **VII. CUPA PERFORMANCE STANDARDS - PLANNED OR UNDER DEVELOPMENT**

Cal/EPA has determined that additional standard development is necessary and appropriate in the following areas:

### **U Hazardous Waste Response Action Regulations**

DTSC is currently developing regulations establishing standards for clean-up<sup>6</sup> at hazardous waste release sites and specifying the criteria and procedures for determining whether or not a CUPA is qualified to implement the environmental assessment and corrective action portions of the Unified Program.

### **U Enforcement Regulations**

Regulations are currently under development by DTSC to incorporate the DTSC's enforcement response policy into the Title 27 Unified Program regulations. The new regulations will establish standards for CUPA inspection and enforcement programs, including criteria for classifying violations and violators, appropriate enforcement response options that take the classifications into account, and a requirement for timely initiation of enforcement responses. The regulations will also establish minimum inspection frequencies for hazardous waste generators, Conditionally Exempt Small Quantity Generators (CESQGs) of silver-only hazardous waste, and generators of universal waste.

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<sup>6</sup> A Clean-up<sup>®</sup> means activities undertaken to investigate, characterize, evaluate, correct, and enforce requirements to address releases of a hazardous waste, hazardous constituent, or hazardous substance, as necessary to protect public health and the environment.

## U Underground Tank Secondary Containment Requirements

The SWRCB is currently amending the underground tank regulations to provide for secondary containment and tank management training requirements mandated by Senate Bill 989 [Sher, Chapter 812, Statutes of 1999] in response to MTBE<sup>7</sup> contamination concerns. These regulations also include amended standards for CUPA implementation of the underground tank program.

## VIII. CONCLUSION

Cal/EPA, in conjunction with the other state agencies responsible for overseeing the Unified Program, has established the necessary statutory and regulatory standards for implementation of the Unified Program by CUPAs. These standards include requirements and criteria for certification and evaluation of CUPAs, as well as performance standards for CUPA local service levels. Furthermore, Cal/EPA has established the processes with which to implement these standards consistently throughout the state.

In addition to the statutory and regulatory standards already in place, Cal/EPA also utilizes other non-regulatory mechanisms to assure continued improvement in the implementation and oversight of the Unified Program. Using management tools (i.e., total quality management teams and interagency workgroups) and information technology (i.e., data management programs and the Internet), Cal/EPA continues to develop guidance documents, identify and institute program changes as necessary, and disseminate information to CUPAs and the regulated community alike.

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<sup>7</sup> Methyl tertiary-butyl ether.

Appendix 1. CUPA Compendium of Performance Standards.  
(<http://www.calepa.ca.gov/CUPA/Documents/compends.pdf>)