



Gavin Newsom
Governor

Jared Blumenfeld
Secretary for Environmental Protection

January 28, 2021

Mr. Rick Dean
Deputy Director of Environmental Health
County of Siskiyou Environmental Health Division
806 South Main Street
Yreka, California 96097-3321

Dear Mr. Dean:

During May through December, 2020, CalEPA and the state program agencies conducted a performance evaluation of the County of Siskiyou Environmental Health Division Certified Unified Program Agency (CUPA). The CUPA evaluation included a remote assessment of administrative documentation, review of regulated facility file documentation, and California Environmental Reporting System data.

Upon completion of the evaluation, a preliminary Summary of Findings report was developed to identify various findings: program deficiencies with corrective actions, incidental findings with resolutions and program observations and recommendations. The report also includes 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 with improvement needed.

To demonstrate progress towards the correction of program deficiencies and incidental findings identified in the final Summary of Findings, the CUPA must submit an Evaluation Progress Report within 60 days from the date of this letter (March 30, 2021), and every 90 days thereafter. Evaluation Progress Reports are required to be submitted to CalEPA until all deficiencies and incidental findings identified have been acknowledged as corrected or resolved. Each Evaluation Progress Report must be submitted to Sam Porras at Samuel.Porras@calepa.ca.gov, or mail.

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

Mr. Rick Dean
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If you have any questions or need further assistance, please contact Melinda Blum at Melinda.Blum@calepa.ca.gov or John Paine, Unified Program Manager, at John.Paine@calepa.ca.gov.

Sincerely,



Jason Boetzer
Assistant Secretary
Local Program Coordination and Emergency Response

Enclosure

cc sent via email:

Mr. John Fitzgerald
CUPA Manager
County of Siskiyou Environmental Health Division
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Ms. Annalisa Kihara
Supervising Water Resource Control Engineer
State Water Resources Control Board
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Sacramento, California 95812-2231

Ms. Laura Fisher
Senior Environmental Scientist, Supervisor
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Ms. Maria Soria
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Ms. Diana Peebler
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cc sent via email:

Mr. James Hosler, Chief
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Ms. Jennifer Lorenzo
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cc sent via email:

Mr. John Paine
Unified Program Manager
California Environmental Protection Agency

Ms. Melinda Blum
Senior Environmental Scientist, Supervisor
California Environmental Protection Agency

Mr. Sam Porras
Environmental Scientist
California Environmental Protection Agency

UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

CUPA: Siskiyou Environmental Health Division

Evaluation Period: May 2020 through December 2020

Evaluation Team Members:

- **CalEPA Team Lead:** Samuel Porras
- **DTSC:** Matthew McCarron
- **Cal OES:** Jack Harrah
- **State Water Board:** Jessica Botsford, Wesley Franks (*shadowing*)
- **CAL FIRE-OSFM:** Glenn Warner

This Final Summary of Findings includes:

- Program deficiencies
- Incidental findings requiring resolution
- Program observations and recommendations
- Examples of outstanding program implementation

The findings contained within this evaluation report are considered final.

Based upon review and completion of the evaluation, the Unified Program implementation and performance of the CUPA is considered: satisfactory with improvements needed.

Questions or comments regarding this evaluation should be directed to the CalEPA Team Lead:

Samuel Porras
CalEPA Unified Program
Phone: (916) 327-9557
E-mail: Samuel.Porras@calepa.ca.gov

The CUPA is required to submit an Evaluation Progress Report 60 days from the receipt of this Final Summary of Findings Report, and every 90 days thereafter, until all deficiencies and incidental findings have been acknowledged as corrected or resolved.

Each Evaluation Progress Report must be submitted to the CalEPA Team Lead and must include a narrative stating the status of correcting each deficiency and resolving each incidental finding identified in this Final Summary of Findings Report.

Evaluation Progress Report submittal dates for the first year following the evaluation are:

1st Progress Report: March 30, 2021 **2nd Progress Report:** June 30, 2021
3rd Progress Report: September 29, 2021 **4th Progress Report:** December 30, 2021

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

DEFICIENCIES REQUIRING CORRECTION

Program deficiencies identify specific aspects regarding inadequate implementation of the Unified Program. The CUPA must complete the corrective action indicated to demonstrate sufficient implementation of the Unified Program as required by regulation or statute.

1. DEFICIENCY:

The Unified Program administrative procedures have components that are missing or incomplete.

The following component is missing:

- Financial Management procedures which include a Fee Accountability Program.
 - The CUPA provided a budget spreadsheet compiling CUPA's operating costs and revenue, however the CUPA did not provide any documentation outlining how their Fee Accountability Program is implemented as is required by California Code of Regulations (CCR) Title 27 Section 15220 and 15180(e)(5).

The following components are incomplete:

- The CUPA's Public Participation Procedures do not address how they ensure the receipt and consideration of comments from regulated businesses and the public. In addition, the procedures do not provide measures to ensure the CUPA is coordinating, consolidating, and making consistent locally required public hearings.
- The CUPA's Record Maintenance Policy, titled as "File Maintenance," does not include all the CUPA-related documents that are required to be kept on file for the minimum five-year retention time. Archival procedures and proper disposal methods are not addressed.
- The CUPA's procedures for providing Hazardous Materials Release Response Plan (HMRRPs) information, located in "Policy #507, Requests for Public Information," do not address procedures for providing other "emergency response personnel and other appropriate government entities" access to HMRRP information.
- The CUPA's procedures for Permitting, located in "UST Permit Modification/Repair Guidelines," do not address the following components in regards to issuing a Unified Program Facility Permit (UPFP):
 - Time lines and time limits of appeal processes;
 - Provisions for preliminary check for application completeness;
 - Provisions for tracking permit applications, establishing follow-up protocol, and facilitating expeditious processing;
 - Provisions regarding the permit cycle;
 - A process for evaluating the coordination, consolidation, and consistency of the Unified Program facility permit process.

CITATION:

California Code of Regulations (CCR), Title 27, Sections 15180(e)(1), (e)(2), (e)(4), (e)(5) and (e)(7); 15185(b) and (f); 15190 and 15220
[CalEPA]

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FINAL SUMMARY OF FINDINGS REPORT**

DEFICIENCIES REQUIRING CORRECTION

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will provide CalEPA with a copy of the revised Unified Program administrative procedures that address the identified missing and incomplete components.

By the 2nd Progress Report, if amendments to the revised Unified Program administrative procedures are necessary based on feedback from CalEPA, the CUPA will provide CalEPA with a copy of the amended Unified Program administrative procedures. If no amendments are necessary, the CUPA will train CUPA personnel on the revised Unified Program administrative procedures. The CUPA will provide training documentation to CalEPA, which at minimum will include an outline of the training conducted and a list of CUPA personnel in attendance. Once training is complete, the CUPA will implement the revised I&E Plan or other applicable procedures.

By the 3rd Progress Report, if amendments were necessary, the CUPA will train CUPA personnel on the amended Unified Program administrative procedures. The CUPA will provide training documentation to CalEPA, which at minimum will include an outline of the training conducted and a list of CUPA personnel in attendance. Once training is complete, the CUPA will implement the amended I&E Plan or other applicable procedures.

2. DEFICIENCY:

The Inspection and Enforcement (I&E) Plan has components that are inaccurate, incomplete, or missing.

The following components are inaccurate or incomplete:

- Section H(4)(c) cites incorrect HSC sections (25291, 25292, and 25295.5) in regards to compliance time frames. The correct HSC sections are 25288(d) and 25290.1.1(b)(3).
- Page 5, part E, Title 27, Section 15260 citations should be reviewed and updated.
- Page 5, bullet 4(a), HSC 25505(a)(2) refers to site maps, not return to compliance.
- Page 5, bullet 4(b), 19 CCR 2775.2(h) applies only to audit findings, not to inspection violations. Not a serious issue, since the CUPA does inspections and audits concurrently.
- Page 6, the APSA RTC timeframe discussion should reference the applicable HSC Chapter 6.11 citation. Although there are no established times under APSA, Unified Program regulated facilities cited with a minor violation have 30 days from the date of the notice to comply as allowed under HSC 25404.1.2(c)(1).
- A description of the graduated series of enforcement actions based on the severity of the violation.
 - Page 15, Figure 2 does not delineate the process for conducting graduated series of enforcement. The narrative description shall include a step-process (with estimated timeline) for applying the graduated series of enforcement that may include a detailed flow chart.
 - Page 23, the CUPA calls attention to the application of a graduated series of enforcement; however, there is no discussion for how the CUPA navigates between different enforcement actions or upgrading a violation to bring a facility into compliance.

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- Page 23, the Matrix of Enforcement Options table does not address the APSA program.
- Page 24, bullet 1, HSC 25514 should be HSC 25515.
- Page 24, bullet 2, HSC 25514.3 should be HSC 25515.1.
- Page 24, bullet 3, HSC 25514.5 should be HSC 25515.2(a).
- Page 24, bullet 4, HSC 25514 should be HSC 25515.2(b).
- Page 24, the Uniform Fire Code reference is outdated. The current fire code adopted by the state is the California Fire Code (2019 edition).
- Page 25, bullet 5, HSC 25515 should be HSC 25515.3(a).
- Page 25, bullet 6, HSC 25515.1 should be HSC 25515.4.
- Page 25, bullet 2(b)(CalARP), HSC 25540 should be HSC 25541.
- Page 27, referral to the APSA program as SPCC was observed.
- The APSA section discussion of Program Specific Enforcement Violations could reference HSC Section 25270.12.1 (administrative penalties) and HSC Section 25270.12.5 (misdemeanors).
- Page 33, in the description for how the CUPA minimizes or eliminates duplication, inconsistencies, and lack of coordination within the inspection and enforcement program, the CUPA states they attend local environmental task force meetings. It is unclear if the environmental task force has any bearing in what occurs in enforcement proceedings and should be further clarified.
- Page 34, CIWMB is now CalRecycle.
- Appendix IX, the “Environmental Health Complaint Procedure” provides procedures for preparing a staff report for an outstanding complaint violation. The complaint procedures do not address the receipt, investigation, enforcement, and closure of a complaint.

The following component is missing:

- HSC, Chapter 6.7 provisions of red tag authority for the UST Program.
- Appendix I through XI appear to be missing content.

Note: The examples provided above may not represent all instances of this deficiency or include all errors within the I&E Plan.

CITATION:

Health and Safety Code (HSC) 6.7, sections 25288(d) and 25290.1.1(b)(3)
CCR, Title 27, Section 15200(a)(9), (a)(11), (a)(13) and (a)(14)
[CalEPA, Cal OES, DTSC, State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will provide CalEPA with a copy of the revised I&E Plan that addresses the inaccurate, incomplete, and missing components, including but not limited to, the examples provided above.

By the 2nd Progress Report, if amendments to the revised I&E Plan are necessary based on feedback from CalEPA, Cal OES, DTSC, and State Water Board, the CUPA will provide CalEPA with a copy of the amended I&E Plan. If no amendments are necessary, the CUPA will train CUPA personnel and UST inspection staff on the revised I&E Plan. The CUPA will provide

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training documentation to CalEPA, which at minimum will include an outline of the training conducted and a list of CUPA personnel and UST inspection staff in attendance. Once training is complete, the CUPA will implement the revised I&E Plan or other applicable procedure.

By the 3rd Progress Report, if amendments were necessary, the CUPA will train CUPA personnel and UST inspection staff on the amended I&E Plan. The CUPA will provide training documentation to CalEPA, which at minimum will include an outline of the training conducted and a list of CUPA personnel and UST inspection staff in attendance. Once training is complete, the CUPA will implement the amended I&E Plan.

3. DEFICIENCY:

The CUPA is not ensuring that all regulated businesses subject to the Hazardous Materials Business Plan (HMBP) reporting requirements submit a complete HMBP to the California Environmental Reporting System (CERS).

Review of HMBPs submitted to CERS by regulated businesses indicates:

- 67 of 473 (14%) HMBP facilities have not submitted chemical inventories or no-change certifications within the last year.
- 79 of 473 (17%) HMBP facilities have not submitted emergency response and training plans or no-change certifications within the last year.

CITATION:

HSC, Chapter 6.95, Sections 25505(a)(1) and (2) and 25508(a)(2) and (3)
[Cal OES]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will develop and provide CalEPA with an action plan to ensure that all HMBP facilities annually submit a complete HMBP or no-change certification.

By the 3rd Progress Report, the CUPA will follow-up with each HMBP facility identified in the action plan, to ensure a complete HMBP or no-change certification is submitted, or the CUPA will initiate appropriate enforcement.

4. DEFICIENCY:

The Underground Storage Tank (UST) Operating Permit does not reflect issuance under a consolidated Unified Program Facility Permit (UPFP). Review of the UST Operating Permit and permit conditions is inconsistent with UST Regulations and HSC. The following information is inconsistent:

- Permit conditions indicate UST owners or operators shall notify the CUPA within 30 days of any significant changes to the facility or operation, while there is a regulatory requirement to notify the CUPA 30 days prior to any change in substance stored.
- Permits state "Post in a conspicuous place at all time", which is more stringent than UST Regulations and HSC, and where no local ordinance authority exists. UST Regulations require a paper or electronic copy of the UST operating permit, which is issued under the UPFP, be readily accessible at the facility.

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Note: The examples provided above may not represent all instances of this deficiency.

Note: Reference State Water Board correspondence dated April 7, 2017, "Amended Requirements for Unified Program Facility Permits Effective January 1, 2017."

CITATION:

HSC, Chapter 6.7, Section 25298(c)
CCR, Title 23, Section 2632(d)(1) and 2712(c) and (i)
CCR, Title 27, Section 15190(b) and (h)
[CalEPA, State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will provide CalEPA with a consolidated UPFP template, which includes the UST operating permit, and permit conditions with revisions to be consistent with UST Regulations and HSC.

By the 2nd Progress Report, the CUPA will, if necessary, amend the revised UPFP template, which includes the UST operating permit, and permit conditions, based on feedback from CalEPA and the State Water Board, and will provide the amended template to CalEPA.

As a result of the CUPA five-year permitting cycle, CalEPA and the State Water Board will consider this deficiency corrected upon completion and acceptance of the revised or amended UPFP template, which includes the UST operating permit, and permit conditions. Issuance of the accepted UPFP template, which includes the UST operating permit, and permit conditions will be verified during the next CUPA Performance Evaluation.

5. DEFICIENCY:

The CUPA is not ensuring all USTs (including associated piping) used for the storage of hazardous substances installed on, or after, July 1, 2004, are in compliance with the design, construction, monitoring, and testing requirements of HSC, Chapter 6.7, Section 25290.1.

Review of CERS and UST facility files indicates the following UST facilities are not in compliance:

- CERS ID 10419319: UST installation dated July 31, 2005, without meeting secondary containment, monitoring requirements, or ELD testing for UST systems installed on, or after July 1, 2004.
- CERS ID 10415482: UST installation dated December 1, 2011, without meeting secondary containment, monitoring requirements, or ELD testing for UST systems installed on, or after July 1, 2004.

Note: The examples provided above may not represent all instances of this deficiency.

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Note: Reference the following State Water Board Local Guidance (LG) Letters:

- LG 162-1 (dated July 25, 2003),
- LG 162-2 (dated October 12, 2007), and
- LG 162-3 (dated March 5, 2008).

CITATION:

HSC Chapter 6.7, Section 25290.1
[State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will draft and provide to CalEPA, written correspondence to inform the facility owner/operator that the installed UST system is not in compliance with the requirements of HSC, Chapter 6.7, Section 25290.1. The correspondence will include, but not be limited to, information regarding what is required to bring the facility into compliance and a timeline for obtaining compliance.

By the 2nd Progress Report, the CUPA will, if necessary, revise the correspondence, based on feedback from the State Water Board and will provide the revised correspondence to CalEPA.

By the 3rd Progress Report, the CUPA will report to CalEPA all USTs that were constructed after July 1, 2004, that do not comply with the design, construction, monitoring, and/or testing requirements outlined in HSC, Section 25290.1.

By the 4th Progress Report, the CUPA will send the correspondence to the facilities identified by the CUPA in the 3rd Progress Report. The CUPA will include both CalEPA and the State Water Board on the correspondence.

The CUPA will continue to follow up with facility owners or operators to ensure UST system(s) are in compliance with HSC, Sections 25290.1. During the next triennial CUPA Performance Evaluation, State Water Board will confirm identified UST systems have been brought back into compliance.

6. DEFICIENCY:

The CUPA is not consistently citing violations for failure to conduct an overfill prevention equipment inspection. No later than October 13, 2018, all overfill prevention equipment must be inspected.

Review of the UST compliance inspection reports, associated Overfill Prevention Equipment Inspection Report Forms, and inspection, violation and enforcement information, also known as (CME) information from CERS indicates the CUPA did not cite violations for the following overfill prevention equipment inspections after October 13, 2018:

- CERS ID 10398724: Overfill Prevention Equipment Inspection Report Form dated May 16, 2019. The CUPA did not 1) issue a violation during the August 14, 2019, UST compliance inspection, and 2) provide accurate United States Environmental Protection Agency (U.S. EPA) Technical Compliance Report (TCR) 9b reporting.

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- CERS ID 10357261: Overfill Prevention Equipment Inspection Report Form dated February 13, 2019. The CUPA did not 1) issue a violation during the February 13, 2019, UST compliance inspection and 2) provide accurate U.S. EPA TCR 9b reporting.
- CERS ID 10310590: Overfill Prevention Equipment Inspection Report Form dated April 19, 2019. The CUPA did not 1) issue a violation during the August 21, 2019, UST compliance inspection and 2) provide accurate U.S. EPA TCR 9b reporting.

Note: The examples provided above may not represent all instances of this deficiency.

CITATION:

CCR, Title 23, Section 2637.2(a) and 2665(b)
[State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will review and revise the I&E Plan, or other applicable procedure, that establishes a process for UST inspection staff to correctly report all UST violations on inspection reports and in CERS. The CUPA will provide CalEPA with the revised I&E Plan, or other applicable procedure. If revisions are made to a procedure other than the I&E Plan, the I&E Plan must be revised to incorporate reference to the revised procedure.

By the 2nd Progress Report, if amendments to the revised I&E Plan, or other applicable procedure are necessary based on feedback from the State Water Board, the CUPA will provide CalEPA with a copy of the amended I&E Plan, or other applicable procedure. If amendments are made to a revised procedure other than the I&E Plan, the I&E Plan must be revised to incorporate reference to the amended procedure. If no amendments are necessary, the CUPA will train UST inspection staff on the revised I&E Plan or other applicable procedure. The CUPA will provide training documentation to CalEPA, which will include, at minimum, an outline of the training conducted and a list of UST inspection staff in attendance. Once training is complete, the CUPA will implement the revised I&E Plan or other applicable procedure.

By the 3rd Progress Report, if amendments were necessary, the CUPA will train UST inspection staff on the amended I&E Plan, or other applicable procedure. The CUPA will provide training documentation to CalEPA, which will include, at minimum, an outline of the training conducted and a list of UST inspection staff in attendance. Once training is complete, the CUPA will implement the amended I&E Plan or other applicable procedure.

By the 4th Progress Report, and with each subsequent Progress Report until considered corrected, the CUPA will provide CalEPA with a copy of the UST compliance inspection report and Overfill Prevention Equipment Inspection Report Form for five UST facilities, as requested by the State Water Board, that have been inspected after training has been completed. If the required overfill prevention equipment inspection has not been completed, the CUPA will provide CalEPA with records of the applied graduated series of enforcement.

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7. DEFICIENCY:

The CUPA is not annually inspecting each UST.

Review of Semi-Annual Report (Report 6) for the following Fiscal Years (FYs) indicates:

- FY 2019/2020
 - Seven of 32 (22%) UST facilities were not inspected. Below are examples:
 - CERS ID 10190497: No annual compliance inspection was conducted in August of 2019.
 - CERS ID 10397989: Annual compliance inspection was due January of 2020 however an annual compliance inspection was not conducted until September of 2020.
 - CERS ID 10339627: Annual compliance inspection was due December 2019; no inspection has been conducted.

Records show these annual inspections were due prior to California's State of Emergency regarding Covid-19, between the months of August 2019, and January 2020.

Note: The examples provided above are intended to contextualize the deficiency.

CITATION:

HSC, Chapter 6.7, Section 25288(a)
CCR, Title 23, Section 2712(e)
[State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will develop and provide CalEPA with an action plan which will include, at minimum:

- A sortable spreadsheet exported from the CUPA's data management system or CERS, identifying each UST facility that has not been inspected within the last 12 months. For each UST listed, the spreadsheet will include, at minimum:
 - Facility name,
 - Facility address,
 - CERS ID, and
 - Date of the last UST compliance inspection.
- A schedule to inspect the identified facilities, prioritizing the most delinquent UST compliance inspections to be completed prior to any other UST compliance inspection.

By the 1st Progress Report, the CUPA will revise the I&E Plan to incorporate steps to ensure UST inspection staff inspect all UST facilities at least once every 12 months.

By the 2nd Progress Report, the CUPA will, if necessary, revise the action plan and amend the revised I&E Plan, based on feedback from the State Water Board. The CUPA will provide the revised action plan and amended I&E Plan to CalEPA.

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By the 3rd Progress Report, and with each subsequent Progress Report until considered corrected, the CUPA will provide CalEPA with UST compliance inspection reports until all UST facilities have been inspected within the last 12 months.

8. DEFICIENCY:

The CUPA is not consistently following-up and documenting return to compliance (RTC) information in CERS for Hazardous Waste Generator (HWG) facilities cited with violations.

Review of CME information in CERS indicates that there is no documented RTC as follows:

- FY 2017/2018, 2018/2019, and 2019/2020
 - 28 of 136 (20%) HWG violations with no RTC

Examples:

- CERS ID 10499977: Violations were cited on July 20, 2017, and January 29, 2018, and there were two follow up inspections with no violations. Five violations cited on July 20, 2017, were elevated to Class I violations on January 29, 2018. The business did not become compliant.
- CERS ID 10414384: Violations were cited May 29, 2019, (one violation had RTC that same date) and there was a follow up inspection on July 31, 2019, with no violations. The business did not become compliant for the four violations cited May 29, 2019.
- CERS ID 10807006: Violations were cited on May 21, 2019. The business did not become compliant. No follow-up actions were noted in the data management system or the facility files.

Note: This deficiency was identified and considered corrected during the 2017 CUPA Performance Evaluation process.

CITATION:

HSC, Chapter 6.5, Sections 25110.8.5 and 25117.6, and 25187.8(b) and (g)

HSC, Chapter 6.11, Section 25404.1.2(c)

CCR, Title 27, Sections 15185(a) and (c), Section 15200(a) and (e)

[DTSC]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will review, revise, and provide CalEPA with the I&E Plan or other applicable procedure to ensure a delineated process for implementation of appropriate informal and formal graduated series of enforcement, when necessary, as a result of facilities with cited violations not returning to compliance within scheduled timeframes. If revisions are made to a procedure outside of the I&E Plan, the I&E Plan must be revised to incorporate reference to the procedure.

By the 1st Progress Report, and with each subsequent Progress Report until considered corrected, the CUPA will provide CalEPA with a sortable spreadsheet obtained from the CUPA's local data management system or CERS, that includes, at minimum, the following information for each HWG facility having open violations (no RTC):

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DEFICIENCIES REQUIRING CORRECTION

- Facility name and address;
- CERS ID;
- Facility ID (if applicable);
- Inspection and violation dates;
- Scheduled RTC date;
- Actual RTC date (to be noted after the 1st spreadsheet is provided);
- RTC qualifier; and
- In the absence of obtained RTC, a narrative of the applied informal or formal graduated series of enforcement taken by the CUPA to ensure the facility obtains compliance.

By the 2nd Progress Report, the CUPA will, if necessary, amend the I&E Plan or other applicable procedure, based on feedback from DTSC and will submit the revisions to CalEPA.

By the 2nd Progress Report, and with each subsequent Progress Report until considered corrected, the CUPA will provide CalEPA with an updated version of the spreadsheet.

By the 3rd Progress Report, the CUPA will train personnel on the revised I&E Plan or other applicable procedure and provide training documentation to CalEPA, which will include, at minimum, an outline of the training conducted and a list of CUPA personnel attending training. Once training is completed, the CUPA will implement the revised I&E Plan or other applicable procedure.

By the 3rd Progress Report, and with each subsequent Progress Report until considered corrected, the CUPA will provide CalEPA with documentation of applied graduated series of enforcement issued during the previous three months, for up to three HWG facilities, as requested by DTSC. In the event enforcement documentation is confidential, a template or copy with redacted information can be provided.

9. DEFICIENCY:

The CUPA is not ensuring each inspector completes the APSA training program and passes the training exam prior to conducting APSA compliance inspections at tank facilities for compliance with the Spill Prevention, Control, and Countermeasure (SPCC) Plan requirements of APSA.

The following inspections were conducted by a CUPA inspector prior to the inspector completing the APSA training program and passing the exam:

- CERS ID 10400002: inspection dated August 5, 2020.
- CERS ID 10175797: inspection dated March 11, 2020.

Note: The examples provided above may not represent all instances of this deficiency.

CITATION:

HSC, Chapter 6.67, Section 25270.5(c)
[OSFM]

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CORRECTIVE ACTION:

By the 1st Progress Report, each CUPA inspector that conducts inspections at APSA tank facilities for compliance with the SPCC Plan requirements of APSA will complete and pass the initial APSA inspector training program. The CUPA will provide CalEPA with a copy of the APSA training certificates.

By the 2nd Progress Report, the CUPA will identify all inspections conducted by inspectors, who did not complete and pass the initial APSA inspector training program, at tank facilities for compliance with the SPCC Plan requirements of APSA. The CUPA will propose a schedule for conducting compliance inspections at these facilities and have APSA-trained inspectors re-inspect them. Inspection prioritization should consider the most delinquent inspections first, but the prioritization should also be based on a risk analysis of all APSA facilities (i.e., large volumes of petroleum or proximity to navigable water).

10. DEFICIENCY: CORRECTED DURING EVALUATION

The CUPA is not ensuring APSA tank facilities submit a complete HMBP to CERS when an HMBP is provided in lieu of an annual tank facility statement.

Review of HMBPs submitted to CERS by APSA facilities in lieu of a tank facility statement indicates:

- 22 of 96 (23%) have no emergency response and employee training plans submitted within the past year.

CITATION:

HSC, Chapter 6.67, Section 25270.6(a)

HSC, Chapter 6.95, Sections 25505(a)(1) and (2) and 25508(a)(2) and (3)

[OSFM]

CORRECTIVE ACTION: COMPLETED

During the CUPA Performance Evaluation the CUPA contacted delinquent facilities, resulting in six delinquent facilities making emergency response and employee training plan submittals, which corrected this deficiency.

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INCIDENTAL FINDINGS REQUIRING RESOLUTION

Incidental findings identify specific incidents or activities regarding implementation of the Unified Program. Though incidental findings do not rise to the level of program deficiencies or inadequate implementation of the Unified Program, the CUPA must complete the resolution indicated as required by regulation or statute.

1. INCIDENTAL FINDING:

The CUPA is not submitting quarterly Surcharge Transmittal Reports to CalEPA within 30 days after the end of each fiscal quarter. The following quarterly Surcharge Transmittal Reports were not received by the required due date or have components that are missing:

- FY 2017/2018
 - 1st Quarter: not submitted
- FY 2018/2019
 - 1st Quarter: not submitted
 - 2nd Quarter: “date submitted” is missing
 - 4th Quarter: “date submitted” is missing
- FY 2019/2020
 - 1st Quarter: “date submitted” is missing
 - 2nd Quarter: “date submitted” is missing
 - 3rd Quarter: “date submitted” is missing
 - 4th Quarter: not submitted

Note: The CUPA is not submitting a copy of the current Surcharge Transmittal Report template to CalEPA.

A copy of the current quarterly [Surcharge Transmittal Report](https://calepa.ca.gov/wp-content/uploads/sites/6/2020/01/SURCHARGE-TRANSMITTAL-REPORT_1819.pdf) can be found at:
https://calepa.ca.gov/wp-content/uploads/sites/6/2020/01/SURCHARGE-TRANSMITTAL-REPORT_1819.pdf

CITATION:

CCR, Title 27, Section 15250(b)(1) and (b)(2)
[CalEPA]

RESOLUTION:

By the 1st Progress Report, the CUPA will have submitted to CalEPA the 2nd quarterly Surcharge Transmittal Report for FY 2020/2021 by the required due date using the current template. Thereafter, the CUPA will submit each quarterly Surcharge Transmittal Report to CalEPA no later than 30 days after the end of each fiscal quarter.

2. INCIDENTAL FINDING:

The CUPA did not submit a Formal Enforcement Summary Report for each case that received a final judgement.

A Formal Enforcement Summary Report was not reported for the following formal enforcement case:

- CERS ID 10467646

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INCIDENTAL FINDINGS REQUIRING RESOLUTION

CITATION:

CCR, Title 27, Section 15290(a)(5)
[CalEPA]

RESOLUTION:

By the 1st Progress Report, the CUPA will provide CalEPA with a Formal Enforcement Summary Report for the case identified above. For each subsequent formal enforcement case that receives a final judgement, the CUPA will ensure that a Formal Enforcement Summary Report will be submitted to CalEPA within 30 days of the final judgment.

- The [Formal Enforcement Summary Report template](https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/CUPA-Documents-eReporting-Template.pdf) is available at: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/CUPA-Documents-eReporting-Template.pdf>
- [Instructions](https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/CUPA-Documents-eReporting-Instructions.pdf) for completing the Formal Enforcement Summary Report template are available at: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/CUPA-Documents-eReporting-Instructions.pdf>

3. INCIDENTAL FINDING:

The CUPA did not complete a Self-Audit Report for FY 2017/2018 and FY 2018/2019.

The annual Self-Audit Report for FY 2019/2020 is missing the following components:

- A report of deficiencies with a plan of correction.
 - The CUPA has a blank section titled as “Program Deficiencies with Corrective Action Plan.” The CUPA has several other descriptions of potential discrepancies throughout the Self-Audit Report that would be improved by incorporating these discussions into the proper section and identifying plans to correct them.
- An indication that there has been an annual review and update of the fee accountability program.

CITATION:

CCR, Title 27, Section 15280(c)
[CalEPA]

RESOLUTION:

By the 3rd Progress Report, the CUPA will provide CalEPA with a completed Self-Audit Report for FY 2020/2021 addressing the missing components identified in this incidental finding. The CUPA will complete a Self-Audit Report by September 30th for each subsequent FY.

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Observations and recommendations identify areas of Unified Program implementation that could be improved and provide suggestions for improvement. Though the CUPA is not required by regulation or statute to apply the recommendations provided, the CUPA would benefit in applying the recommendations provided to improve the overall implementation of the Unified Program.

1. OBSERVATION:

The citation for the CUPA's Public Information Request, titled as "Policy #507, Request for Public Information," is incorrect. In addition, Policy #507 does not include a time estimate for responding to requests from the public.

RECOMMENDATION:

Replace citation for Title 27, Section 15180(a)(2)(B) with Title 27, Section 15180(e)(3). The California Public Records Act requires that 10 days be allowed for an agency to respond to a records request, unless the department submits a written notice for an extension to the requestor.

2. OBSERVATION:

The "UST Permit Flow Chart" does not contain the current fee amount for conducting a plan check of a completed UST permit application form.

RECOMMENDATION:

Review and revise the UST Permit Flow Chart as necessary.

3. OBSERVATION:

Since the CUPA applied for certification in 1995, an expansion of responsibilities within the APSA and HWG Programs has occurred and the number of facilities regulated by the CUPA has changed. The information below is a comparison of the degree to which both the total number of regulated facilities and total Unified Program elements have increased or decreased since the initial certification of the CUPA with present-day circumstance. The information is sourced from the Siskiyou County Public Health 1995 CUPA Application and the CERS "Summary Regulated Facilities by Unified Program Element" report and the CERS "UST Inspection Summary Report," both generated on September 28, 2020.

- Total Number of Regulated Businesses and Facilities:
 - Upon Certification in 1995: **570**
 - Current CUPA Evaluation: **508**
 - A decrease of **62** facilities
- Total Number of Hazardous Material Release Reporting, Inventory and Response Plans (Business Plan) Regulated Businesses and Facilities:
 - Upon Certification in 1995: **484**
 - Current CUPA Evaluation: **487**
 - An increase of **3** facilities

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- Total Number of Regulated UST Facilities:
 - Upon Certification in 1995: **81**
 - Current CUPA Evaluation: **32**
 - A decrease of **49** facilities
- Total Number of Regulated USTs:
 - Upon Certification in 1995: **199**
 - Current CUPA Evaluation: **111**
 - A decrease of **88** USTs
- Total Number of Regulated HWGs:
 - Upon Certification in 1995: **251**
 - Current CUPA Evaluation: **231**
 - A decrease of **20** facilities
- Total Number of Regulated Household Hazardous Waste (HHW) Facilities:
 - Household Hazardous Waste Facilities were not regulated under the Unified Program upon certification in 1995.
 - Current CUPA Evaluation: **3**
 - An increase of **3** facilities
- Total Number of Regulated Tiered Permitting Facilities (Permit By Rule, Conditionally Authorized, Conditionally Exempt):
 - Upon Certification in 1995: **0**
 - Current CUPA Evaluation: **0**
 - No change in facility count
- Total Number of Regulated Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) Facilities:
 - RCRA LQG Facilities were not regulated under the Unified Program upon certification in 1995.
 - Current CUPA Evaluation: **5**
 - An increase of **5** facilities
- Total Number of Regulated Risk Management Prevention Plan (RMPP) or California Accidental Release Prevention (CalARP) Program Facilities:
 - Upon Certification in 1995: **5**
 - Current CUPA Evaluation: **2**
 - A decrease of **3** facilities
- Total Number of Regulated APSA Tank Facilities:
 - Upon Certification in 1995: N/A
 - Current CUPA Evaluation: **96**
 - An increase of **96** facilities

While the number of total regulated facilities for UST facilities, total USTs, HWGs, and CalARP facilities regulated by the CUPA have significantly decreased since the CUPA applied for certification in 1995, the number of total regulated facilities has increased for the Business Plan Program, HHW, RCRA LQGs, and significantly for the APSA Program. The decline in the overall number of regulated USTs and UST facilities is almost parallel to the increase in regulated APSA tank facilities. Overall, there has been a decrease of 53 regulated facilities across all program elements.

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Though additional regulatory oversight has been incorporated into the implementation of the Unified Program and the number of facilities regulated by the CUPA has changed since the CUPA applied for certification in 1995, the full time equivalent of inspection and supervisory personnel has relatively remained the same. The information below is a comparison of CUPA personnel allocated to the implementation of the Unified Program upon certification with present-day circumstance. The information is sourced from the Siskiyou County Public Health 1995 CUPA Application and recent information provided by the CUPA.

CUPA Personnel:

- Inspection and other Staff
 - Upon Certification in 1995:
 - **1.75** Staff, each at a Full Time Equivalent = **1.75** Full Time positions
 - Comments: The original CUPA application for certification identifies 1.75 full time equivalent (FTE) field personnel, which consists of one full-time Registered Environmental Health Specialist (REHS) II inspector and 0.75 FTE clerical support.
 - Currently:
 - **2** Staff, each at a Full Time Equivalent = **2** Full Time positions
 - Comments: One staff member is still in training and will be conducting inspections within the next few months. There are no vacancies currently.
- Supervisory and Management Staff
 - Upon Certification in 1995:
 - **1** Staff (Director of Environmental Health), at a **0.10** Full Time Equivalent and **1** Staff (Waste Management Manager) at a **0.90** Full Time Equivalent = **1** Full Time position
 - Currently:
 - **1** Manager, at a Full Time Equivalent = **1** Full Time position
 - Comments: The CUPA Manager fulfills the supervisory role and is responsible for conducting inspections and enforcement tasks. As of May 29, 2020, the CUPA supervisor retired and the position remains unfilled. While the position is vacant, supervisory job duties are divided among supervisors of other County program areas.

The CUPA has two full-time personnel positions, currently filled by staff who are relatively new inspectors and are still undergoing training to become fully qualified to conduct all inspection and enforcement duties independently across all program elements of the Unified Program. In discussion with the CUPA, high staff turnover and challenges in obtaining and training new staff has likely contributed to the decline in maintaining the mandated inspection frequencies and uploading CME information to CERS on a regular basis.

RECOMMENDATION:

Ensure budgetary record keeping of revenues and expenditures clearly reflect and demonstrate allocation of resources to implement the Unified Program, such as full time equivalents of staff positions, financial impacts of conducting inspections and applying enforcement for all Unified Program elements. Though the CUPA established a fee increase for the UST and HWG program

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elements, which was applied to regulated facilities in increments over the last three years, the fee increase does not appear sufficient to cover the recurring deficit resulting from Unified Program implementation and CUPA operations.

Conduct a single fee assessment to determine the necessary and reasonable costs to implement all aspects of the Unified Program with the existing regulated businesses and facilities within each program element, incorporating the revenue obtained from the increased single fee for the UST and HWG program elements. Determine if it is necessary to increase the single fee for program elements other than UST and HWG to ensure revenue is reasonably adequate for implementing the Unified Program and CUPA operations, specifically in areas of inspection and enforcement. In comparison, single fee amounts for the CUPA remain lower than single fee amounts assessed by other rural CUPAs. Reevaluating the current revenue sources and expenditures will assist in supporting and justification of a single fee increase for other program elements to obtain additional staff, or other resources that may be necessary to ensure adequate implementation of each Unified Program element.

It is noted that the CUPA has struggled with frequent staff turnover and the ability to retain staff once training is provided. It is a substantial investment of time and finances to train new staff, and the investment is lost once employees part. The virtual CUPA Annual Training Conference could be an opportunity for the CUPA to provide additional training opportunities for newly recruited staff at a very low cost with added flexibility for attendance. Though not reflected in the CUPA personnel allocations above, during FY 2017/2018, there were at least three additional staff working that have had hours greatly reduced or are no longer employed with the CUPA.

4. OBSERVATION:

On the CUPA's webpage at:

<https://www.co.siskiyou.ca.us/environmentalhealth/page/aboveground-petroleum-storage>, the APSA link lands on a DTSC webpage that is no longer valid.

RECOMMENDATION:

Update the APSA link to the new OSFM APSA webpage at:

<https://osfm.fire.ca.gov/divisions/pipeline-safety-and-cupa/certified-unified-program-agency-cupa/aboveground-petroleum-storage-act/>. Also, consider providing a link to the U.S. EPA website at: <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations> for information on SPCC requirements.

5. OBSERVATION:

The CUPA utilizes STI SP001 checklists in support of facility inspections. The CUPA's inspection report identifies approximately 11 APSA violations, while the CERS APSA violation library currently contains approximately 100 APSA violations.

RECOMMENDATION:

Utilize comprehensive APSA inspection checklists to ensure each inspector is consistent in conducting APSA inspections. Either update the APSA inspection checklists to reflect changes made to the current CERS violation library and ensure each violation is applicable to the type of APSA facility being inspected, or utilize the latest version of the CUPA Forum Board APSA

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inspection checklists in support of facility inspections at conditionally exempt tank facilities, Tier I qualified facilities, Tier II qualified facilities and professional engineer-certified SPCC Plan facilities.

6. OBSERVATION:

While the CUPA has previously cited CERS violation number 4030010 (inadequate sized secondary containment) for two tank facilities, the CUPA has not observed facility CERS ID 10159463 to be in violation of CERS violation number 4030010. Facility files for CERS ID 10159463 indicate the facility may not have adequate sized secondary containment for the largest single aboveground storage tank, including sufficient freeboard for precipitation.

RECOMMENDATION:

Consistently implement and enforce the APSA program at all facilities.

7. OBSERVATION:

The CUPA accepted at least three HMBP submittals, provided by APSA tank facilities in lieu of the APSA tank facility statement, which contained the outdated emergency response and training plans template. The phone number listed for OSFM on the outdated template is no longer valid.

RECOMMENDATION:

Encourage APSA tank facilities to use the current emergency response and trainings plans template with the next HMBP submittal when an HMBP is provided in lieu of the tank facility statement.

8. OBSERVATION:

There are two citation errors in the "Agricultural Exemption" Letter.

- CCR, Title 19, Section 2729.4(b) should be CCR, Title 19, Section 2654(b).
- HSC, Section 25503.5(c)(3) should be HSC, Section 25507(d).

RECOMMENDATION:

Correct the citations in this document.

9. OBSERVATION:

There are several citation errors in the "Agricultural Exemption Application" document:

- HSC 25505(d) should be HSC 25507(d).
- In bullets 2 and 6, CCR, Title 19, Section 2729.1 should be CCR, Title 19, Section 2651.

RECOMMENDATION:

Correct the citations in this document.

10. OBSERVATION:

The Area Plan contains the following information that is inaccurate, outdated or may benefit from improvement:

- Page 9, the APSA program is referred to as aboveground storage tanks.

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- Pages 9, 20, 22, 38, 41, 42, 43 and likely several other places, the California Emergency Management Agency should be the Governor's Office of Emergency Services (Cal OES).
- Page 12, no mention is made of the Cal OES sponsored Type II hazmat teams in Susanville and Yuba City, which, although the response time is long, can be called upon in case more assets are needed.
- Page 18, CCR, Title 19, Section 2725 should be CCR, Title 19, Section 2645.
- Page 20, the telephone number for the California State Warning Center is incorrect – 800-853-7550 should be 800-852-7550. The number is correct in numerous other places in the document.
- Page 22, CCR, Title 19, Section 2703 should be CCR, Title 19, Section 2631.
- Page 22, the link to the Cal OES website for written notification is incorrect. The correct link is: <https://www.caloes.ca.gov/FireRescueSite/Documents/304%20-%20Written%20Report%20Form.pdf>.
- Page 22, HSC 25507.10 should be HSC 25510.3.
- Page 26, the Firescope link is incorrect; "http://www.firescope.org/ics-forms" should be <https://firescope.caloes.ca.gov/publications>.
- Page 41, the 2001 California Fire Code reference is outdated. The current fire code adopted by the state is the California Fire Code, and the 2019 edition became effective January 1, 2020.
- Page 46, the Firescope link is incorrect. If you intended to bring up the Standardized Equipment List, the link is: <https://www.caloes.ca.gov/FireRescueSite/Documents/06%20HMTT%20Standardized%20Equipment%20List.pdf> . A photo-documentation manual is also available: <https://www.caloes.ca.gov/FireRescueSite/Documents/07%20HazMat%20Team%20Typing%20-%20Photo%20Doc%20V5.1.2%2004-2018.pdf> .

The Area Plan, Part II contains the following minor errors:

- Pages 1 and 11, the California Emergency Management Agency should be Cal OES.

The Area Plan, Part III contains the following minor errors:

- The phone number associated with the State Fire Marshal (Monrovia) is not valid. The new number is (916) 568-3800 for the main office in Sacramento and (916) 323-7390 for the 24-hour Duty Chief line.

Note: The examples provided above may not include all errors within the Area Plan.

RECOMMENDATION:

With the next review and revision of the Area Plan, address inaccurate or outdated information.

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11. OBSERVATION:

Review of CERS indicates the following USTs or UST systems as having single-walled components which may require permanent closure by December 31, 2025, in accordance with HSC, Chapter 6.7, Section 25292.05. Below are a few examples:

- CERS ID 10188201 (Tank ID 81800057);
- CERS ID 10413784 (Tank ID 880040-400001); and
- CERS ID 10339636 (Tank IDs 007160-1 and 007160-3).

As a courtesy, State Water Board will, prior to the CUPA Performance Evaluation exit briefing, provide the CUPA with a complete list of USTs/UST systems with single-walled components as identified in CERS which require permanent closure by December 31, 2025.

RECOMMENDATION:

Continue to provide verbal reminders to all applicable UST facility owners or operators regarding the December 31, 2025, requirements for permanent closure of single-walled USTs. Consider providing written notification of the requirement to all applicable UST facility owners or operators. The written notification should inform facility owners or operators that in order to remain in compliance, owners or operators must replace or remove single-walled USTs by December 31, 2025. Additional information regarding single-walled UST closure requirements may be found at: http://waterboards.ca.gov/water_issues/programs/ust/single_walled/.

Notify facility owners or operators that Replacing, Removing, or Upgrading Underground Storage Tanks (RUST) Program grants and loans are available to assist eligible small businesses with the costs necessary to remove, replace, or upgrade project USTs. More information on funding sources may be found at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.html.

12. OBSERVATION:

Review of overall implementation of the HWG program, including CERS data, facility file information, and Self-Audit Reports between FYs 2017/2018, 2018/2019 and 2019/2020, is summarized below:

- CERS indicates that 213 of 236 (90%) facilities had routine HWG inspections conducted.
- The CUPA conducted 325 inspections (both routine and other)
 - 237 inspections resulted with no violations issued
 - 88 inspections resulted with violations issued
 - 70 of 88 (80%) facilities that had issued violations have returned to compliance
 - A total of 142 violations were issued with the 88 inspections
 - 108 of 136 (80%) violations have RTC
 - Five of Eight (62.5%) Class I violations remain out of compliance
 - 13 of 69 (19%) Class II violations remain out of compliance
 - 10 of 59 (17%) minor violations remain out of compliance
- The CUPA did not conduct any formal enforcement actions for the HWG program during the evaluation period. In 2017 and 2018 the CUPA forwarded several referrals to the County District Attorney's Office.

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- The CUPA indicated that no samples were collected during the evaluation period.
- DTSC was unable to conduct oversight inspections due to Coronavirus (COVID-19) restrictions.
- The CUPA's website for hazardous waste includes a Return To Compliance Certification Form. It states that noncompliance with violations may lead to the business being billed at an hourly rate, yet does not mention any potential graduated series of enforcement actions.

RECOMMENDATION:

Ensure that complete and thorough inspections are conducted to identify all violations at facilities. Continue with the inspection frequency effort as identified in the I&E Plan. Adhere to the I&E Plan to follow up with facilities that have not returned to compliance (RTC) by the scheduled RTC date and pursue a graduated series of enforcement for facilities that do not RTC. If the local DA chooses not to pursue a criminal or civil action against a facility, the CUPA should proceed with an Administrative Enforcement Order.

13. OBSERVATION:

The CUPA has identified five hazardous waste generators that are not subject to HMBP reporting requirements due to quantity thresholds. However, if a facility is subject to any of the six CUPA regulatory programs, the facility must complete the CERS Business Activities page. All regulated businesses, including Conditionally Exempt Small Quantity Generators (CESQGs), are required to report data applicable to the business facility to CERS, per CCR, Title 27, Section 15188. The I&E Plan indicates CESQGs have an inspection frequency of once every five years.

RECOMMENDATION:

Ensure all regulated businesses, including CESQGs, submit a business activities page into CERS pursuant to CCR, Title 27, Section 15188.

14. OBSERVATION:

The CUPA has not included the "Date Submitted" on the Annual Single Fee Summary Reports for FYs 2017/2018, 2018/2019, and 2019/2020.

RECOMMENDATION:

Enter the "Date Submitted" on the Annual Single Fee Summary Reports to demonstrate completion by September 30th of each year.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

Examples of outstanding program implementation highlight efforts and activities of the CUPA that are considered above and beyond the standard expectations for implementation of the Unified Program.

1. CUPA OBTAINS NEW LOCAL DATA MANAGEMENT SYSTEM FOR IMPROVED EFFICIENCY:

Siskiyou CUPA applied for and received a grant in May 2019, from the CUPA Forum Board that will allow the CUPA to afford employing the use of Tyler Technologies as the local Data Management System (DMS). Currently, the CUPA uses a permitting and billing software program for Building, Planning, and Environmental Health that is not designed for the management and implementation of Environmental Health or CUPA inspection programs. While the current software is able to generate annual bills for CUPA facilities, it is not able to generate inspection reports, permits, or track compliance, monitoring and enforcement information. Not having an adequate software program for the CUPA to fully utilize for all aspects of Unified Program implementation results in a substantial administrative burden for CUPA staff. The new DMS will significantly decrease the time needed for administrative staff, and will allow staff to easily maintain information relative to frequency of inspections and compliance with violations as well as education activities. The CUPA established a single fee increase phased in over a three-year period, starting in 2018 and ending in 2020, to offset the expense to maintain the annual user license fee of the new DMS.
