

January 31, 2023

Mr. Jason Phillippe, Director  
Placer County Environmental Health  
3091 County Center Drive, Suite 180  
Auburn, California 95603-2614

Dear Mr. Phillippe:

During June 2019 through October 2019, CalEPA and the state program agencies conducted a performance evaluation of the Placer County Environmental Health 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 information.

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.

CalEPA recognizes the delay with issuing the final Summary of Findings report. Consequently, as the next CUPA Performance Evaluation is scheduled to begin in June 2023, there is sufficient time for submittal and review of two Evaluation Progress Reports, although the timeframe for completion of corrective actions and resolutions outlined in the Summary of Findings report may extend beyond the remaining time period available for the Evaluation Progress Report process before the subsequent CUPA Performance Evaluation begins.

The CUPA is required to submit the first Evaluation Progress Report 60 days from the receipt of this Final Summary of Findings report (April 4, 2023). Please provide the Evaluation Progress Report to the CalEPA Team Lead, Timothy Brandt, at [Timothy.Brandt@calepa.ca.gov](mailto:Timothy.Brandt@calepa.ca.gov).

The CUPA is strongly encouraged to provide an update detailing as much progress made as possible in accomplishing the corrective actions and resolutions for each identified deficiency and incidental finding, particularly if steps for corrective actions and resolutions outlined for completion in anticipated subsequent Progress Reports have

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been completed and addressed at present, or in advance. Any deficiencies that remain uncorrected, and any incidental findings that remain unresolved will be incorporated into the 2023 CUPA Performance Evaluation.

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

If you have any questions or need further assistance, please contact Melinda Blum at [Melinda.Blum@calepa.ca.gov](mailto:Melinda.Blum@calepa.ca.gov).

Sincerely,



Jason Boetzer  
Assistant 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: Placer County Environmental Health

Evaluation Period: June 2019 through October 2019

#### Evaluation Team Members:

- **CalEPA Team Lead:** Timothy Brandt, Marc Lorentzen
- **DTSC:** Matt McCarron
- **CalEPA\*/Cal OES:** Denise Gibson
- **State Water Board:** Kaitlin Cottrell, Jessica Botsford
- **CAL FIRE-OSFM:** Denise Villanueva, Carmen Zamora

This Final Summary of Findings includes:

- Deficiencies requiring correction
- Incidental findings requiring resolution
- 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 CUPA's Unified Program implementation and performance is considered satisfactory with improvement needed.

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

**Tim Brandt**

CalEPA Unified Program

Phone: (916) 323-2204

E-mail: [timothy.brandt@calepa.ca.gov](mailto:timothy.brandt@calepa.ca.gov)

CalEPA recognizes the delayed issuance of this Final Summary of Findings report. Consequently, as the next CUPA Performance Evaluation is scheduled to begin in June 2023, there is sufficient time for submittal and review of two Evaluation Progress Reports, although the timeframe for completion of corrective actions may extend beyond submittal of the first Evaluation Progress Report.

The CUPA is required to submit the first Evaluation Progress Report 60 days from the receipt of this Final Summary of Findings Report, no later than April 4, 2023, and the second Evaluation Progress Report 90 days thereafter, no later than July 11, 2023. Each Evaluation Progress Report must be submitted to the CalEPA Team Lead at [kaeleigh.pontif@calepa.ca.gov](mailto:kaeleigh.pontif@calepa.ca.gov).

The CUPA is strongly encouraged to provide an update detailing as much progress made as possible in accomplishing the corrective actions and resolutions for each identified deficiency and incidental finding, particularly if steps for corrective actions and resolutions outlined for completion in anticipated subsequent Progress Reports have been completed and addressed at present, or in advance. Any deficiencies that remain uncorrected or incidental findings that remain unresolved will be incorporated into the next CUPA Performance Evaluation.

\*Effective July 1, 2021, oversight of the Hazardous Materials Release Response Plans and Inventory and the California Accidental Release Prevention Program transitioned from Cal OES to CalEPA.

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**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.

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**1. DEFICIENCY:**

The CUPA is not consistently citing violations for failure to conduct an overfill prevention equipment inspection. All initial overfill prevention equipment inspections must have been completed no later than October 13, 2018. Upon adoption of this provision in UST Regulations, the CUPA did not consistently cite violations to ensure it was implemented.

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

- CERS ID 10204831– Overfill Prevention Inspection was not conducted by the October 13, 2018, deadline. No violation was reported in CERS.
- CERS ID 10205287– Overfill Prevention Inspection was conducted February 1, 2019. No violation was reported in CERS.
- CERS ID 10205698– Overfill Prevention Inspection was conducted December 12, 2018. No violation was reported in CERS.

As a result, United States (U.S.) Environmental Protection Agency (EPA) Technical Compliance Rate (TCR) 9b reporting is inaccurate.

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

**CITATION:**

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

**CORRECTIVE ACTION:**

By the 1<sup>st</sup> Progress Report, the CUPA will revise and provide CalEPA with the Inspection and Enforcement (I&E) Plan, or other applicable procedure, to ensure the establishment of a process to consistently and correctly report all violations during annual compliance inspections and in CERS.

By the 2<sup>nd</sup> Progress Report, the CUPA will, if necessary, amend the I&E Plan, or other applicable procedure, based on feedback from the State Water Board and will provide the revised I&E Plan, or other applicable procedure, to CalEPA. If no amendments are necessary, the CUPA will train personnel on the revised I&E Plan, or other applicable procedure and provide training documentation to CalEPA. Training documentation 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 procedure.

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**DEFICIENCIES REQUIRING CORRECTION**

By the 3<sup>rd</sup> Progress Report, if amendments to the I&E Plan or other applicable procedure were necessary, the CUPA will train personnel on the amended I&E Plan or other applicable procedure and provide training documentation to CalEPA. Training documentation 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 procedure.

By the 4<sup>th</sup> Progress Report, the CUPA will provide CalEPA with the most recent annual UST compliance inspection report and Overfill Prevention Equipment Inspection Report Form for five Underground Storage Tank (UST) facilities that have received an overfill prevention equipment inspection after training of UST inspection staff has been completed.

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**2. DEFICIENCY:**

The CUPA did not establish and implement the following Unified Program administrative procedures:

- Unified Program facility permit (consolidated permit) plan or procedure.
- Data Management Procedure
- Financial Management Procedures
  - A single fee system in compliance with CCR, Title 27, Section 15210
  - A fee accountability program in compliance with CCR, Title 27, Section 15220
  - A surcharge collection and reimbursement program in compliance with CCR, Title 27, Section 15250
    - Note: A fee dispute resolution procedure was provided; however no other procedures regarding the State Surcharge were provided.

**CITATION:**

CCR, Title 27, Section 15180(e)  
[CalEPA]

**CORRECTIVE ACTION:**

By the 1<sup>st</sup> Progress Report, the CUPA will develop and provide CalEPA with the Unified Program administrative procedures identified above.

By the 2<sup>nd</sup> Progress Report, the CUPA will, if necessary, revise the Unified Program administrative procedures, based on feedback from CalEPA and will provide the revised Unified Program administrative procedures to CalEPA. If no revisions are necessary, the CUPA will train CUPA personnel on the developed Unified Program administrative procedures and provide training documentation to CalEPA. Training documentation 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 developed Unified Program administrative procedures.

By the 3<sup>rd</sup> Progress Report, if revisions to the Unified Program administrative procedures were necessary, the CUPA will train CUPA personnel on the revised Unified Program administrative procedures and provide training documentation to CalEPA. Training documentation will include an outline of the training conducted and a list of CUPA personnel in attendance.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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DEFICIENCIES REQUIRING CORRECTION

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**3. DEFICIENCY:**

The CUPA is not properly classifying hazardous waste generator (HWG) violations.

Review of facility files and CERS CME information finds the CUPA is classifying Class I or Class II HWG violations as minor violations in the following instances:

- Violation for exceedance of authorized accumulation time (CCR, Title 22, Section 66262.34) incorrectly cited as a minor violation. Maximum accumulation time may not be exceeded without a hazardous waste storage permit or grant of authorization from DTSC. An economic benefit is gained by not disposing of waste within the authorized time. This does not meet the definition of minor violation as defined in HSC, Section 25404(a)(3):
  - Examples include:
    - CERS ID 10204657, inspection dated September 5, 2018
    - CERS ID 10204753, inspection dated May 21, 2019
    - CERS ID 10204756, inspection dated May 3, 2018 (2 violations cited)
    - CERS ID 10205719, inspection dated April 18, 2018
- Violation for failure to provide or conduct training for employees incorrectly cited as a minor violation. Since no training was provided, employees are not familiar with hazardous waste management and handling, nor how to respond to emergencies. There may have been an economic benefit to the facility by not providing training. This does not meet the definition of minor violation as defined in HSC, Section 25404(a)(3)
  - Examples include:
    - CERS ID 10205044, inspection dated March 22, 2018
    - CERS ID 10205443, inspection dated June 14, 2017
    - CERS ID 10205989, inspection dated September 14, 2016

Review of facility files and CERS CME information finds the following facilities were cited with minor violations that did not obtain return to compliance (RTC), and were repeatedly cited, however the classification was not escalated to a Class I or II classification:

- CERS ID 10204552, inspections dated March 25, 2015, September 6, 2016, and September 7, 2018
- CERS ID 10205125, inspections dated September 17, 2015, July 8, 2016, and February 27, 2019
- CERS ID 10205839, inspections dated January 28, 2019, and August 23, 2016

**CITATION:**

HSC, Chapter 6.5, Sections 25110.8.5 and 25117.6  
CCR, Title 22, Sections 66260.10 and 66262.34  
[DTSC]

**CORRECTIVE ACTION:**

By the 1<sup>st</sup> Progress Report, the CUPA will train staff on the definition of minor violation as defined in HSC Chapter 6.11, Section 25404(a)(3) and Class I and Class II violations as defined in Chapter



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**DEFICIENCIES REQUIRING CORRECTION**

6.5, Sections 25110.8.5 and 25117.6 and CCR, Title 22, Section 66260.10, and Training will include, at minimum, review of the following:

- [Violation Classification Training Video 2014](https://www.youtube.com/watch?v=RB-5V6RfPH8)  
<https://www.youtube.com/watch?v=RB-5V6RfPH8>
- [Violation Classification Guidance](https://calepa.ca.gov/wp-content/uploads/sites/6/2020/06/Violation-Classification-Guidance-Document-accessible.pdf)  
<https://calepa.ca.gov/wp-content/uploads/sites/6/2020/06/Violation-Classification-Guidance-Document-accessible.pdf>

The CUPA will provide training documentation to CalEPA that includes an outline of the training conducted and a list of CUPA personnel in attendance

By the 2<sup>nd</sup> Progress Report, the CUPA will provide CalEPA with the inspection report for three HWG facilities cited with hazardous waste violations that were inspected after training was conducted.

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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.

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**1. INCIDENTAL FINDING:**

The CUPA is not consistently documenting in sufficient detail whether the UST owner/operator has demonstrated to the satisfaction of the CUPA that tank closure, removal and soil and groundwater sampling complies with statute and regulation and maintaining closure records as required by statute and regulation.

Review of facility files finds the CUPA:

- issues a UST Closure notification for sites where no contamination is found;
- does not issue similar letters to sites which are referred to the Regional Water Board for cleanup indicating the UST is closed in accordance with statute and regulation, and to the satisfaction of the local agency. UST closure notifications are required whether cleanup is needed or not. The following is an example:
  - CERS ID 10135429

Note: The example provided above may not represent all instances of this incidental finding.

**CITATION:**

HSC, Chapter 6.7, Section 25298(c)  
CCR, Title 23, Section 2672(d)  
[State Water Board]

**RESOLUTION:**

By the 1<sup>st</sup> Progress Report, the CUPA will revise the UST closure procedure or other applicable procedure, to ensure establishment of a process as to how the CUPA will document in sufficient detail whether the owner/operator has demonstrated to the satisfaction of the CUPA that tank closure, removal and soil sampling complies with statute and regulation for cases referred to the Regional Water Board for site cleanup (i.e. correspondence, hardcopy, electronic media).

With respect to facilities which have not been provided UST closure documentation, in the event of a public request for closure documentation, the CUPA will provide the requested documentation. Closure documentation will demonstrate the CUPA's satisfaction regarding UST closure, removal, and soil sampling complies with statute and regulation.

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UNIFIED PROGRAM PERFORMANCE EVALUATION  
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INCIDENTAL FINDINGS REQUIRING RESOLUTION

**2. INCIDENTAL FINDING:**

The I&E Plan is missing the following required component:

- An inspection frequency for Permit-By-Rule, Conditionally Authorized, and Conditionally Exempt HWG facilities that indicates the initial inspection will occur within the first two years of notification and every three years thereafter.

**CITATION:**

CCR, Title 27, Section 15200(a), (a)(13), and (14)  
[DTSC]

**RESOLUTION:**

By the 1<sup>st</sup> Progress Report, the CUPA will update the I&E plan to include the required element identified above and will train staff on the revised I&E Plan. The CUPA will provide CalEPA with the revised I&E Plan and training documentation to CalEPA. Training documentation will include an outline of the training conducted and a list of CUPA personnel in attendance.

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

The CUPA is not consistently following up and documenting RTC information for Aboveground Petroleum Storage Act (APSA) tank facilities cited with violations.

Review of CERS CME information indicates:

- 52 of 176 (30%) violations cited between July 1, 2018, and June 30, 2019, have no documented RTC.

**CITATION:**

HSC, Chapter 6.11, Section 25404.1.2(c)  
CCR, Title 27, Sections 15185(a) and (c) and 15200(a)  
[OSFM]

**RESOLUTION: COMPLETED**

During the evaluation, the CUPA followed up with APSA tank facilities having open violations. Review of CERS CME information on August 27, 2019, indicates 157 of 176 (89%) violations have documented RTC. No further action is required.

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UNIFIED PROGRAM PERFORMANCE EVALUATION  
FINAL SUMMARY OF FINDINGS REPORT

**OBSERVATIONS AND RECOMMENDATIONS**

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.

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**1. OBSERVATION:**

Spill Prevention, Control, and Countermeasure (SPCC) Plan submittals were accepted by the CUPA for several facilities, including CERS IDs 10206271, 10760923, 10205443, and 10445140.

There is no APSA requirement for SPCC Plans to be submitted to CERS; therefore, SPCC Plans should not be uploaded to CERS.

**RECOMMENDATION:**

Inform APSA tank facilities that SPCC Plans should not be uploaded to CERS.

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**2. OBSERVATION:**

The CUPA's Aboveground Storage Tanks (AST) website, <https://www.placer.ca.gov/3178/Aboveground-Storage-Tanks-AST>, contains the following outdated or incorrect statements:

- “The APSA applies to operators of any AST with a capacity greater than 1,320 gallons and facilities where 1,320 gallons or more of petroleum is stored in containers that hold at least 55 gallons. The APSA requires operators to prepare and implement a Spill Prevention Control and Countermeasures (SPCC) Plan, conduct periodic inspections...”

APSA regulates tank facilities that are subject to the Federal SPCC rule, or have a storage capacity of 1,320 gallons or more of petroleum, or have a tank in an underground area. Conditionally exempt tank facilities are not required to prepare and implement an SPCC Plan under APSA and such tank facilities are required to conduct ‘daily’ visual inspections of their ASTs.

**RECOMMENDATION:**

Update the information on the AST website.

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**3. OBSERVATION:**

The I&E Plan contains the following incorrect or missing APSA program and fire code hazardous materials management plan (HMMP) and inventory statement (HMIS) information:

- The Table of Contents does not include the Complaint Response Procedures section nor the Sampling Procedures section.
- Page 1- The HMMP-HMIS program element is omitted. Although HMMP-HMIS requirements have been consolidated with the hazardous materials business plan

UNIFIED PROGRAM PERFORMANCE EVALUATION  
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**OBSERVATIONS AND RECOMMENDATIONS**

program, HMMP-HMIS is considered one of the six program elements that the CUPA implements within its jurisdiction.

- Page 14 and 29- HSC Section 25270.5 is referenced to address APSA program violations. The correct citation is HSC, Chapter 6.67, commencing with Section 25270.

**RECOMMENDATION:**

Update the I&E Plan.

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**4. OBSERVATION:**

The CUPA uses a comprehensive APSA inspection checklist. If a facility receives a violation, a summary is included at the end of an inspection report with the applicable Federal SPCC rule citation first, along with the HSC citation.

The Federal SPCC rule requirements have not been delegated to any state and, therefore, CUPAs cannot enforce the Federal SPCC rule.

**RECOMMENDATION:**

Near the top section on the first page of the APSA inspection checklist, add the HSC citation, such as the minimum "HSC, Chapter 6.67, commencing with Section 25270." On the summary of violations, include the HSC citation before referencing the Federal SPCC rule, if applicable.

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**5. OBSERVATION:**

Review of CERS finds that there are UST systems within the jurisdiction of the CUPA which may need to be permanently closed by December 31, 2025, in accordance with HSC, Chapter 6.7, Section 25292.05.

The following are examples and may not include all UST systems subject to the 2025 Single-Walled closure requirements:

- CERS ID 10204594 (Tank IDs 1 - 4)
- CERS ID 10204837 (Tank IDs 1 - 3)
- CERS ID 10204615 (Tank IDs T479 – T481)

**RECOMMENDATION:**

Continue to provide verbal reminders to UST facility owner/operators and consider providing written notification of the December 31, 2025, requirements for permanent closure of single-walled USTs. The notification should inform the facility owner/operators that, to stay in compliance, owner/operators must replace or remove single-walled USTs by December 31, 2025. Additional information can be found on the [Single-Walled UST closure requirements](https://www.waterboards.ca.gov/ust/single_walled.html) webpage ([https://www.waterboards.ca.gov/ust/single\\_walled.html](https://www.waterboards.ca.gov/ust/single_walled.html)).

The facility owner/operators should be notified 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 tanks.

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**OBSERVATIONS AND RECOMMENDATIONS**

Additional information on funding sources, can be found on the [RUST](https://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.html) website ([https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/rust.html](https://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.html)).

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**6. OBSERVATION:**

Review of facility files finds the CUPA is not consistently requiring UST facilities to submit annual maintenance activities on the required Monitoring System Certification Form. The following are examples:

- CERS ID 10204651
- CERS ID 10206061

**RECOMMENDATION:**

Ensure all maintenance activities are submitted and accepted on the correct form

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**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY**

**UNIFIED PROGRAM PERFORMANCE EVALUATION  
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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.

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**1. CUPA PERSONNEL EMERGENCY RESPONSE:**

With the ever-increasing number of devastating wildfires and other crippling disasters in California, environmental health department personnel must be properly trained and ready to respond to communities and mutual aid requests involving issues regulated under the Unified Program throughout the State. The Placer County Environmental Health (PCEH) has assisted the California Department of Public Health (CDPH) and the California Environmental Protection Agency (CalEPA) in creating statewide standards for mutual aid, providing personal protective equipment, and developing corresponding training programs for CUPA personnel, which has enabled the quick mobilization of providing trained CUPA personnel resources to fulfill mutual aid requests of other counties impacted by devastating events, such as wildfires.

The comprehensive emergency response program developed and prepared by the PCEH enables CUPA personnel to effectively respond to a wildfire or other disaster to protect public health within the jurisdiction of the CUPA and beyond. The PCEH emergency response program is a model for the development of standards designed to ensure environmental health staff throughout the state can be called upon to respond when the California mutual aid system is activated.

The Placer County Environmental Health (PCEH) emergency response program fully prepares CUPA personnel to protect the communities within the jurisdiction of the CUPA, as well as throughout the state, and respond accordingly. The PCEH ensures CUPA personnel are trained with the ability to conduct regulated facility assessments and assist in the cleanup and recovery phases of wildfires. These activities comprise of remediation oversight of household hazardous waste cleanup and removal of hazardous waste level contaminated debris related to structure fires. PCEH CUPA personnel are also trained to be tasked with conducting health and safety assessments of hazardous materials facilities to identify and mitigate any release of hazardous materials; oversee the identification, collection, and disposal of household hazardous wastes; and to respond to emergency activities caused by disaster-related hazardous materials releases. In addition, PCEH acquired basic equipment and supplies, including personal protective equipment, for all staff, including CUPA personnel, so they are ready to respond to incidents within the jurisdiction of the CUPA, or elsewhere within the state in response to a mutual aid request.

PCEH staff, including CUPA personnel, responded to the recent fires in Butte County (Camp Fire), Shasta and Trinity Counties (Carr Fire), and Napa and Sonoma Counties (Tubbs Fire), performing site assessment of Unified Program facility evaluations and directing contractors in

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FINAL SUMMARY OF FINDINGS REPORT**

**EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION**

the cleanup of household hazardous waste. As a result of the emergency response program, PCEH was able to provide high-quality mutual aid assistance to neighboring counties relative to the Unified Program and is prepared to respond locally if a disaster strikes Placer county.

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**2. FIELD TABLETS FOR COMPLIANCE OPTIMIZATION**

To fulfill the electronic submittal requirements of the Unified Program and assist businesses within the regulated community with electronic submittals to CERS, PCEH provides field tablets equipped with wireless capabilities for CUPA personnel to use. The field tablets allow CUPA inspectors to provide one-on-one CERS training with facility representatives while conducting routine inspections in addition to completing electronic inspection reports. Utilization of field tablets has resulted in increased regulatory compliance for existing and new businesses and a strengthened relationship between the regulated community and the CUPA.

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