



Gavin Newsom
Governor

Yana Garcia
Secretary for Environmental Protection

May 9, 2023

Ms. Deborah Bernhard
CUPA Administrator
City of Santa Monica Fire Department
Fire Prevention Division
333 Olympic Drive, 2nd Floor
Santa Monica, California 90401-3126

Dear Ms. Bernhard:

During June 2019 through October 2019, CalEPA and the state program agencies conducted a performance evaluation of the City of Santa Monica Fire Department Fire Prevention Division Certified Unified Program Agency (CUPA). The CUPA evaluation included a remote assessment of administrative documentation, review of regulated facility file documentation, California Environmental Reporting System information, and oversight inspections.

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 meets or exceeds.

CalEPA recognizes the delay with issuing the final Summary of Findings report. Consequently, as the next CUPA Performance Evaluation is scheduled to begin in July 2023, there is sufficient time for submittal and review of one Evaluation Progress Report, although the timeframe for completion of corrective actions and resolutions may extend beyond submittal of the first Evaluation Progress Report.

The CUPA is required to submit the Evaluation Progress Report 60 days from the receipt of this Final Summary of Findings Report. Please provide the Evaluation Progress Report to the CalEPA Team Lead, Tim Brandt, at 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 been completed and addressed at present. Any deficiencies that remain uncorrected

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and any incidental findings that remain unresolved will be incorporated into the 2023 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.

Sincerely,



Jason Boetzer
Assistant Secretary
Local Program Coordination and Emergency Response

Enclosure

cc sent via email:

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Ms. Jessica Snow
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UNIFIED PROGRAM PERFORMANCE EVALUATION FINAL SUMMARY OF FINDINGS REPORT

CUPA: City of Santa Monica Fire Department Fire Prevention Division

Evaluation Period: June 2019 through October 2019

Evaluation Team Members:

- **CalEPA Team Lead:** Tim Brandt, Marc Lorentzen
- **DTSC:** Kevin Abriol
- **Cal OES/CalEPA*:** Fred Mehr
- **State Water Board:** Lisa Jensen
- **CAL FIRE-OSFM:** Glenn Warner

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 Unified Program implementation and performance of the CUPA is considered: meets or exceeds.

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

CalEPA recognizes the delayed issuance of this Final Summary of Findings report. Consequently, as the next CUPA Performance Evaluation is scheduled to begin in July 2023, there is sufficient time for submittal and review of one Evaluation Progress Report, 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 Evaluation Progress Report 60 days from the receipt of this Final Summary of Findings Report. The Evaluation Progress Report must be submitted to the CalEPA Team Lead at timothy.brandt@calepa.ca.gov no later than **July 14, 2023**.

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.

1. DEFICIENCY:

The CUPA is not issuing the Unified Program Facility Permit (UPFP), which includes the UST operating permit, prior to or upon the expiration date of an existing permit.

The UPFP has an expiration date of June 30.

Review finds UPFPs were issued substantially beyond the start date identified on the UPFP. The following facilities were issued a UPFP with a start date of October 1, 2018, and with an issuance date occurring after October 1, 2018:

- CERS ID 10173173: UPFP issued August 12, 2019
- CERS ID 10175569: UPFP issued August 12, 2019
- CERS ID 10435456: UPFP issued December 3, 2018

CITATION:

Health and Safety Code (HSC), Chapter 6.7, Section 25284(a)
California Code of Regulations (CCR), Title 23, Section 2712(c)
[State Water Board]

CORRECTIVE ACTION:

By the 1st Progress Report, the CUPA will review, revise, and provide CalEPA with the procedure for issuing the UPFP, which includes the UST operating permit, to ensure the issuance date of the UPFP and UST operating permit does not occur after the start date indicated on the UPFP and UST operating permit.

By the 2nd Progress Report, the CUPA will, if necessary, amend the UPFP issuance procedure, based on feedback from the State Water Board and will submit the amended UPFP issuance procedure to CalEPA. If no amendments are necessary, the CUPA will implement the revised UPFP issuance procedure and train CUPA personnel on the revised UPFP issuance procedure. The CUPA will provide training documentation to CalEPA, which will include at minimum, an outline of the training conducted and a list of CUPA personnel in attendance.

The CUPA will provide CalEPA with five UPFPs, including a UST operating permit, that have been issued to UST facilities that reflect an accurate start and issuance date.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

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's Inspection and Enforcement (I&E) Plan contains inaccurate information.

The following information is inaccurate:

- Page 17- The Hazardous Waste Penalty information is outdated.
 - HSC, Chapter 6.5, Section 25188 changed as of January 1, 2018, to state, "A person subject to an order issued pursuant to Section 25187 who does not comply with that order shall be subject to a civil penalty of not more than seventy thousand dollars (\$70,000) for each day of noncompliance."
 - HSC, Chapter 6.5, Section 25189 changed as of January 1, 2018, and has updated penalty amounts of up to \$70,000 for each violation or for continuing violations (a through e). The I&E Plan reflects the outdated \$25,000 penalty amount.

CITATION:

HSC, Chapter 6.5, Sections 25188 and 25189
CCR, Title 27, Section 15200(a)
[DTSC]

RESOLUTION:

By the 1st Progress Report, the CUPA will review and revise the I&E Plan to reflect accurate information. The CUPA will and provide CalEPA with the revised I&E Plan, addressing revisions to the inaccurate, information identified.

2. INCIDENTAL FINDING:

The CUPA is not ensuring the Los Angeles County Fire West District Participating Agency (PA) is applying enforcement to HWG facilities cited for violations return to compliance (RTC). In some cases, the PA is stating that a violation has been corrected when the violation still exists.

During the inspection report review, DTSC noted the following:

- CERSID 10159009: Inspection dated January 17, 2019, cites a violation for failure to maintain an active U.S. Environmental Protection Agency (U.S. EPA) Identification (ID) number. The follow-up inspection dated March 21, 2019, cites the violation as corrected with the following note: "Completed EPA ID application ... Violations corrected and notice of compliance abated." However, review of the DTSC Hazardous Waste Tracking System (HWTS) finds the U.S. EPA ID for the facility, CAL000070848, has been inactive since June 30, 1998.

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FINAL SUMMARY OF FINDINGS REPORT**

INCIDENTAL FINDINGS REQUIRING RESOLUTION

- CERSID 10456684 Inspection dated January 30, 2018, cites a violation for failure to maintain an active EPA ID number. The violation was considered corrected onsite with the following note: “CAL912975348 inactive per HWTS. Application to reactivate completed at time of inspection – to be emailed on behalf of business owner ... Submit documentation to the CUPA demonstrating that you have reactivated the facility’s EPA ID number.” However, a review of the HWTS indicates that the U.S. EPA ID for the facility, CAL912975348, has been inactive since June 30, 2016.

CITATION:

HSC, Chapter 6.5, Sections 25110.8.5 and 25117.6

HSC, Chapter 6.11, Section 25404.1.2(c)

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

[DTSC]

RESOLUTION:

By the 1st Progress Report, the CUPA will ensure the Los Angeles County Fire West District PA trains personnel on:

- correctly determining when violations have obtained RTC, including when to consider a violation “Corrected Onsite”, and
- obtaining the requisite evidence to demonstrate correction of a violation cited.

The CUPA will ensure the PA provides training documentation to the CUPA, including, at minimum, the date training was conducted, an outline of the training conducted, and PA personnel in attendance. The CUPA will provide the training documentation to CalEPA.

UNIFIED PROGRAM PERFORMANCE EVALUATION
PRELIMINARY SUMMARY OF FINDINGS REPORT

PROGRAM 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.

1. OBSERVATION:

Spill Prevention, Control, and Countermeasure (SPCC) Plan submittals were accepted in CERS as part of the Aboveground Petroleum Storage Act (APSA) submittal for CERS ID 10595296 and CERS ID 10729825.

SPCC Plans are not required as part of an APSA CERS submittal; therefore, SPCC Plans should not be uploaded to CERS.

The APSA documentation section in CERS is for annual tank facility statement submittals, unless a business plan is already submitted, or other local reporting requirements.

RECOMMENDATION:

Utilize the CERS regulator comments field to provide feedback to the APSA tank facility that SPCC Plans should not be uploaded in future CERS submittals.

2. OBSERVATION:

The CUPA is not consistently ensuring that APSA tank facilities comply with the tank facility statement reporting requirements.

Most APSA tank facilities submit a Hazardous Materials Business Plan (HMBP) in lieu of the tank facility statement to CERS. The CUPA is not consistently ensuring HMBPs provided in lieu of tank facility statements include site maps that contain all applicable required elements.

Review of APSA facility file information indicates the following APSA tank facilities were missing various required elements in the recently accepted site map submittal:

- 2 of 10 (80%)
 - CERS ID 10411423- missing emergency shutoffs, evacuation staging areas, and emergency response equipment.
 - CERS ID 10595296- missing emergency shutoffs and evacuation staging areas.

Note: Review of CERS comments associated with some rejected HMBP site map submittals demonstrates that the CUPA has rejected site maps with missing required elements and notified APSA tank facilities appropriately of the missing elements.

UNIFIED PROGRAM PERFORMANCE EVALUATION
PRELIMINARY SUMMARY OF FINDINGS REPORT

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

RECOMMENDATION:

Develop and implement an action plan to ensure that future HMBP submittals, provided in lieu of tank facility statements, are thoroughly reviewed to ensure site maps contain all applicable required elements. The action plan should include steps to follow up with rejected or incomplete site map submittals.

3. OBSERVATION:

The CUPA uses a single APSA inspection checklist to conduct inspections at all APSA facility types. The APSA inspection checklist references 39 violations.

The current Unified Program violation library in CERS contains approximately 100 APSA violations.

RECOMMENDATION:

Review all APSA violations in the current Unified Program violation library in CERS and incorporate all violations into the inspection checklist for all applicable APSA tank facilities. The CUPA may also utilize the APSA inspection checklists, developed by the APSA Technical Advisory Group, for inspecting Conditionally Exempt facilities, Tier I qualified facilities, Tier II qualified facilities, and facilities, with a professional engineer (PE)-certified SPCC Plan. Ensure the checklist used or violation cited is applicable to the APSA tank facility being inspected.

4. OBSERVATION:

Review of the I&E Plan finds the following APSA Program information is inaccurate and may benefit from improvement:

- Page 3, paragraph F, Applicability section
 - The number of regulated APSA tank facilities is approximately 25 as of April 2019, rather than 18 as stated.
 - The second sentence related to APSA facility applicability is outdated, as tank facilities with a tank in an underground area (TIUGA) are regulated under APSA, regardless of the facility's total petroleum storage capacity if the tank is stationary, contains petroleum, and has a minimum shell capacity of 55 gallons.
 - Reference to HSC, Section 25270.5 as the authority to implement the APSA Program is incorrect. The CUPA authority to implement the APSA Program is HSC, Chapter 6.67 (commencing with Section 25270).
 - Reference HSC, Section 25270.5(b) to identify the alternate triennial inspection frequency being implemented for the inspection all APSA facilities, including those storing less than 10,000 gallons of petroleum.

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UNIFIED PROGRAM PERFORMANCE EVALUATION PRELIMINARY SUMMARY OF FINDINGS REPORT

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

- Page 5, Required Frequency of Inspection table
 - The triennial statutory inspection frequency applies to APSA facilities storing 10,000 gallons or more of petroleum. It is most accurate to cite HSC, Section 25270.5(a) when referencing these APSA mandated inspections.
 - Consider including the alternative triennial inspection frequency to the Required Frequency of Inspection table to identify inspecting all APSA facilities, including those storing less than 10,000 gallons of petroleum, as indicated in paragraph F on Page 3, and reference HSC, Section 25270.5(b).
- Page 12, Section 3, is titled Program Specific Enforcement Violations. When discussing APSA Program specific enforcement information (starting on page 15), it may be more appropriate to reference HSC, Sections 25270.12, 25270.12.1 and 25270.12.5 for APSA penalties. For clarity, it may be appropriate to delete the other references to APSA statute sections 25270.3, 25270.4, 25270.5, 25270.6, 25270.8 and 25270.9.
- U.S. EPA has not delegated authority relative to the Federal SPCC rule to any state. To avoid confusion, removal of SPCC references is advised in the first sentence of paragraph F on Page 3, in the title line of section 6 on Page 7, and on Pages 15 and 22.

RECOMMENDATION:

Update the APSA Program information in the I&E Plan.

5. OBSERVATION:

Review of "Procedure 1.9" indicates the following APSA Program information is missing, inaccurate, outdated and may benefit from improvement:

- Page 1, Subject title: The U.S. EPA has not delegated authority relative to the Federal SPCC rule to any state. The SPCC reference should be removed.
- Section 1.00 (A) discussion should clearly identify that APSA regulated facilities, not Aboveground Storage Tanks (ASTs), must prepare and implement an SPCC Plan in accordance with APSA requirements.
- Section 2.00 (B) contains erroneous terminology related to APSA facilities.
 - The terms Tier I and Tier II [qualified facilities] are federal SPCC rule terms that allow certain facilities to self-certify the SPCC Plan in lieu of having a PE certify the SPCC Plan.
 - Qualified facility thresholds include total **oil** storage capacity (not exclusively petroleum) of up to 10,000 gallons and the facility must not have had a discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons, or no single discharge each exceeding 42 gallons within any 12-month period, in the three years prior to the SPCC Plan certification date, or since becoming subject to the Federal SPCC rule.

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UNIFIED PROGRAM PERFORMANCE EVALUATION PRELIMINARY SUMMARY OF FINDINGS REPORT

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

- Section 4.00 (A) does not reflect current APSA facility applicability, since tank facilities with a TIUGA are regulated under APSA, regardless of the facility's total petroleum storage capacity if the tank is stationary, contains petroleum, and has a minimum shell capacity of 55 gallons.
- Section 4.00 (B) does not discuss allowance for tank facilities to submit an HMBP in lieu of the tank facility statement.
- Section 4.00 (C)
 - The current APSA statute requirements (HSC, Section 25270.4.5) for facilities to prepare and implement an SPCC Plan using the same format required by Part 112 (commencing with Section 112.1) of Subchapter D of Chapter I of Title 40 of the Code of Federal Regulations are not included.
 - The statement that Tier II [qualified facility] SPCC Plans be signed and certified by a licensed PE is incorrect, unless the facility has a hybrid SPCC Plan that uses environmental equivalence and/or has made an impracticability determination; the PE would have to certify those parts of the hybrid SPCC Plan. Tier I or Tier II qualified facilities may self-certify the SPCC Plans.
 - The statement that a 'CUPA inspector is not responsible for evaluating the contents of the SPCC Plan, but only to verify the plan is provided' is not entirely accurate. Implementation of the APSA Program includes review of annual tank facility statements (or business plans), review of SPCC Plans, and inspections of tanks at certain tank facilities to determine compliance with the SPCC Plan requirements of APSA. CUPAs are not only required to verify if an APSA tank facility has prepared an SPCC Plan, but also to ensure the plan complies with the Federal SPCC requirements, is implemented in compliance with the latest requirements of the SPCC rule and is updated to reflect changes to the facility or operations over time.
- Section 4.00 (E) references the outdated CalEPA APSA Fact Sheet.
- Section 4.15 (A) has incorrect and incomplete information.
 - The note stating facilities with tanks that meet the AST exemptions provided in HSC, Section 25270.2 should include 'listed in items 1 through 4' after 'above exemptions' for clarity and to distinguish the note from item 5.
 - The list of AST exemptions per HSC, Section 25270.2 is incomplete and should be updated to reflect current APSA exclusions.
 - Item 5 discusses conditionally exempt tank facilities and does not include all the conditions to meet the SPCC plan exemption described in HSC, Section 25270.4.5(b). The discussion related to the APSA conditional exemption should reflect all criteria described in HSC, Section 25270.4.5(b). The first statement in the note to item 5 should be modified as follows for clarification "The above conditionally-exempt facilities (identified in item 5) are not required to prepare an SPCC Plan under APSA." Such conditionally exempt APSA tank facilities may still

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PRELIMINARY SUMMARY OF FINDINGS REPORT**

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

be required to prepare and implement an SPCC Plan under the Federal SPCC rule. While the applicability threshold is different for farms including nurseries, there is no similar APSA exemption for logging or construction sites under the Federal SPCC rule.

RECOMMENDATION:

Update the APSA program information in Procedure 1.9.

6. OBSERVATION:

Review of the area plan indicates the following information is inaccurate, outdated or may benefit from improvement:

- Page 19, paragraph 4, should be revised to properly state current APSA statute requirements for regulated facilities, not federal requirements.
- Page 106
 - The CALIFORNIA RELEASE REPORTING SUMMARY table includes an inaccurate reference to HSC, Section 25270.7, which does not exist.
 - The information provided in the columns associated with HSC, Section 25270.7 should be double checked relative to the information provided relative to HSC, Section 25270.8 in the same table.
- The Uniform Fire Code references (Pages 16, 20 and 148) and the Uniform Building Code reference (Page 32) are outdated. The current fire code adopted by the state is the California Fire Code, while the current building code is the current California Building Code.
- Multiple instances of incorrect referral to the APSA Program as 'Aboveground Petroleum Storage Tank' or 'Aboveground Storage Tank Spill Prevention Control and Countermeasures Plan' were observed, including Pages i, and 3.

RECOMMENDATION:

Update the area plan.

7. OBSERVATION:

The UPFP refers to the APSA Program as 'Aboveground Storage Tanks SPCC Plan.'

RECOMMENDATION:

Update the APSA reference on the UPFP.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

UNIFIED PROGRAM PERFORMANCE EVALUATION
PRELIMINARY SUMMARY OF FINDINGS REPORT

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

8. OBSERVATION:

Review of CERS finds the following 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:

- CERS ID 10122169 (Tank IDs 1 - 4)
- CERS ID 10175569 (Tank IDs 1 - 4)
- CERS ID 10128148 (Tank IDs 1)

Note: The examples identified above may not represent all UST systems which may need to be permanently closed by December 31, 2025, in accordance with HSC, Chapter 6.7, Section 25292.05.

RECOMMENDATION:

Continue to provide verbal reminders to UST facility owners/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 owners/operators that, in order to stay in compliance and avoid fines, owners/operators must replace or remove single-walled USTs by December 31, 2025. Additional information can be found at https://www.waterboards.ca.gov/ust/single_walled.html.

UST facility owners/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. Additional information on funding sources, can be found on the [RUST](http://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.shtml) website (http://www.waterboards.ca.gov/water_issues/programs/ustcf/rust.shtml).

9. OBSERVATION:

Review of CERS UST facility information finds the following facilities are improperly geolocated in the CERS Location Map with latitude and longitude coordinates provided outside the county in an undeveloped area located in the Sierra National Forest:

- CERS ID 10122169
- CERS ID 10122172
- CERS ID 10124281

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

Note: U. S. EPA expects the Facility Location Map data provided in CERS for each facility to accurately reflect the geographic location of the facility. The reference point for each facility

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PROGRAM OBSERVATIONS AND RECOMMENDATIONS

should be located in the center of the parcel map and is not required to be directly on top of the UST system. Incorrect location of a facility impacts an emergency responder's ability to rely on CERS as a facility location tool in the event of a natural disaster or other emergency.

RECOMMENDATION:

Ensure the geolocation of UST facilities is correctly reflected in CERS. The CUPA or the facility owner/operator may do this by relocating the location drop pin in the CERS Location Map.

10. OBSERVATION:

On September 17, 2019, DTSC conducted a non-Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) oversight inspection with the Los Angeles County Fire West District PA at CERS ID 10129348. The LA County Fire West District is the PA for the hazardous waste generator program. Prior to arriving at the facility, the inspector demonstrated knowledge of the facility's inspection history, CERS data, as well as a review of the HWTS and Transporter Quarterly Report (TQR) manifest information. During the inspection, the inspector gained consent to inspect the facility, toured the entire facility, took photographs, asked appropriate operating questions during the walkthrough, and requested all appropriate paperwork. Some guidance by DTSC inspectors was provided to the inspector regarding satellite accumulation requirements including labeling and closed containers of the used oil. At the conclusion of the inspection, the inspector briefed the operators on all of the issues found.

On September 18, 2019, DTSC conducted a Small Quantity Generator (SQG) oversight inspection with the Los Angeles County Fire West District PA at CERS ID 10125937. Prior to arriving at the facility, the inspector demonstrated knowledge of the facility's inspection history, CERS data, as well as a review of the HWTS and TQR manifest information. During the inspection, the inspector gained consent to inspect the facility, toured the entire facility, took photographs, asked appropriate operating questions during the walkthrough, and requested all appropriate paperwork. The inspection requested all appropriate SQG documentation. At the conclusion of the inspection, the inspector briefed the operators on all of the identified issues.

RECOMMENDATION:

CUPA and PA inspectors should review satellite accumulation requirements found in CCR, Title 22, Sections 66262.34(e) and (f)(3) as well as Section 66265.173(a).

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

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. CERS HMBP SUBMITTAL REMINDER PROCESS:

The CUPA has implemented a proactive process that supports the regulated business community in maintaining compliance with the requirement to make annual CERS HMBP submittals. The CUPA's Newsletter is sent to all regulated businesses and provides a reminder of the upcoming HMBP submittal date deadline. Facilities are subsequently provided a 1st Reminder email approximately 45 days in advance of the HMBP submittal date deadline, followed by a 2nd reminder email approximately 15 days in advance of the HMBP submittal date deadline. CUPA staff then monitor facility compliance. Non-compliant facilities are issued an advisory letter via postal mail, after which further enforcement actions are considered as appropriate.
