



Public Health Department

Environmental Health

202 Mira Loma Drive
Oroville, California 95965

Cathy A. Raevsky, Director
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buttecounty.net/publichealth

HAZMAT ADVISORY GROUP

MINUTES

OCTOBER 16, 2015

TAHOE ROOM ** 202 MIRA LOMA DRIVE, OROVILLE

I. Preliminary Items

A. Call to Order

[Bud called the meeting to order at 10:07 a.m.](#)

B. Roll Call and Determination of Quorum

Scott Steele, Josh Hubbard, Bud Caldwell, Russ Fowler, Kenny Wahl (new member replacing Charina Gaspay to represent Large Quantity Generators), and Malcolm were present., Susan Ricketts, Curt Josiassen, Keven Lemos, Jim Murray, and Robyn DiFalco were absent. **(See Attachment A)**

[A quorum was established.](#)

C. Introduction of guests

Matt Tennis attended as a guest. Mike Huerta, Danelle Leen, and Brad Banner attended on behalf of Environmental Health.

D. Review of minutes

[Malcolm made a motion to accept the minutes as written. Bud seconded the motion and the motion passed unanimously.](#)

E. Agenda review

[No changes to the agenda were requested.](#)

F. Public comments and input

[There was no public comment.](#)

II. Action Items

A. Draft Plan for CUPA Regulation of Agricultural Handlers **(See Attachment B)**

1. The discussion began with the question concerning what is meant by “federally regulated” facilities. Mike explained that the term is used to designate facilities that qualify to be regulated by the federal Emergency Planning and Community Right to Know Act (EPCRA).



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2. Colleen pointed out that, based on the EPCRA criteria of 10,000 pounds or 1,300 gallons of hazard materials (fuels) stored for greater than 30 days by farmers, the federal regulation would apply to many more farmers than the 150-200 estimated in the proposed workplan.
3. Much of the meeting discussion focused on “*why now?*” is the CUPA proposing enforcement of hazmat regulations for Ag Handlers, “*how*” is the CUPA planning to get the word out about the regulation and its impact on them, “*what*” information will be most useful to the Ag community, and “*when*” are the important upcoming meetings being planned?
4. Colleen invited the CUPA to the next Farm Bureau Board meeting on November 5 at 7:00 p.m. to discuss implementation of the workplan. The committee suggested that the CUPA be prepared to answer the following questions that will be raised by the farmers:
 - a. What are we being required to do?
 - b. Why do I need to do this?
 - c. If I don’t do this, what will happen?
 - d. Who will have access to information about where I store my hazardous material?
5. Brad stated that the Butte County CUPA’s current initiative is consistent with the direction being taken by other CUPAs in the Northern California region. Brad pointed out that CUPAs are regularly audited by CalEPA and are expected to enforce state and federal regulations as a requirement for certification, giving the recent state audit of Sacramento Environmental Management as an example. **(See Attachment C)**
6. The CUPA is preparing a draft survey intended to help Ag Handlers assess how hazmat regulations will affect their facilities and help the CUPA assess the number of facilities that will fall under the regulation.
7. The discussion veered off point somewhat from the topic of enforcement of Ag Handlers to the needs of First Responders for information from CERS. Russ pointed out that CERS information was helpful for his hazmat planners, but only to the extent that the information in CERS helped update the Preplanning documents that First Responders use when going out to an incident. Russ pointed out that an informed facility manager is what First Responders rely most upon. Mike pointed out that the CUPA would provide training on how to use a quick pull down window off of CERS that provides First Responders and/or their dispatch with the most current information about the type and quantity of hazardous materials present.



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8. Russ and others expressed frustration that the threshold amounts of materials regulated under state and federal law by the CUPAs are too low to be practical. The group discussed the possibility, down the road a ways, of inviting a legislator, such as Doug LaMalfa, to attend a meeting to discuss their concerns about the unacceptably low regulatory thresholds.
9. Significant discussion took place about the issue of confidentiality. Steve questioned whether the risk of disclosure of locations of hazardous materials outweighed the benefit to First Responders, especially since the First Responders do not use the information when they respond.
10. Colleen requested that the confidentiality issue be studied and discussed by the CUPA at the upcoming Farm Bureau Board meeting.

III. **Agenda Preparation for Next Meeting**

The next meeting is planned for the third Friday of November (November 20) at 10:00 a.m. in the Tahoe Room at 202 Mira Loma Drive in Oroville.

IV. **Adjourn**

The meeting adjourned at 12:15 p.m.

Brad

Submitted by Brad Banner



Public Health Department

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**Hazmat Advisory Group
 Sign-In Sheet**

ATTACHMENT A

Date: October 16, 2015

Location: Tahoe Rm, 202 Mira Loma Dr., Oroville

Working Group Member		Initials
Reliance Propane Scott Steele		<i>SS</i>
CSU Chico (Primary) Kenny Wahl		<i>KW</i>
PNP Chico #82 (Alternate) Charina Gaspay		
Lundberg Family Farm Keven Lemos		
Chico Metal Finishing Jim Murray		
ARCO AM/PM #82605 Josh Hubbard		<i>JH</i>
Northgate Petroleum Bud Caldwell		<i>BC</i>
Butte County Rice Growers Association Susan Ricketts		
Josiassen Farms, Inc Curt Josiassen		
Cal Fire/Butte Fire Russ Fowler		<i>RF</i>
NRC Malcolm Maxwell		<i>M.M.</i>
Butte Environmental Council Robyn DiFalco		
Guest Name	Business Name	Email Address
<i>Brad Banner</i>		
<i>Danelle Leon</i>		
<i>Mike Hertz</i>		
<i>Colleen Cecil</i>	<i>Butte Co. Farm Bureau</i>	
<i>Matt Tennis</i>	<i>Farmer</i>	

CUPA Regulation of Agricultural Handlers

Draft Workplan

October 16, 2015

ATTACHMENT B

Task A: Between November 1 and April 30, 2015, CUPA staff will incorporate into the local regulatory program the 150-200 large quantity Ag Handlers with Federally regulated thresholds.

Subtask A.1. By November 15, compile a complete list of federally regulated facilities.

Subtask A.2. By November 15, develop informational flyer for federally regulated facilities.

Subtask A.3. By November 15, develop a survey for federally regulated facilities to determine extent of regulation needed.

Subtask A.4. By November 30, mail flyer and survey to federally regulated facilities, with a brief explanation that they will be contacted sometime during the next two weeks by staff in order to complete the survey.

Subtask A.5. By December 15, complete telephone survey of all federally regulated facilities.

Subtask A.6. By April 30, complete inspection of all federally regulated facilities.

Task B: Between December 1, 2015 and January 31, 2016, CUPA staff will complete outreach to (1) Agriculture Commissioner's Pesticide Applicators Workshop, (2) BCRA's Spring Meeting, and (3) Wholesale Herbicide meeting and hold one centrally located workshop for small Ag Handlers.

Subtask B.1. By November 15, identify dates and contact information for each of the meetings referenced for Task B.

Subtask B.2. By November 30, contact persons in charge for the meetings so to solicit and invitation to attend the meetings and provide information about the Ag Handler regulation

Subtask B.3. Two weeks prior to the first meeting, develop presentation PowerPoint, handouts, or other items needed in the outreach.

Task C: No later than February 28, 2016, schedule public hearing with the Butte County Board of Supervisors proposing a Business Plan exemption.

Subtask C.1. By January 30, draft Board agenda item.

Subtask C.2. By February 15, review agenda item with the Hazmat Advisory Group.

Subtask C.3. By February 28, submit agenda item for departmental and county review.

Task D: In a coordinated manner with Task C and no later than February 28, 2016, present to the Board of Supervisors a reduced fee for oversight of small Ag Handlers with conditional exemptions.

Task E: Beginning May 1, 2016, CUPA staff will incorporate into the local regulatory program small Ag Handlers.



Edmund G. Brown Jr.
Governor

Matthew Rodriguez
Secretary for Environmental Protection

ATTACHMENT C

Certified Mail: 7014 1200 0001 5649 3494

January 29, 2015

Mr. Val Siebal, Director
Sacramento County
Environmental Management Department
10590 Armstrong Avenue
Mather, California 95655-4153

Dear Mr. Siebal:

On January 6 - 7, 2015, the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC), and the California Office of Emergency Services (Cal OES), conducted a Unified Program evaluation of the Sacramento County Environmental Management Agency Certified Unified Program Agency (CUPA). The evaluation comprised of an in-office review and oversight inspections.

Upon closing of the evaluation, the Unified Program Evaluation Team (team) developed a preliminary Summary of Findings, which identified program deficiencies and provided corrective actions with timeframes for correction. Program observations, recommendations and examples of outstanding implementation were also noted.

Enclosed, please find the final Summary of Findings. Based upon review and completion of the evaluation, the implementation and performance of the Unified Program by the CUPA is considered to meet or exceed Unified Program standards. Congratulations on a well-managed program.

Deficiency Progress Reports are due every 90 days from the last day of the evaluation to document progress of the CUPA towards correcting identified deficiencies. The first Deficiency Progress Report is due April 7, 2015. Submittal of Deficiency Progress Reports is required until all identified deficiencies have been corrected. Each Deficiency Progress Report should be emailed as a Microsoft Word document file to the team lead, katrina.valerio@calepa.ca.gov.

The final Summary of Findings and Deficiency Progress Reports will be posted at:

<http://cersapps.calepa.ca.gov/Public/Directory/CUPAEvaluationDocuments>

Mr. Val Siebal, Director
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During the evaluation, CalEPA also noted the CUPA has worked to bring about a number of local program innovations, including the attachment of quick reference codes to Notices to Comply, and the development of a video series that provides instructions on how to correct common minor violations.

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 the team lead, Katrina Valerio, at (916) 505-4206 or John Paine, Manager, at (916) 327-5092.

Sincerely,

Original signed by Jim Bohon

Jim Bohon, Assistant Secretary
Local Program Coordination and Emergency Response
California Environmental Protection Agency

Enclosure

cc sent via email

Ms. Marie Woodin
Deputy Chief
Sacramento County
Environmental Management Department
10590 Armstrong Avenue, Suite A
Mather, California 95655

Mr. Ryan Bailey
Supervising Environmental Specialist
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Environmental Management Department
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Mr. Fred Mehr
Environmental Scientist
California Office of Emergency Services
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Mather, California 95655

Mr. Val Siebal, Director
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Mr. Matthew McCarron
Senior Environmental Scientist, Specialist
Department of Toxic Substances Control
700 Heinz Avenue, Suite 210
Berkeley, California 94710-2721 cc sent via email

Ms. Katrina Valerio
Environmental Scientist
California Environmental Protection Agency
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Sacramento, California 95812-2815

Ms. Laura Fisher, Chief
State Water Resources Control Board
P.O. Box 100
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Ms. Diana Peebler
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Mr. Kevin Reinertson, Chief
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Sacramento, California 94244-2460

Mr. Thomas E. Campbell, Chief
California Office of Emergency Services
3650 Schriever Avenue
Mather, California 95655

Ms. Elise Rothschild
Deputy Director
Department of Toxic Substances Control
P.O. Box 2815
Sacramento, California 95812-2815

Mr. John Paine
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California Environmental Protection Agency
P.O. Box 2815
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Edmund G. Brown Jr.
Governor

Matthew Rodriguez
Secretary for Environmental Protection

CERTIFIED UNIFIED PROGRAM AGENCY
FINAL SUMMARY OF FINDINGS

EVALUATION DATE(S):	January 6 and 7, 2015				
CUPA:	Sacramento County Environmental Management Department				
EVALUATION TEAM MEMBERS:	CalEPA Team Lead	DTSC	Cal OES	SWRCB	CAL FIRE - OSFM
	Katrina Valerio	Matt McCarron	Fred Mehr	Not Attending	Not Attending

This **FINAL SUMMARY OF FINDINGS** includes:

- deficiencies identified during the evaluation
- 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 are considered to be:

meets or exceeds Unified Program standards.

Questions or comments regarding this evaluation should be directed to **CalEPA Evaluation Team Lead**.

The CUPA is required to submit a **Deficiency Progress Report every 90 days** from the last day the evaluation is conducted, until all deficiencies have been acknowledged as corrected.

Each **Deficiency Progress Report** must include a narrative stating the correction of ***all*** deficiencies identified in the Summary of Findings evaluation report.

Deficiency Progress Report submittal dates for the first year following the evaluation are as follows:

Update 1: April 7, 2015

Update 2: July 7, 2015

Update 3: October 7, 2015

Update 4: January 7, 2016

Each Deficiency Progress Report must be submitted to the CalEPA Team Lead.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

CERTIFIED UNIFIED PROGRAM AGENCY

EVALUATION: **FINAL SUMMARY OF FINDINGS**

DEFICIENCIES IDENTIFIED DURING EVALUATION

1.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA's local reporting portal is not able to transfer electronic data submitted by regulated businesses to California Environmental Reporting System (CERS) using the data exchange technical specifications provided by CalEPA.</p> <p>EnvisionConnect, the data management system used by the CUPA is unable to upload "batches" of submittals into CERS, each submittal must be uploaded to CERS from EnvisionConnect individually. The CUPA meets regularly with representatives from their vendor (Decade), and its own Information Technology staff, and has been working diligently with the Decade users group in order to further compliance with state standards. CUPA staff regularly perform quality assurance/quality control reconciliation of submittals and catalogue submittal errors during Electronic Data Transfer using the CERS integration wizard.</p> <p>Currently, the CUPA receives most of its business plan and hazardous materials inventory submittals through its portal. Underground Storage Tank (UST) and Aboveground Petroleum Storage Tank Act (APSA) submittals have primarily been uploaded directly into CERS.</p> <p>The CUPA spoke with Decade during the evaluation and the ability to upload submittals in batches is not in the works. CUPA inspectors have uploaded several hundred submittals and the CUPA has identified a process change that has been incorporated into their standard operating procedure to ensure that each submittal is</p>	<p>With each quarterly deficiency update, beginning April 7, 2015, the CUPA will apprise CalEPA of the overall status of this project.</p> <p>By January 7, 2016, the CUPA will have uploaded all electronic submittals to CERS.</p> <p>CalEPA will review CERS to confirm that submittals have been uploaded.</p>

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EVALUATION: **FINAL SUMMARY OF FINDINGS**

DEFICIENCIES IDENTIFIED DURING EVALUATION

<p>uploaded.</p> <p>CUPA staff will continue to upload business plans and inventories individually as they are submitted over the next fiscal year (FY).</p> <p>Additionally, the CUPA hosts weekly alternating workshops on Business Plan and UST electronic form submittals for business owners, operators, and agricultural handlers in the Environmental Management Department's onsite computer lab.</p> <p>CITATION: CCR Title 27 Section 15187 (a)(2) [CalEPA]</p>	
<p>*</p> <p>DEFICIENCY:</p> <p>This deficiency is carried over from the 2011 CUPA evaluation.</p> <p>The CUPA is not implementing and enforcing the requirements of the business plan program for all regulated businesses. Specifically, the CUPA is not regulating all agricultural handlers that are subject to the business plan program.</p>	<p>CORRECTIVE ACTION:</p> <p>This deficiency was found to be corrected during the 2014 evaluation. No further corrective action is required. The narrative below catalogues changes observed in the regulation of agricultural handlers within the last three years.</p> <p>The CUPA has created a detailed training program and provides regular training to Agricultural Commissioner's staff.</p> <p>The CUPA has identified the universe of farms within the county. Agricultural Commissioner's staff or CUPA's staff (depending on the program element) have inspected 92% of the County's agricultural handlers in the last three years. Agricultural commissioner's staff conduct inspections at farm facilities that are subject to the Business Plan program, regulated as small quantity hazardous waste generators, and that APSA regulated facilities storing 1,320 to 10,000 gallons of petroleum . CUPA staff conduct inspections at farms facilities that are regulated as large quantity hazardous waste generators (LQGs), APSA facilities (storing above 10,000 gallons), and UST facilities .</p> <p>Post inspection return to compliance follow up is initiated and follow up by CUPA staff. Of the inspection reports reviewed, all were complete and included violations,</p>

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DEFICIENCIES IDENTIFIED DURING EVALUATION

		factual basis for the violations, observations and specified return to compliance timeframes. Inspection reports completed by the agricultural commissioner's staff appeared to state evaluators to be equivalent in detail to those completed by CUPA inspectors for non-agricultural handlers.
CITATION:	HSC, Chapter 6.95 Section 25507.1 CCR, Title 19, Sections 2729, 2729.1 and 2729.2 [Cal OES]	

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EVALUATION: **FINAL SUMMARY OF FINDINGS**

OBSERVATIONS AND RECOMMENDATIONS

The observations and recommendations provided in this section address activities the CUPA is implementing and/or may include areas for continuous improvement not specifically required of the CUPA by regulation or statute.

1. OBSERVATION:	The CUPA's Inspection and Enforcement (I & E) Plan has been updated to include statutory and regulatory changes that took effect in 2014, and takes into full account the use of the CUPA's data management system for pre-inspection review and post-inspection follow up.
RECOMMENDATION:	None.
2. OBSERVATION:	CalEPA reviewed invoices for several CUPA facilities. The CUPA is assessing the correct surcharge for all state programs including the newly required surcharge for APSA facilities.
RECOMMENDATION:	None
3. OBSERVATION:	The CUPA began assessing fees on agricultural handlers on July 1, 2014.
RECOMMENDATION:	None.
4. OBSERVATION:	The CUPA submitted 32 formal enforcement reports detailing formal enforcement cases that have received a final judgment during FY 2013/2014.
RECOMMENDATION:	CalEPA recommends that the CUPA continue this practice. Please send the reports to Thai.le@calepa.ca.gov to ensure the reports are posted to CalEPA's website in a timely manner.
5. OBSERVATION:	The Sacramento County CUPA is 100% fee funded, which means that the CUPA is not reliant on/does not receive monies from the general fund and has not had to endure resource cuts, as other county departments.
RECOMMENDATION:	None
6. OBSERVATION:	The CUPA recorded fees not collected from closed businesses as "waived" single fee in their Annual Single Fee Summary Report. Pursuant to CalEPA's request during the evaluation, the CUPA revised the

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OBSERVATIONS AND RECOMMENDATIONS

	<p>summary report to account for state surcharge in the same manner. In practice the CUPA was omitting state surcharge billed to closed businesses from Annual Single Fee reports which arithmetically looks like a discrepancy between the assessment of single fee and state surcharge.</p>
	<p>RECOMMENDATION:</p>
	<p>CalEPA recommends that the CUPA report non-collected state surcharge in the same manner it reports non-collected single fee monies from closed businesses. This will reduce questions from state evaluators during future assessments.</p>
7.	<p>OBSERVATION:</p> <p>There is a difference of approximately 1,529 facilities between what the CUPA has reported in its FY 2013/2014 annual self-audit report, which is 2964 facilities, and the total number of businesses manifesting off hazardous waste with active US Environmental Protection Agency (EPA) Identification (ID) numbers listed in DTSC's Hazardous Waste Tracking System (HWTS), which is 4,493 facilities. While some of these 1,529 may be in some state of change, many may need to be under the CUPA jurisdiction for permits.</p> <p>The CUPA does review the HWTS data system to cross-check for new EPA ID numbers issued by DTSC and US EPA. Additionally, the CUPA purchases a subscription of the American City Business Journals which provides information on new business licenses issued in their service area. This service assists the CUPA in keeping up with the new businesses that should be covered in their service area.</p>
	<p>RECOMMENDATION:</p>
	<p>DTSC recommends that the CUPA continues this practice.</p>
8.	<p>OBSERVATION:</p> <p>Two hazardous waste generator oversight inspections were conducted with DTSC. During the first oversight inspection conducted at the City of Folsom Corporation yard, the CUPA inspector conducted a thorough inspection. The inspector was well prepared for the inspection, established rapport with the facility, toured the entire site, checked all required documentation for LQGs, spotted all violations, and answered questions regarding hazardous waste rules and regulations accurately. The CUPA inspector documented some violations with photographs.</p> <p>During the second oversight inspection conducted at D & T Fiberglass, Inc., the CUPA inspector conducted a good inspection. The inspector was well prepared and established rapport with the facility, checked all required documentation for a tiered permitting facility, spotted all violations, and answered questions regarding hazardous waste rules and regulations accurately.</p>
	<p>RECOMMENDATION:</p>
	<p>None</p>
9.	<p>OBSERVATION:</p> <p>Based on various working observations, the recent US EPA evaluation of the Sacramento County UST program, and satisfactory significant operational compliance reporting, the State Water Board</p>

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OBSERVATIONS AND RECOMMENDATIONS

elect not to participate in the onsite evaluation of the Sacramento County Environmental Management Agency CUPA. State Water Board staff routinely work with Sacramento County staff, and are familiar with its program implementation, policies, and procedures. All of which appear satisfactory. US EPA audited the Sacramento County CUPA as part of a State Water Board audit on the implementation of the federal UST Program and Energy Policy Act implementation. US EPA's findings also indicated that the program is performing satisfactorily. State Water Board staff thanks Sacramento County CUPA for their continued satisfactory implementation of the UST Program.

RECOMMENDATION:

None.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

- 1. Enforcement Program** - The Sacramento County CUPA has an effective and aggressive enforcement program that consistently applies the administrative enforcement order (AEO) process across all program elements. Additionally, the CUPA's Envision Connect data management system automatically sends follow-up notifications to businesses that have minor violations or delinquent accounts and elevates enforcement if necessary. The CUPA has issued 106 AEO's over the past three FYs, initiated and/or participated in the majority of statewide cases.

The CUPA has instituted a failure to pay program which ties fees to permits and has allowed the CUPA to establish a part-time position with the County Department of Revenue Recovery to pursue the collection of late fees. This helps to level the competitive playing field and through the additional follow-up has demonstrated a marked decrease in the payment delinquency rate.

The CUPA has established a Failure to Return to Compliance program that is aided by the automatic notification letters sent by the CUPA's data management system. CUPA staff and supervisors meet quarterly to review open violations. Failure to return to compliance letters are then sent quarterly to facilities that have not returned to compliance. CalEPA noted two facilities that had not returned to compliance within the timeframes designated in notices to comply. Each facility remitted required documentation within two weeks of receiving the return to compliance letter.

- 2. Enforcement Revenue Credit Program** - The Sacramento County CUPA continues to implement its enforcement revenue credit program that was initiated on July 1, 2005. This is a positive incentive for businesses to "play by the rules" as the program applies credits to annual fee invoices for facilities that have achieved an acceptable level of compliance. The credits are derived from enforcement revenue collected, less costs to implement enforcement activities. To date over \$2.5 million has been returned to compliant facilities. The program has been enthusiastically embraced by businesses and adds credibility to the CUPA's overall enforcement program. The credit is applied to all facilities that have not been pursued for formal enforcement within the last three years.
- 3. CUPA Community Participation/ Community Resource** - The Sacramento County CUPA and its staff are actively involved with various statewide organizations, workgroups, technical advisory groups (TAG), and committees, including the Enforcement Steering Committee, Data Steering Committee, Underground Storage Tank TAG, CUPA Forum Board, and the Unified Program Administration and Advisory Group. The CUPA's involvement with the development of CERS 3 has been invaluable. The CUPA staff have also been active participants (such as coordinators, trainers, or speakers) at various symposiums and conferences such as the Continuing Challenge Conference and -CUPA Training conference. The CUPA is an active participant in the Sacramento County Environmental Crimes Task Force, which holds monthly meetings, and the Metal Theft Task Force with Yolo, Sacramento, and Placer Counties. The CUPA has been an active participant in the efforts to rewrite/reorganize Health and Safety Code Chapter 6.95.

The CUPA has trained other nearby CUPAs on dry cleaners and in pursuing AEOs, and has taken state agency staff on UST and AST training inspections. The CUPA was recognized at the California Conference

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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of Environmental Health Directors with a Resolution for Outstanding Aid Given to fellow CUPAs in the areas of enforcement, training, methamphetamine laboratory remediation documents.

- 4. Use of Technology** - The CUPA's use of technology in their inspection and enforcement process is advanced and progressive in assisting the business and public in understanding the environmental requirements and providing information access to the public. Examples include:
- a. The CUPA has produced a series of videos to address compliance issues both specific and generic. The CUPA received the CUPA Forum Board Innovation Award for development of the Nine (9) video series currently posted to the CUPA's website with more topics in process. These videos run from approximately 1 to 5 minutes and can be viewed on smartphones.
 - b. The CUPA successfully uses tablets in the field for producing inspection reports and Notices to Comply. On the notice to comply, Quick Response (QR) codes are inserted with a violation to link to the videos described above if the video is specific to that violation, so that a facility can view the corrective action needed to be taken on their smartphones.
 - c. The CUPA also uses Facebook and the County's website to push more information out to the public and facilities to assist in regulatory understanding.
 - i. Resources such as facility check lists and return to compliance documents are available for businesses to use to prepare their facility for inspections and compliance <http://www.emd.saccounty.net/Documents/EMDForms-CUPA-Checklists.html>
 - ii. List of handbooks, factsheets, forms and publications on over three (3) dozen topics to assist all 6 CUPA program elements. <http://www.emd.saccounty.net/Documents/EMDForms-CUPA-Forms.html#CUPAInfo>
While many CUPAs provide similar resources, the depth of the handbooks for Hazardous Waste management, Hazardous Waste Tank Assessment, Hazardous Waste at Retail Stores and Tiered Permitting info are in a step-by-step format for the users.
 - d. Public Records access including facility inspection reports were recently uploaded to a web portal <http://www.emd.saccounty.net/Admin/EMDDocumentReview.html>
 - e. The CUPA has a training room equipped with 20 computers, and staff available for businesses to come to the office to get hands on assistance with using CERS or their portal to provide the county with required information for the businesses.
 - f. All documents are electronically stored and inspection reports and other documents that do not require information to be redacted are accessible to the public online.