



Edmund G. Brown Jr.  
Governor

Matthew Rodriguez  
Secretary for Environmental Protection

Certified Mail: 7014 1200 0001 5649 2954

August 26, 2015

Mr. Stuart Tom  
Fire Marshal  
Fire Prevention Bureau  
City of Glendale Fire Department  
780 Flower Street  
Glendale, California 91201

Dear Mr. Tom:

On May 12-13, 2015, the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC), the California Office of Emergency Services (Cal OES), the CAL FIRE - Office of the State Fire Marshal (OSFM), and the State Water Resources Control Board (SWRCB) conducted a Unified Program evaluation of the City of Glendale Fire Department Certified Unified Program Agency (CUPA). The evaluation comprised of an in-office review of regulated facility files and records 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 and recommendations 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 be unsatisfactory.

Deficiency Progress Reports are due every 90 days to document progress of the CUPA towards correcting identified deficiencies. The first Deficiency Progress Report is due October 21, 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, [kareem.taylor@calepa.ca.gov](mailto:kareem.taylor@calepa.ca.gov).

Failure to adequately correct identified deficiencies in a timely manner may result in the establishment of a Program Improvement Agreement between CalEPA and the governing body of the CUPA.

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

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

If you have any questions or need further assistance, please contact the team lead, Kareem Taylor, at (916) 327-9557 or John Paine, Manager, at (916) 327-5092.

Sincerely,

Original signed by Jim Bohon

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

Enclosure

cc sent via email

Mr. Doug Nickles  
Fire Prevention Coordinator  
City of Glendale Fire Department  
780 Flower Street  
Glendale, California 91201

Mr. Sean Farrow  
Environmental Scientist  
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Ms. Denise Gibson  
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Mr. Fred Mehr  
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cc sent via email

Ms. Laura Fisher, Chief  
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Mr. Greg Andersen, Chief  
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Mr. Thomas E. Campbell, Chief  
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Mather, California 95655

Mr. John Paine  
Unified Program Manager  
California Environmental Protection Agency

Mr. Kareem Taylor  
Unified Program Evaluation Team Lead  
California Environmental Protection Agency

**CERTIFIED UNIFIED PROGRAM AGENCY**  
**FINAL SUMMARY OF FINDINGS**

<b>EVALUATION DATE(S):</b>	<b>May 12 - 13, 2015</b>				
<b>CUPA:</b>	City of Glendale Fire Department				
<b>EVALUATION TEAM MEMBERS:</b>	<b>CalEPA Team Lead</b>	<b>DTSC</b>	<b>Cal OES</b>	<b>SWRCB</b>	<b>CAL FIRE - OSFM</b>
	Kareem Taylor	Ari Erman	Fred Mehr	Sean Farrow Laura Fisher	Denise Gibson

This **FINAL SUMMARY OF FINDINGS** includes:

- deficiencies identified during the evaluation
- program observations and recommendations

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:

**Unsatisfactory.**

Questions or comments regarding this evaluation should be directed to **Kareem Taylor**.

<p>The CUPA is required to submit a <b>Deficiency Progress Report every 90 days</b>, until all deficiencies have been acknowledged as corrected.</p> <p>Each <b>Deficiency Progress Report</b> must include a narrative stating the correction of <b><i>all</i></b> deficiencies identified in the Summary of Findings evaluation report.</p>	<p><b>Deficiency Progress Report submittal dates for the first year following the evaluation are as follows:</b></p> <p align="center"><b>Update 1: October 21, 2015</b> <b>Update 2: January 21, 2016</b> <b>Update 3: April 21, 2016</b> <b>Update 4: July 21, 2016</b></p> <p><b>Each Deficiency Progress Report must be submitted to the CalEPA Team Lead.</b></p>
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# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

### EVALUATION: **FINAL SUMMARY OF FINDINGS**

#### DEFICIENCIES IDENTIFIED DURING EVALUATION

1. DEFICIENCY:	CORRECTIVE ACTION:
<p>The CUPA is not ensuring that all businesses subject to the business plan program submit a complete hazardous materials business plan (HMBP) in the California Environmental Reporting System (CERS).</p> <p>An analysis of the facility records in CERS indicates that the CUPA's continuing efforts are expected to bring all facilities into compliance with the submission of complete business plans by July 21, 2016. This level of effort is not sufficient to ensure that all regulated businesses will submit a complete HMBP annually.</p>	<p>By October 21, 2015, the CUPA will identify, and submit a list to CalEPA, all businesses that have not submitted a complete HMBP in CERS.</p> <p>By July 21, 2016, all regulated businesses will have submitted a complete HMBP into CERS. The CUPA will submit an updated list to CalEPA showing that each facility has submitted the required elements or that appropriate enforcement actions have been taken.</p>
<p><b>CITATION:</b> HSC, Chapter 6.95, Section 25504, 25505 and 25508 [CalEPA, Cal OES, OSFM]</p>	
2. DEFICIENCY:	CORRECTIVE ACTION:
<p>The CUPA is not ensuring that regulated businesses submit required information into CERS. CalEPA's review of CERS information indicates that 182 (26%) of approximately 700 facilities have not submitted required information into CERS.</p> <p>An analysis of the facility records in CERS indicates that the CUPA's continuing efforts will ensure that 90% of all regulated businesses will submit information into CERS by February 2016.</p>	<p>By October 21, 2015, the CUPA will report to CalEPA the number of regulated businesses that have not submitted required information into CERS.</p> <p>By October 21, 2015, the CUPA will send a notification to those businesses informing them that required information must be submitted electronically into CERS.</p> <p>By February 2016, at least 90% of all regulated businesses will have submitted required information into CERS. The CUPA will have taken appropriate enforcement actions against businesses that have not submitted required information. The CUPA will report to CalEPA the number of businesses that have submitted required information and the number of businesses that the CUPA performed enforcement actions against.</p>
<p><b>CITATION:</b> HSC, Chapter 6.11, Section 25404(a)(1)(C) and (e)(4) CCR, Title 27, Section 15188(b) [CalEPA]</p>	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION: **FINAL SUMMARY OF FINDINGS** DEFICIENCIES IDENTIFIED DURING EVALUATION

<b>3.</b>	<b>DEFICIENCY:</b>	<b>CORRECTIVE ACTION:</b>
	<p>The CUPA is not following-up and/or documenting return to compliance (RTC) for all businesses cited for violations. Additionally, the CUPA is not ensuring that all facilities with minor violations RTC within 30 days of notification.</p> <p>CalEPA's review of fiscal year (FY) 2013/2014 CERS information indicates the following:</p> <ul style="list-style-type: none"> <li>• 63 or 83% of 76 HMBP violations have not RTC.</li> <li>• 43 or 53% of 88 underground storage tank (UST) violations have not RTC.</li> <li>• 18 or 95% of 19 Aboveground Petroleum Storage Act (APSA) violations have not RTC.</li> <li>• 44 or 65% of 69 hazardous waste generator (HWG) violations have not RTC.</li> <li>• 1 tiered permitting violation has not RTC.</li> </ul> <p>DTSC's file review indicates that the businesses below were cited for violations, but documentation of RTC or CUPA follow-up was not found:</p> <ul style="list-style-type: none"> <li>• Modern Engine Inc. located at 628 Irving Avenue</li> <li>• Chase Auto Body located at 4506 San Fernando Rd.</li> <li>• Kings Body Shop located at 6155 San Fernando Rd. #3</li> <li>• Automation Plating Corp. located at 902 Thompson Ave.</li> </ul>	<p>By October 21, 2015, the CUPA will submit to CalEPA, a list the facilities with ongoing violations and facilities without RTC documentation.</p> <p>By January 21, 2016, the CUPA will submit an updated list showing either that facilities have RTC, appropriate enforcement actions have been taken, or that RTC documentation has been placed in the facility files.</p> <p>By January 21, 2016, the CUPA will submit RTC documentation from five facilities selected by CalEPA and DTSC.</p> <p>By January 21, 2016, the CUPA will submit to CalEPA a copy of RTC documentation for the facilities listed in this deficiency.</p>
	<b>CITATION:</b>	
	HSC, Chapter 6.5, Section 25187.8 CCR, Title 27, Section 15200 (a) CCR, Title 23, Section 2712(f) [CalEPA, DTSC, State Water Board, OSFM]	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

CERTIFIED UNIFIED PROGRAM AGENCY  
**EVALUATION: FINAL SUMMARY OF FINDINGS**  
**DEFICIENCIES IDENTIFIED DURING EVALUATION**

4.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA is not assessing the correct state surcharge. The CUPA incorrectly assessed the CUPA oversight surcharge of \$34 since January 2013. The correct CUPA oversight surcharge is \$35.</p> <p>The CUPA is not assessing the APSA surcharge of \$26 that became effective July 2014.</p>	<p>Immediately, the CUPA will discontinue the \$34 CUPA oversight surcharge assessment and begin assessing the correct CUPA oversight surcharge of \$35. The CUPA will begin assessing the APSA surcharge.</p> <p>By October 21, 2015, the CUPA will determine, and report to CalEPA, the total state surcharges that were not assessed. The CUPA oversight surcharge shortfall is \$3 per regulated facility (\$1 per year from 2013 through 2015). The APSA surcharge shortfall is \$26 per APSA facility.</p> <p>By October 21, 2015, the CUPA will assess and collect the surcharge monies that were not previously assessed.</p> <p>By October 21, 2016, the CUPA will submit five single fee invoices to CalEPA (two from APSA facility) showing the correct surcharge assessments.</p> <p>By April 21, 2016, the CUPA will submit to CalEPA the state surcharges that were not previously assessed.</p>
	<p><b>CITATION:</b>                      CCR, Title 27, Section 15240(c)(4), 15250  <b>[CalEPA]</b></p>	
5.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA did not inspect all California Accidental Release Prevention (CalARP) facilities at least once every three years. The CUPA did not inspect 8 (or 61%) of 13 CalARP facilities within the last three years.</p>	<p>By October 21, 2015, the CUPA will submit a plan to CalEPA detailing how resources will be allocated to complete all required CalARP inspections.</p> <p>By April 21, 2016, the CUPA will have inspected all CalARP facilities.</p>
	<p><b>CITATION:</b>                      HSC, Chapter 6.95, Section 25537(a)                      CCR, Title 19, Section 2775 <b>[CalOES]</b></p>	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION: **FINAL SUMMARY OF FINDINGS** DEFICIENCIES IDENTIFIED DURING EVALUATION

6.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA did not ensure that Large Quantity Generator (LQG) facilities conduct a tank integrity assessment on above ground storage tanks holding hazardous waste used oil. A required tank integrity assessment was not conducted at the following facilities:</p> <ul style="list-style-type: none"> <li>• Subaru of Glendale located at 1320 S. Brand Blvd.</li> <li>• Fiat of Glendale located at 900 S Brand Blvd.</li> </ul> <p>Further investigation and discussion with CUPA staff revealed that this is a CUPA program deficiency and not a site specific issue. The CUPA staff explained that they have not been issuing formal exemptions for the tank integrity assessments in the past, and several LQG facilities currently do not have a tank integrity assessment for above ground storage tanks holding Non-RCRA hazardous waste. This issue was also identified during the oversight inspection of Valvoline Instant Oil Change.</p>	<p>By October 21, 2015, the CUPA will either request the LQG facility to conduct a tank integrity assessment certified by a professional engineer or issue a formal exemption, in lieu of, the assessment specified in CCR, title 22, section 66265.192(k), for above ground storage tanks used for the accumulation of non-RCRA hazardous wastes at LQG facilities.</p> <p>By October 21, 2015, the CUPA will submit to CalEPA documentation indicating that either a tank integrity assessment exemption was issued by the CUPA or an engineering assessment certified by a professional engineer was conducted by the facility.</p>
	<b>CITATION:</b>	
	CCR, Title 22, Sections 66265.192(a) and 66265.192(j)(k) [DTSC]	
7.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA is not ensuring that all appropriate Underground Storage Tank (UST) related fields in CERS are properly completed by businesses.</p> <p>The State Water Resources Control Board (State Water Board) review of CERS submittals shows that CUPA inspectors are accepting incomplete or inaccurate UST related fields in CERS. A few examples of incomplete or</p>	<p>Effective immediately, the CUPA will only allow for complete or accurate UST related fields in CERS. Verification of submittals will occur during annual compliance inspections.</p> <p>By October 21, 2015, the CUPA will establish, implement, and submit to CalEPA, a procedure to ensure that businesses submit complete information and that the information is accurate for the tank system. The</p>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION: **FINAL SUMMARY OF FINDINGS** DEFICIENCIES IDENTIFIED DURING EVALUATION

<p>inaccurate data fields that have been accepted are as follows:</p> <ul style="list-style-type: none"> <li>• Missing owner/operator agreements;</li> <li>• Tanks with double walled riser pipe;</li> <li>• Automatic Tank Gauge being used to monitor double-walled UST's;</li> <li>• Pipe monitoring requirements missing; and</li> <li>• Under Dispenser Containment (UDC) is reported as fiberglass, but the monitoring plan indicates the UDC is steel.</li> </ul>	<p>procedure will include, but not be limited to, steps that International Code Council (ICC) certified staff will use to accept submittals in CERS.</p> <p>For data already submitted and accepted by the CUPA in CERS, the CUPA will, prior to the next annual UST compliance inspection, review UST related fields and ensure the information is complete and accurate for the tank system for each facility.</p> <p>By August 21, 2016, the CUPA will submit the CERS identification numbers for ten (10) UST facilities where accurate and complete UST-related fields are maintained.</p>
<b>CITATION:</b>	
CCR, Title 27, Section 15185(a) [ <b>State Water Board</b> ]	
HSC, Chapter 6.11, Section 25404(a)(1)(C)	
<b>8. DEFICIENCY:</b>	<b>CORRECTIVE ACTION:</b>
<p>The CUPA is issuing Unified Program Facility Permits (UPFP) that authorizes UST operations when facilities are not in compliance with the provisions of UST regulations.</p> <p>The State Water Board file review shows that UST violations observed during annual UST compliance inspections have not returned to compliance within required timeframes. The facilities with these violations have been issued a UPFP that authorizes UST operations.</p>	<p>From this point forward, the CUPA will only issue UPFPs that authorizes UST operations only when facilities are in compliance with the provisions of UST regulations.</p> <p>By October 21, 2015, the CUPA will revise and enhance its policies and procedures to verify UST compliance with regulations before issuing a UPFP that authorizes UST operations. Please submit a copy of the policies and procedures to CalEPA for review.</p> <p>By June 21, 2016, the State Water Board will select five (5) percent of the regulated UST facilities from CERS and provide the list to the CUPA.</p> <p>By July 21, 2016, the CUPA will then submit to CalEPA copies of annual compliance inspections, monitoring certifications, and any RTC documentation for the facilities selected. State Water Board will review the information and determine whether UPFPs that authorizes UST operations are only being issued to compliant facilities.</p>
<b>CITATION:</b>	
HSC, Chapter 6.7, Section 25285(b) [ <b>State Water Board</b> ]	
CCR, Title 27, Section 15190(b)	
CCR, Title 23, Section 2712 (e)	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION: **FINAL SUMMARY OF FINDINGS** DEFICIENCIES IDENTIFIED DURING EVALUATION

		<p>This deficiency will be considered corrected after one successful permitting cycle and where the CUPA has withheld the permitting of UST operations for facilities not in compliance, if appropriate.</p>
<b>9.</b>	<b>DEFICIENCY:</b>	<b>CORRECTIVE ACTION:</b>
	<p>The annual UST compliance inspection is not always conducted in accordance with the requirements set forth in Statute or Regulation.</p> <p>The State Water Board review shows that:</p> <ol style="list-style-type: none"> <li>1. Facility representative signatures are missing from many of the annual UST compliance inspection reports, therefore the State Water Board is unsure if a report has been received by the owner/operator;</li> <li>2. Inspector signatures are missing from many of the annual UST compliance inspection reports. Therefore, the State Water Board is unsure if reports have been issued to the facilities.</li> </ol>	<p>From this point forward, all annual UST compliance inspections shall be conducted in accordance with Statute and Regulation as explained in Local Guidance Letter (LG) 159.</p> <p>By October 21, 2015, the CUPA will develop and submit to CalEPA inspection procedures consistent with the description in LG 159 to implement the law. This procedure will be added to the CUPA's I &amp; E Plan. The State Water Board will review the inspection procedures and provide feedback to the CUPA.</p> <p>By October 21, 2015, the CUPA will begin implementing the new UST inspection procedure.</p> <p>By September 30, 2016, the CUPA will submit its self-audit report to CalEPA that addresses the new UST inspection procedure. The report will identify if any changes are needed.</p> <p>By January 21, 2017, the CUPA will submit to CalEPA the most recent compliance inspection reports from ten (10) UST facilities selected by the State Water Board. The State Water Board will verify if staff is following the UST inspection procedure.</p>
	<b>CITATION:</b>	
	<p>HSC, Chapter 6.7, Section, 25288 (a) CCR, Title 23, Section, 2712 (e) <b>[State Water Board]</b></p>	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

### EVALUATION: **FINAL SUMMARY OF FINDINGS**

#### DEFICIENCIES IDENTIFIED DURING EVALUATION

10.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA is not meeting the mandated inspection frequency for the APSA program. Of the 10 APSA facility files reviewed by OSFM, 6 facilities were not inspected.</p> <p>The CUPA has not identified all APSA facilities that require inspections. The CUPA is in the process of determining all of their APSA facilities and their petroleum inventory amounts.</p> <p><b>CITATION:</b> HSC, Chapter 6.67, Section 25270.5(a) [OSFM]</p>	<p>By October 21, 2015, the CUPA will identify all APSA facilities with 10,000 gallons or more of petroleum and develop a tracking mechanism to ensure that these APSA facilities are inspected at least once every three years.</p> <p>Once these facilities have been identified, the CUPA will prioritize the facilities for inspection, based on a risk analysis, and inspect those determined to have the greatest risk first.</p> <p>By January 21, 2016, the CUPA will inspect all of their APSA facilities of 10,000 gallons of petroleum or greater. The CUPA will include, in their Deficiency Progress Reports, the names, inspection dates and inspection reports of APSA facilities that have been inspected during each reporting period.</p>
11.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>One CUPA inspector is conducting APSA compliance inspections without completing the APSA initial basic inspectors training course.</p> <p><b>CITATION:</b> HSC Chapter 6.67 Section 25270.5 (c) [OSFM]</p>	<p>Prior to conducting any APSA compliance inspections, each CUPA inspector must first complete and pass the exam for the APSA inspector training program.</p> <p>By October 21, 2015, the CUPA will submit to CalEPA, a copy of the inspectors' certificate who completed and passed the APSA initial basic inspectors training course and inspector exam.</p>
12.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA is not retaining information needed to implement the Unified Program. The CUPA does not retain all inspection reports for a minimum of five years. Some inspection reports were missing from</p>	<p>Immediately, the CUPA will retain all required information necessary to implement the Unified Program for a minimum of five years.</p>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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### EVALUATION: **FINAL SUMMARY OF FINDINGS**

#### DEFICIENCIES IDENTIFIED DURING EVALUATION

	<p>facility files. However, inspection information of the facilities with missing inspection reports was submitted into CERS. Additionally, the CUPA does not retain UST monitoring certifications.</p>	<p>By January 21, 2016, the CUPA will provide the inspection reports and associated annual UST monitoring certifications, if applicable, of facilities selected by CalEPA, OSFM, and the State Water Board.</p>
	<p><b>CITATION:</b></p>	
	<p>CCR, Title 27, Section 15185 HSC, Chapter 6.7, Section 25288(b) <b>[CalEPA, State Water Board, OSFM]</b></p>	
<p><b>13.</b></p>	<p><b>DEFICIENCY:</b></p>	<p><b>CORRECTIVE ACTION:</b></p>
	<p>The CUPA did not complete its annual self-audit report by September 30. The FY 2013/2014 self-audit report was completed on April 24, 2015.</p>	<p>By September 30, 2015, the CUPA will submit its FY 2014/2015 self-audit report to CalEPA.</p>
	<p><b>CITATION:</b></p>	
	<p>CCR, Title 27, Section 15280(a) <b>[CalEPA]</b></p>	
<p><b>14.</b></p>	<p><b>DEFICIENCY:</b></p>	<p><b>CORRECTIVE ACTION:</b></p>
	<p>The CUPA is not consistently reporting significant operational compliance (SOC) criteria in CERS when UST violations have been cited during the annual UST compliance inspection.</p> <p>File review of CERS and annual UST compliance inspection reports show that SOC violations have been observed during annual UST compliance inspections. However, reporting the violations in CERS is lacking or incorrectly reported.</p> <p>For instance:</p> <ul style="list-style-type: none"> <li>An annual UST compliance inspection report dated 9/3/2014 shows that the premium UST annular sensor failed however; this violation is not in CERS.</li> </ul>	<p>From this point forward, the CUPA will collect and report accurate SOC information to the State Water Board.</p> <p>By October 21, 2015, the CUPA will develop and submit to CalEPA, clear written procedure for UST inspection staff for reporting SOC information.</p> <p>By November 21, 2015, the CUPA will amend the SOC reporting procedure, if required to do so by the State Water Board. Submit the amended procedure to CalEPA for review and approval.</p> <p>By December 21, 2015, the CUPA will incorporate the SOC reporting procedure into its data management procedure and begin implementation.</p> <p>By September 30, 2016, the CUPA will submit its FY 2015/2016 self-audit report to CalEPA that addresses the implementation of the SOC reporting procedure. The CUPA will identify if any changes are needed.</p>

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## CERTIFIED UNIFIED PROGRAM AGENCY

### EVALUATION: **FINAL SUMMARY OF FINDINGS**

#### DEFICIENCIES IDENTIFIED DURING EVALUATION

<ul style="list-style-type: none"><li>• A routine inspection in CERS dated 5/28/2014, shows release detection violations however the SOC field is blank.</li><li>• A routine inspection in CERS dated 2/12/2015, shows the facility has no compliance with release detection and release prevention criteria however only release prevention violations are noted.</li></ul>	<p>By January 21, 2017, the CUPA will submit to CalEPA the most recent compliance inspection reports from ten (10) UST facilities selected by the State Water Board. The State Water Board will verify if staff is following the SOC reporting procedure.</p>
<b>CITATION:</b>	
CCR, Title 23, Section 2713(d) [State Water Board]	

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

### 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.*

<b>1.</b>	<p><b>OBSERVATION:</b></p> <p>The CUPA is reporting inspection, violation, and enforcement information to CalEPA through CERS. The CUPA often used nonspecific, general violations from the CERS violation library when reporting violations. The CUPA included comments to add context for each reported general violation. Many of the general violations reported were related to businesses failing to submit required information into CERS. There are violations in the violation library that address the specific noncompliance issues such as failing to submit required information.</p> <p><b>RECOMMENDATION:</b></p> <p>CalEPA recommends that the CUPA report violations using specific violations from the CERS violation library when reporting violations.</p>
<b>2.</b>	<p><b>OBSERVATION:</b></p> <p>DTSC conducted two HWG oversight inspections. During both inspections, the CUPA inspectors conducted good inspections. The inspectors were well-prepared for the inspection, established rapport with the facility, toured the entire site, checked all required documentation for LQGs and small quantity generators, identified all violations, and answered questions regarding hazardous waste laws and regulations accurately. The inspectors did not document violations with photographs.</p> <p><b>RECOMMENDATION:</b></p> <p>DTSC recommends that the CUPA document violations with photographs when applicable. Photographs are a great enforcement tool in cases where facilities refuse to RTC for an extended period of time.</p>
<b>3.</b>	<p><b>OBSERVATION:</b></p> <p>The CUPA has inspected all of their LQG facilities and tier permitting facilities within the past three years. In addition, the CUPA has inspected over 90% of their hazardous waste generator facilities within the past three years. An inspection overdue list provided by the CUPA indicates that there are a few HWG facilities that have not been inspected over the past 3 years, and in addition there are a few facilities with no inspection records.</p>

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### EVALUATION: **FINAL SUMMARY OF FINDINGS**

	<b>RECOMMENDATION:</b>  DTSC recommends that the CUPA prioritize inspections at facilities that are overdue for an inspection and facilities with no inspection records.
<b>4.</b>	<b>OBSERVATION:</b>  The CUPA was able to demonstrate that one of the two complaints that were referred by DTSC and/or CalEPA from May 2012 to May 2015 were tracked. Follow-up documentation and/or written status updates were available for complaint no: 14-0714-0358, but not available for complaint no: 12-0512-0262. The facility related to complaint no: 12-0512-0262 was inspected several months after the complaint was referred to the CUPA, however there is no indication that the complaint was addressed during the inspection. The CUPA's complaint contact information may not be up-to-date, the previous CUPA supervisor's name was still listed as one of the CUPA contacts for a complaint referred on July 7, 2014.
	<b>RECOMMENDATION:</b>  DTSC recommend that the CUPA follow up with complaint no: 12-0512-0262, and file all complaint follow-up information in a separate file for easy review and follow up. DTSC recommends that the CUPA contact Nancy Lancaster, DTSC complaint coordinator, at <a href="mailto:nancy.lancaster@dtsc.ca.gov">nancy.lancaster@dtsc.ca.gov</a> , and update their complaint contact information.
<b>5.</b>	<b>OBSERVATION:</b>  State Water Boards review UST CERS submittals show that Mr. Vasken Demirjian is assigned as the facility owner for Fire Stations 21, 25, 26, and 29. Mr. Vasken Demirjian is no longer associated with any of the fire departments. Therefore, the fire departments need to resubmit UST information and change the assigned owner of the fire departments.
	<b>RECOMMENDATION:</b>  State Water Board recommends that the CUPA contact the Fire Stations and have them resubmit UST CERS submittals within 30 days and change the assigned owner.
<b>6.</b>	<b>OBSERVATION:</b>  State Water Board file review shows the Department of Public Works is conducting designated operator (DO) monthly inspections for its city-owned UST facilities. State Water Boards Office of Chief Council is working with the City of Glendale Fire Department CUPA to satisfactorily resolve this issue.

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

CERTIFIED UNIFIED PROGRAM AGENCY

EVALUATION: **FINAL SUMMARY OF FINDINGS**

<b>RECOMMENDATION:</b>
The State Water Board recommends that the City of Glendale Fire Department CUPA continue to work with State Water Board's Office of Chief Council to satisfactorily resolve this issue.