



Edmund G. Brown Jr.  
Governor

Matthew Rodriguez  
Secretary for Environmental Protection

Certified Mail: 7015 1730 0001 0036 7289

May 11, 2017

Mr. William C. Stratton, Director  
Ventura County Division of Environmental Health  
800 South Victoria Avenue  
Ventura, California 93009-1730

Dear Mr. Stratton:

On March 28, 2017, 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 (State Water Board) completed a Unified Program evaluation of the Ventura County Environmental Health Division Certified Unified Program Agency (CUPA). The evaluation comprised of a remote assessment and oversight inspections.

Upon completion 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 be satisfactory with improvements needed.

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. Due to the delay with finalizing the Summary of Findings, the first Deficiency Progress Report is due May 11, 2017. 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](mailto: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. William C. Stratton, 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 maintaining an inspection program that consistently exceeds minimum standards.

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) 323-2204 or John Paine, Unified Program Manager, at (916) 327-5092.

Sincerely,

Original Signed by Jim Bohon

Jim Bohon  
Assistant Secretary for Local Program Coordination and Emergency Response

Enclosure

cc sent via email

Mr. Rick Bandelin  
CUPA Manager  
Ventura County Division of Environmental Health  
800 South Victoria Avenue  
Ventura, California 93009-1730

Mr. Sean Farrow  
Environmental Scientist  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-0100

Ms. Jennifer Lorenzo  
Senior Environmental Scientist, Specialist  
CAL FIRE - Office of the State Fire Marshal  
P.O. Box 944246  
Sacramento, California 94244-2460

Mr. Glenn Warner  
Senior Environmental Scientist, Specialist  
CAL FIRE - Office of the State Fire Marshal  
P.O. Box 944246  
Sacramento, California 94244-2460

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cc sent via email

Ms. Denise Gibson  
Environmental Scientist  
California Office of Emergency Services  
3650 Schriever Avenue  
Mather, California 95655-4203

Mr. Matt McCarron  
Senior Environmental Scientist, Specialist  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 210  
Berkeley, California 94710-2721

Mr. Kevin Abriol  
Environmental Scientist  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 210  
Berkeley, California 94710-2721

Ms. Laura Fisher, Chief  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-0100

Ms. Diana Peebler  
Senior Environmental Scientist, Supervisor  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 210  
Berkeley, California 94710-2721

Mr. Ben Ho, Chief  
CAL FIRE - Office of the State Fire Marshal  
P.O. Box 944246  
Sacramento, California 94244-2460

Mr. Larry Collins, Chief  
California Office of Emergency Services  
3650 Schriever Avenue  
Mather, California 95655-4203

Mr. Jack Harrah  
Senior Emergency Services Coordinator  
California Office of Emergency Services  
3650 Schriever Avenue  
Mather, California 95655-4203

Mr. William C. Stratton, Director  
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cc sent via email

Mr. John Paine  
Unified Program Manager  
California Environmental Protection Agency

Ms. Katrina Valerio  
Unified Program Evaluation Team Lead  
California Environmental Protection Agency



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

<b>EVALUATION YEAR:</b>	<b>2017</b>	<b>REVIEW PERIOD:</b>	<b>February 10 – March 28, 2017</b>	<b>ISSUANCE DATE:</b>	<b>May 11, 2017</b>
<b>CUPA:</b>	Ventura County Resource Management Agency				
<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>
	Katrina Valerio	Matt McCarron Kevin Abriol	Denise Gibson	Sean Farrow	Jenna Yang

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:

**satisfactory with improvements needed**

Questions or comments regarding this evaluation should be directed to Katrina Valerio.

<p>The CUPA is required to submit a <b>Deficiency Progress Report every 90 days</b> from the last day the evaluation is conducted, 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><u>all</u></b> deficiencies identified in the Summary of Findings evaluation report.</p>	<p><b>Deficiency Progress Report</b> submittal dates for the first year following the evaluation are as follows:</p> <p style="text-align: center;"><b>Update 1: July 11, 2017</b>  <b>Update 2: October 11, 2017</b>  <b>Update 3: January 11, 2018</b>  <b>Update 4: April 11, 2018</b></p> <p style="text-align: center;"><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 consistently ensuring its Participating Agency (PA) is collecting, managing and reporting the number of Underground Storage Tanks (UST) inspections in the Significant Operational Compliance (SOC) Report (Report 6).</p> <p>State Water Board review of Report 6 finds the following for the PA:</p> <ul style="list-style-type: none"> <li>• Fiscal Year (FY) 2015/2016 Report 6 shows 49 inspections conducted. For comparison, the California Environmental Reporting System (CERS) shows 66 routine inspections conducted.</li> <li>• FY 2014/2015 Report 6 shows 52 inspections conducted. For comparison, CERS shows 81 routine inspections conducted.</li> <li>• FY 2013/2014 Report 6 shows 51 inspections conducted. For comparison, CERS shows 73 routine inspections conducted.</li> </ul>	<p>By July 11, 2017, the CUPA in coordination with the PA will perform a thorough analysis of the data management processes and conclude why reported inspection numbers differ between the different reporting formats. The CUPA in coordination with the PA will provide formal findings of the analysis to CalEPA for review.</p> <p>By July 11, 2017, based on the CUPA and PA's analysis of data management processes the CUPA in coordination with the PA will revise, and provide to CalEPA the revised Data Management Procedure, or other applicable procedure. The Data Management Procedure will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Collecting, retaining, managing, and reporting inspection information at the local level and to state agencies.</li> </ul> <p>By October 11, 2017, the CUPA in coordination with the PA will if necessary, make amendments to these procedures, based on feedback from the State Water Board and submit the revisions to CalEPA.</p> <p>By November 10, 2017, the CUPA and PA will implement and train personnel on the new Data Management Procedure, or other applicable procedure.</p> <p>By January 11, 2018, the CUPA in coordination with the PA will provide training documentation to CalEPA. Training documentation will include, but not be limited to an outline of the training conducted and a list of CUPA personnel attending training.</p> <p>By March 1, 2018 and September 1, 2018, the CUPA will ensure the PA submits a Report 6 which is consistent with CERS inspection information.</p>
	<b>CITATION:</b>	
	CCR, Title 23, Section 2713(d) <b>[State Water Board]</b>	
2.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA and PA are not consistently reporting all inspection, violation, and enforcement information, also known as CME, to CERS.</p>	<p>By July 11, 2017, the CUPA in coordination with the PA will revise and provide CalEPA with the Data Management Procedure or other applicable procedure to ensure the personnel consistently and correctly report inspection, violation, and enforcement information to CERS.</p>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

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

#### DEFICIENCIES IDENTIFIED DURING EVALUATION

<p>Ventura County Resource Management Agency</p> <p><u>UST</u></p> <ul style="list-style-type: none"><li>• CERS Identification (ID) 10332628 Annual UST compliance inspection report dated 10/16/2014 identifies violations being cited for visual alarm not working for all sensors and the printer for the monitoring panel not working. The associated CERS routine inspection dated 10/16/2014 does not show these violations being reported. The CUPA should have reported all cited violations in the UST inspection report.</li><li>• CERS ID 10332955 UST Inspection report dated 1/14/2015 identifies a violation being cited for failure to complete site map. The associated CERS routine inspection dated 1/14/2015 does not show this violation being reported. The CUPA should have reported all cited violations in the UST inspection report.</li></ul> <p><u>Aboveground Petroleum Storage Act (APSA)</u></p> <ul style="list-style-type: none"><li>• CERS ID 10332649 For an inspection on 5/20/2015, return to compliance (RTC) documentation dated 10/1/2015 is reported to CERS as 10/7/2015.</li><li>• CERS ID 10002046 For an inspection on 2/25/2015, RTC documentation dated 3/19/2015 is reported to CERS as 3/18/2015.</li></ul> <p><b>Note:</b> During the 2017 CUPA Evaluation Process, the CUPA updated CERS and reported all CME data described above.</p>	<p>By October 11, 2017, the CUPA in coordination with the PA will, if necessary, amend the procedure based on feedback from the evaluation team and submit the revisions to CalEPA.</p> <p>By November 10, 2017, the CUPA and PA will implement and train personnel on the procedure.</p> <p>By January 11, 2018, the CUPA and PA will provide training documentation to CalEPA. Training documentation will include, but not be limited to, an outline of the training conducted and a list of personnel in attendance.</p> <p>By April 11, 2018, the CUPA and PA will each provide CalEPA with documentation for five (5) UST and three (3) APSA facilities selected by the evaluation team. The documentation will include but not be limited to the most recent; 1) inspection report, 2) RTC documentation, and specifically for UST facilities 3) annual UST monitoring certification, 4) annual spill bucket test, and 5) any other necessary testing and compliance documentation not found in CERS.</p>
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# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

<p>City of Ventura Fire Department <u>UST</u></p> <ul style="list-style-type: none"><li>• CERS ID 10334632 Report 6 and CERS demonstrate the PA issuing/affixing one (1) Red Tag (Number 00001) on 5/16/2016. However, no violations reported in CERS for the “routine” inspection dated 5/4/2016 or for the “other” inspection dated 5/16/2016. It is unclear why the PA issued/affixed the Red Tag and to which UST the Red Tag was issued to.</li><li>• CERS ID 10334026 UST Inspection report dated 2/9/2015 identifies a violation for the audio and visual overfill alarms not functioning. Furthermore, the UST inspection report notes, the repair log and post installation and overfill alarm tests need to be kept onsite which show alarm functions as intended. The associated CERS routine inspection dated 2/9/2015 does not show this violation being reported. The PA should have reported the cited violation in the UST inspection report to CERS.</li><li>• CERS ID 10334947 UST Inspection report dated 10/11/2016 identifies a violation for the facility not having access to CERS documents. The CUPA further states, “No current CERS documents presented to inspector for review.” The associated CERS routine inspection dated 10/11/2016 does not show this violation being reported. The PA should have reported the cited violation in the UST inspection report to CERS.</li></ul> <p><u>APSA</u></p> <ul style="list-style-type: none"><li>• CERS ID 10334071 Inspection performed on 6/23/2016 documents at least 11 violations. CERS shows 6 violations and an inspection date of 6/22/2016.</li></ul>	
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# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

<ul style="list-style-type: none"> <li>CERS ID 10333780 Inspection performed on 6/21/2016 documents at least 6 violations. CERS shows 1 violation and an inspection date of 6/29/2016.</li> </ul> <p>State Water Board finds the reporting of SOC and violation information in CERS is not consistent. For example:</p> <p>Ventura County Resource Management Agency</p> <ul style="list-style-type: none"> <li>FY 2015/2016 17 of 173 routine inspections in CERS do not identify SOC.</li> <li>FY 2014/2015 95 of 166 routine inspections in CERS do not identify SOC.</li> </ul> <p><b>Note:</b> During the 2017 CUPA Evaluation Process, State Water Board finds the CUPA entering SOC data described above into CERS.</p> <p>City of Ventura Fire Department</p> <ul style="list-style-type: none"> <li>FY 2015/2016 12 of 66 routine inspections in CERS do not identify SOC.</li> <li>FY 2014/2015 38 of 81 routine inspections in CERS do not identify SOC.</li> </ul>	
<p><b>CITATION:</b></p>	
<p>HSC, Chapter 6.11, Section 25404(e)(4) CCR, Title 27, Section 15290(b) CCR, Title 27, Section 15187(c) <b>[CalEPA, State Water Board, OSFM]</b></p>	
<p><b>3. DEFICIENCY:</b></p> <p>The CUPA is not ensuring that all businesses annually submit a complete hazardous materials business plan (Business Plan) to CERS.</p>	<p><b>CORRECTIVE ACTION:</b></p> <p>By July 11, 2017, the CUPA will develop and provide CalEPA with a list of all regulated businesses that have not annually submitted a complete Business Plan.</p> <p>With each Deficiency Progress Report, the CUPA will update the list with the status of business compliance and provide it to CalEPA.</p>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

	<p>The evaluation team reviewed Business Plan submittals in CERS and found that approximately 25% (545 of 2192) of the facilities did not submit a hazardous materials inventory and 30% (662 of 2192) did not submit an emergency response/training plan within the last 12 months.</p>	<p>By January 11, 2018, the CUPA will follow-up with each regulated business identified on the list to ensure the facility submits a complete Business Plan or will initiate appropriate enforcement actions.</p>
	<p><b>CITATION:</b></p>	
	<p>HSC, Chapter 6.95, Section 25505 HSC, Chapter 6.95, Section 25508(a)(1)(A) 2013 CFC, Chapter 50, Section 5001.5.1 and 5001.5.2 [Cal OES, OSFM]</p>	
<b>4.</b>	<b>DEFICIENCY:</b>	<b>CORRECTIVE ACTION:</b>
	<p>The CUPA is not submitting Surcharge and Surcharge Transmittal Reports to the state by the required due date for each fiscal quarter. With a few exceptions, the CUPA has submitted all Surcharge Transmittal Reports one quarter late for the last three FYs.</p>	<p>By July 30, 2017, the CUPA will prepare and submit to the state the next quarterly Surcharge Transmittal Report. Thereafter, the CUPA will prepare and submit quarterly Surcharge Transmittal Reports to the state no later than 30 days after the end of each fiscal quarter.</p>
	<p><b>CITATION:</b></p>	<p>By October 11, 2017, and with each Deficiency Progress Report thereafter, the CUPA will provide CalEPA with a copy of the Surcharge Transmittal Report for the previous fiscal quarter.</p>
	<p>CCR, Title 27, Section 15250(b)(1) [CalEPA]</p>	
<b>5.</b>	<b>DEFICIENCY:</b>	<b>CORRECTIVE ACTION:</b>
	<p>The CUPA has been unable to meet the following reporting requirements:</p> <ul style="list-style-type: none"> <li>• The CUPA did not complete a FY 2014/2015 or FY 2015/2016 Self-Audit report.</li> <li>• During the 2014 evaluation, the CUPA submitted only 3 Deficiency Progress Update Reports. The final report submitted nearly a year after the previous report.</li> </ul>	<p>Beginning July 11, 2017, and every 90 days thereafter, the CUPA will submit annual progress update reports to CalEPA until all other deficiencies have been corrected.</p> <p>By September 30, 2017, and each year thereafter, the CUPA will complete an annual self-audit report.</p> <p>By October 11, 2017, the CUPA will send a copy of the FY 2016/2017 self-audit report to CalEPA.</p>
	<p><b>CITATION:</b></p>	
	<p>CCR, Title 27, Section 15280(a) CCR, Title 27, Section 25290 [CalEPA]</p>	

# 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. OBSERVATION:</b>
<p>State Water Board review of the CUPA and PA's accepted CERS UST submittals finds some limited instances of inaccurate data. This includes, but is not limited to, the following examples:</p> <ul style="list-style-type: none"><li>• USTs with single-wall pressurized pipe utilizing mechanical line leak detectors. CERS IDs 10332781 (Tank 3) and 10333573 (Tanks 1, 2, 3, 4) [CUPA] CERS ID 10335175 (Tanks 2 and 3) [PA]</li><li>• USTs with single-wall and double-wall pipe where no line leak detector is installed (excluding emergency generators). CERS IDs 10180321 (Tank 2) and 10424905 (Tanks TA0000027, TA0000586, TA0000028, TA0000587) [CUPA] CERS IDs 10332154 (Tank 2) and 10333357 (Tank 2) [PA]</li><li>• USTs identified as having no overfill protection installed. CERS IDs 10332124 (Tank L490785), 10333573 (Tanks 2, 3, 4), and 10333408 (Tank 3) [CUPA] CERS IDs 10334995 (Tank 1) and 10335856 (Tanks; Tank 1, Tank 2, Tank 3, Tank 4) [PA]</li><li>• USTs identified as having no spill buckets installed. CERS IDs 10332628 (Tanks 1A, 1B), 10332664 (Tanks T3, T4), and 10334239 (Tank 1) [CUPA] CERS IDs 10334995 (Tank 1) and 10335070 (Tank 2) [PA]</li></ul>
<b>RECOMMENDATION:</b>
<p>State Water Board recommends that the CUPA and PA review accepted CERS UST submittals, including but not limited to the facilities identified above, for inaccurate data no later than the next annual UST compliance inspection.</p>
<b>2. OBSERVATION:</b>
<p>State Water Board review of the CUPA's Data Management Procedures finds them basic in nature.</p>
<b>RECOMMENDATION:</b>
<p>State Water Board recommends that the CUPA revise the Data Management Procedures to include but not be limited to the following:</p> <ul style="list-style-type: none"><li>• A schedule when the CUPA and PA are to upload inspection, violation, and enforcement information to CERS.</li><li>• The CUPA and PA process for reviewing electronic facility submittals and either accepting, not accepting, or accepting with conditions.</li></ul>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

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

#### OBSERVATIONS AND RECOMMENDATIONS

<b>3. OBSERVATION:</b>
State Water Board review of the CUPA's CERS violation information for the last three (3) FYs, finds the CUPA progressively reporting accurate violation information. The following are examples of the CUPA reporting accurate violation information: <ul style="list-style-type: none"><li>• FY 2015/2016 The CUPA utilizes general violation code for 2 of 243 reported violations.</li><li>• FY 2014/2015 The CUPA utilizes general violation code for 2 of 118 reported violations.</li><li>• FY 2013/2014 The CUPA utilizes general violation code for 21 of 214 reported violations.</li></ul>
<b>RECOMMENDATION:</b>
State Water Board recommends that the CUPA continue to refine its reporting process. In addition, State Water Board recommends the CUPA conduct random quality assurance/quality control (QA/QC) of UST violations prior to submitting the information to CERS to ensure general violations are not being reported.
<b>4. OBSERVATION:</b>
State Water Board review of the CUPA's annual UST compliance inspection reports finds one (1) instance out of 60, where the CUPA cites a violation; however does not identify the UST or UST system.
<b>RECOMMENDATION:</b>
State Water Board recommends that the CUPA have inspection personnel review State Water Board published guidance dated June 8, 2015, "Recording Underground Storage Tank Violations."
<b>5. OBSERVATION:</b>
The PA has accepted Business Plan submittals that are incomplete. Two (2) of five (5) facility files reviewed were incomplete: <ul style="list-style-type: none"><li>• CERS ID 10334905 – Emergency response and training plan submittal was accepted; however, the submitted document is a blank form of the consolidated contingency plan template.</li><li>• CERS ID 10338028 – Emergency response and training plan submittal was accepted; however, the submitted document is a site map.</li></ul>
<b>RECOMMENDATION:</b>
OSFM recommends the CUPA ensure that the PA is thoroughly reviewing Business Plan submittals before acceptance. Facilities with incomplete Business Plan submittals should be followed-up on.

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

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

#### OBSERVATIONS AND RECOMMENDATIONS

<p><b>6. OBSERVATION:</b></p> <p>The CUPA has reported some violations into CERS as “No SPCC (Spill Prevention Control and Countermeasure) Plan” violation when the intended violation is not available in the CERS violation library. For example, the inspection for CERS ID 10332301 on 4/16/2015 shows four violations of “No SPCC Plan,” or violation #4010001. However, the intended violations were for not describing oil and storage capacities, not including a failure prediction, not updating contact and phone numbers, and not implementing the SPCC Plan. The “General” violation should be used when a description that matches the cited violation does not exist in the CERS violation library.</p> <p>Also, the CUPA has reported some violations into CERS that are not correct. For example, the inspection for CERS ID 10334401 on 6/15/2015 shows a violation for “Failure to inspect outlets,” or violation #4030004. The description for this violation in CERS is: failure to inspect the lowermost drains and all outlets prior to filling and departure of any tank car or tank truck. On the inspection report, the facility was cited for: failure to control or record drainage of rainwater; facility must inspect rainwater collected in containment areas. The appropriate violation to report to CERS would be violation #4030006 or #4010026.</p> <p><b>RECOMMENDATION:</b></p> <p>OSFM recommends that the CUPA review the CERS violation library when it is updated annually. Since June 2016, many new violations have been added to the APSA section of the violation library, and some have been removed. If a violation does not exist in the CERS violation library, use the “General” violation and provide a comment describing the violation.</p>
<p><b>8. OBSERVATION:</b></p> <p>DTSC conducted two onsite hazardous waste treatment facility oversight inspections with Ventura County CUPA. Both inspections were conducted by two inspectors. The Hazardous Waste Generator (HWG) portion was conducted by one inspector and the Tiered Permitting (TP) portion was conducted by another. This is standard practice for all TP inspections conducted within the CUPA’s jurisdiction. Prior to arriving at each facility, the inspectors demonstrated knowledge of the facility’s inspection history, CERS data, and Hazardous Waste Tracking System shipment information. During both inspections, the lead CUPA inspector asked for consent to inspect the facility and conducted thorough hazardous waste inspections.</p> <p>The first inspection was conducted at a small quantity generator/ conditionally exempt small quantity treatment (CESQT) facility (CERS ID 10335982). The facility mainly conducts QA/QC and research and development on computer chips including etching silicon wafers. They perform elementary pH neutralization under the CESQT tier. The inspectors cited the facility with 7 HWG violations: 1) Failure to closed containers, 2) failure to retain used oil receipts, 3) failure to make a hazardous waste determination for solder dross, soap solution waste, steam board wash waste, 4) failure to label all hazardous waste containers, 5) failure to dispose of used oil within 180 days, 6) failure to conduct weekly inspections of hazardous waste storage areas, and 7) failure to maintain treatment unit operating instructions and training plan for the hazardous waste treatment unit.</p>

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

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

#### OBSERVATIONS AND RECOMMENDATIONS

The second inspection was conducted at a Resource Conservation and Recovery Act Large Quantity Generator/Conditionally Authorized (CA) facility (CERS ID 10151779). The facility is involved with research and development for numerous industries including plating, paper pulping, and water treatment technologies. They perform elementary pH neutralization under the CA tier however their acid neutralization tanks are not currently in use. The inspectors cited the facility with 3 HWG violations: 1) failure to maintain and operate a facility in a manner to prevent hazardous waste or hazardous material spills, 2) failure to maintain a complete training plan including type and amount of training for personnel handling hazardous waste, 3) failure to make a hazardous waste determination on metal fines.

**RECOMMENDATION:**

DTSC recommends that the CUPA inspectors continue to conduct thorough HWG/TP inspections.

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

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

#### EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. **APSA Program Participation** – CUPA staff actively participates in APSA program workgroups such as the APSA regulations, APSA Technical Advisory Group (TAG), and APSA violation library updates. Most notably, CUPA staff has contributed significant time and knowledge towards updating the APSA Basic Inspector Training program. The CUPA has also coordinated with the United States Environmental Protection Agency on several APSA inspections.
2. **Inspection Program** – The CUPA is exceeding the required triennial inspection frequency for Business Plan, California Accidental Release Prevention, and Tired Permitting facilities. The CUPA is also exceeding the triennial inspection frequency for HWG’s outlined in the CUPA’s I&E Plan. The CUPA is meeting the annual inspection requirement for UST facilities and achieving a 1.5 – 2 year inspection interval for all other program elements.
3. **Coordination, and Leadership with statewide Unified Program Groups** – The CUPA manager and staff participate in several committees and tags as well as the CUPA Forum Board. This includes participation in the following:
  - Chair, UST TAG
  - Chair, Hazardous Waste TAG
  - Business Plan TAG, APSA TAG
  - CUPA Forum Board
  - CERS Violation library revision committees for UST, HWG, Business Plan, and APSA
  - CERS 3.0 Enhancements UST Subcommittee
  - APSA Regulation committee
  - APSA training module workgroup
  - APSA violation library committee
  - APSA Regulation review committee
4. **Envision Connect Home Page, and Electronic Data Management** – The CUPA created an electronic home page “dash board” that displays real time data in a usable format that enables inspection staff and the CUPA manager to quickly assess the status of:
  - Open violations
  - Inspection due dates
  - UST monitor system and secondary containment testing due dates
  - Open complaints
  - Number of inspections performed last month and current month.

The CUPA uses its Envision Connect database to generate monthly Notices of Violation to facilities that did not return to compliance within the specified time frame, which results in a higher RTC rate.

Additionally, the Ventura County CUPA added three temporary extra help positions to assist businesses with CERS implementation (from account creation to scan/upload of required documents).

5. **Local Agency Coordination** - Promotes consistency and coordination with the PA through; continuous CERS collaboration, joint inspections, and on-going training in the APSA, Business Plan programs.

# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

## CERTIFIED UNIFIED PROGRAM AGENCY

### EVALUATION: FINAL SUMMARY OF FINDINGS

The CUPA coordinated and trained with local Sheriff OES and Public Health's Emergency Management Agency on spills, training, and preparation of a coordinated ER and Area Plan. The CUPA also actively participates with the Ventura County DA's environmental crimes task force, resulting in several active Ventura County CUPA cases and statewide enforcement cases.

Although the CUPA continues to export its hazardous material inventory for use with Ventura County Fire Department's Computer Operated Management of Emergency Operations (CAMEO) system, it also trained Ventura County Fire on use of CERS emergency responder tab.

- 6. CUPA Education and Outreach** - The CUPA issues reminder letters to UST owners when the annual UST monitor system certification is due. The letter also provides the due dates for all applicable secondary containment testing and spill buckets.

The CUPA also provided multiple notifications to single-walled UST owners to upgrade or remove SW components through:

- Information written on inspection reports regarding requirement
- Email to owners of this requirement
- Email to owners about SW workshop.

- 7. PA Community Outreach and Education** – The City of Ventura Fire Department (VFD) PA has a robust outreach program for the businesses in their community. The PA maintains ongoing outreach instructing new/existing businesses in both initiating electronic reporting and requisite updating.

Inspectors meet at regulated facilities, outside of the fixed inspection cycle, to develop, update and assist with on-site training and emergency response plan development. Prior to granting approval to operate, inspectors conduct walk-throughs with all business owners, regardless of quantities on site, going over safe storage and handling of hazardous materials. All program documents including VFD inspection forms are now provided online at the VFD website.

Inspectors also undertake general compliance inspections, per California Fire Code, that VFD consider to germane to safe storage of hazardous materials. They include assessing on site fire protection (extinguishers, sprinklers), required access/clearance, and inventory management.

Additionally, Inspectors take part in recurring hazardous waste collect events put on by the City, as a means of educating residents on the safe handling and disposal household hazardous materials.