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June 13, 2017

Ms. Heidi Kunstal, Director  
Del Norte County Environmental Health Division  
981 H Street, Suite 110  
Crescent City, California 95531-3415

Dear Ms. Kunstal:

The Del Norte County Environmental Health Division Certified Unified Program Agency (CUPA) has been selected for an evaluation scheduled to occur on August 29 – 30, 2017. The evaluation will take place at the CUPA office. The evaluation process has changed since the last evaluation took place.

I, Kareem Taylor, will lead the Unified Program Evaluation Team (team) as the California Environmental Protection Agency (CalEPA) representative. I will be joined by evaluators representing the Department of Toxic Substances Control (DTSC) and the California Governor's Office of Emergency Services (Cal OES). CALFIRE - Office of the State Fire Marshal (OSFM) and State Water Resources Control Board (State Water Board) representatives will not attend the office evaluation. However, they will evaluate the CUPA remotely using the facility file documents requested in Enclosure 1, as well as, other documents requested below.

To facilitate the evaluation process, you will be required to submit the following documents to California Environmental Protection Agency (CalEPA) by August 21, 2017.

- Inspection and Enforcement Plan
- Facility Files for OSFM and State Water Board (Enclosure 1)
- Self Audit Reports for Fiscal Year (FY) 2013-2014, 2014-2015, and 2015-2016
- California Accidental Release Prevention (CalARP) Performance Audit for FY 2013-2014 through 2015-2016
- CalARP dispute resolution procedure
- CUPA Administrative procedures
  - public participation,
  - records maintenance,
  - information request response,
  - business plan information forwarding,
  - permitting,

- financial management (includes the single fee system, fee accountability program, and surcharge collection and reimbursement program),
  - fee dispute resolution,
  - data management.
- Fee accountability program documents including record/budget spreadsheet for FY 2014-2015, 2015-2016, and 2016-2017 (documentation should show CUPA specific revenue and itemized direct and indirect costs)
- Surcharge Transmittal Reports (Report 1) from FY 2013-2014, 2014-2015, 2015-2016, and 2016-2017
- Single fee invoices from FY 2013-2014, 2014-2015, 2015-2016, and 2016-2017 (Please ensure that at least one invoice is provided for each of the following facility types per fiscal year: CalARP, Underground Storage Tank, Aboveground Petroleum Storage Act (APSA), Hazardous Materials Business Plan, Hazardous Waste Generator)
- Area Plan
- Staff education and training records for each CUPA staff
  - Health and Safety Training Certification with current refresher
  - International Code Council Certifications
  - APSA Inspector Training Certificates
  - Ongoing training Documentation (past 3 years)
- 2-3 recently closed formal enforcement case files (within the last 2 years)
- CUPA Organization Chart

Several methods, including a Secure File Transfer Protocol (SFTP) site are available to convey information listed above to CalEPA. The CalEPA Team Lead will follow up with you, and provide information on how to access the SFTP site. If for any reason the SFTP site is not compatible with a CUPA's system, evaluation documentation may also be submitted via email [kareem.taylor@calepa.ca.gov](mailto:kareem.taylor@calepa.ca.gov) or mail using electronic storage media (thumb drives or DVDs) to:

CalEPA Unified Program  
Attention: Kareem Taylor  
P.O. Box 2815  
Sacramento, California 95812-2815

As necessary, DTSC, Cal OES, OSFM, and the State Water Board evaluators may contact you to schedule oversight inspections.

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Please remember to provide the documents listed above and in the enclosure by August 21, 2017. Should you have any questions regarding the evaluation process, please contact Loretta Sylve, Unified Program Supervisor, at (916) 327-5097 or email [loretta.sylve@calepa.ca.gov](mailto:loretta.sylve@calepa.ca.gov).

Sincerely,

Original Signed by Jim Bohon

James Bohon  
Acting Unified Program Manager

Enclosures

cc sent via email

Mr. Brian McNally  
Senior Environmental Health Specialist  
Del Norte County Environmental Health Division  
981 H Street, Suite 110  
Crescent City, California 95531-3415

Mr. Houawa Moua  
Senior Environmental Health Specialist  
Del Norte County Environmental Health Division  
981 H Street, Suite 110  
Crescent City, California 95531-3415

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

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cc sent via email

Ms. Loretta Sylve  
Senior Environmental Scientist, Supervisor  
California Environmental Protection Agency

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

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**Facility File Request**  
**Del Norte County Environmental Health Division CUPA**

Please submit documentation for each facility file listed below that includes the following:

- Last two routine inspection reports with summaries of violations/notices to comply/notices of violation
- Correspondences related to returning the facility to compliance
- Return to compliance documentation
- Current Unified Program Facility Permit
- For the Underground Storage Tank facilities, please submit the following additional information:
  - Last three (3) Annual Inspection Reports
  - Last three (3) Monitoring Certification Reports
  - Last three (3) Spill Bucket Tests
  - Last two (2) Secondary Containment Test Reports
  - Tank Lining Certifications (as appropriate)
  - Last three (3) Tank and Piping integrity tests (as appropriate)
  - Enhanced Leak Detection test results (as appropriate)

**OSFM Requested Facilities**

- 10445164, Pelican Bay State Prison
- 10592449, Del Norte High School
- 10190620, Redwood National Park
- 10197310, Hambro Forest Products, Inc.
- 10469179, C. Renner, Petroleum
- 10197298, Del Norte County Unified School District
- 10450162, Del Norte County Community Development Department Road Division
- 10197517, Crescent City Harbor District
- 10469179, C. Renner, Petroleum
- 10423456, Department of California Highway Patrol

**State Water Board Requested Facilities**

- 10019728, Crescent City Chevron
- 10190477, Northcrest Patriot
- 10197109, Crescent City Shell
- 10197328, Sutter Coast Hospital
- 10197523, Joe's Chevron
- 10197526, Hiouchi Hamlet
- 10458907, Texaco
- 10471117, Fort Dick Market
- 10474741, L & M Renner Inc - Klamath Cardlock
- 10504711, Renner Patriot
- 10504714, Renner Petroleum Citizens Dock
- 10720078, Full Steam Ahead LLC

**Facility Files for the Office Evaluation  
Del Norte County Environmental Health Division CUPA**

Please have the following facility files ready in the office for the evaluation:

**Cal OES Requested Facilities**

- 10144845, Verizon Wireless Requa
- 10148993, Walmart #1910
- 10156495, Safeway 0954
- 10190437, Fashion Blacksmith, INC.
- 10190469, O'Reilly Auto Parts #3140
- 10190475, Dahlstrom & Watt Bulb Farms
- 10190477, Northcrest Patriot
- 10190479, Mor-Jon, Inc.
- 10190489, Suburban Propane
- 10190491, U.S. Coast Guard Cutter Dorado
- 10190614, Del Norte County Transfer Station
- 10190620, Redwood National Park
- 10190623, Rite Aid #6040
- 10190629, Apria Healthcare
- 10190635, Coast Auto Center Inc.
- 10190638, Walgreens #11754
- 10190833, The Triplicate - Smith River Plant
- 10197067, Salvage Redwood Sales LLC

**DTSC Requested Facilities**

- 10560874, City Yard
- 10625422, Babich Trucking LLC
- 10197517, Crescent City Harbor District
- 10502842, Ken's Auto Repair Inc.
- 10197526, Hiouchi Hamlet
- 10197352, Palmer Westbrook Inc.
- 10469179, C. Renner, Petroleum
- 10001011, Caltrans-Idlewild
- 10190614, Del Norte County Transfer Station
- 10190635, Coast Auto Center Inc.

Please also provide complaint records for the following DTSC referred complaints:

- CASE #: 16-0316-0162- Address: Kellogg Road and Tell Blvd, Crescent City, CA 95531
- CASE #: 15-0415-0177- Address: 645 Elk Valley Road, Crescent City, CA 95531