

March 21, 2022

Ms. Christine Lane
Director of Environmental Health
Orange County Environmental Health
1241 East Dyer Road, Suite 120
Santa Ana, California 92705-5611

Dear Ms. Lane:

From January 2019 through June 2019, CalEPA and the state program agencies conducted a performance evaluation of the Orange County Environmental Health Certified Unified Program Agency (CUPA). The evaluation comprised of an assessment of administrative documentation, regulated facility file documentation, California Environmental Reporting System data, and oversight inspections.

Upon completion of the evaluation, CalEPA issued a final report that included program deficiencies and incidental findings with corresponding corrective actions and resolutions. CalEPA recognizes there was a delay with issuing the final Summary of Findings report, consequently, allowing enough time for submittal and review of only one Evaluation Progress Report. CalEPA has received and reviewed the required Evaluation Progress Report submitted by the CUPA documenting the correction of program deficiencies and resolution of incidental findings identified in the final report. Of the five deficiencies identified, CalEPA considers three as corrected. Of the three incidental findings identified, CalEPA considers two as resolved.

Upon closing the 2019 evaluation, the following two deficiencies will be incorporated into the scheduled 2022 evaluation:

- The CUPA is not consistently and thoroughly evaluating Participating Agencies (PAs) with UST program responsibilities on an annual basis.
 - Note: Two of the three revised procedures provided with the Progress Report need further revision.
- The CUPA is not documenting whether the UST owner/operator has demonstrated to the satisfaction of the CUPA, that tank closure, removal, and soil and/or ground water sampling complies with UST Regulations and HSC.
 - Note: The revised procedure provided was found acceptable. Documentation of training staff on the revised procedure is needed.

Upon closing the 2019 evaluation, the following incidental finding will be incorporated into the scheduled 2022 evaluation:

- The CUPA is not consistently citing violations for failure to conduct an overfill prevention equipment inspection no later than October 13, 2018, and after repairs as required by CCR, Title 23, Sections 2637.2(a) and 2665(b).
 - Note: The revised procedure provided was found acceptable.
Documentation of training staff on the revised procedure is needed.

The CUPA's implementation and performance of the Unified Program will remain as "*satisfactory with improvements needed*" until the remaining deficiencies and/or incidental finding are corrected or until the conclusion of the upcoming 2022 evaluation.

Thank you for your continued commitment to the protection of public health and the environment through the implementation of the Unified Program.

If you have any questions or need further assistance, please contact John Paine, Unified Program Manager, at (916) 327-5092.

Sincerely,



Jason Boetzer, REHS
Assistant Secretary
Local Program Coordination and Emergency Response

cc sent via email:

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