



Edmund G. Brown Jr.
Governor

Matthew Rodriguez
Secretary for Environmental Protection

Certified Mail: 7003 1680 0000 6175 0251

February 18, 2015

Mr. Michael Vizzier, Chief
County of San Diego
Department of Environmental Health
P.O. Box 129261
San Diego, California 92112-9261

Dear Mr. Vizzier:

On September 16 - 17, 2014, 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 County of San Diego Department of Environmental Health 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 be satisfactory with some improvements needed.

Deficiency Progress Reports are due every 90 days to document progress towards correcting identified deficiencies. The first Deficiency Progress Report is due May 18, 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.

The final Summary of Findings and Deficiency Progress Reports will be posted at:
<http://cersapps.calepa.ca.gov/Public/Directory/CUPAEvaluationDocuments>

During the evaluation, CalEPA also noted the CUPA has worked to bring about a number of local program innovations, including a user-friendly website and the Border 2020 program.

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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, Kareem Taylor, at (916) 327-9557 or John Paine, Unified Program 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. Arleen Gurfield
CUPA Program Coordinator
Department of Environmental Health
County of San Diego
P.O. Box 129261
San Diego, California 92112-9261

Ms. Michelle Price, Supervisor
Department of Environmental Health
County of San Diego
P.O. Box 129261
San Diego, California 92112-9261

Mr. Brian Abeel
Senior Emergency Services Coordinator
California Office of Emergency Services
3650 Schriever Avenue
Mather, California 95655

Ms. Asha Arora
Senior Hazardous Substances Scientist
Department of Toxic Substances Control
700 Heinz Avenue, Suite 210
Berkeley, California 94710-2721

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cc sent via email

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

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

Mr. John Paine
Manager, Unified Program
California Environmental Protection Agency

Mr. Kareem Taylor
Environmental Scientist
California Environmental Protection Agency

CERTIFIED UNIFIED PROGRAM AGENCY
FINAL SUMMARY OF FINDINGS

EVALUATION DATE(S):	September 16 and 17, 2014				
CUPA:	San Diego Department of Environmental Health				
EVALUATION TEAM MEMBERS:	CalEPA Team Lead	DTSC	Cal OES	SWRCB	CAL FIRE - OSFM
	Kareem Taylor	Asha Arora	Brian Abeel	N/A	N/A

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 Kareem Taylor.

The CUPA is required to submit a **Deficiency Progress Report every 90 days** 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: May 18, 2015

Update 2: Aug 18, 2015

Update 3: Nov 18, 2015

Update 4: Feb 18, 2016

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

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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EVALUATION: **FINAL SUMMARY OF FINDINGS**

DEFICIENCIES IDENTIFIED DURING EVALUATION

1.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>While the CUPA has allocated significant resources to ensuring that all Unified Program facilities submit information electronically to the California Environmental Reporting System (CERS), 9 of the 27 facility files reviewed by Cal OES revealed that the facility did not electronically submit a business plan into CERS:</p> <ul style="list-style-type: none"> • Farm ACW – Facility Permit #199360 • L.T. Farms – Facility Permit #199336 • Golden Eagle Farm – Facility Permit #199585 • Teal Electronics Corp – Facility Permit #132779 • Pacific Plating – Facility Permit #212155 • Sanchez Polishing & Plating – Facility Permit #134179 • Eastman Soil Amendments – Facility Permit #129144 <p>A validation check of CERS indicated that the spot check was accurate.</p> <p>In pursuing business compliance, the CUPA mailed two letters to all Unified Program facilities informing them about the electronic reporting requirement, facilitated over 50 CERS workshops, sent blast email notifications about electronic reporting, cited violations for not using CERS, and assisted facilities with CERS submissions during inspections.</p>	<p>An examination of records in CERS shows that the CUPAs continuing efforts is expected to bring all facilities into compliance with the electronic reporting requirement by July 1, 2015.</p> <p>By May 18, 2015, the CUPA will have followed-up with all business plan facilities that handle extremely hazardous substances.</p> <p>By May 18, 2015, the CUPA will submit a list of facilities to CalEPA that have not submitted a business plan as required by Health and Safety Code (HSC), Chapter 6.95. The CUPA will follow-up with the facilities listed and initiate appropriate enforcement actions. The CUPA will use a spreadsheet to list the facilities and track compliance and any enforcement activities.</p> <p>By August 18, 2015, the CUPA will provide a status report to CalEPA on any remaining facilities that have not reported electronically. This deficiency will be considered corrected when the CUPA has reached the 90th percentile of businesses reporting electronically. This accounts for the expected statewide 10 percent per year business turnover.</p>
	<p>CITATION:</p> <p>HSC, Chapter 6.95, Section 25501 (e)(4) HSC, Chapter 6.95, Section 25508 (a)(1) and (3) HSC, Chapter 6.11, Section 25404 (e)(4) [CalEPA, Cal OES]</p>	

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2.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA is not inspecting hazardous waste generator (HWG) and tiered permitting (TP) facilities with an inspection frequency consistent with its Inspection and Enforcement (I & E) plan.</p> <p>Based on the Annual Inspection Summary Reports from fiscal years (FY) 2012/2013, 2011/2012, and 2010/2011, the CUPA inspected 82.20% of its TP facilities.</p> <p>Of the 36 HWG facility files reviewed by DTSC, four facilities had not been inspected within the inspection frequency stated in the CUPA's I & E plan (dated June 2011) of 18 months for HWG and 36 months for TP:</p> <ul style="list-style-type: none">• A&Z Metal Finishing, 9352 Cabot Dr. was last inspected on 8/19/10 and 8/26/10.• WD-40 Company, Inc., 1060 Cudahy Pl, San Diego was inspected on 4/05/12 and previously on 9/18/08.• S Bay Wastewater Treatment Fac., 2415 Dairy Mart Rd, San Diego was last inspected on 10/28/10.• Twin Oaks Chlorination Station, 3896 El Paso Alto, San Marcos was last inspected on 7/26/11. <p>In addition, DTSC's file review indicates that the following TP facilities have not been inspected within the past three years.</p> <ul style="list-style-type: none">• A & Z Metal Finishing (conditional authorization facility), 9352 Cabot Dr., San Diego was inspected on 8/19/10 and 8/26/10.• Deutsch ECD (permit-by-rule (PBR)	<p>By December 29, 2015, the CUPA will inspect all Resource Recovery Conservation and Recovery Act (RCRA) large quantity generators (LQG) and TP facilities that have not been inspected in the past 24 months for HWG and 30 months for TP facilities (inspection frequencies are based on the finalized I & E plan dated August 2014).</p> <p>With each progress report, please update CalEPA on the number of RCRA LQG and TP facilities inspected.</p>

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	<p>facility), 250 Eddie Jones Way, Oceanside was last inspected on 4/20/11.</p> <p>The facility list of 10,660 HWG facilities provided by the CUPA indicated that 28% of the facilities have not been inspected within the inspection frequency stated in the CUPA's I & E plan (dated June 2011) of 18 months for HWG and 36 months for TP. This list of facilities does not include medical waste facilities, which are not regulated under the Unified Program.</p> <p>CITATION:</p> <p>HSC, Chapter 6.5, Section 25201.4 (b) CCR, Title 27, Section 15200 (a)(3) [DTSC]</p>	
3.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA inspector did not conduct a complete HWG inspection.</p> <p>An oversight inspection of TTM Technologies, located at 5037 Ruffner St., San Diego was conducted on September 10 and 11, 2014. This was a PBR and conditionally exempt (CE) tiered permitted facility in addition to being a RCRA LQG. During the inspection of this facility, the DTSC evaluator informed the CUPA inspectors of several regulatory issues with the facility that the inspectors were not aware of. Some of these regulatory requirements were included in the Notice of Violation dated September 11, 2014 while others were included in the inspection report dated October 2, 2014.</p> <ul style="list-style-type: none">A waste analysis was not performed by a certified lab at least initially (representative sampling) for all waste streams when the facility treated waste in the PBR units.	<p>CalEPA noted that the CUPA sent many of its staff to McCoy's HWG training in 2014.</p> <p>By May 18, 2015, the CUPA will have provided refresher TP and HWG inspection training for the inspector.</p> <p>Additionally, by August 18, 2015 the CUPA will provide training to all inspectors covering the documentation of the factual basis of a violation and its corrective action in the inspection report/Notice of Violation. Please submit documentation of the training to CalEPA.</p> <p>The CUPA will ensure that its staff conducts inspections in a manner consistent with statute and regulations for businesses subject to the HWG/TP program.</p> <p>By August 18, 2015, the CUPA will submit to CalEPA copies of Notice of Violations that have been issued to three separate HWG facilities since February 29, 2014. In addition, each Notice of Violation should be from a different inspector. The Notice of Violations may include an inspection checklist and should have the following:</p>

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- Elements of the inspection that were not addressed include the following:
 - number of treatment units reported by the facility was incorrect;
 - failure to minimize release: pipes from the plating baths were leaking to the extent that in some areas the concrete was etched and there was crystallized material on the floors;
 - deficient waste analysis plan: the plan was missing some requirements from Title 22, section 66265.13(b);
 - excluded recyclable materials: the facility did not notify the CUPA per HSC 25143.10;
 - hazardous waste determination: the facility did not produce analytical results for all waste streams being treated under TP; and,
 - the facility did not have written best management practices nor did they implement such practices for cyanide treatment.

Additionally, inspection reports/Notices of Violations reviewed by DTSC in 36 facility files did not thoroughly document observations and the factual basis of the violations.

The inspection report for Farm ACW, 40477 Calle Roxanne, FallBrook, dated 3/9/12, noted "HW tanks/containers not inspected for leaks or damage on a weekly basis. Begin doing this in the future. It is recommended that you track those inspections in a log Weekly inspection of (but not required)." The inspector did not provide evidence in the inspection report that showed how he/she

- observations
- violations cited
- factual basis for the violations
- corrective actions for the violations

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	<p>knew these tanks were not inspected on a weekly basis.</p> <p>CITATION:</p> <p>HSC, Chapter 6.5, Sections 25201, 25185(c)(2), 25198 CCR, Title 22, Sections 66262.34 (e), 67450.3 (c)(8) [DTSC]</p>	
4.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>In some cases, the CUPA is not following-up and/or documenting return to compliance (RTC) for facilities cited with violations in Notices to Comply (NTC) and inspection reports.</p> <p>DTSC reviewed inspection reports for two facilities cited for violations, but documentation of RTC or CUPA follow-up was not found. The Annual Inspection Summary Reports (Report 3) indicate that RTC rates for inspections with Class 1 and 2 violations were low.</p> <p>The low RTC rate was also noted in the CUPA's program overview presentation to the evaluation team. One of the reasons identified by the CUPA was due to the redirection of resources in support of implementing electronic reporting.</p> <p>The FY 2012/2013 Annual Inspection Summary Report 3 shows the following:</p> <ul style="list-style-type: none"> • 22% of HWGs RTC within 90 days. • 50% of RCRA LQGs RTC within 90 days. • 0% of TP facilities RTC within 90 days. <p>The FY 2011/2012 Annual Inspection Summary Report 3 shows the following:</p>	<p>By May 18, 2015, the CUPA will create a list of facilities with ongoing violations. The CUPA will submit the list to CalEPA. The CUPA will follow-up with businesses cited for violations and document RTC actions. In the absence of RTC documentation from businesses, the CUPA will document follow-up actions like re-inspections, enforcement letters, etc.</p> <p>With each quarterly progress report, the CUPA will provide an updated list to CalEPA showing RTC actions taken for each facility.</p> <p>Additionally, the CUPA will provide CalEPA with RTC or follow-up documentation for the facilities DTSC identified during the 2014 evaluation for not having RTC or follow-up documentation.</p>

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<ul style="list-style-type: none"> • 35% of HWGs RTC within 90 days. • 69% of RCRA LQGs RTC within 90 days. • 35% of TP facilities RTC within 90 days. <p>The FY 2010/2011 Annual Inspection Summary Report 3 shows the following:</p> <ul style="list-style-type: none"> • 32% of HWGs RTC within 90 days. • 55% of RCRA LQGs RTC within 90 days. • 47% of TP facilities RTC within 90 days. <p>CITATION:</p> <p>HSC, Chapter 6.5, Section 25187.8 (h) CCR, Title 27, Section 15200 (a) CCR, Title 27, Section 15185 (a) and (c) [DTSC]</p>	
5. DEFICIENCY:	CORRECTIVE ACTION:
<p>The CUPA's Unified Program facility permit does not include all of the applicable program element(s) that a Unified Program facility is regulated under.</p> <p>In June 2011, the CUPA requested their software vendor, Accela, to develop a Unified Program Facility Permit template that lists all program elements a facility is subject to. Due to system limitations at the time, Accela was unable to comply with the CUPA's request. Instead, Accela could only produce generic permits that lacked applicable program elements.</p> <p>CITATION:</p> <p>CCR, Title 27, Section 15190 (h)(1) [CalEPA]</p>	<p>On September 25, 2014, the CUPA submitted a template of the proposed Unified Program facility permit to CalEPA. CalEPA accepted the template.</p> <p>By May 18, 2015, the CUPA will submit to CalEPA copies of Unified Program facility permits recently issued to five regulated facilities. The permits will include all of the applicable program element(s).</p>

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6.	DEFICIENCY:	CORRECTIVE ACTION:
	<p>The CUPA did not report quarterly inspection, violation, and enforcement information for each program element to CalEPA through the Accela local information management system or CERS.</p> <p>The CUPA did not report inspection, violation, and enforcement information for the entire 2013/2014 fiscal year by August 30, 2014. The latest information submittal reported in the California Environmental Reporting System (CERS) is dated July 12, 2013.</p>	<p>The CUPA submitted inspection, violation, and enforcement information for FY 2013/2014 on September 22, 2014. This deficiency is corrected. No further actions are required.</p>
	CITATION:	
	CCR, Title 27, Section 15290 (b) [CalEPA]	

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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:	<p>The CUPA utilizes Accela, Documentum, and CERS as their data management systems to collect, retain, and manage Unified Program information. Accela is used to manage single fee, permitting, inspection, violation, and enforcement information and electronically exchanges data with CERS. Documentum stores scanned documents such as inspection reports, hazardous waste manifests, and UST monitoring certifications.</p> <p>During CalEPA's review of the electronic files, CalEPA observed that document names were not specific to the type of document. Ambiguous document names make it difficult for CUPA staff and others to find needed information. An example of this is as follows: <i>DEH2004-HUPFP-203828-DEH-HMD-Inspection-2009</i></p> <p>This document is a hazardous materials questionnaire that a facility owner must complete for the CUPA to determine the programs the facility is regulated under. Staff would not know this unless the document is opened first.</p>
RECOMMENDATION:	<p>CalEPA recommends that the CUPA revise their naming convention for electronic Unified Program documents so that each name is specific to the document. Additionally, please consider using a document date in the name that includes the month, day, and year.</p>
2. OBSERVATION:	<p>The Agriculture Weights and Measures (AWM) memorandum of understanding (MOU) is dated July 28, 1988 and may not accurately reflect current program implementation. Per the memorandum, AWM regulates farm facilities that are subject only to the Hazardous Materials Business Plan (HMBP) program, while the CUPA regulates farm facilities subject to multiple programs in addition to the HMBP program. After a discussion with CUPA staff, it appears that AWM is solely responsible for implementing the HMBP program for all farm facilities within their jurisdiction, even if those facilities are subject to other Unified Program elements. The CUPA regulates the other non-HMBP programs at all farm facilities.</p>
RECOMMENDATION:	<p>CalEPA recommends that the CUPA coordinate with AWM to revise their MOU to accurately reflect the roles and responsibilities for regulating farm facilities.</p>

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3.	<p>OBSERVATION:</p> <p>The I & E plan's schedule of inspection frequencies for all program elements was labelled as inspection goals. The CUPA corrected the issue before the completion of the initial report by submitting a finalized I & E plan (dated August 2014) that labels the schedule of inspection frequencies for all program elements as "HMD Inspection Frequency."</p> <p>RECOMMENDATION:</p> <p>None.</p>
4.	<p>OBSERVATION:</p> <p>Each facility file reviewed by Cal OES required reviewing three to four databases to determine: (1) if the CUPA was adequately implementing and enforcing the Unified Program elements; and, (2) if facilities were complying with program requirements. The electronic files provided by the CUPA were not indexed and could not be viewed within Kiva (old data management system) or Accela. The electronic files inconsistently contained Unified Program documents:</p> <ul style="list-style-type: none">• Not all files contained inspection reports;• Some files contained business plan certifications while others did not;• No files contained Business Plan or Risk Management Plan documents; and,• While some files contained documented violations and on-going enforcement, documents were missing that connected all stages of the inspection and enforcement process (e.g. inspection reports, follow-up inspections, correspondence follow-up, return to compliance, etc.). <p>San Diego County Environmental Health - Hazardous Materials Division's staff could not access the San Diego County Agriculture, Weights and Measures' Accela database for Unified Program facility documents. This may present difficulties for the San Diego County Environmental Health – Hazardous Materials Division to ensure the San Diego County Agriculture, Weights and Measures Office is adequately implementing and ensuring facility compliance with the Unified Program.</p> <p>Because the facility files were saved over multiple databases, San Diego County Environmental Health – Hazardous Materials Division and Agriculture, Weights and Measures Office staff may not have access to all facility related records. Additionally compliance file reviews could require a large amount of time to ensure compliance.</p> <p>The amount of time to conduct the review extended beyond the scheduled evaluation period. The review process was completed upon return to the evaluators' offices.</p>

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RECOMMENDATION:

Cal OES recommends that the CUPA examine organizing facility files so that information may be found in fewer data management systems. Also, please ensure that CUPA staff can access all data management systems and that all facility information is scanned into applicable systems.

5. OBSERVATION:

Due to the size and complexity of the San Diego County Environmental Health – Hazardous Material Division’s Area Plan, Cal OES could not complete the review of the Area Plan within the evaluation’s allotted amount of time to ensure the plan contained all the Title 19, Division 2, Chapter 4, Article 3 required elements.

The following observations, from the partial review, are for San Diego County Environmental Health - Hazardous Materials Division’s consideration to improve the content and format of the plan.

- The plan contains an abundant amount of valuable information
- The plan is an administrative document rather than a HazMat emergency response plan.
- The plan is redundant, disjointed and cumbersome to navigate.
- The Table of Contents is not organized in a clear manner. Although the contents contain titles as first-level headers and often include second-level or section titles, and occasionally even third-level titles or subsections, all are not apparent and listed following one another. There is no outline that deciphers the sections such as Part I, Chapter 1, A, 1, Appendix or another method.
- All the pages within the plan are not counted.
- Several pages within the document contain the same number (e.g. 1, 2, 3, ... are repeated in several areas of the plan).
- The page numbers listed in the table of contents and optional reporting form are not always correct and need updating.
- The plan has two sets of Appendices A-D that are different from each other (e.g. Appendix A – Recognizing and Reporting Pesticide Problems Brochure and Appendix A – San Diego County Contingency Plan: Oil Spill Contingency Element).
- The plan contains erroneous information. Examples include the LEPC Region VI Hazardous Materials Emergency Response Plan is not developed by Cal EMA, but by LEPC Region VI and Cal OES and Cal EMA references are used interchangeably throughout the document. Cal EMA’s name was changed in July 2013 to Cal OES.
- From the partial review of the required elements (Title 19 Sections 2720-2724), the plan appears to contain all required elements. However, the surety of this observation is left to question because the plan is written in a manner that gathers information together and duplicates information throughout. A more concise document will allow a reader to navigate throughout in an effective and efficient manner gleaning from it information pertinent to their needs.

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- Large administrative documents may be better to reference and provide valid working links. As an example, Section A – Unified San Diego County Emergency Services Organizational Area Emergency Plan, http://www.sdcounty.ca.gov/oes/emergency_management/protected/docs. This document is dated Sept 2006 and a disclaimer statement is included that states that this plan is in process of being updated at this time and that the approved plan will be available by December 2010. However, the Area Plan is dated 2014.
- Throughout the document references are listed following the end of a heading, title, section, subsection, appendix, etc. For clarity, the references should be listed by a clear, concise, and organized method.
- Agencies roles, responsibilities, and contact information and other information like emergency funding sources, contractors, and disposal sites are scattered throughout the plan. Utilizing tables rather than paragraphs to capture the information in one location is more palpable to the reader. Listing agencies/organizations in alphabetical order will be more palpable as well.

RECOMMENDATION:

Cal OES recommends an update to the Area Plan to improve content readability and organization.

6. OBSERVATION:

The HWG field inspection report and checklist developed by the CUPA contains a section for an inspector to check off which hazardous waste program the facility is regulated by (ex. LQG, small quantity generator (SQG)), but the section has not been used consistently. While this information is not required, it is important to note the type of hazardous waste facility so that inspectors can determine the applicable HWG regulations at the beginning of inspections.

RECOMMENDATION:

DTSC recommends that the CUPA consistently check the appropriate check boxes for the type of hazardous waste facility being inspected. Also, DTSC recommends that the CUPA modify its HWG inspection report to include a checkbox for CESQG.

7. OBSERVATION:

The CUPA inspectors are not consistently documenting EPA ID#s on HWG and TP inspection reports.

RECOMMENDATION:

DTSC recommends that the CUPA include EPA ID#s for all HWG and TP inspections.

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OBSERVATIONS AND RECOMMENDATIONS

8.	OBSERVATION:
	The CUPA does not classify all violations as Class 1, Class 2, or minor in its inspection reports. Violations are classified in Accela.
	RECOMMENDATION:
	DTSC recommends that the CUPA begin classifying violations as Class 1, Class 2, or minor in its inspection reports. The CUPA may modify its inspection reports to include checkbox columns where classifications may be recorded by inspectors. Documenting violation classifications will allow for better efficiency when violation data is entered into the Accela data management system.

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EVALUATION: **FINAL SUMMARY OF FINDINGS**

EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. **Web Site** – The CUPA has a very informative and user-friendly web site. The web site contains information about all of the program elements and what the requirements are for each. Instructions and templates are available through web links. Information on how to start a CERS account, how to complete a CERS submittal, and an instructional CERS video are included. Regulated businesses that have established an online account with the County of San Diego may pay CUPA fees online. The CUPA has also developed an online Spill Prevention Control and Countermeasure (SPCC) Plan course for business owners called “How to Prepare Your Own SPCC Plan.” Owners can access the seven-module course through the web site. The website also contains a manual for plating companies.
2. **Border Program** – The CUPA participate in the Border 2020 program, which is the latest environmental program implemented under the 1983 La Paz Agreement. It builds on the Border 2012 Environmental Program, emphasizing regional bottom-up approaches for decision making, priority setting, and project implementation to address the environmental and public health problems in the border region.
3. **Coordination** – CUPA staff have been active participants in a variety of work groups, committees, etc. that help coordinate, consolidate, and make consistent the Unified Program. These include the following:
 - CUPA Forum Board
 - CUPA Forum Trust
 - Enforcement Steering Committee
 - Data Steering Committee
 - Aboveground Petroleum Storage Tank Work Group
 - Emergency Response Technical Advisory Group (TAG)
 - Hazardous Waste TAG
 - Hazardous Materials TAG
 - Underground Storage Tank TAG
 - CERS TAG
 - Regional Training Coordinators
 - Hazardous waste counting work group
 - CUPA conferences training