



# CERTIFIED UNIFIED PROGRAM AGENCY SELF-AUDIT CHECKLIST



***Fiscal Reporting Year: 2021-2022***

Dates of Evaluation: July 5, 14, and 27; August 18; September 14, 2022

<b>Jurisdiction Name</b> County of Riverside	<b>CUPA</b> Riverside County Department of Environmental Health
<b>Contact Person Name</b> Nicholas Crain, Program Chief II	<b>Address</b> 4065 County Circle Dr #104, Riverside, CA 92503
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This self-audit should include the following documentation as attachments:

- ✓ A periodic review of PAs [27 CCR 15280(b)]
- ✓ A report of PA deficiencies with a plan of correction [27 CCR 15280(c)(1)]
- ✓ A summary of findings for the self-audit [27 CCR 15280(c)(2)(A-D)]
- ✓ A summary of Single Fee System activities [27 CCR 15280(c)(2)(D)]
- ✓ A record of changes in local ordinances, resolutions, and agreements affecting the Unified Program [27 CCR 15280(c)(5)]
- ✓ A summary of the annual review and update of the fee accountability program as required by Title 27, CCR, Section 15210(b)(2) [27 CCR 15280(c)(4)]
- ✓ A listing of all stationary sources covered by the CalARP program which have been audited [19 CCR 2780.5(b)(1)]
- ✓ A listing of all stationary sources covered by the CalARP program which have been requested to develop RMPs [19 CCR 2780.5(b)(2)]
- ✓ A listing of all stationary sources covered by the CalARP program which have been inspected [19 CCR 2780.5(b)(3)]
- ✓ A listing of all stationary sources covered by the CalARP program which have received comments on the RMP [19 CCR 2780.5(b)(4)]
- ✓ A list of new or modified stationary sources covered by the CalARP program [19 CCR 2780.5(b)(5)]
- ✓ A summary of enforcement actions initiated by the CUPA identifying each stationary source covered by the CalARP program [19 CCR 2780.5(b)(6)]
- ✓ A summary of the personnel and personnel years necessary to directly implement, administer, and operate the CalARP program [19 CCR 2780.5(b)(7)]

***Any "no" answers will be explained in a separate written summary attached***

## 1.0 ANNUAL PROGRAM SELF-AUDIT

- 1.1 Was the self-audit completed by September 30 for the previous fiscal year?**  
[27 CCR 15280(a)] **Yes**  **No**
- 1.2 Has the CUPA maintained the self-audit on-file for the past five fiscal years?**  
[27 CCR 15280(a)] **Yes**  **No**
- 1.3 Do the CUPA and PAs have procedures for providing a copy of this self-audit to the Secretary or state agency responsible for overseeing one or more program elements upon 60 days written request?**  
[27 CCR 15280(a)(2)] **Yes**  **No**
- 1.4 Does the self-audit include an evaluation of all CUPA program elements?**  
[27 CCR 15280(a)(3)] **Yes**  **No**
- 1.5 Does the self-audit assess the performance of any Participating Agency program implementation?**  
[27 CCR 15280(b)] **Yes**  **No**
- 1.5.1 Did the PAs receive an in-person evaluation or were they required to complete a self-evaluation this year?**
- |   |  |
|---|--|
| City of Corona Fire Department<br><input type="checkbox"/> In-person <input checked="" type="checkbox"/> Self | City of Riverside Fire Department<br><input type="checkbox"/> In-person <input checked="" type="checkbox"/> Self |
|---|--|
- 1.5.2 What is the current compliance status of the most recent in-person evaluation?**
- |  |   |
|--|---|
| City of Corona Fire Department<br><i>Satisfactory with Improvements Needed</i> | City of Riverside Fire Department<br><i>Satisfactory with Improvements Needed</i> |
|--|---|
- 1.5.3 What is the expected date of the next in-person PA evaluation?**
- |   |  |
|---|--|
| City of Corona Fire Department<br><i>2024</i> | City of Riverside Fire Department<br><i>2024</i> |
|---|--|
- 1.6 Does the self-audit include each of the following elements:**
- 1.6.1 A report of program observations with a plan of correction?**  
[27 CCR 15280(c)(1)] **Yes**  **No**

- 1.6.2 A narrative summary of the effectiveness of activities including at least all of the following elements:**
- 1.6.2.1 Permitting?**  
[27 CCR 15280(c)(2)(A)] **Yes**  **No**
- 1.6.2.2 Inspections?**  
[27 CCR 15280(c)(2)(B)] **Yes**  **No**
- 1.6.2.3 Enforcement?**  
[27 CCR 15280(c)(2)(C)] **Yes**  **No**
- 1.6.2.3 Single fee system?**  
[27 CCR 15280(c)(2)(D)] **Yes**  **No**
- 1.7 Does the self-audit include an explanation of any discrepancies on the annual and quarterly reports of program activities which have been submitted to the Secretary?**  
[27 CCR 15280(c)(3)] **Yes**  **No**
- 1.8 Does the self-audit include a summary of the annual review and update of the fee accountability program as required by 27 CCR 15220?**  
[27 CCR 15280(c)(4)] **Yes**  **No**
- 1.9 Does the self-audit include a record of changes in local ordinances, resolutions, and agreements affecting the Unified Program?**  
[27 CCR 15280(c)(5)] **Yes**  **No**
- 1.10 Does the self-audit include a summary of new programs being included in the Unified Program, if applicable?**  
[27 CCR 15280(c)(6)] **Yes**  **No**
- 1.11 Does the self-audit include a CalARP program summary containing each of the following elements?**
- 1.11.1 A listing of all stationary sources covered by the CalARP program which have been audited?**  
[19 CCR 2780.5(b)(1)] **Yes**  **No**

- |        |  |   |                                       |
|--------|--|---|---------------------------------------|
| 1.11.2 | <b>A listing of all stationary sources covered by the CalARP program which have been requested to develop RMPs?</b><br>[19 CCR 2780.5(b)(2)]                 | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.3 | <b>A listing of all stationary sources covered by the CalARP program which have been inspected?</b><br>[19 CCR 2780.5(b)(3)]                                 | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.4 | <b>A listing of all stationary sources covered by the CalARP program which have received comments on the RMP?</b><br>[19 CCR 2780.5(b)(4)]                   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.5 | <b>A list of new or modified stationary sources covered by the CalARP program?</b><br>[19 CCR 2780.5(b)(5)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.6 | <b>A summary of enforcement actions initiated by the CUPA identifying each stationary source covered by the CalARP program?</b><br>[19 CCR 2780.5(b)(6)]     | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.7 | <b>A summary of the personnel and personnel years necessary to directly implement, administer, and operator the CalARP program?</b><br>[19 CCR 2780.5(b)(7)] | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 1.11.8 | <b>A list of those stationary sources determined by the AA to be exempt from the chapter pursuant to Section 25534(b)(2)?</b><br>[19 CCR 2780.5(b)(8)]       | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |

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## 2.0 PROGRAM ADMINISTRATION

### 2.1 PUBLIC PARTICIPATION

- 2.1.1 Has the CUPA implemented public participation procedures?**  
[27 CCR 15180(e)(1)] Yes  No
- 2.1.2 Do the public participation procedures include procedures to ensure receipt and consideration of comments from regulated businesses and the public?**  
[27 CCR 15180(e)(1)(A)] Yes  No
- 2.1.3 Do the public participation procedures include procedures to coordinate, consolidate, and make consistent locally required public hearings related to the unified program?**  
[27 CCR 15180(e)(1)(B)] Yes  No
- 2.1.4 Do the public participation procedures include consolidated public notices for activities related to the elements of the unified program?**  
[27 CCR 15180(e)(1)(C)] Yes  No

### 2.2 INFORMATION AND RECORDS MANAGEMENT

- 2.2.1 Has the CUPA implemented procedures for records maintenance that identify the type of records maintained, minimum retention times, archive procedures, and proper disposal methods?**  
[27 CCR 15180(e)(2)] Yes  No
- 2.2.2 Is the CUPA requiring the submission of information that is not required by Health and Safety Code or Code of Regulations? (explanation required if yes)**  
[27 CCR 15185(e) and 15190(b)(2)] Yes  No   
*CUPA requires HMBP submission from Ag Handlers*
- 2.2.2.1 If yes, is the information required codified in a local ordinance?**  
[27 CCR 15185(e)(2)] Yes  No
- 2.2.2.2 If yes, has the CUPA notified CalEPA of the local ordinance requirement?**  
[27 CCR 15185(e)(3)] Yes  No

<b>2.2.3</b>	<b>Have the CUPA and PAs instituted procedures to respond to requests from the public, from government agencies with a legal right to access the information, or from emergency responders?</b> [27 CCR 15180(e)(3)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.3.1</b>	<b>Does the CUPA have procedures in place for the proper release of trade secret materials contained in a business plan to the general public?</b> [HSC 25509(b), 25512 et seq]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.3.2</b>	<b>Does the CUPA have procedures in place for the proper release of offsite consequence analysis data contained in a Risk Management Plan to the general public?</b> [19 CCR 2775.5 et seq]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.4</b>	<b>Are enforcement case files maintained confidentially until a final judgement is received?</b> [GOV 6254(b) & (f)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.5</b>	<b>Does the CUPA have procedures for forwarding the HMRRP information to emergency responders?</b> [27 CCR 15180(e)(4)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.6</b>	<b>Do the CUPA and PAs maintain complete personnel training records?</b> [27 CCR 15260(d)(3)(D)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.7</b>	<b>Do the PAs make training records available to the CUPA upon request?</b> [27 CCR 15270(b)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.8</b>	<b>Does the CUPA have data management procedures that include:</b>		
<b>2.2.8.1</b>	<b>The collection, retention, and management of electronic data and documents in compliance with Section 15185?</b> [27 CCR 15180(e)(7)(A)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.8.2</b>	<b>The transfer and exchange of electronic data through an applicable local information management system or local reporting portal?</b> [27 CCR 15180(e)(7)(B)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.2.8.3</b>	<b>The reporting of electronic data in compliance with section 15290?</b> [27 CCR 15180(e)(7)(C)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>2.3</b>	<b>PARTICIPATING AGENCY DISPUTE RESOLUTION AND FORMAL APPEALS PROCESS</b>		

2.3.1	<b>Does the CUPA have procedures for the withdrawal or removal of a PA?</b> [27 CCR 15180(e)(6)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.2	<b>Do the Participating Agency withdrawal procedures include:</b>		
2.3.2.1	<b>Providing notice to the PA?</b> [27 CCR 15180(e)(6)(A)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.2.1	<b>Stating causes for removal or withdrawal?</b> [27 CCR 15180(e)(6)(B)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.2.2	<b>Taking public comments?</b> [27 CCR 15180(e)(6)(C)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.2.3	<b>Allowing the Participating Agency to make formal appeals?</b> [27 CCR 15180(e)(6)(D)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.2.4	<b>Resolving disputes between the CUPA and the PA?</b> [27 CCR 15180(e)(6)(E)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
2.3.4	<b>Does the CUPA maintain written agreements with the governing bodies of all PAs?</b> [27 CCR 15150(d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>

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### 3.0 UNIFIED PROGRAM CONSOLIDATED PERMIT PROGRAM

#### 3.1 CONSOLIDATED PERMIT PROGRAM

- 3.1.1 Does the CUPA issue a Unified Program Facility Permit that consolidates and coordinates permits and authorizations for all program activities?**  
[27 CCR 15190(b)]
- Yes**      **No**
- 3.1.2 Does the CUPA maintain a single point of contact for permit applications?**  
[27 CCR 15190(c)]
- Yes**      **No**
- 3.1.3 Does the CUPA issue permit instructions for specific requirements applicable to a regulated business?**  
[27 CCR 15190(b)(1)]
- Yes**      **No**
- 3.1.4 Does the CUPA issue permits in a timely manner?**  
[27 CCR 15190(d)]
- Yes**      **No**
- 3.1.5 Does the permitting process include:**
- 3.1.5.1 A preliminary check for application completeness?**  
[27 CCR 15190(d)(2)]
- Yes**      **No**
- 3.1.5.2 A technical review of permit applications by the responsible agency?**  
[27 CCR 15190(d)(3)]
- Yes**      **No**
- 3.1.5.3 A procedure for tracking permit applications, establishing follow-up protocol, and facilitating expeditious processing when necessary?**  
[27 CCR 15190(d)(4)]
- Yes**      **No**
- 3.1.6 Does the consolidated permit program include a mechanism for evaluating the permit process?**  
[27 CCR 15190(g)(1)]
- Yes**      **No**



**3.2 CONSOLIDATED PERMIT PROGRAM PLAN**

**3.2.1 Does the Consolidated Permit Program Plan include the following elements:**

- |                |   |   |                                       |
|----------------|---|---|---------------------------------------|
| <b>3.2.1.1</b> | <b>Use of CERS or a local information management system to manage permit information?</b><br>[27 CCR 15190(b)(2)]             | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.1.3</b> | <b>Management of any additional locally required information in accordance with section 15185(e)?</b><br>[27 CCR 15190(b)(3)] | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.1.4</b> | <b>Evaluation of the coordination, consolidation, and consistency of the facility permit process?</b><br>[27 CCR 15190(g)]    | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2</b>   | <b>Does the Consolidated Permit include:</b>  |   |                                       |
| <b>3.2.2.1</b> | <b>A list of the program element permits that make up the Consolidated Permit?</b><br>[27 CCR 15190(h)(1)]                    | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2.2</b> | <b>The agency responsible for issuing the Unified Program facility permit?</b><br>[27 CCR 15190(h)(2)]                        | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2.3</b> | <b>Identification of the permitted facility by business name and address?</b><br>[27 CCR 15190(h)(3)]                         | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2.4</b> | <b>The permit issuance date?</b><br>[27 CCR 15190(h)(4)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2.5</b> | <b>The expiration date of the permit?</b><br>[27 CCR 15190(h)(5)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>3.2.2.6</b> | <b>An addendum to identify any permit conditions for each applicable program element?</b><br>[27 CCR 15190(h)(6)]             | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |

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## 4.0 INSPECTION AND ENFORCEMENT PROGRAM

### 4.1 INSPECTION AND ENFORCEMENT PROGRAM PLAN

- 4.1.1 Has the CUPA implemented and maintained an Inspection and Enforcement Program Plan?**  
[27 CCR 15200(a)] **Yes**  **No**
- 4.1.2 Does the CUPA perform a review of the Inspection and Enforcement Program Plan when required?**  
[27 CCR 15200(b)] **Yes**  **No**
- 4.1.2.1 What is the date of the last major plan revision?**  
*Major revision in September 2017, with subsequent minor revisions as necessary*
- 4.1.3 Has the CUPA consulted with all PAs and reached consensus prior to making any changes to the plan?**  
[27 CCR 15200(b)(1)] **Yes**  **No**
- 4.1.4 Does the inspection component of the plan include the following:**
- 4.1.4.1 The mandated inspection frequency for facilities within each program element?**  
[27 CCR 15200(a)(3)] **Yes**  **No**
- 4.1.4.2 A schedule of the frequency of inspections to be conducted?**  
[27 CCR 15200(a)(3)(A)] **Yes**  **No**
- 4.1.4.3 Provisions to promote integrated multi-media inspections?**  
[27 CCR 15200(a)(10) and 15200(c)] **Yes**  **No**
- 4.1.4.4 A mechanism to ensure that Unified Program inspector training meets or exceeds statutory and regulatory requirements for inspector training?**  
[27 CCR 15260(c)] **Yes**  **No**
- 4.1.4.5 Methods to coordinate inspections between the CUPA and PAs?**  
[27 CCR 15200(a)(4)] **Yes**  **No**

- 4.1.6 Does the enforcement component of the Inspection and Enforcement Program Plan include the following:**
- 4.1.6.1 A description of responsible agency enforcement notification procedures which ensure appropriate confidentiality, and coordination and timely notification of the appropriate prosecuting agency?**  
[27 CCR 15200(a)(5)(A) and 15200(a)(5)(B)] **Yes** **No**
- 4.1.6.2 Uniform and coordinated application of enforcement standards?**  
[27 CCR 15200(a)(7)] **Yes** **No**
- 4.1.6.3 Penalties and enforcement actions which are consistent and predictable for similar violations and no less stringent than state statute and regulations?**  
[27 CCR 15200(a)(8)] **Yes** **No**
- 4.1.6.4 A graduated series of enforcement actions which may be taken by the responsible agencies, based on the severity of the violation?**  
[27 CCR 15200(a)(9)] **Yes** **No**
- 4.1.6.5 A description of efforts to eliminate duplication, inconsistencies, and the lack of coordination within inspection and enforcement programs?**  
[27 CCR 15200(a)(11)] **Yes** **No**
- 4.1.6.6 Procedures for coordinating enforcement efforts between the CUPA and PAs?**  
[27 CCR 15200(a)(12)] **Yes** **No**
- 4.1.7 Does the Plan contain procedures to ensure that the CUPA/PA has sampling capability and use of a State Certified Laboratory?**  
[27 CCR 15200(a)(14)] **Yes** **No**
- 4.2 UNIFIED PROGRAM INSPECTIONS**
- 4.2.1 Has the CUPA made progress toward meeting the objectives of inspecting all regulated businesses at least once every three years and USTs at least every year?**  
[27 CCR 15200(a)(3)] **Yes** **No**

- 4.2.2 Does the CUPA provide a summary of hazardous waste violations to the operator prior to leaving the facility?**  
[HSC 25185(c)(1)]
- Yes    No
- 4.2.3 Do the CUPA and its PAs issue copies of inspection reports to inspected businesses within 5 days of completion of the report and not more than 65 days after completion of the inspection?**  
[HSC 25185(c)(2)(A)]
- Yes    No
- 4.2.4 Do the inspection reports include all pertinent information, or are items including documents, photographs, and sampling results supplied upon request?**  
[HSC 25185(c)(2)(A)]
- Yes    No
- 4.3 UNIFIED PROGRAM ENFORCEMENT ACTIONS**
- 4.3.1 Do the CUPA and its PA's issue enforcement orders for administrative actions and referrals to the prosecuting agencies for civil and criminal actions?**  
[HSC 25404.1.1(a)]
- Yes    No
- 4.3.2 Do the CUPA and its PA's follow the statutes and regulations that determine the appropriate level of enforcement response for each program element?**  
[HSC 25404.1.1(a) et seq]
- Yes    No
- 4.4 COMPLAINT HANDLING**
- 4.4.1 Does the CUPA have provisions for addressing complaints, including receipt, investigation, enforcement, and closure of the complaint?**  
[27 CCR 15200(a)(13)]
- Yes    No
- 4.4.1 Does the CUPA ensure that all releases and threatened releases are reported to CalOES?**  
[HSC 25510(a)]
- Yes    No
- 4.4.2 Does the CUPA maintain at least one 24/7 nonemergency contact number?**  
[HSC 25510(d)]
- Yes    No
- 4.5 UNIFIED PROGRAM VIOLATIONS**
- 4.5.1 Are violations returned to compliance within an appropriate timeframe?**  
[27 CCR 15200(a)]
- Yes    No

**4.5.1.1 For each program, enter the percentage of violations that are uncorrected in EC and CERS when viewed over the last 3 fiscal reporting years. Exclude violations which occurred within most recent 90 days.**

	HMBP	Waste	UST	APSA	Tiered	CalARP
<b>(EC)</b>	5.5%	4.5%	7.5%	3.6%	14.9%	19.4%
<b>(CERS)</b>	5.7%	4.6%	7.6%	3.6%	14.9%	19.4%

**4.5.1.2 For each program, enter the percentage of violations that are uncorrected in EC and CERS when viewed over the last fiscal year. Exclude violations which occurred within most recent 90 days.**

	HMBP	Waste	UST	APSA	Tiered	CalARP
<b>(EC)</b>	14.8%	13.4%	20.3%	11.5%	0%	7.1%
<b>(CERS)</b>	15.2%	13.3%	21.6%	10.7%	0%	7.1%

**4.5.2 Is the CUPA utilizing the CERS violation library correctly?**

[27 CCR 15290(b)(2) ref 15185(d)]

**Yes**  **No**

**4.5.3 Is the CUPA escalating violations across all programs appropriately?**

[HSC 25404(a)(3); 27 CCR 15200(a)]

**Yes**  **No**

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## 5.0 SINGLE FEE SYSTEM ACCOUNTABILITY

### 5.1 SINGLE FEE SYSTEM

#### 5.1.1 What is the date of the most recent fee accountability review/survey?

*September 2021*

#### 5.1.2 Does the Single Fee System replace all fees currently mandated in Health and Safety Code, Sections 25205.14 (Tiered Permitting), 25287 (Underground Storage Tanks), 25513 (Business Plans), and 25535.5 (Risk Management Prevention Plans)?

[27 CCR 15210(a)(1)&(2)]

Yes No

#### 5.1.3 Are fee schedules based on factors associated with the cost of implementing and maintaining programs?

[27 CCR 15210(c)(1)]

Yes No

#### 5.1.4 Are fees based on the necessary and reasonable costs to implement the Unified Program?

[27 CCR 15210(c)(2)]

Yes No

#### 5.1.5 Do adjustments in the fee schedule reflect reasonable and necessary costs?

[27 CCR 15210(c)(3)]

Yes No

#### 5.1.6 Has each participating agency notified the CUPA of its program costs?

[27 CCR 15210(e)]

Yes No

#### 5.1.7 Are all funds collected on behalf of the participating agency by the CUPA forwarded to the participating agency?

[27 CCR 15210(f)]

Yes No

#### 5.1.8 Does the CUPA pay the participating agency within 60 days of receiving fees designated for the participating agency (unless the participating agency and CUPA agree in writing to an alternate schedule)?

[27 CCR 15210(f)(1)]

Yes No

#### 5.1.9 Does each billing statement itemize the fees by program element, if those fee elements are calculated separately?

[27 CCR 15210(f)(1)]

Yes No

- 5.1.10 **Has the governing body of the CUPA established a fee schedule for businesses regulated under the Unified Program?**  
[27 CCR 15210(i)] Yes No
- 5.1.11 **Does the governing body of the CUPA utilize the fee schedules established by the participating agencies and authorize the collection of those fees?**  
[27 CCR 15210(i)] Yes No
- 5.1.12 **Does the CUPA or participating agency make fee schedules available to interested parties upon request?**  
[27 CCR 15210(j)] Yes No
- 5.1.13 **Does the CUPA have a mechanism to resolve fee disputes which arise between the CUPA and participating agencies, between a regulated business and either the responsible agency or the CUPA, or between a regulated business and the state regarding the state surcharge?**  
[27 CCR 15210(k)] Yes No
- 5.1.14 **Does the single fee system include mechanisms for the billing, collection, and transmittal of the state surcharge(s)?**  
[27 CCR 15210(l)] Yes No
- 5.2 **FEE ACCOUNTABILITY & FINANCIAL MANAGEMENT PROGRAM**
- 5.2.1 **Does the fee accountability program encourage more efficient and cost-effective operation of the program for which the single fee and surcharge are assessed?**  
[27 CCR 15220(a)] Yes No
- 5.2.2 **Does the fee accountability program include the following elements:**
- 5.2.2.1 **A procedure of accounting for the fee schedule, the actual amount billed, and the revenue collected?**  
[27 CCR 15220(a)(1)(A)] Yes No
- 5.2.2.2 **Discrete billable services, categorized as either site specific or general?**  
[27 CCR 15220(a)(1)(B)] Yes No

<b>5.2.2.3</b>	<b>Staff work hours required to implement the program?</b> [27 CCR 15220(a)(1)(C)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.2.4</b>	<b>Direct program expenses including durable and disposable equipment?</b> [27 CCR 15220(a)(1)(D)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.2.5</b>	<b>Indirect program expenses including overhead for facilities and administrative functions?</b> [27 CCR 15220(a)(1)(E)]	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>5.2.2.6</b>	<b>The number of regulated businesses in each program element within the jurisdiction?</b> [27 CCR 15220(a)(1)(F)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.2.7</b>	<b>Total number of regulated businesses in the jurisdiction?</b> [27 CCR 15220(a)(1)(G)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.2.8</b>	<b>Quantity and range of services provided, including frequency of inspection?</b> [27 CCR 15220(a)(1)(H)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.3</b>	<b>Do the CUPA and participating agencies annually review and update the fee accountability program?</b> [27 CCR 15220(a)(2)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.2.4</b>	<b>Does the fee for the disclosure program consider the volume and degree of hazard potential of the hazardous material handled by the business?</b> [HSC 25513(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>5.3</b>	<b>PARTICIPATING AGENCY'S RESPONSIBILITIES WITHIN THE SINGLE FEE SYSTEM</b>		
<b>5.3.1</b>	<b>Do the PA's fees reflect the necessary and reasonable costs of implementing the associated program element or elements?</b> [27 CCR 15210(c)]	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
<b>5.3.2</b>	<b>Has the PA notified the CUPA of that fee amount within the time frame as identified in the Unified Program single fee system implementation plan?</b> [27 CCR 15210(j)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>



**5.4 ACCOUNTING WITHIN THE UNIFIED PROGRAM**

- 5.4.1 Does the CUPA maintain a separate, "special account" for all enforcement monies collected?**  
[HSC 25404.1.1(i)] **Yes**  **No**
- 5.4.2 Are fees collected for the disclosure program necessary/reasonable and only used to fund oversight of the disclosure program?**  
[HSC 25513(a)] **Yes**  **No**
- 5.4.3 Are fees collected for the CalARP program necessary/reasonable and only used to fund oversight of the CalARP program?**  
[HSC 25535.5 ref 25404.5] **Yes**  **No**
- 5.4.4 Are fees collected for the hazardous waste program necessary/reasonable and only used to fund oversight of the hazardous waste program?**  
[HSC 25205.14] **Yes**  **No**
- 5.4.5 Are fees collected for the UST program necessary/reasonable and only used to fund oversight of the UST program?**  
[HSC 25287] **Yes**  **No**

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## 6.0 SURCHARGE

### 6.1 COLLECTION AND RECORD KEEPING

- 6.1.1 Does the CUPA collect the surcharge for all program elements as a part of the single fee system?  
[27 CCR 15250(a)] Yes  No
- 6.1.2 Does the CUPA meet surcharge collection and reporting requirements for all program elements within its Unified Program?  
[27 CCR 15250(a)] Yes  No
- 6.1.3 Does the CUPA have a procedure in place for waiving state surcharges?  
[27 CCR 15250(a)(3)] Yes  No   
*No waiving occurs*
- 6.1.4 Does the CUPA (or other Responsible Agency) retain surcharge billing and collection records for five (5) years following closure of any billing period or until completion of any audit in process, whichever is longer?  
[27 CCR 15185(c)(4)] Yes  No
- 6.1.5 Does the CUPA assess the surcharge every twelve months after the effective date of certification?  
[27 CCR 15250(a)(2)] Yes  No
- ### 6.2 REMITTANCE TO THE SECRETARY
- 6.2.1 Has the CUPA transmitted all collected state surcharge revenues to the Secretary quarterly, within 30 days of the end of each state fiscal quarter?  
[27 CCR 15250(b)(1)] Yes  No
- 6.2.3 Have the collected state surcharge revenues been remitted to the Secretary with a completed copy of Surcharge Transmittal Report (Report 1)?  
[27 CCR 15250(b)(2)(i)] Yes  No
- 6.2.4 Has the CUPA prepared and implemented a plan to resolve disputes with regulated businesses involving the state surcharge?  
[27 CCR 15210(k)] Yes  No

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## 7.0 UNIFIED PROGRAM REPORTING

- 7.1 Have the following reports for the last fiscal year been completed and/or submitted as required?
- 7.1.1 Annual Single Fee Summary Report (Report 2)?  
[27 CCR 15290(a)(2)] Yes No
- 7.1.2 Quarterly compliance, monitoring, and enforcement (CME) data?  
[27 CCR 15290(a)(3)] Yes No
- 7.1.3 Biannual Underground Storage Tank Program Reports (Report 6)?  
[27 CCR 15290(a)(4) and 23 CCR 2713] Yes No
- 7.2 Has the CUPA sent an enforcement summary to CalEPA for each enforcement case which has received a final judgment?  
[27 CCR 15290(a)(5)] Yes No
- 7.2.1 Does the CUPA send enforcement summary reports to CalEPA within 30 days after a final case disposition?  
[27 CCR 15290(a)(5)(A)] Yes No

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## 8.0 CUPA AND PARTICIPATING AGENCY TECHNICAL EXPERTISE AND ONGOING TRAINING

*Note: Upon certification, Agencies implementing one or more program elements of the Unified Program shall be considered to possess adequate expertise to implement those specific program elements as participating agencies or as the CUPA.*

### 8.1 CUPA TECHNICAL EXPERTISE AND ONGOING TRAINING

#### 8.1.1 Do CUPA technical program staff and supervisors who are involved in specific activities associated with oversight of the local Unified Program requirements meet the minimum educational requirements listed below?

[27 CCR 15260(a)(1)(A)]

Yes      No  
     

**Option 1: Thirty (30) semester units earned from an accredited college or institution approved by the California Superintendent of Public Instruction under the provisions of California Education Code Section 94310(b), from one or more of the following disciplines. Biology or microbiology, chemistry or chemical engineering, physics or physical science, environmental science, geology or soil science, environmental health, environmental or sanitary engineering, toxicology, industrial hygiene, hazardous materials management, fire science or fire technology.**

OR

**Option 2: Equivalent to graduation from an accredited college or university or equivalent degree approved by the California Superintendent of Public Instruction under the provisions of California Education Code Section 94301(b) with major course work in the disciplines listed in option 1.**

OR

**Option 3: Qualifying experience in hazardous materials management, regulation, analysis, or research; environmental research, monitoring, surveillance or enforcement; or resource recovery may be substituted for the required education, on the basis of one year of qualifying experience for 15 units of college course work authorized pursuant to disciplines listed in option 1, for up to a maximum of 15 units.**

#### 8.1.2 Do CUPA technical program staff and supervisors who are involved in specific activities associated with oversight of the local Unified Program requirements meet minimum hours of training or experience requirements contained in 8.1.8. for all the following subject areas:

[27 CCR 15260(a)(1)(B)]

##### 8.1.2.1 Regulatory overview?

[27 CCR 15260(a)(1)(B)(i)]

Yes      No

- 8.1.2.2 Classification, identification, and chemistry of hazardous materials and hazardous waste?**  
[27 CCR 15260(a)(1)(B)(ii)] Yes  No
- 8.1.2.3 Health and environmental effects of hazardous substances, including chemical exposure and route of entry?**  
[27 CCR 15260(a)(1)(B)(iii)] Yes  No
- 8.1.2.4 Sampling methodologies and use of instrumentation for detection and sampling of hazardous substances?**  
[27 CCR 15260(a)(1)(B)(iv)] Yes  No
- 8.1.2.5 Conducting inspections and enforcement actions, and writing inspection reports and notice of violation?**  
[27 CCR 15260(a)(1)(B)(v)] Yes  No
- 8.1.2.6 Interviewing, case development, and collection and preservation of evidence?**  
[27 CCR 15260(a)(1)(B)(vi)] Yes  No
- 8.1.3 Does one or more CUPA technical staff or supervisor meet all of the requirements listed in 8.1.6 through 8.1.8?**  
[27 CCR 15260(b)] Yes  No
- 8.1.4 Has the CUPA identified the specific types of ongoing training which technical staff and supervisors are required to receive?**  
[27 CCR 15260(c)] Yes  No
- 8.1.5 Does CUPA technical staff and supervisors receive training in the following areas?**
- 8.1.5.1 Hazardous materials and hazardous waste permitting, inspection and enforcement duties and responsibilities pursuant to state law and regulation, and to local ordinances and resolutions?**  
[27 CCR 15260(c)(1)] Yes  No

- |         |   |   |                                       |
|---------|---|---|---------------------------------------|
| 8.1.5.2 | <b>Inspection techniques, including evidence collection, chain of custody, sample preservation, and interviewing?</b><br>[27 CCR 15260(c)(2)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 8.1.5.3 | <b>Administration practices within a hazardous materials and hazardous waste program?</b><br>[27 CCR 15260(c)(3)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 8.1.5.4 | <b>Monitoring equipment, data evaluation, and interpretation of the results as related to hazardous materials and hazardous waste analysis?</b><br>[27 CCR 15260(c)(4)]                                     | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 8.1.5.5 | <b>Field staff health and safety training that includes planning field inspections, safety equipment, on-site procedures, decontamination and hazard recognition and avoidance?</b><br>[27 CCR 15260(c)(5)] | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| 8.1.6   | <b>Do CUPA technical program staff and supervisors meet the minimum educational requirements listed below?</b><br>[27 CCR 15260(d)(1)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |

**Option 1: Equivalent to graduation from an accredited college or university or equivalent degree approved by the California Superintendent of Public Instruction under the provisions of California Education Code section 94310(b) with major course work in biological, chemical, physical, environmental or soil science; environmental health; environmental or sanitary engineering; toxicology; industrial hygiene; or a related field. Additional qualifying experience in hazardous materials management, regulation, analysis, or research; environmental research, monitoring, surveillance or enforcement; or resource recovery may be substituted for the required education on the basis of one year of qualifying experience for each year of college work for up to a maximum of two years. When substituting experience for education, qualifying education must include a minimum of 30 semester units in natural science from an accredited college or equivalent units from an institution approved as above.**

**OR**

**Option 2: Registration as an Environmental Health Specialist.**

- 8.1.7 Do participating staff have a minimum of one year experience in conducting hazardous materials or hazardous waste regulatory inspections?**  
[27 CCR 15260(d)(2)]
- Yes**      **No**
- 8.1.8 Have staff who issue enforcement orders completed the following minimum training:**
- 8.1.8.1 Health and safety training as specified in section 5192(e) Title 8, California Code of Regulations?**  
[27 CCR 15260(d)(3)(A)]
- Yes**      **No**
- 8.1.8.2 100 hours of training in regulatory investigative techniques including training in the subjects of federal and state statutes and regulations on hazardous waste control, conducting an inspection, waste classification, inspection report writing, collection and preservation of samples, enforcement response options, writing reports of violation, interviewing, case development, collection and preservation of evidence, witness training, and rules of evidence and the administrative hearing process?**  
[27 CCR 15260(d)(3)(B)]
- Yes**      **No**
- 8.1.8.3 24 hours of training in penalty assessment and negotiation techniques**  
[27 CCR 15260(d)(3)(C)]
- Yes**      **No**
- 8.1.9 Does the CUPA document employee training and experience?**  
[27 CCR 15260(d)(3)(D)]
- Yes**      **No**
- 8.2 PARTICIPATING AGENCY TECHNICAL EXPERTISE AND ONGOING TRAINING**
- 8.2.1 Do Participating Agency technical staff and supervisors meet the ongoing training requirements identified in 8.1.5?**  
[27 CCR 15270(b)]
- Yes**      **No**

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## 9.0 DISCLOSURE PROGRAM

### 9.1 AREA PLAN

- 9.1.1 Has the CUPA prepared an Area Plan?**  
[HSC 25503(c) et seq] Yes  No
- 9.1.2 Does the current Area Plan contain all required sections?**  
[HSC 25503(c) & 27 CCR 2720 et seq] Yes  No
- 9.1.3 Has the CUPA certified to CalEPA every three years that it has conducted a complete review of its Area Plan and made any necessary revisions?**  
[HSC 25503(d)(2)] Yes  No
- 9.1.3.1** Enter the date of the most recent Area Plan certification:  
*June 2022*

### 9.2 BUSINESS PLANS

- 9.2.1 Have handlers submitted a complete Business Plan?**  
[HSC 25505 et seq] Yes  No
- 9.2.1.1** Enter the percentage of active handlers in CERS without an accepted Business Plan: 15%
- 9.2.2 Have businesses submitted a chemical inventory/map annually?**  
[HSC 25505 et seq & 25508(a) et seq] Yes  No
- 9.2.2.1** Percentage of active handlers in CERS without an accepted inventory/map: 12%
- 9.2.3 Is the CUPA ensuring that chemical inventory and map pages contain all required information?**  
[HSC 25505(a)(2) and (3)] Yes  No
- 9.2.4 Have all businesses submitted a ER plan/Procedures annually?**  
[HSC 25505 et seq & 25508(a) et seq] Yes  No
- 9.2.4.1** Percentage of active handlers in CERS without an accepted ER Plan/Procedures: 15%
- 9.2.5 Is the CUPA ensuring that ER Plans/Procedures contain all required information?**  
[HSC 25505(a)(3) & 25508(a)(2) and (3)] Yes  No



<b>9.2.6</b>	<b>Is the CUPA ensuring that businesses resubmit within 30 days after a Plan is rejected in CERS?</b> [HSC 25508(a)(3)]	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>
9.2.6.1	Percentage of rejected submittals failing to resubmit within 30 days: 31.8%		
<b>9.2.7</b>	<b>Is the CUPA properly exempting agricultural handlers?</b> [HSC 25507, 25507.1 and 25508(a)(3)] <i>Note: This item is not applicable in Riverside County due to more stringent local ordinance requirements.</i>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>9.3</b>	<b>INSPECTION AND ENFORCEMENT</b>		
<b>9.3.1</b>	<b>Is the CUPA conducting inspections of all handlers at least once every 3 years?</b> [HSC 25511(b)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
9.3.1.1	Percentage of facilities in CERS without triennial inspection: 5.5%		
9.3.1.2	Percentage of facilities in local system without triennial inspection: 5.5%		
<b>9.3.2</b>	<b>Is the CUPA properly classifying disclosure violations?</b> [HSC 25404(a)(3) and 25404.2(a)(3) and (4)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>9.3.3</b>	<b>Is the CUPA escalating disclosure violations appropriately?</b> [HSC 25404(a)(3) & 27 CCR 15200(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>9.3.4</b>	<b>Has the CUPA pursued enforcement options for all class I disclosure violations in the last fiscal year?</b> [HSC 25404.1.1 & 27 CCR 15200(a)(6) and (9)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
9.3.4.1	Percentage of disclosure class I violations without enforcement action: 0.0%		

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## 10.0 UNDERGROUND STORAGE TANK PROGRAM

- |        |   |  |                                |
|--------|---|--|--------------------------------|
| 10.1   | Does the CUPA ensure that all UST information in CERS is complete and correct?<br>[HSC 25286 & 25288(a)]  | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.2   | Does the CUPA ensure that only ICC-certified UST Inspectors review UST submittals in CERS and conduct UST field inspections?<br>[23 CCR 2715(j)]                                    | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.3   | Does the UST Report 6 submitted by the CUPA list the correct number of inspections?<br>[23 CCR 2713(c)(3)]  | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.4   | Can the CUPA use the report 6 generated by CERS?<br>[23 CCR 2713(c)(3)]   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.5   | Does the UST Report 6 submitted by the CUPA list all violations and correct TCR criteria?<br>[23 CCR 2713(d)]   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.6   | Does the CUPA withhold permits for facilities that have been issued a red tag, subject to enforcement action, and/or not paid the UST surcharge?<br>[HSC 25285(b) & 23 CCR 2712(c)] | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.7   | Does the CUPA have a procedure for affixing red tags?<br>[23 CCR 2714.1 et seq]   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.8   | Does the UST operating permit contain all of the following information?   |  |                                |
| 10.8.1 | Permit expiration date?<br>[23 CCR 2712(c)]   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.8.2 | Monitoring requirements for each permitted tank system?<br>[23 CCR 2712(c)]   | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |
| 10.8.3 | State underground storage tank ID numbers?<br>[23 CCR 2712(c)]  | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/> |

<b>10.8.4</b>	<b>Permit issuance date?</b> [23 CCR 2712(c)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9</b>	<b>INSPECTIONS AND ENFORCEMENT</b>		
<b>10.9.1</b>	<b>Is the CUPA reporting violations consistently and correctly in CERS?</b> [HSC 25288(b), 25299, 25299.2(a), 23 CCR 2712(g)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.2</b>	<b>Is the CUPA conducting inspections of all UST facilities at least once annually?</b> [HSC 25288(a) and 23 CCR 2712(e)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.2.1</b>	Percentage of facilities in CERS without annual inspection: 0%		
<b>10.9.2.2</b>	Percentage of facilities in local system without annual inspection: 0%		
<b>10.9.3</b>	<b>Does the CUPA conduct complete compliance inspections in accordance with LG-159?</b> [HSC 25288(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.4</b>	<b>Does the CUPA have a mechanism to enforce when leak testing and monitoring results are received outside 30 days from testing?</b> [HSC 25288(b) & 23 CCR 2637(e), 2638(d), 2643(g), 2644.1(a)(5)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.5</b>	<b>Does the CUPA have at least the last three years of testing and monitoring records in the facility files?</b> [23 CCR 2637(e), 2638(d), 2643(g), 2644.1(a)(5) and 27 CCR 15185(b)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.6</b>	<b>Does the CUPA prepare a UST compliance inspection report for every UST inspection?</b> [HSC 25288(b)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.6.1</b>	<b>Does the CUPA consistently and correctly associate violations to specific UST systems?</b> [HSC 25288, 25299 & 23 CCR 2712(c), (e), (g) and 2713(c), (d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>

<b>10.9.7</b>	<b>Is the CUPA properly classifying UST violations?</b> [HSC 25404(a)(3) and 25404.2(a)(3) and (4)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.8</b>	<b>Is the CUPA escalating UST violations appropriately?</b> [HSC 25404(a)(3) & 27 CCR 15200(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.9</b>	<b>Has the CUPA pursued enforcement options for all class I UST violations?</b> [HSC 25404.1.1 & 27 CCR 15200(a)(6) and (9)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.9.9.1</b>	Percentage of class I UST violations without enforcement action: <i>0.00%</i>		
<b>10.10</b>	<b>ENHANCED LEAK DETECTION TESTING</b>		
<b>10.10.1</b>	<b>Does the CUPA require initial ELD testing due to proximity to drinking water wells?</b> [HSC 25292.4, 25292.5 and 23 CC 2644.1]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.10.2</b>	<b>Does the CUPA require UST systems with single-wall components to conduct 3-year ELD testing, if within 1,000 feet of a drinking water well?</b> [HSC 25292.4 and 23 CC 2640(e), 2644.1]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.11</b>	<b>TANK CLOSURE</b>		
<b>10.11.1</b>	<b>Does the CUPA sufficiently document tank closure, removal, and soil sampling results?</b> [23 CCR 2672(d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>10.11.2</b>	<b>Does the CUPA require proper soil sampling and analysis be completed during closure activities?</b> [23 CCR 2672(d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>

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## 11.0 ABOVEGROUND PETROLEUM STORAGE ACT PROGRAM

11.1	Is the CUPA ensuring that only persons whom have completed the APSA inspector training are conducting APSA inspections? [HSC 25270.5(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.2	Is the CUPA conducting compliance verifications at facilities that store less than 10,000 gallons of petroleum? [HSC 25270.5(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.3	Is the CUPA properly applying the conditional exemption criteria? [HSC 25270.4.5(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.4	Is the CUPA in compliance with not storing SPCC Plans with UPA records?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.5	Is the CUPA properly regulating tanks in underground areas? [HSC 25270.2(o)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.6	Is the CUPA conducting inspections of all APSA facilities at least once every 3 years? [HSC 25280.5(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.6.1	Percentage of facilities in CERS without triennial inspection: 5.5%		
11.6.2	Percentage of facilities in local system without triennial inspection: 5.5%		
11.7	Is the CUPA properly classifying APSA violations? [HSC 25270.4, 25270.12, 25270.12.1, 25270.12.5, 25404(a)(3), 25404.2(a)(3) and (4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.8	Is the CUPA escalating APSA violations appropriately? [HSC 25270.4, 25270.12, 25270.12.1, 25270.12.5, 25404(a)(3) & 27 CCR 15200(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.9	Has the CUPA pursued enforcement options for all class I APSA violations? [HSC 25404.1.1 & 27 CCR 15200(a)(6) and (9)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.9.1	Percentage of class I APSA violations without enforcement action: 0%		

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## 12.0 HAZARDOUS WASTE AND TIERED PERMITTING PROGRAMS

### 12.1 POLICIES AND PROCEDURES

#### 12.1.1 Does the CUPA have procedures for each of the following items:

- |                 |  |   |                                       |
|-----------------|--|---|---------------------------------------|
| <b>12.1.1.1</b> | <b>The receipt of release reports from tank systems or secondary containment?</b><br>[22 CCR 67383.3(a)(1)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.1.2</b> | <b>Tiered permitting notifications?</b><br>[22 CCR 67450.3(c) and 67450.2(b)(4)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.1.3</b> | <b>Notification of contingency plan activation following release?</b><br>[22 CCR 66265.56(i)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.2</b>   | <b>Is the CUPA properly processing onsite hazardous waste treatment notifications for PBR facilities with a FTU within 45 days of receipt?</b><br>[22 CCR 67450.2(b)(4) and 67450.3(c)(1)] | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.2.1</b> | Percentage not reviewed within 45 days of receipt over last 3 years: 0%  |   |                                       |
| <b>12.1.3</b>   | <b>Does the CUPA ensure LQG facilities with tanks obtain a tank integrity assessment or exemption?</b><br>[22 CCR 66265.192(a), (j), and (k)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.4</b>   | <b>Does the CUPA ensure a copy of non-RCRA LQG tank exemption forms are placed into facility files?</b><br>[22 CCR 66265.192(j)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.5</b>   | <b>Does the CUPA ensure FTU operators have a written closure plan containing all required elements?</b><br>[22 CCR 674050.3(c)(11)(B)]   | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.6</b>   | <b>Does the CUPA acknowledge in writing the receipt of an annual or amended FTU notification within 45 calendar days of receipt?</b><br>[22 CCR 67450.3(d)]                                | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |
| <b>12.1.6.1</b> | <b>Does the acknowledgement specify all incorrect information?</b><br>[22 CCR 67450.3(d)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/> |

**12.2 INSPECTIONS AND ENFORCEMENT**

<b>12.2.1</b>	<b>Does the CUPA ensure appropriate applicability and separation between SQG, LQG, and RCRA violations?</b> [HSC 25101(d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.2</b>	<b>Are CUPA inspectors properly trained regarding application of all hazardous waste violations?</b> [HSC 25101(d)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.3</b>	<b>Are TP inspectors properly trained regarding application of all TP violations?</b> [HSC 25200.3]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.4</b>	<b>Is the CUPA inspecting all hazardous waste and tiered permitting facilities at least once every 3 years?</b> [HSC 25201.4(b)(2) & 27 CCR 15200(a)(3)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.4.1</b>	Percentage of hazardous waste facilities in CERS without triennial inspection: 6.7%		
<b>12.2.4.2</b>	Percentage of hazardous waste facilities in local system without triennial inspection: 6.7%		
<b>12.2.4.3</b>	Percentage of tiered permitting facilities in CERS without triennial inspection: 2.67%		
<b>12.2.4.4</b>	Percentage of tiered permitting facilities in local system without triennial inspection: 2.67%		
<b>12.2.5</b>	<b>Does the CUPA inspect all new tiered permitting facilities within 2 years of the start of operations?</b> [HSC 25201.4(b)(2)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.6</b>	<b>Is the CUPA properly classifying waste and tiered permitting violations?</b> 25404(a)(3), 25404.2(a)(3) and (4)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.7</b>	<b>Is the CUPA escalating waste and tiered permitting violations appropriately?</b> [HSC 25404(a)(3) & 27 CCR 15200(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.8</b>	<b>Has the CUPA pursued enforcement options for all class I violations?</b> [HSC 25404.1.1 & 27 CCR 15200(a)(6) and (9)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>12.2.8.1</b>	Percentage of class I hazardous waste violations without enforcement action: 0%		
<b>12.2.8.2</b>	Percentage of class I tiered permitting violations without enforcement action: 0%		

- |                |  |   |  |
|----------------|--|---|--|
| <b>12.2.9</b>  | <b>Does the CUPA return facilities to compliance within the expected timeframe? (30 days unless enforced upon in a graduated series of enforcement)</b><br>[HSC 25404.1.2(c), 25187.8]<br>43% (Based on Report Builder report)   | <b>Yes</b><br><input type="checkbox"/>            | <b>No</b><br><input checked="" type="checkbox"/> |
| <b>12.2.10</b> | <b>Does the CUPA consistently list proper documentation on all inspection reports, including observations, factual basis, and corrective actions? Specifically, things like “type and amount of open containers”, “type and amount of unlabeled containers”, “type and amount of waste which is disposed of improperly”.</b><br>[HSC 25185(c)(2)(A)] | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/>            |
| <b>12.2.11</b> | <b>Does the CUPA consistently document all RTC actions and place appropriate documentation into facility files?</b><br>[HSC 25187.8(b) and (g), 25404.1.2(c) & 27 CCR 15200(a)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/>            |
| <b>12.2.12</b> | <b>Does the CUPA enforce upon facilities which are rejected by a district attorney?</b><br>[HSC 25187.8(b) and (g), 25404.1.1 & 27 CCR 15200(a)(6) and (9)]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/>            |
| <b>12.2.13</b> | <b>Does the CUPA have inspectors trained to identify and inspect special groups within the hazardous waste framework (e.g., appliance recyclers, onsite recyclers, universal waste handlers, etc.)</b><br>[HSC 25212]  | <b>Yes</b><br><input checked="" type="checkbox"/> | <b>No</b><br><input type="checkbox"/>            |

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## 13.0 CALIFORNIA ACCIDENTAL RELEASE PREVENTION PROGRAM

### 13.1 POLICIES AND PROCEDURES

- 13.1.1** Does the CUPA have a procedure for dispute resolution?  
[19 CCR 2780.1(a)] Yes  No
- 13.1.2** Does the CUPA have a method to identify “table 3” facilities?  
Yes  No
- 13.1.3** Does the CUPA have a CalARP Official/Coordinator?  
[19 CCR 2780.1(a)(2)] Yes  No
- 13.1.3.1** CalARP Official/Coordinator Name: *All EHS IVs assigned to hazmat*
- 13.1.4** Does the CUPA have a process in place to coordinate and request information regarding emergency response planning at stationary sources?  
[19 CCR 2765.2(c)] Yes  No
- 13.1.6** Does the CUPA have a procedure in place for lowering program level?  
[HSC 25534(b)] Yes  No
- 13.1.7** Has the CUPA determined how many personnel years are necessary to implement the CalARP program?  
[19 CCR 2780.5(b)(7)] Yes  No
- 13.1.7.1** Personnel years necessary: *0.25 FTE*
- 13.2** Risk Management Plans
- 13.2.1** Does the CUPA ensure RMPs are required for new stationary sources prior to the date a new regulated substance is brought onsite?  
[19 CCR 2745.1(c)] Yes  No

- 13.2.2 Does the CUPA provide written deficiency notices to a stationary source if the submitted RMP does not meet requirements?**  
[19 CCR 2745.2(b)] **Yes**  **No**
- 13.2.3 Does the CUPA make new RMPs available for public review?**  
[19 CCR 2745.2(c)] **Yes**  **No**
- 13.2.3.1 Does the CUPA take into account public comments at the end of the public review period?**  
[19 CCR 2745.2(d)] **Yes**  **No**
- 13.2.4 Does the CUPA have a process in place to ensure submitted RMPs meet all statutory and regulatory requirements?**  
[19 CCR 2745.3 – 2745.9] **Yes**  **No**
- 13.2.5 Does the CUPA have a process in place to ensure an updated RMP is received from a stationary source when appropriate?**  
[19 CCR 2745.10 et seq] **Yes**  **No**
- 13.2.6 Does the CUPA have access to appropriate modeling tools so as to determine if the OCA data was prepared in accordance with requirements?**  
[19 CCR 2745.4(b)] **Yes**  **No**
- 13.2.7 Does the CUPA conduct audits of RMPs in addition to required inspections?**  
[19 CCR 2775.2] **Yes**  **No**
- 13.2.7.1 Does the CUPA issue written preliminary determinations to the stationary source after an audit of the RMP has been conducted?**  
[19 CCR 2775.2(e)] **Yes**  **No**
- 13.3 INSPECTIONS AND ENFORCEMENT**
- 13.3.1 Is the CUPA conducting inspections of all stationary sources at least once every 3 years?**  
[HSC 25537(a) and 19 CCR 2775.3] **Yes**  **No**
- 13.3.1.1** Percentage of facilities in CERS without triennial inspection: 7.4%
- 13.3.1.2** Percentage of facilities in local system without triennial inspection: 7.4%

<b>13.3.2</b>	<b>Is the CUPA properly classifying CalARP violations?</b> [HSC 25404(a)(3) and 25404.2(a)(3) and (4)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>13.3.3</b>	<b>Is the CUPA escalating CalARP violations appropriately?</b> [HSC 25404(a)(3) & 27 CCR 15200(a)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>13.3.4</b>	<b>Has the CUPA pursued enforcement options for all class I CalARP violations?</b> [HSC 25404.1.1 & 27 CCR 15200(a)(6) and (9)]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>13.3.4.1</b>	Percentage of class I CalARP violations without enforcement action: <i>0.0%</i>		
<b>13.3.5</b>	<b>Is the CUPA conducting complete oversight inspections?</b> [19 CCR 2775.3]	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>

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## 14.0 AREAS OF IMPROVEMENT IDENTIFIED IN THE SELF-AUDIT

- |      |  |  |   |
|------|--|--|---|
| 14.1 | Has the CUPA developed an action plan to correct observations noted in the self-audit?<br>[27 CCR 15280(1)(1)] | Yes<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/>            |
| 14.2 | Have the observations been corrected?  | Yes<br><input type="checkbox"/>            | No<br><input checked="" type="checkbox"/> |

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## 15.0 CERTIFICATION STATEMENT

The individual signing this document declares that they have the authority to sign this CUPA Self-Audit report on behalf of the agency designated below and certifies that the information provided in this self-audit is true, accurate, and complete to the best of their knowledge.

**CUPA:** Riverside County Department of Environmental Health

**Signature:** \_\_\_\_\_

**Name:** Nicholas Crain, Program Chief II

**Date:** \_\_\_\_\_