

CERS2 Submission Statuses for Facility Submittals

Prepared by Cal/EPA Unified Program February 2011

CERS1 currently allows regulators to set the status of a facility submittal using eleven options, not all of which are truly related to submission status. This paper reviews the current statuses and describes Cal/EPA's proposed approach of separating most of these options into two separate status fields. An [earlier version of this document](#) was presented to CERS Regulator User Group at its 2/8/2011 meeting.

The current CERS1 facility submittal status options are shown below. The current definitions for these options (as inherited from UNIDOCS) are shown in the appendix of this document.

- Accepted
- In Process
- Submittal Received
- Inactive
- Facility Closed
- Non-CERS Agency
- Test
- Waiting for Resubmittal
- Field Verified
- Rejected
- Unreviewed

This list intermingles statuses for facility submittals (e.g., accepted, rejected) and the actual status of the facility (e.g., inactive, facility closed). Additionally, some statuses relate to data validation (e.g., field verified) that would need to be addressed separately from the actual status of a facility submittal. Cal/EPA anticipates moving most of the existing submittal status options into two separate status fields. A few options will also be dropped (see appendix).

Submittal Status Field

[Note: Adopted as revised below at 2/22/2011 CERS Regulator User Group]

To assist with statistical and other reports, the **Submittal Status** field needs to be very specific and not be intermingled with other business processes. In CERS2, the revised **Submittal Status** field would be applied to each program element, not to an entire facility submittal as currently done in CERS1. Regulators would need to change the **Submittal Status** field to *Accepted* or *Deficient* in a timely manner. The **Submittal Status** field (and the definitions below) would be prominently displayed to both business and regulator users.

- **Received:** The submitted program element has been recorded into CERS and meets minimal data validation requirements. Depending upon the program element, the regulator may be required to accept the submitted program element.
- **Under Review:** Regulator is reviewing the submitted program element.
- **Accepted** **Approved:** Regulator has reviewed the submitted program element and finds the data/documents meet state and local reporting requirements.
- **Deficient:** Regulator has reviewed the submitted program element and finds the data/documents do not meet state and local reporting requirements. Regulator has required the business to make a new submission for the program element.

The *Under Review* option is an optional submission status regulators can use to aid in their internal submission review and acceptance process, and should be set only on an interim basis for submitted program elements the regulator intends to accept/reject.

Cal/EPA intends to drop the current *Test* option as all test submittals should occur in the training version of CERS. Cal/EPA will drop the *Non-CERS Agency* status because it involves a past pilot effort that is no longer relevant in CERS1 or CERS2.

Facility Operational Status Field

Note: *Based upon discussion at the Feb.22 CERS Regulator User Group, a decision on this field was deferred until Cal/EPA could provide a revised proposal.*

The proposed **Facility Status** field is necessary for the regulator to know if a facility is active/open or closed. This field does not currently exist in CERS1 as a separate field.

- **Active:** Facility is operating and subject to reporting under Unified Program and/or local agency requirements.
- **Closed:** Business operation at the facility has ceased and all materials and operations that would have required reporting have been removed and discontinued. Does not imply that the site is free from contamination or that no further regulatory oversight is required.

In addition to tracking if a facility is operational, there is a separate business need to track whether a facility is subject to reporting requirements **under a specific program element**, regardless of what they may indicate on their Business Activities form. For example, the site may have hazardous materials below reporting threshold but the agency wants to track them because they had exceeded the reporting threshold in the past and may again at some time. There are probably other business needs in this area as well. Cal/EPA will present a proposed solution to this issue at a later CERS Regulator User Group meeting.

Data Validation Status

Note: *The CERS Regulator User Group determined this field need was unnecessary at its 2/22/2011 meeting.*

One other status currently supported in CERS1 (*Field Verified*) related to tracking internal processes involving detailed verification of submittal data. Such data quality verification practices vary widely between UPAs, between inspectors, between program elements, and even between data fields within program elements. In some cases onsite verification, such as comparing the submitted chemical inventory with observations made at the facility, may have substantial value to UPA staff and or emergency responders. In other cases the validation of the data may be less valuable and may be dependent on UPA workload, staffing and internal priorities.

Cal/EPA has determined that UPA business practices vary widely in this area, and it would not be practical to support a data validation status field within CERS (especially for EDT). Regulators who wish to track such data can do so within their own data systems.

[Appendix on next page]

Appendix

Below is a listing of the CERS1 submittal status options, annotated with planned replacement values in CERS2.

CERS 1 Status Name	CERS1 Description	Replacement Status in CERS2	CERS2 Status Description
Submittal Received	The Submittal has been received by the agency and will be assigned for review.	Received (Submittal Status)	The submitted program element has been recorded into CERS and meets minimal data validation requirements. The regulator must still review and approve the submitted program element.
Unreviewed	The local agency has not looked at your submittal.	Received (Submittal Status)	The submitted program element has been recorded into CERS and meets minimal data validation requirements. The regulator must still review and approve the submitted program element.
In Process	The submittal is being reviewed for completeness and accuracy.	Under Review (Submittal Status)	Regulator is reviewing the submitted program element.
Accepted	The submittals appears to meet the general reporting requirements.	Approved (Submittal Status)	Regulator has reviewed the submitted program element and finds the data/documents meet state and local reporting requirements.
Rejected	The submittal is unacceptable due to serious omissions, errors, or inaccuracies.	Deficient (Submittal Status)	Regulator has reviewed the submitted program element and finds the data/document(s) does not meet state and local reporting requirements. Regulator has required the business to make a new submission for the program element.
Waiting for Resubmittal	Some key elements are missing (such as a facility map) and the local agency is waiting for resubmittal.	Deficient (Submittal Status)	Regulator has reviewed the submitted program element and finds the data/document(s) does not meet state and local reporting requirements. Regulator has required the business to make a new submission for the program element.
Facility Closed	Facility has been closed.	Closed (Facility Status)	Business operation has ceased and all materials and operations that would have required reporting have been removed and discontinued. Does not imply that the site is free from contamination or that no further regulatory oversight is required.
Inactive	Facility is currently inactive. Example, hazardous materials quantities have been reduced to below the reporting threshold.	To Be Determined	Note: Further research needed. "Inactiveness" should probably be determined for a facility on a per program element-basis, and some UPAs have asked for CERS features to indicate a specific facility is exempt or always required to submit a program element.
Test	The facility was not listed in the system so a test ID number has been provided.	Dropped	<i>Note: Test submittals should only occur in the CERS training system. Any existing CERS submittals with status "Test" will not be migrated to CERS2.</i>
Field Verified	A field inspection has been conducted. The submittal is consistent with field observations.	Dropped	<i>Note: This type of data should be tracked internally by UPAs as necessary. Need feedback from past UNIDOCs UPAs on which new Submittal Status submittals with this status should be mapped to.</i>
Non-CERS Agency	The submission was made by a facility not under a CERS member agency.	Dropped	<i>Note: No longer relevant in CERS project.</i>