

CERS2: Not Business as Usual

CERS Regulator User Group August 16, 2011
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Overview

- ▶ CERS2 implements electronic reporting as mandated in Unified Program's statutes & regs.
 - ▶ UPAs currently implement some of these mandates differently.
 - ▶ CERS2 statewide reporting enforces a more standardized approach.
 - ▶ Some UPAs will need to change business processes.
 - ▶ This presentation reviews possible areas where business process change may occur.
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Submittal = 1 + Submittal Elements

- ▶ A Facility Submittal is made up of one or more separate *Submittal Elements*.
- ▶ CERS2 *Submittal Elements* defined by form/data dependencies & schedule mandates.
- ▶ *Submittal Elements* often--but not always--align with program elements.
- ▶ Businesses (Organizations) can submit one, a few, or all *Submittal Elements* for a facility.
- ▶ Regulators separately review/approve each submitted *Submittal Element* as necessary.

CERS2 Submittal Elements

| CERS2 Submittal Element | UP Program Element |
|---|--------------------|
| Facility Information (Business Activities + Owner/Operator) [always managed by the CUPA] | Business Plan |
| Hazardous Materials Inventory | Business Plan |
| Emergency Response & Training Plans | Business Plan |
| Underground Storage Tanks | UST |
| Onsite Hazardous Waste Treatment Notification | Hazardous Waste |
| Recyclable Materials Report | Hazardous Waste |
| Remote Waste Consolidation Annual Notification | Hazardous Waste |
| Hazardous Waste Tank Closure Certification | Hazardous Waste |
| Aboveground Petroleum Storage Tanks | APSA |
| California Accidental Release Program | CalARP |

Submittal Element Assignments

- ▶ For each facility in state, only one UPA can review/approve a specific submittal element.
- ▶ CERS2 allows only the UPA of record for a **Facility→Submittal Element** to set/change the submittal status/comments.
- ▶ CERS2 only accepts inspections marked as being performed by the UPA of record for a **Facility→Program Element**.
- ▶ For CUPAs with PAs, **Facility→Submittal Element→Regulator** assignments need to be reviewed and maintained in the CERS2 UI.

Facility → Submittal Element → Regulator Assignments

| CERS ID | Facility Info | Inventory | ER/Training Plans | UST | HWTP | HWRMR |
|----------|-----------------|-----------------------|-----------------------|-----------------|----------------------|-----------------|
| 10000123 | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |
| 10000045 | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |
| 10000567 | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |
| 10001456 | LA County Fire | Compton Fire Dept | Compton Fire Dept | LA County Fire | LA County Fire | LA County Fire |
| 10002468 | LA County Fire | Compton Fire Dept | Compton Fire Dept | LA County Fire | LA County Fire | LA County Fire |
| 10003945 | LA County Fire | Culver City Fire Dept | Culver City Fire Dept | LA County Fire | LA County Fire | LA County Fire |
| 10006890 | LA County Fire | Culver City Fire Dept | Culver City Fire Dept | LA County Fire | LA County Fire | LA County Fire |
| 10007568 | El Segundo City | El Segundo City Fire | El Segundo City Fire | El Segundo City | El Segundo City Fire | El Segundo City |
| 10009123 | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |

These assignments will need to be managed by CUPAs in the CERS2 UI.

Submittal Element Assignments for New Facilities

- ▶ Cal/EPA—manages a table of **ZIP Code→Submittal Element→Regulator** assignments applied to new facilities.
- ▶ CUPAs can edit facility's initial assignments.
- ▶ “Secondary” CUPAs having jurisdiction over a small portion of a ZIP Code will receive an alert when a new facility added.
- ▶ CUPAs contact Cal/EPA if ZIP assignments change
- ▶ ZIP Code assignment not perfect, but...

ZIP Code → Submittal Element → Regulator Assignments for New Facilities

| ZipCode | Primary CUPA | Secondary CUPA | FacInfo | Inventory | ER/Train Plans | UST | HWTP |
|---------|----------------------|----------------|---------------------------|---------------------------|---------------------------|---------------------------|-----------------|
| 90202 | LA County Fire | | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |
| 90209 | LA County Fire | | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |
| 90220 | LA County Fire | | LA County Fire | Compton Fire Dept | Compton Fire Dept | LA County Fire | LA County Fire |
| 90221 | LA County Fire | | LA County Fire | Compton Fire Dept | Compton Fire Dept | LA County Fire | LA County Fire |
| 90224 | LA County Fire | | LA County Fire | Compton Fire Dept | Compton Fire Dept | LA County Fire | LA County Fire |
| 90230 | LA County Fire | | LA County Fire | Culver City Fire Dept | Culver City Fire Dept | LA County Fire | LA County Fire |
| 90231 | LA County Fire | | LA County Fire | Culver City Fire Dept | Culver City Fire Dept | LA County Fire | LA County Fire |
| 90233 | LA County Fire | | LA County Fire | Culver City Fire Dept | Culver City Fire Dept | LA County Fire | LA County Fire |
| 90241 | LA County Fire | | LA County Fire | Downey Fire Dept | Downey Fire Dept | LA County Fire | LA County Fire |
| 90242 | LA County Fire | | LA County Fire | Downey Fire Dept | Downey Fire Dept | LA County Fire | LA County Fire |
| 90245 | El Segundo City Fire | | El Segundo City Fire Dept | El Segundo City |
| 90277 | LA County Fire | | LA County Fire | LA County Fire | LA County Fire | LA County Fire | LA County Fire |

CERS2 Submittal Statuses

- ▶ Different from CERS1 / UNIDOCS.
- ▶ Specific and must be applied statewide.
 - We all need to talk the same talk!
- ▶ New definitions must be meaningful to businesses/organizations AND regulators.

CERS2 Submittal Statuses

| Status | Description |
|-----------------------|---|
| Submitted | Organization has intentionally submitted a completed submittal element to CERS (or a regulator's data system) to meet their facility reporting requirements. Depending on the submittal element and local practices, the regulator may review/accept the submittal element. |
| Under Review | Regulator intends to review/accept the submitted submittal element. |
| Accepted | Regulator has reviewed the submittal element and finds the data/documents meet state and local reporting requirements. |
| Not Accepted | Regulator has reviewed the submittal element and finds the data/documents do not meet state and local reporting requirements. The organization must make a new submission for the submittal element. |
| Not Applicable | Regulator has reviewed the submittal element and finds the facility's organization is not required to submit the data to the regulator. |
| Draft | Organization has initiated a submittal element in CERS (or a regulator's data system), but has not yet intentionally submitted it to a regulator for review/acceptance. |

Supplement Documentation for Submittal Elements

- ▶ UP mandates result in needed supplemental documentation for some *Submittal Elements*.
- ▶ Some *Submittal Elements* can't be submitted into CERS2 until supplemental documentation is addressed.
- ▶ Examples:
 - Inventory Submittal Element must include a site plan/map doc.
 - ER/Training Plan Submittal Element must include ER and employee training plan docs.

Organization Options for Docs

- ▶ Organizations can choose one of the following options for each supporting document:
 - Upload one or more docs (25MB max per doc)
 - Provide publicly available URL
 - Document previously provided to regulator
 - Document stored on-site per regulator agreement
 - Explain why Facility exempt from doc requirement
- ▶ Regulator should reject submittal element if an inappropriate supporting documentation option was selected (e.g., facility is not exempt).

No Edits of Facility Submittals

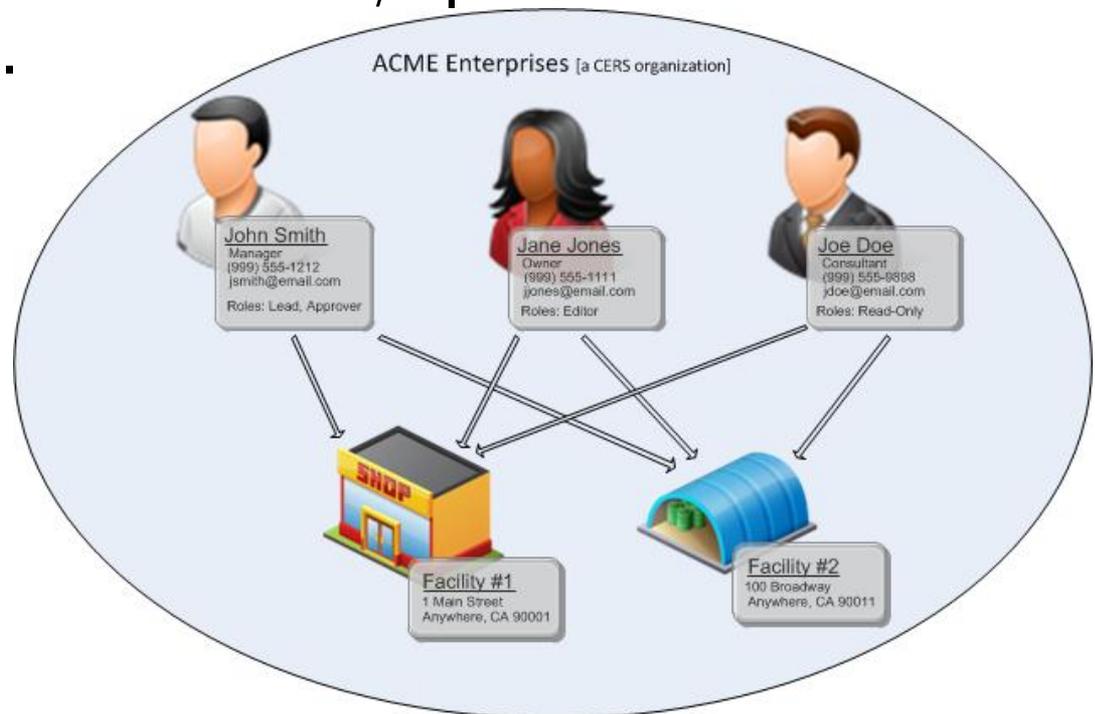
- ▶ Once submitted, an organization can't edit a *Submittal Element*—can only copy and submit a new updated/corrected one.
- ▶ Regulator's can only edit the Submittal Status and comments for a *Submittal Element*.
- ▶ Regulator finalizes Submittal Status by setting to *Approved*, *Not Approved*, or *Not Applicable*.
- ▶ Once *Submitted* by an Organization, regulator data systems must send facility submittals to CERS2 within 15 days, regardless of review status.

CME Data

- ▶ CME [US EPA Acronym]
= “Compliance, Monitoring, & Enforcement”
= ~ Inspection + Violation + Enforcement data
- ▶ Edits/updates allowed for CME data, unlike facility submittals (e.g., RTC dates).
- ▶ Likely policy: Submit CME data to CERS **at least** quarterly (within 45 days).
- ▶ CERS2 designed to manage CME detail data (i.e., violations), but can accept summary data. Some UPA reports to Cal/EPA can't be generated without detail data.

CERS2 “Organizations”

- ▶ Organizations allow a set of users to manage in CERS2 *multiple* facilities owned/operated by a *single* business.
- ▶ A user’s rights are same for all of the Organization’s facilities.
- ▶ Regulators need to look up & provide CERS2 Organization ID for new facilities whenever possible (including facility seeding)



All CUPAs use CERS2 for...

- ▶ Even if CUPA implements all reporting via their local data systems, ALL CUPAs must use CERS2 user interface for:
 - Review/approve organization user access requests (e.g., facility change of owner/operator)
 - Review/approve regulator user access requests.
 - Manage **Facility**→**Submittal Element**→**Regulator** assignments.
 - Update contacts in Cal/EPA's CUPA Directory.

CERS2 Submittal/Data Validation

- ▶ Organizations preparing Facility Submittals using CERS2 will be required to provide:
 - Correct data types (e.g., numbers in numeric fields),
 - Minimally-required fields (as earlier identified by CRUG),
 - All necessary UPCFs and supplement documentation for each submittal element.
- ▶ These same rules will need to be implemented in local web portals so they can successfully submit data to CERS2.
- ▶ More data validations will be added over time to assist submitters & reduce regulator review

Initial Data “Seeding” to CERS2

- ▶ Regulators can “seed” new facilities in CERS2 (and update existing facilities) by submitting data as a “Draft” submittal later reviewed and submitted by the facility owner/operator.
- ▶ Seeding only of *Facility Information* and *Hazardous Material Inventory* Submittal Elements using XML or specific Excel template.
- ▶ All “seeding” data must be correct type/format and have values for minimally required fields.
- ▶ Much effort to resolve differences between CERS & local facility records, plus identify multi-facility organizations.

Questions?

Please contact:

- ▶ CERS Help Center
- ▶ Dan Firth

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