

Listing of Business Critical Locally Collected Fields as Reported by UPAs in November 2010

Row #	Field Name	Justification / Comments	Local Agencies
3	Billing Contact Name(s)	<p>This is necessary for Solano County to ensure billing accurately mailed to for payment . Solano County conducting inspections to get this information results in cost to the agency without obtaining payment</p> <p>Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS</p> <p>Without this information, businesses would be required to go to our portal and provide it there or submit paperwork to our department.</p> <p>If these fields are not added to CERS Sunnyvale will include them in the local system developed for billing and program tracking purposes.</p>	Kern, Tehema, Santa Clara County Fire, Sunnyvale, Monterey
4	Billing Contact email address	<p>Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS</p>	Santa Clara County Fire, Monterey
5	Billing Address	<p>This is necessary for Solano County to ensure billing accurately mailed to for payment. Solano County conducting inspections to get this information results in cost to the agency</p> <p>Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS</p> <p>This data is critical for our agency to meet its obligations as a CUPA for billing.</p> <p>This data is critical for our agency to meet its obligations as a CUPA for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing.</p> <p>are mission critical because they are information vital to Unified Program billing activities. Collecting those data elements by means other than CERS would be cumbersome and potentially costly on an ongoing basis from a labor standpoint</p> <p>Without this information, businesses would be required to go to our portal and provide it there or submit paperwork to our department.</p>	Kern, Solano, Tehema, Santa Clara County Fire, Sunnyvale, San Bernardino, Roseville, Monterey
6	Billing City	<p>This is necessary for Solano County to ensure billing accurately mailed to for payment. Solano County conducting inspections to get this information results in cost to the agency without obtaining payment</p> <p>Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS</p> <p>If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing.</p> <p>This data is critical for our agency to meet its obligations as a CUPA for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing.</p>	Kern, Solano, Tehema, Santa Clara County Fire, Sunnyvale, San Bernardino, Monterey

		are mission critical because they are information vital to Unified Program billing activities. Collecting those data elements by means other than CERS would be cumbersome and potentially costly on an ongoing basis from a labor standpoint	
		Without this information, businesses would be required to go to our portal and provide it there or submit paperwork to our department.	
7	Zip Code	This is necessary for Solano County to ensure billing accurately mailed to for payment. Solano County conducting inspections to get this information results in cost to the agency without obtaining payment	Kern, Solano, Tehema, Santa Clara County Fire, Sunnyvale, San Bernardino, Monterey
		Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS	
		This data is critical for our agency to meet its obligations as a CUPA for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing.	
		are mission critical because they are information vital to Unified Program billing activities. Collecting those data elements by means other than CERS would be cumbersome and potentially costly on an ongoing basis from a labor standpoint	
		Without this information, businesses would be required to go to our portal and provide it there or submit paperwork to our department.	
8	Phone	This is necessary for Solano County to ensure billing accurately mailed to for payment. Solano County conducting inspections to get this information results in cost to the agency without obtaining payment	Kern, Solano, Tehema, Santa Clara County Fire, Sunnyvale, Monterey
		Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS	
		Without this information, businesses would be required to go to our portal and provide it there or submit paperwork to our department.	
9	Business Operator Email address	Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS	Tehema, Santa Clara County Fire, Sunnyvale, Monterey
		E-mail addresses are useful to disseminating compliance info. However, it could be that once everyone is on board with CERS, we'll have that info via CERS & won't need to also collect it thru HMBP filings. Again, though, CERS filings may be done by consultants/contractors, & they may not be the folks to contact for communicating compliance information to the actual businesses.	Sonoma
10	Business Owner Email address	Needed to properly coordinate our (PA) billing with the CUPA. If the additional billing fields are not added to CERS we will need to maintain our facility information layout in our File Maker Database and thus continue to use File Maker as well as CERS	Tehema, Santa Clara County Fire, Monterey
22	Invoice and permit Mailing address	1. This data is critical for our agency to meet its obligations as a CUPA for placement of businesses into appropriate regulatory programs and for billing. 2. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each business that submitted a permit application before placement into appropriate regulatory programs could be determined, as well as contacting each of our ~7,000 regulated businesses every year to determine whether they had either an increase or decrease in number of employees that would move them into a different permit category.	San Bernardino, Sunnyvale
		If these fields are not added to CERS Sunnyvale will include them in the local system developed for billing and program tracking purposes.	

24	Property Owner	Since the property owner is ultimately responsible for compliance on their property, the contact info is useful to us when we fail to achieve compliance, either as the result of an annual renewal application or an outstanding NOV. If we did not receive this info via CERS, we would most likely ask for it on the billing statement. However, we'd really like to avoid having to ask for any facility related data (i.e. info not directly related to billing) on the billing statement.	San Francisco, Roseville, Sonoma
		We use them for invoicing & for contact info, which can relate directly to compliance v. simply billing. For example, for mailing information related to compliance issues, we need a mailing address, since in certain cases, the site address is not where the mail should go (esp. with larger entities that have one compliance person handling everything v. individual site managers). Property owner info can be helpful when sites close & do not remove hazardous materials or hazardous wastes, for emergency response purposes, & for site cleanup issues.	
25	Property Owner Phone number	Since the property owner is ultimately responsible for compliance on their property, the contact info is useful to us when we fail to achieve compliance, either as the result of an annual renewal application or an outstanding NOV. If we did not receive this info via CERS, we would most likely ask for it on the billing statement. However, we'd really like to avoid having to ask for any facility related data (i.e. info not directly related to billing) on the billing statement.	San Francisco, Roseville
26	PropertyOwnerMailingAddress	We use them for invoicing & for contact info, which can relate directly to compliance v. simply billing. For example, for mailing information related to compliance issues, we need a mailing address, since in certain cases, the site address is not where the mail should go (esp. with larger entities that have one compliance person handling everything v. individual site managers). Property owner info can be helpful when sites close & do not remove hazardous materials or hazardous wastes, for emergency response purposes, & for site cleanup issues.	Sonoma
27	PropertyOwnerCity	Same	Sonoma
28	PropertyOwnerState	Same	Sonoma
29	PropertyOwnerZip	Same	Sonoma
33	Number of Employees	This is necessary for Solano County to ensure billing accurately mailed to for payment. Solano County conducting inspections to get this information results in cost to the agency without obtaining payment	Contra Costa, Solano, San Bernardino
		We use the number of employees as one of the criteria to determine which fee category a facility will be in. The other criteria is the total amount of hazardous materials handled. The number of employees is not easily determined by inspections since the number of employees may change from year to year and most of our inspections are not done annually for the Hazardous Materials Business Plan Program.	
		The reason this is critical is that our permit application and fee schedule are based on this number. Since assignment of permit category cannot be made without this information, placement into appropriate regulatory programs is not possible without this information. This precludes tracking of an inspection, violations, and other related information until this assignment is made. In EnvisionConnect, this corresponds to the General Health Program. If we don't have a place to put this information in CERS, we would have to have a separate signed document every year from the owner/operator that included this information.	
		Discussion: Since our permit application and fee schedule are based on the number of employees, placement into appropriate regulatory programs is not possible without this information. In addition, the number of employees may fluctuate over the course of a year, and we require information affecting permits to be changed on the business plan signed by the owner/operator. If we don't have a place to put this information in CERS, we would have to contact each business applying for a permit before we could assign them to the appropriate regulatory programs, as well as require an annual submission of a signed document that included this information from each owner/operator.	
35	Assessor Parcel Number	This is necessary for Solano County to ensure proper file management and verify the facility's zoning. Many facilities such as gas production facilities do not have addresses and the assessor parcel number is the way to identify the location of these facilities	Solano, Kern

		Sometimes the facility address does not match the one on the County Assessors Data base. Often times, the rural facilities do not have addresses and are located by Township, Range and Section, Latitude and Longitude, or just directions. The facility owners are often better equipped to provide the correct APN #. Row 35 would require staff time to find the facility on maps or in the field in order to determine the APN #. Often times the directions to the facility confusing and staff spends hours just trying to find the site. Kern County has many farms, ranches, cell towers, and oil fields that do not have addresses.	
		Often times, the rural facilities do not have addresses and are located by Township, Range and Section, Latitude and Longitude, or just directions.	
48	Local Site ID	required to connect new CERS records to existing local records. Required for billing and regulatory purposes and should be per program element (UST, HazMat, etc) as different local agencies may be involved. ?The involvement of multiple agencies (each with their own ID#) over a transition period makes use of a single number impossible during the transition as- as we transition, some sites will have CERS numbers, some won't.	Pasadena
		Comment from Dan: Decade client agencies may require a separate number for initial uploading to CERS from Decade's Envision Connect	Various
53		If these fields are not added to CERS Sunnyvale will include them in the local system developed for billing and program tracking purposes.	Sunnyvale
54		Same	Sunnyvale
55		Same	Sunnyvale
56		Same	Sunnyvale
57		Same	Sunnyvale
58		Same	Sunnyvale
59		Same	Sunnyvale
60		Same	Sunnyvale
61		Same	Sunnyvale
62		Same	Sunnyvale
63		Same	Sunnyvale
64		Same	Sunnyvale
84		Same	Sunnyvale
86		Same	Sunnyvale
87		Same	Sunnyvale
Other Input			
	No restriction on local information	Berkeley has collected data beyond the UPCF since 1986. Some of the additional information is physical data and some data is collected for fiscal purposes. The state legislators wrote the 6.95 HSC allowing local jurisdictions to be more stringent than the state and to collect additional information. We were led to believe that CERS would not try to deny CUPAs their legal rights to collect this additional information. If, as I now understand, the CERS is being imposed on us, substantially denying our rights to collect additional information or be more stringent, then I must ask that Cal EPA consider the legality of doing so. If you want to deny locally collected information, then please start with legislators and ask them to change the law. HSC 25500 preamble "The Legislature further finds and declares that this chapter does not occupy the whole area of regulating the inventorying of hazardous materials and the preparation of hazardous materials response plans by businesses and the Legislature does not intend to preempt any local actions, ordinances, or regulations which impose additional or more stringent requirements on businesses which handle hazardous materials. Thus, in enacting this chapter, it is not the intent of the Legislature to preempt or otherwise nullify any other statute or local ordinances containing the same or greater standards and protections." State regulations also state "may establish local standards for the collection of locally required supplemental information in addition to the standards specified in the Unified Program Data Dictionary. (Title 27, Section 15185(h))".	Berkeley

	None	The Nevada County Department of Environmental Health does not collect any local fields, though I like the idea of requiring the NFPA 704 placard numbers for each chemical because we base our permitting on them.	Nevada
	None	We don't collect any extra information locally on the UP Forms. It might be a good idea to keep the ability to do that in the future though, so I recommend: Option 3) to add optional fields that CUPAs and PAs could select for use in their jurisdiction.	Mariposa
	None		Riverside
	None		Livermore
	None	Union City no longer collects additional locally collected information. We would support Option 3 of the three options for the addition of locally collected information but would not object to Option 2.	Union City
	None but with exception	CERS should require just the data fields on the existing forms - Local agencies should be able to collect all the information they want and take responsibility for uploading just the required data to CERS - This would require agencies collecting additional information to provide the only portal for electronic submission and review and forward information to CERS - Agencies just collecting the required information would be able to use the CERS portal - This way agencies collecting additional information bear the cost of collecting the information.	Amador
	?	Data in Rows 3 to 54 have value to us. (No justification provided.)	Orange County Fire Authority
	Add new fields:	Business Activities - UPCF:	San Diego
		MEDICAL WASTE	San Diego
		Generate <200 lbs/month of Medical/Biohazardous Waste? YES NO	San Diego
		Generate ≥200 lbs/month of Medical/Biohazardous Waste? YES NO	San Diego
		Generate ≤200 lbs/month of Medical/Biohazardous Waste and treat any amount of medical waste? YES NO	San Diego
		HANDLE TOXIC GASES with threshold limit concentration (TLV) ≤ 10 ppm in any quantity? YES NO	San Diego
		Owner/Operator Page - UPCF:	San Diego
		Emergency Contacts	San Diego
		Primary Email Address	San Diego
		Secondary Email Address	San Diego
		Chemical Description - UPCF:	San Diego
		o CHECK THIS BOX IF THIS HAZARDOUS MATERIAL IS A TOXIC GAS THAT HAS A THRESHOLD LIMIT VALUE (TLV) < 10 ppm. THIS HAZARDOUS MATERIAL MUST BE INVENTORIED IN ANY QUANTITY.	San Diego
		o CHECK THIS BOX IF THIS HAZARDOUS MATERIAL IS SUBJECT TO RMP REQUIREMENTS AND/OR CAL/ARP REQUIREMENTS	San Diego
		If not added to CERS there would likely be two methods of collection: In the field during an inspection or via loc	San Diego
	Add new field: Billing State	This data is critical for our agency to meet its obligations as a CUPA for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing. If this information weren't included in CERS the cost to our agency would be significant as it would involve contacting each of our ~7,000 regulated businesses to determine the address that should be used for billing.	San Bernardino
	Business Mailing Address City, State, and Zip (they're currently on one line in the data dictionary)	Currently defined in Title 27 as ID 108a, 108b, 108c, and 108d. Four separate lines. I am unable to locate where they are in CERS. Kern County uses this information. I cannot find the information on CERS. It is already in Title 27.	Kern