

Summary of Data Exchange-Related Changes to the Unified Program Data Dictionary (July 2011 Update)

Prepared by the Cal/EPA Unified Program July 2011 [SUPERCEDED]

Summary

This document summarizes necessary corrections, clarifications, and additions to the Unified Program's Data Dictionary needed for successful implementation of electronic data exchange as mandated by AB2286. Most changes were deemed "required" by Cal/EPA Unified Program staff, while some cases changes were recommended and later adopted by the Unified Program Data Management Steering Committee (DMSC) during late 2010 and early 2011.

Data Dictionary Issues

The Unified Program's Data Dictionary in CCR Title 27 was originally adopted in 1999, prior to the widespread use of XML as a data exchange technology, the much lower cost of data storage in the present day, and AB 2286 mandates for electronic reporting. This results in a number of problems with the existing data dictionary, including:

- Overly short field lengths were designed to reduce data storage costs or accommodate paper forms, forcing truncated and less useful/clear data.
- Some fields were not structured to correctly capture multiple values.
- Some fields don't reflect current federal data standards and/or are not ideally crafted for XML-based data exchange.
- Some fields definitions included inconsistencies/errors that needed to be corrected (e.g., field lengths did not match length of code values, code values were inconsistently implemented for similar fields, etc.).

This document reflects a thorough review of the entire Title 27 data dictionary by the Cal/EPA Unified Program staff. It summarizes **required changes** that had to be made to implement CERS electronic data exchange, **required corrections** of Title 27 fields and/or UPCF forms, and **recommended** changes adopted by the DMSC that ensure data consistency into the future and ease of data entry by users. In some cases the changes were partially influenced by already collected data from UNIDOCS/CERS1, where data field lengths were not consistently applied to all data fields. In most cases these changes will have little if any impact on businesses or UPAs. However, UPAs using CERS as their primary business reporting tool who plan on exchanging data with CERS using their local systems may be impacted.

Future Rulemaking

Cal/EPA intends to pursue a rulemaking process to incorporate all the changes identified in this document into Unified Program regulations.

Document Organization

- This initial discussion section and a Table of Contents.
- A section on field changes spanning multiple portions of the Data Dictionary.
- A section on field changes for specific Data Dictionary fields/section.
- A section of notes identifying and/or clarifying changes made and other issues.

Data Registry

A searchable database of the updated/revised Unified Program Data Dictionary and the original Title 27 Data Dictionary is available at: <https://cers.calepa.ca.gov/Data/Registry/>

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SUPERCEDED

A. Changes Spanning Multiple Title 27 Chapters/UPCF Forms

Addition of CERS ID Field (#1a)

Status	REQUIRED
Description	The numeric nine digit CERS ID will be assigned exclusively by the CERS system. Initial values started at 100000001. CERS IDs are assigned to a physical facility, and normally do not change when a facility's owners/operators change.
Rationale	CERS requires a fixed, non-changeable ID for each physical facility. The existing Facility ID definition includes geographic/jurisdictional elements that have and will change over time (e.g., merging/separating UPAs, newly incorporated cities). The Facility ID's six digit unique number may eventually not be large enough for UPAs with many facilities. Using a numeric primary identifier for facilities will allow more rapid and cost-effective report generation in CERS.
Impacts	Field added to all tables which include the <i>Facility ID</i> field (#1). Chapter 1: Business Activities Chapter 1: Business Owner / Operator Identification Chapter 2: Hazardous Materials Inventory - Chemical Description Chapter 3: Underground Storage Tank - UST Certification of Installation/Modification Chapter 3: Underground Storage Tank - UST Monitoring Plan Chapter 3: Underground Storage Tank - UST Operating Permit Application-Facility Information Chapter 3: Underground Storage Tank - UST Operating Permit Application-Tank Information Chapter 4: Hazardous Waste - Certification of Financial Assurance Chapter 4: Hazardous Waste - Hazardous Waste Tank Closure Certification Chapter 4: Hazardous Waste - Onsite Hazardous Waste Treatment Notification - Facility Chapter 4: Hazardous Waste - Onsite Hazardous Waste Treatment Notification - Unit Chapter 4: Hazardous Waste - Onsite Tiered Permitting - Waste and Treatment Process Combinations Chapter 4: Hazardous Waste - Recyclable Materials Chapter 4: Hazardous Waste - Recyclable Materials Chapter 4: Hazardous Waste - Remote Waste Consolidation Site Annual Notification Chapter 5: Compliance Activity Information (Previously Approved) Chapter 5: Inspection Information (Previously Approved) Chapter 5: Enforcement Information (Previously Approved) Chapter 5: Violation Information (Previously Approved)

Change Type of Obvious Numeric Fields from Alphanumeric to Numeric

Status	REQUIRED
Description	Redefine obvious numeric fields from alphanumeric to numeric types.
Rationale	There are many data dictionary fields that are obviously numeric but have an alphanumeric type. To reduce ambiguity and ensure data consistency, all of these fields should be re-defined as numeric types. These changes will also support more cost effective and rapid reports generation in CERS.
Impacts	#437 Number of Compartments in the Unit #519 Total Number of Recyclable Materials [field was dropped as part of June 2011 changes] #602a Number of Units = CESQT #602b Number of Units = CESW #602c Number of Units = CA #602d Number of Units = PBR #602e Number of Units = CEL #602f Number of Units = CE-CL #602g Number of Units = Total #608 Number of Tanks (Onsite Hazardous Waste Facility) #609 Number of Containers/Treatment Areas

#611	Monthly Treatment Volume
#746a	Concentration of Flammable Vapor 1 = top
#746b	Concentration of Flammable Vapor 1 = center
#746c	Concentration of Flammable Vapor 1 = bottom
#747a	Concentration of Oxygen 1 = top
#747b	Concentration of Oxygen 1 = center
#747c	Concentration of Oxygen 1 = bottom
#749a	Concentration of Flammable Vapor 2 = top
#749b	Concentration of Flammable Vapor 2 = center
#749c	Concentration of Flammable Vapor 2 = bottom
#750a	Concentration of Oxygen 2 = top
#750b	Concentration of Oxygen 2 = center
#750c	Concentration of Oxygen 2 = bottom
#752a	Concentration of Flammable Vapor 3 = top
#752b	Concentration of Flammable Vapor 3 = center
#752c	Concentration of Flammable Vapor 3 = bottom
#753a	Concentration of Oxygen 3 = top
#753b	Concentration of Oxygen 3 = center
#753c	Concentration of Oxygen 3 = bottom
Note: All of the Concentration fields are expressed as a percentage using format xx.xx	
#919	Final Fine or Penalty Assessed
#920	Supplemental Environmental Projects Value

Lengthen Chemical Name-related fields

Status	Recommended; Approved by DMSC
Description	Change chemical name-related fields from the current AN(60) to AN(500).
Rationale	Chemical and chemical component names can potentially have very long names. Existing UNIDOCs/CERS1 chemical data (which could be considered a snapshot of statewide data) includes hundreds of chemicals that exceed the current AN(60) definition for the various chemical name fields in the Data Dictionary. There are no clear federal data standards for chemical name length. Based upon a review of the US EPA Federal Substance Registry, a length of AN(500) will capture 99.99% of the chemicals in that registry.
Impacts	Lengthen the field names shown below from AN(60) to AN(500): #205 Chemical Name #207 Common Name #227 Hazardous Component 1 Name #231 Hazardous Component 2 Name #235 Hazardous Component 3 Name #239 Hazardous Component 4 Name #243 Hazardous Component 5 Name #521 Common Name(Recyclable Materials) #528 Hazardous Constituent 1 #534 Hazardous Constituent 2 #540 Hazardous Constituent 3 #546 Hazardous Constituent 4

Change Formatting and length of Date-Related Fields [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Change length of all 29 date-related fields from 8 to 10 characters and the formatting from YYYYMMDD to YYYY-MM-DD to match modern data exchange formats (i.e., XML Date datatype).
Rationale	The Title 27 lists nearly 30 date-related fields of type "D" (date) but with a length of 8 characters formatted as YYYYMMDD. Dates stored in database systems are always stored in

	<p>some internal representation that does not match this format, and modern XML-based data exchanges require dates to be formatted as 10 characters with dashes: YYYY-MM-DD. Cal/EPA has determined changing the format/length of these 29 date-related fields is appropriate because Title 27 clearly indicates these fields should be expressed as a date type and the XML Date datatype is of the format YYYY-MM-DD, and Cal/EPA has statutory authority to identify an XML-based data exchange format.</p>
Impacts	<p>#100 Beginning Date #101 Ending Date #134 Date Identification Signed #424 Date Certified (UST Facility) #430-a Date UST Permanently Closed #430-b Date Existing UST Discovered #435 Date UST System Installed #470 Date Certified #483b Work Authorized under Permit (Number or Date) #484 Date Certified #490-77 Date [certified] #500 Beginning Date of Reporting Period #501 Ending Date of Reporting Period #515 Date (Recyclable Materials) #603 Date Certified (Onsite Hazardous Waste Facility) #617 Secondary Containment Installation Date #707 Date of Closure Assurance Mechanism #716 Date Certified (Financial Assurance) #730 Date Certified (Remote Consolidation) #759 Date Certified (Tank Closure) #906 Inspection Date #917 Date Returned to Compliance #913e Date Red Tag Affixed #913f Date Red Tag Removed #915 Date of Enforcement Action #917a Date a Referred Case Settled or Dropped #932 Violation Date #933 Violation Scheduled Return to Compliance Date #934 Violation Actual Return to Compliance Date</p>

Contact/Address Related Changes

Lengthen City Address Fields

Status	Recommended; Approved by DMSC
Description	Lengthening of the City address-related fields from AN(20) to AN(60).
Rationale	The current UNIDOCS/CERS1 data set includes several hundred records where the City is longer than 20 characters. The current Federal NEIEN facility identification data exchange standard for <i>Locality Name</i> is AN(60).
Impacts	<p>#104 City (Business) #108b Business Mailing Address City #114 Business Owner City #120 Environmental Contact City #410 Property Owner City #417 Tank Owner City #428-4 Tank Operator City #508 City (Offsite Generator) #512 City for Mailing Address (Offsite Generator) #712 Financial Institution or Surety City #722 City (Remote Consolidation)</p>

#742	Tank Owner City (Closure)
#757	Certifier City (Tank Closure)

Lengthen ZIP Code Fields

Status	REQUIRED
Description	Lengthening of ZIP Code-related fields from AN(9) to AN(10). Format is 99999, 99999-9999, or international postal codes with dashes as necessary.
Rationale	AN(10) allows for a full range of international postal codes. The current Federal NEIEN facility identification data exchange standard for Mailing Address Postal Code is AN(14). However, Cal/EPA has not found sufficient justification to warrant more than 10 characters. By extending the field by one digit, we can support all international postal codes (with dashes) as well as US ZIP or ZIP+4 values (with dashes).
Impacts	#105 ZipCode #108d Business Zip Code #116 Business Owner Zip Code #122 Environmental Contact Zip Code #412 Property Owner Zip Code #419 Tank Owner Zip Code #428-6 Tank Operator Zip Code #510 Zip Code (Offsite Generator) #514 Zip Code for Mailing Address (Offsite Generator) #714 Financial Institution or Surety Zip Code #723 Zip Code (Remote Consolidation) #744 Tank Owner Zip Code (Closure)

Lengthen Phone Number Fields

Status	REQUIRED
Description	Lengthening of phone number fields from AN(15) to AN(25).
Rationale	The existing Title 27 definition for phone number fields specifies an area code, 7 digit number, and an extension. The current standard would not work for longer extension numbers. Additionally, some phone numbers will be international numbers with other length/formatting issues. The current Federal NEIEN facility identification data exchange standard for phone fields is AN(25).
Impacts	#102 Business Phone #110 Business Operator Phone #112 Business Owner Phone #118 Environmental Contact Phone #125 Primary Emergency Contact Business Phone Number #126 Primary Emergency Contact 24-Hour Phone #127 Primary Emergency Contact Pager Number #130 Secondary Emergency Contact Business Phone #131 Secondary Emergency Contact 24-Hour Phone #132 Secondary Emergency Contact Pager Number #408 Property Owner Phone #415 Tank Owner Phone #425 Applicant Phone (UST Facility) #428-2 Tank Operator Phone #487 Phone number #507 Phone (Offsite Generator) #758 Certifier Phone (Tank Closure)

Addition of Country Fields for Addresses

Status	REQUIRED
Description	Addition of an AN(45) Country field to addresses which could potentially be out-of-state. All data exchanges should assume the default/assumed value is "United States". The formatting instructions for these fields will include the following: Specify the full country name as shown in the USPS International Mail Manual. If no country is provided, the value will default to "United States".
Rationale	Aside from a facility's actual physical address which must be within California, there are several other sets of address fields in Title 27 for which entities/contacts will have an international address. Addition of this field will capture these cases. The current Federal NEIEN facility identification data exchange standard for Country Name is AN(45).
Impacts	Address-Related Fields for which <i>Country</i> field would be added: <ul style="list-style-type: none"> • Owner/Operator Identification: #116a Business Owner , #122a Environmental Contact • Underground Storage Tank Permit: #412a Property Owner, #419a Tank Owner, #428-7 Tank Operator • Hazardous Waste Certification of Financial Assurance: #714a Financial Institution or Surety • Hazardous Waste Closure Certification: #744a Tank Owner • Hazardous Waste Recyclable Materials: #510a Street Address (Offsite Generator), #514a Mailing Address (Offsite Generator) • Hazardous Waste Remote Waste Consolidation Site Notification: #723a Remote Consolidation (street address)

Lengthen Name-related Fields

Status	Recommended; Approved by DMSC
Description	Expand various Title 27 "name" fields that imply a complete first/last name (or potentially an organization name) from various shorter standards (20-35 characters) to an AN(80) standard.
Rationale	Most of these fields are too short for longer personal or organizational names, forcing business/organization users to abbreviate/truncate data and reduce its clarity. The current Federal NEIEN facility identification data exchange standard for similar fields is AN(80).
Impacts	<ul style="list-style-type: none"> #109 Business Operator Name #111 Business Owner Name #117 Environmental Contact Name #123 Primary Emergency Contact Name #128 Secondary Emergency Contact Name #135 Document Preparer Name (Identification) #136 Name of Signer of Identification #406 Supervisor of Division, Section, or Office (Required for Public Agencies Only) #407 Property Owner Name #414 Tank Owner Name #426 Applicant Name (UST Facility) #428-1 Tank Operator Name #471 Applicant Name #482a Name of Contractor Who Performed the Installation/Modification #485 Certifier's Name #488 Name of Certifier's Employer #490-72 Name of first person having responsibility #490-74 Name of second person having responsibility #490-78 Applicant Name #504 Offsite Generator Name #516 Name of Document Preparer (Recyclable Materials) #517 Certifier Name (Recyclable Materials) #604 Owner/Operator Name (Onsite Hazardous Waste Facility) #710 Financial Institution or Surety Name #717 Owner/Operator Name (Financial Assurance) #731 Owner/Operator Name (Remote Consolidation)

#740	Tank Owner Name (Closure)
#754	Certifier Name (Tank Closure)

Lengthen Title Fields

Status	Recommended; Approved by DMSC
Description	Expand various Title 27 title-related fields from various shorter standards (25-25 characters) to an AN(50) standard.
Rationale	Many of these fields are too short for data already captured in UNIDOCs/CERS1. Shorter field lengths force business/organization users to abbreviate/truncate data and reduce its clarity. The current Federal NEIEN facility identification data exchange standard for similar fields is AN(50).
Impacts	<ul style="list-style-type: none"> #124 Primary Emergency Contact Title #129 Secondary Emergency Contact Title #137 Title of Signer of Identification #427 Applicant Title (UST Facility) #472 Applicant Title #486 Certifier's Title #490-73 Title of first person having responsibility #490-75 Title of second person having responsibility #490-79 Applicant Title #518 Certifier Title (Recyclable Materials) #605 Owner/Operator Title (Onsite Hazardous Waste Facility) #718 Owner/Operator Title (Financial Assurance) #755 Certifier Title (Tank Closure) #732 Owner/Operator Title (Remote Consolidation)

Lengthen Email-related Fields [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Expand various Title 27 email-related fields from AN(70) to AN(254) to match the longer values permitted for emails and more commonly used in various data exchanges.
Rationale	The format of email addresses is formally defined internationally in RFC 5322 (mostly section 3.4.1) and RFC 5321 with 254 characters being the practical upper limit. Various US EPA exchange standards range from 120 (FacID) to 240 (RCRAInfo 5.2). Since email addresses are of no value if they are truncated, the data dictionary should be modified to capture the longest likely email address.
Impacts	<ul style="list-style-type: none"> #119a Environmental Contact Email Address #142 Billing Contact Email Address

B. Changes for Specific Title 27 Chapters/UPCF Forms

Business Activities Field Changes

Drop Upgrade/Install Underground Storage Tank Field (#6)

Status	Recommended; Approved by DMSC
Description	Drop Field #6 <i>Upgrade/Install Underground Storage Tank</i> , which is an AN(1) Y/N field on the Business Activities portion of the data dictionary for reporting if a facility intends to install or upgrade a UST. This field is not currently implemented on the Business Activities UPCF of CERS1 forms.
Rationale	The UST Tank form captures similar information.
Impacts	Drop Field #6

Drop Underground Storage Tank Closure Field (#7)

Status	Recommended; Approved by DMSC
Description	Drop Field #7 <i>Underground Storage Tank Closure</i> , which is an AN(1) Y/N field on the Business Activities portion of the Data Dictionary to report if the facility intends to install or upgrade a UST. This field is not currently implemented on the Business Activities UPCF of CERS1 forms.
Rationale	The UST Tank form captures similar information.
Impacts	Drop Field #7

Drop Local Requirements Field (#15)

Status	REQUIRED
Description	This <i>Local Requirements</i> field for Business Activities has an undefined type/length in the Data Dictionary.
Rationale	CERS will include a data dictionary of locally collected fields defined at the state level that can be electronically exchanged, eliminating the general need for this field. Cal/EPA wishes to eliminate this field to reduce confusion to reporters. See also “Business Activities Comments” field below.
Impacts	Drop the Local Requirements field (#15)

Add Business Activities Comments Field (#16)

Status	Recommended; Approved by DMSC
Description	AN(500)
Rationale	Reporters could use this optional field to provide additional information about their facility’s business activities that cannot be captured in other fields.
Impacts	Add new AN(500) field #16 called <i>Business Activities Comments</i>

Owner/Operator Information Field Changes

Change Type of Dun and Bradstreet Field to Numeric (#106)

Status	REQUIRED
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Description	Change the type of the Owner/Operator information <i>Dun and Bradstreet</i> field from AN(9) to N(9)
Rationale	This is the standard format for a DUNS number, both as defined by Dun & Bradstreet and Federal NEIEN standards.
Impacts	Change type of #106 from AN(9) to N(9)

Change Type of SIC Code Field to Numeric (#107)

Status	REQUIRED
Description	Change the SIC field from AN(4) to N(4)
Rationale	The current Federal NEIEN facility identification data exchange standard for SIC codes is represented as a numeric field.
Impacts	Type of Field #107 is changed from AN(4) to numeric.

Change Type of NAICS Code to Numeric (#107a)

Status	REQUIRED
Description	Change the NAICS Code field from AN(6) to N(6).
Rationale	The current Federal NEIEN facility identification data exchange standard for NAICS codes is represented as a numeric field.
Impacts	Type of Field #107a is changed from AN(6) to numeric.

Revision of County Field (#108)

Status	REQUIRED
Description	Drop the existing County field (#108) and replace with a numeric CountyID field (new #105a). Valid values are 1-58, each value assigned to the county name in alphabetic order.
Rationale	The existing county standard AN(35) does not indicate if the word “County” should be included. Its placement/numbering also leaves ambiguity if the county values should relate to the physical facility or the facility mailing address. Existing UNIDOCs/CERS data is very diverse for this field. Replacing with a numeric key and relocating the field closer the facility physical/site address fields will help clarify the usage of this field.
Impacts	Drop the existing County field (#108) Add new CountyID field (#105a).

Renaming of Certain Mailing Address Fields (#108b, 108c, 108d)

Status	Recommended; Approved by DMSC
Description	Include the term “mailing” in the Business City (#108b), Business State (#108c), and Business ZIP Code (#108d) fields names to clarify/differentiate them
Rationale	This is consistent with the naming of the Business Mailing Address field (#108a) and will reduce confusion about how these fields are different from fields #104 (<i>City (Business)</i>) and #105 (<i>ZIP Code (Business)</i>).
Impacts	Change the field names as shown below: <ul style="list-style-type: none"> • #108b “Business City” to “Business Mailing Address City” • #108c “Business State” to “Business Mailing Address State” • #108d “Business ZIP Code” to “Business Mailing Address ZIP Code”

Addition of Facility-information related Locally-Collected Fields (#170-178) [Added June 2011]

Status	Locally-Collected Fields adopted by DMSC during late 2010. Cal/EPA Required Change as of June 2011			
Description	Add the DMSC-adopted Locally Collected Fields (which were all facility information-related) to the Facility Information data fields.			
Rationale	Unified Program regulations provide latitude for UPAs to identify and collect locally-required information. However, the implementation of locally-collected data in the Title 27 Data Dictionary (fields #15, #133, #246) is not viable for electronic XML data transfer. In late 2010 based upon UPA feedback, the DMSC adopted a small set of optional fields which would be included/defined as electronic data transfer fields. Facility operators only need to provide this data if their local regulator explicitly requests the data in these fields. All of the adopted fields related to general facility information. Any future locally-required fields adopted through the DMSC's data dictionary revision policy/process would need to be identified by relevant program and added to the pertinent portion of the Unified Program Data Dictionary.			
Impacts	Add the following fields:			
	170	Assessor Parcel Number	APN formats are assigned by each County and are not standardized statewide.	AN(15)
	171	Number of Employees	Number of employees working at the facility.	N
	172	Property Owner Name	Similar to UP data field #407.	AN(80)
	173	Property Owner Phone	Area code + 7 digit phone number + extension	AN(25)
	174	Property Owner Mailing Address	One or two lines of up to 35 character each.	AN(70)
	175	Property Owner City		AN(60)
	176	Property Owner State	Valid 2-digit state code	AN(2)
	177	Property Owner ZIP Code	5 digit ZIP Code or 5 digit ZIP Code with dash and plus-four code.	AN(10)
	178	Property Owner Country	Default/assumed value is "United States"	AN(45)

Chemical Description Field Changes

Drop Chemical Inventory Add/Delete/Review Field (#200) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Eliminate this numeric field which must be provided on each copy of a <i>Hazardous Materials Inventory-Chemical Description</i> form showing the total count of such forms in the facility's submittal.
Rationale	Cal/EPA has determined the most simple and efficient approach to electronically submitting changes to a chemical inventory (or any submittal element for a facility) is to send a complete new/updated copy of the data. This kind of copy/edit/submit process will be simple to do in the CERS user interface or businesses who manually enter data, and could be easily performed by businesses (and UPAs) storing inventory data in a data management system. This field will be eliminated from the data dictionary because it reflects a paper-based process where a field was needed to indicate if a paper form reflected an update or deletion of a chemical from their inventory.
Impacts	#200 Add/Delete/Revise

Revision of Chemical Description Fire Code Hazard Classes Field (#210)

Status	REQUIRED														
Description	The existing AN(60) Fire Code Hazard Class field (#210) is an optional field for businesses to complete based on local UPA requirements. This field would be dropped and replaced by 8 new numeric fields (#210a-#210h) with numeric code values for each hazard class. The numeric code values will be assigned by the Cal/EPA Unified Program, and will reflect the current list of California Fire Code Hazard Classes. IDs will not be reused to ensure preserving historical records, so codes of up to three digits may ultimately be supported.														
Rationale	While #210 is not a required field for all facilities statewide, businesses need a statewide definition for electronic reporting. The existing field (#210) is too vague and does not provide sufficient guidance at the statewide level for successful electronic data exchange. The names of the first two hazard codes begin with primary/secondary to indicate hazard codes should be reported in order of their precedence/hazardousness. However the remaining names were simplified based upon DMSC guidance.														
Impacts	<p>Fields Dropped:</p> <ul style="list-style-type: none"> #210, Fire Code Hazard Classes <p>Fields Added:</p> <ul style="list-style-type: none"> #210a, Primary Fire Code Hazard Class N(3) #210b, Secondary Fire Code Hazard Class N(3) #210c, Third Fire Code Hazard Class N(3) #210d, Fourth Fire Code Hazard Class N(3) #210e, Fifth Fire Code Hazard Class N(3) #210f, Sixth Fire Code Hazard Class N(3) #210g, Seventh Fire Code Hazard Class N(3) #210h, Eighth Fire Code Hazard Class N(3) <p>Codes shared by all added fields (This list may be altered slightly based upon final feedback from the State Fire Marshall's office).</p> <table> <tr> <td>1-Carcinogen</td> <td>21-Oxidizing Gas, Gaseous</td> </tr> <tr> <td>2-Combustible Liquid, Class II</td> <td>22-Oxidizing Gas, Liquefied</td> </tr> <tr> <td>3-Combustible Liquid, Class III-A</td> <td>23-Organic Peroxide, Class I</td> </tr> <tr> <td>4-Combustible Liquid, Class III-B</td> <td>24-Organic Peroxide, Class II</td> </tr> <tr> <td>5-Corrosive</td> <td>25-Organic Peroxide, Class III</td> </tr> <tr> <td>6-Cryogen</td> <td>26-Organic Peroxide, Class IV</td> </tr> <tr> <td>7-Explosive</td> <td>27-Other Health Hazard</td> </tr> </table>	1-Carcinogen	21-Oxidizing Gas, Gaseous	2-Combustible Liquid, Class II	22-Oxidizing Gas, Liquefied	3-Combustible Liquid, Class III-A	23-Organic Peroxide, Class I	4-Combustible Liquid, Class III-B	24-Organic Peroxide, Class II	5-Corrosive	25-Organic Peroxide, Class III	6-Cryogen	26-Organic Peroxide, Class IV	7-Explosive	27-Other Health Hazard
1-Carcinogen	21-Oxidizing Gas, Gaseous														
2-Combustible Liquid, Class II	22-Oxidizing Gas, Liquefied														
3-Combustible Liquid, Class III-A	23-Organic Peroxide, Class I														
4-Combustible Liquid, Class III-B	24-Organic Peroxide, Class II														
5-Corrosive	25-Organic Peroxide, Class III														
6-Cryogen	26-Organic Peroxide, Class IV														
7-Explosive	27-Other Health Hazard														

8-Flammable Gas	28-Pyrophoric
9-Flammable Liquid, Class I-A	29-Radioactive
10-Flammable Liquid, Class I-B	30-Sensitizer
11-Flammable Liquid, Class I-C	31-Toxic
12-Flammable Solid	32-Unstable(Reactive), Class 1
13-Highly Toxic	33-Unstable(Reactive), Class 2
14-Irritant	34-Unstable(Reactive), Class 3
15-Liquified Petroleum Gas	35-Unstable(Reactive), Class 4
16-Magnesium	36-Water Reactive, Class 1
17-Oxidizing, Class 1	37-Water Reactive, Class 2
18-Oxidizing, Class 2	38-Water Reactive, Class 3
19-Oxidizing, Class 3	39-Other
20-Oxidizing, Class 4	

Revision of Units (Inventory) Field (#221)

Status	REQUIRED; Direction Provided and Approval Given by DMSC													
Description	Modify the data dictionary values for Chemical Description field #221 <i>Units (Inventory)</i> to match the values and order shown on the Chemical Description UPCF.													
Rationale	<p>Field #221 describes which unit of measure is most appropriate for the material being reported. The values in the UPCF form are not represented in the same order or code values as the Title 27 Data Dictionary. The CERS screen is missing an option value for 'Tons'.</p> <table border="1" data-bbox="360 808 1469 989"> <tr> <td>221</td> <td>Units (Inventory)</td> <td>a = cubic feet b = pounds c = tons d = gallons</td> <td>1</td> <td>AN</td> <td>Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).</td> </tr> </table> <p>UPCF Form (CERS1 is similar)</p> <table border="1" data-bbox="360 1031 1469 1087"> <tr> <td>UNITS* (Check one item only)</td> <td><input type="checkbox"/> a. GALLONS</td> <td><input type="checkbox"/> b. CUBIC FEET</td> <td><input type="checkbox"/> c. POUNDS</td> <td><input type="checkbox"/> d. TONS</td> <td>221</td> <td>DAYS ON SITE:</td> </tr> </table> <p>* If EHS, amount must be in pounds.</p> <p>The DMSC directed that the values on the UPCF form should take precedence over the data dictionary values since there is vastly more legacy forms based on the UPCF than electronic records based on the Data Dictionary.</p>	221	Units (Inventory)	a = cubic feet b = pounds c = tons d = gallons	1	AN	Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).	UNITS* (Check one item only)	<input type="checkbox"/> a. GALLONS	<input type="checkbox"/> b. CUBIC FEET	<input type="checkbox"/> c. POUNDS	<input type="checkbox"/> d. TONS	221	DAYS ON SITE:
221	Units (Inventory)	a = cubic feet b = pounds c = tons d = gallons	1	AN	Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).									
UNITS* (Check one item only)	<input type="checkbox"/> a. GALLONS	<input type="checkbox"/> b. CUBIC FEET	<input type="checkbox"/> c. POUNDS	<input type="checkbox"/> d. TONS	221	DAYS ON SITE:								
Impacts	Data Dictionary field values for #221 changed to: a = gallons; b = cubic feet; c = pounds; d = tons													

Revision of Storage Container=Other Field (#223r)

Status	REQUIRED
Description	Chemical Description field #223r (<i>Storage Container=Other</i>) is defined in the data dictionary as an AN(30) field allowing a reporter to describe an alternate container type in which hazardous materials are stored. UPCF and CERS1 forms currently express this field as a checkbox rather than a free form text field.
Rationale	To better align this field with the pattern used in the rest of the data dictionary, this field should be turned into a AN(1) field accepting values of Y or N, and a new field should be added (#223r-1) called <i>Specify Other Storage Container</i> .
Impacts	Change type of Field #223r from AN(30) to AN(1) accepting values of Y or N. Add new field #223r-1 called Specify Other Storage Container that is AN(30).

Revision of Storage Pressure Field (#224)

Status	REQUIRED; Direction Provided and Approval Given by DMSC
Description	Modify the data dictionary values for Chemical Description field #221 <i>Storage Pressure</i> to

	match the values and order shown on the Chemical Description UPCF.						
Rationale	<p>Chemical Description field #224 <i>Storage Pressure</i> is a AN(1) field representing the pressure at which a hazardous material is stored. The codes/values on the UPCF do not match the values specified in the data dictionary.</p> <table border="1"> <tr> <td>224</td> <td>Storage Pressure</td> <td>a = ambient b = below ambient c = above ambient</td> <td>1</td> <td>AN</td> <td>Pressure at which hazardous material is stored.</td> </tr> </table> <p>UPCF: STORAGE PRESSURE <input type="checkbox"/> a. AMBIENT <input type="checkbox"/> b. ABOVE AMBIENT <input type="checkbox"/> c. BELOW AMBIENT 224</p> <p>The DMSC directed that the values on the UPCF form should take precedence over the data dictionary values since there is vastly more legacy forms based on the UPCF than electronic records based on the Data Dictionary.</p>	224	Storage Pressure	a = ambient b = below ambient c = above ambient	1	AN	Pressure at which hazardous material is stored.
224	Storage Pressure	a = ambient b = below ambient c = above ambient	1	AN	Pressure at which hazardous material is stored.		
Impacts	Data Dictionary field values for #224 changed to: a = ambient; b = above ambient; c = below ambient						

Revision of *Storage Temperature* Field (#225)

Status	REQUIRED; Direction Provided and Approval Given by DMSC						
Description	Modify the data dictionary values for Chemical Description field #225 <i>Storage Temperature</i> to match the values and order shown on the Chemical Description UPCF.						
Rationale	<p>Chemical Description field #225 <i>Storage Temperature</i> is an AN(1) field representing the temperature at which a hazardous material is stored. The codes/values on the UPCF do not match the values specified in the data dictionary.</p> <table border="1"> <tr> <td>225</td> <td>Storage Temperature</td> <td>a = ambient b = below ambient c = above ambient d = cryogenic</td> <td>1</td> <td>AN</td> <td>Temperature at which hazardous material is stored.</td> </tr> </table> <p>UPCF: STORAGE TEMPERATURE <input type="checkbox"/> a. AMBIENT <input type="checkbox"/> b. ABOVE AMBIENT <input type="checkbox"/> c. BELOW AMBIENT <input type="checkbox"/> d. CRYOGENIC 225</p> <p>The DMSC directed that the values on the UPCF form should take precedence over the data dictionary values since there is vastly more legacy forms based on the UPCF than electronic records based on the Data Dictionary.</p>	225	Storage Temperature	a = ambient b = below ambient c = above ambient d = cryogenic	1	AN	Temperature at which hazardous material is stored.
225	Storage Temperature	a = ambient b = below ambient c = above ambient d = cryogenic	1	AN	Temperature at which hazardous material is stored.		
Impacts	Data Dictionary field values for #225 changed to: a = ambient; b = above ambient; c = below ambient; d = cryogenic.						

Revise *Additional Locally Collected Information* Field to *Chemical Description Comments* (#246)

[Modified June 2011]

Status	REQUIRED
Description	The AN(255) field <i>Additional Locally Collected Information</i> will be renamed to <i>Chemical Description Comments</i> and lengthened to AN(1000).
Rationale	<p>Based upon recommendations from the CERS Regulator User Group and approvals from the Unified Program Data Steering Management Committee, electronic collection of locally collected fields will be handled via a defined set of specific locally collected fields, eliminating the need for this field. The field will be renamed to <i>Chemical Description Comments</i> to allow businesses to submit any additional chemical description information they wish to provide or requested by their local regulator.</p> <p>Note: Further data analysis in Spring 2011 indicated the original field length recommendation of AN(500) was insufficient. This version reflects a June 2011 update to AN(1000).</p>

Impacts	Rename field #246 to <i>Chemical Description Comments</i> and change its type from AN(255) to AN(1000).
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Add Additional Mixture Components Field (#247)

Status	REQUIRED
Description	Addition of a new AN(2000) field called <i>Additional Mixture Components</i> to Chemical Description to capture additional hazardous mixture component data (as necessary).
Rationale	A field is needed to capture additional mixture component data beyond the initial five components defined in the data dictionary. This field would capture such data in free text format.
Impacts	Addition of field #247 to <i>Additional Mixture Components</i> as AN(2000).

Add CERS Chemical Library ID Field (#250) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Add AN(50) field #250 for reporters to indicate a chemical entry is based upon a chemical record in CERS Chemical Library.
Rationale	The CERS Chemical Library includes descriptions of hazardous substances which don't have CAS numbers. This optional field allows reporters to specify a submitted chemical record is based upon and should be updated with the latest information from the specified chemical ID in the CERS Chemical Library. This field is needed to capture "canned" materials described in the CERS Chemical Library that don't have CAS numbers. If a submitted chemical record cites multiple identifiers, CERS will update the record with the latest information based upon the following order of precedence: CAS #, CERS Chemical Library ID, SRS Identifier.
Impacts	Addition of field #250 to <i>CERS Chemical Library ID</i> as AN(50).

Add US EPA Substance Registry System Identifier Field (#251) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Add AN(50) field #251 for reporters to indicate a chemical entry is based upon a chemical record in the U.S. EPA's Substance Registry System (SRS).
Rationale	The US EPA's Substance Registry System (SRS) includes descriptions of hazardous substances which don't have CAS numbers. This optional field allows reporters to specify a submitted chemical record is based upon and should be updated with the latest information from the specified identifier from SRS. This field is needed to capture "canned" materials described in the CERS Chemical Library that don't have CAS numbers. If a submitted chemical record cites multiple identifiers, CERS will update the record with the latest information based upon the following order of precedence: CAS #, CERS Chemical Library ID, SRS Identifier.
Impacts	Addition of field #251 to <i>US EPA Substance Registry System Identifier</i> as AN(50).

Add DOT Hazard Classification Identifier Field (#252) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Add numeric field #252 to capture a hazardous material classification as defined by US Department of Transportation and defined in CFR 49 §173.2 .
Rationale	DOT hazard classifications are the most commonly/widely used identifiers by emergency

	<p>responders for hazardous materials releases. These codes are also readily available and published in Material Safety Data Sheets (MSDSs). This field will not be a required field from facilities to satisfy electronic reporting requirements. However, inclusion of this field in the Unified Program Data Dictionary will support exchanging of this data between facilities, local agencies, and Cal/EPA for the benefit of emergency responders.</p>
Impacts	<p>Addition of field #252 to <i>DOT Hazard Classification Identifier</i> as a numeric field. Valid class/division numbers as of June 2011 are:</p> <ul style="list-style-type: none"> 1.1 MASS EXPLOSIVE HAZARD 1.2 PROJECTION HAZARD 1.3 FIRE AND/OR MINOR BLAST/PROJECTION HAZARD 1.4 MINOR EXPLOSION HAZARD 1.5 VERY INSENSITIVE WITH MASS EXPLOSION HAZARD 1.6 EXTREMELY INSENSITIVE; NO MASS EXPLOSION HAZARD 2.1 FLAMMABLE GASES 2.2 NONFLAMMABLE GASES 2.3 TOXIC GASES 3 FLAMMABLE AND COMBUSTIBLE LIQUIDS 4.1 FLAMMABLE SOLIDS 4.2 SPONTANEOUSLY COMBUSTIBLE 4.3 DANGEROUS WHEN WET 5.1 OXIDIZING SUBSTANCES 5.2 ORGANIC PEROXIDES 6.1 TOXIC SUBSTANCES 6.2 INFECTIOUS SUBSTANCES 7 RADIOACTIVE MATERIAL 8 CORROSIVES (LIQUIDS AND SOLIDS) 9 MISC. HAZARDOUS MATERIALS

SUPERSEDED

UST-Related Field Changes

Modify Code Descriptions in UST Facility *Type of Action* Field (#400) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Change the description of code value 5 from “Change of Information” to “Confirmed/Updated Information”.
Rationale	The code values for this field are not mutually exclusive, and there is no obvious value to select when a user is confirming but not updating any form information. Changing the description of this code value will identify a clear “default” choice for the majority of electronic submissions for this form that involves few if any updates. This change will not have any serious impact on data entry from legacy forms.
Impacts	#400 Type of Action

Modify Code Descriptions in UST Tank *Type of Action* Field (#430) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Change the description of code value 5 from “Change of Information” to “Confirmed/Updated Information”.
Rationale	The code values for this field are not mutually exclusive, and there is no obvious value to select when a user is confirming but not updating any form information. Changing the description of this code value will identify a clear “default” choice for the majority electronic submissions for this form that involves few if any updates. This change will also not have any serious impact on data entry from legacy forms.
Impacts	#430 Type of Action

Modify description of UST Facility *Date UST System Installed* Field (#435) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	In addition to changing the formatting of this date-related field to the standard XML Date datatype as described elsewhere in this document, the description will be modified as follows: <i>“The date the tank installation was completed. If the actual date is not known, the first day of the month the installation was completed may be used.”</i>
Rationale	Cal/EPA has determined that date-related values should be formatted in the standard XML Date datatype format (YYYY-MM-DD). The Title 27 DD formatting instructions/description for this field indicated a format of YYYYMM. This approach was inconsistent with other date-related data. These changes align with standard data exchange approaches while retaining the ability for users to indicate the general date of an UST installation.
Impacts	Modify formatting and description notes for this field #435 as indicated.

Lengthen UST Facility *Additional Description* Field (#438)

Status	Recommended; Approved by DMSC
Description	Currently an AN(70) local use only field for “additional tank or location description/information” which is not shown on the UPCF or in CERS1. Would lengthen to AN(500).
Rationale	Field is very short to support much description or other information. This lengthening would allow the field to act as the equivalent of a comments field on this form. This change would also align with the recommended new “Business Activities Comments” field (#16).

Impacts	Lengthen #438 from AN(70) to AN(500).
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Revision of UST Tank Steel Component Protection Field (#448)

Status	REQUIRED
Description	Replacement of #448 with three new true/false AN(1) fields (#448a, 448b, 448c) that accept either “Y” or “N” codes
Rationale	The UST Certification of Installation form instructions indicate that multiple values can be selected (i.e., Sacrificial Anodes, Impressed Current, and Isolation). Cal/EPA staff has confirmed that multiple values could potentially apply to a UST tank, so this correction is needed.
Impacts	Field #448 is dropped. The following AN(1) fields would be added accepting values of “Y” or “N”: <ul style="list-style-type: none"> • #448a Corrosion Protection: Sacrificial Anode • #448b Corrosion Protection: Impressed Current • #448c Corrosion Protection: Isolation

Revision of UST Tank Overfill Prevention Field (#452)

Status	REQUIRED
Description	Replacement of #452 with four new true/false AN(1) fields (#452a through #452d) that accept either “Y” or “N” codes.
Rationale	The UST Certification of Installation form instructions indicate that multiple values can be selected (i.e., Audible/Visual Alarms, Ball Float, Fill Tube Shut-Off Valve, and Exempt). Cal/EPA staff has confirmed that multiple values could potentially apply to a UST tank, so this correction is needed.
Impacts	Field #452 is dropped. The following AN(1) fields would be added accepting values of “Y” or “N”: <ul style="list-style-type: none"> • #452a Overfill Prevention: Audible/Visual Alarms • #452b Overfill Prevention: Ball Float • #452c Overfill Prevention: Fill Tube Shut-Off Valve • #452d Overfill Prevention: Exempt

Revision of UST Tank Piping/Turbine Containment Field (#464d)

Status	REQUIRED
Description	Change the code value for “None” from “03” to “90”
Rationale	All other UST form values for “None” are coded as 90 except for this field and #464i. This correction will apply consistency across the data standard.
Impacts	Only one of the three code values for this specific field (#464d) would change from “03” to “90.”

Revision of UST Tank Vent Piping Transition Sumps Field (#464i)

Status	REQUIRED
Description	Change the code value for “None” from “03” to “90”
Rationale	All other UST form values for “None” are coded as 90 except for this field and #464i. This correction will apply consistency across the data standard.

Impacts	Only one of the three code values for this specific field (#464i) would change from “03” to “90.”
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Note on Under Dispenser Containment Construction Type Field (#469a)

Status	REQUIRED; Direction Provided and Approval Given by DMSC																	
Description	The Tank Description UPCF has an additional value for field #269a <i>Dispenser Containment Construction Type</i> called “None” that is not included in the data dictionary. The “No Dispensers” and “None” values on the UPCF are equivalent, but all future data exchanges should use the “No Dispensers” value.																	
Rationale	<p>The Tank Description UPCF shows an additional value (“None”) for field #469a than is shown in the Data Dictionary (01=Single-walled; 02=Double-walled; 03=No Dispensers).</p> <table border="1" data-bbox="358 575 1382 648"> <thead> <tr> <th colspan="5">VII. UNDER DISPENSER CONTAINMENT (UDC)</th> </tr> </thead> <tbody> <tr> <td>CONSTRUCTION TYPE</td> <td><input type="checkbox"/> 1. SINGLE WALL</td> <td><input type="checkbox"/> 2. DOUBLE WALL</td> <td><input type="checkbox"/> 3. NO DISPENSERS</td> <td><input checked="" type="checkbox"/> 90. NONE</td> <td>469a</td> </tr> <tr> <td>CONSTRUCTION MATERIAL</td> <td><input type="checkbox"/> 1. STEEL</td> <td><input type="checkbox"/> 4. FIBERGLASS</td> <td><input type="checkbox"/> 10. RIGID PLASTIC</td> <td><input type="checkbox"/> 99. OTHER (Specify)</td> <td>469b 469c</td> </tr> </tbody> </table> <p>The DMSC determined the UPCF value of “None” is equivalent to the data dictionary value of “No Dispensers.” The Data Dictionary will not be modified, but all data exchanges and conversions of old UPCF values should be mapped to the “No Dispensers” value (03) shown in the data dictionary.</p>	VII. UNDER DISPENSER CONTAINMENT (UDC)					CONSTRUCTION TYPE	<input type="checkbox"/> 1. SINGLE WALL	<input type="checkbox"/> 2. DOUBLE WALL	<input type="checkbox"/> 3. NO DISPENSERS	<input checked="" type="checkbox"/> 90. NONE	469a	CONSTRUCTION MATERIAL	<input type="checkbox"/> 1. STEEL	<input type="checkbox"/> 4. FIBERGLASS	<input type="checkbox"/> 10. RIGID PLASTIC	<input type="checkbox"/> 99. OTHER (Specify)	469b 469c
VII. UNDER DISPENSER CONTAINMENT (UDC)																		
CONSTRUCTION TYPE	<input type="checkbox"/> 1. SINGLE WALL	<input type="checkbox"/> 2. DOUBLE WALL	<input type="checkbox"/> 3. NO DISPENSERS	<input checked="" type="checkbox"/> 90. NONE	469a													
CONSTRUCTION MATERIAL	<input type="checkbox"/> 1. STEEL	<input type="checkbox"/> 4. FIBERGLASS	<input type="checkbox"/> 10. RIGID PLASTIC	<input type="checkbox"/> 99. OTHER (Specify)	469b 469c													
Impacts	The CERS2 user interface and data exchanges will be limited to the three values defined in the data dictionary. Any legacy conversion of Tank Description UPCFs to electronic format should map the value of “None” to “No Dispensers.”																	

Note on Under Dispenser Containment (UDC) Construction Material Field (#469b)

Status	REQUIRED
Description	The <i>Under Dispenser Containment (UDC) Construction Material</i> field (#469b) on the Tank Description UPCF does not include two values included in the data dictionary for this field: “Concrete” and “None.”
Rationale	The data dictionary is correct will not be modified. All future data exchanges and user interfaces should include these values missing from the Tank Description UPCF.
Impacts	The CERS2 user interface and data exchanges will include all of the values defined in the data dictionary for field #469b.

Revision of UST Certification of Installation Type of Project Field (#483a)

Status	REQUIRED
Description	Replacement of #483a with five new true/false AN(1) fields (#483a-1 through #483a-5) that accept either “Y” or “N” codes.
Rationale	The UST Certification of Installation form instructions indicate that multiple values can be selected (e.g., Tank Installation, Piping Installation, etc.). The instructions also indicate the form can be completed for “...installation or upgrading of tanks and/or piping associated with a UST system...”, implying multiple installation/upgrading activities can be represented on the form, justifying this correction.
Impacts	<p>Field #483a is dropped.</p> <p>The following AN(1) fields would be added accepting values of “Y” or “N”:</p> <ul style="list-style-type: none"> • #483a-1 Project Type: Tank • #483a-2 Project Type: Piping • #483a-3 Project Type: Sump • #483a-4 Project Type: Under Dispenser Containment

- #483a-5 Project Type: Other

Drop Type of Action Field (#490-1) from UST Monitoring Plan Form [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Eliminate this AN(2) field indicating if a Monitoring Plan submittal represents a “new” plan or a “change of information” for an existing plan.
Rationale	Cal/EPA has determined the most simple and efficient approach to electronically submitting UST monitoring plan data is to include it with data for a tank. This is because the existing Tank ID Number (#432) is too loosely defined to allow accurate/reliable association of separate tank and monitoring plan records in a data management system. CERS and UPA data systems will be implemented to ensure business users entering data manually can easily copy monitoring plan data to one tank to another tank(s), and businesses providing data electronically can readily accommodate this change. This field will be eliminated from the data dictionary because it reflects a paper-based process where tank and plan data were viewed/managed in a paper file rather than via a data management system.
Impacts	#490-1 Type of Action [UST Monitoring Plan]

Drop UST Monitoring Plan Plan Type Field (#490-2)

Status	REQUIRED
Description	UST Tank field #490-2 is AN(25) and allows the user to indicate all of the tanks a UST monitoring plan applies to. For purposes of data exchange, this field is deprecated. Cal/EPA’s data exchange format will require all monitoring plan fields (490x fields) to be included in the submission for each tank, so there will not be a need to indicate which tank a monitoring plan applies to.
Rationale	The existing data dictionary AN(25) is unable to capture the implementation of this field as shown on the UST Monitoring Plan UPCF as it has no value/field for indicating plan applies to all tanks. Additionally, the field length is too short to apply to more than one or two typical tank numbers. Cal/EPA has determined the clearest approach for data exchange would be to include all 490 series fields with each tank’s data (fields 430-470), even if that creates some duplication of 490 series data during a data exchange. CERS and UPA portals will implement a simple approach in the user interface for business users to “copy” already entered monitoring plan data from one tank to another.
Impacts	This field will not be defined or used in electronic data exchanges.

Correction of UST Monitoring Plan Programmed Tank Tests field (#490-18)

Status	REQUIRED
Description	Change the description of first code value (01) from .01 GPH to .1 GPH to match the UPCF form.
Rationale	The UPCF UST Monitoring Plan form shows valid values for this field of 0.1 GPH, 0.2 GPH, and Other. Cal/EPA Technology Services believe that UPCF values are correct/intended value, so the Data Dictionary values need to be corrected to match the UPCF form.
Impacts	Only the description of one of three code values for this specific field (#490-18) would be changed from .01 to .1 GPH.

Lengthen UST Monitoring Tank Gauging Test Period Field (#490-22) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Lengthen the field from AN(1) to AN(2) to be internally consistent with the two character codes shown in the Title 27 Data Dictionary.
Rationale	The Title 27 Data Dictionary field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. Cal/EPA decided to lengthen the field.
Impacts	#490-22 Tank Gauging Test Period

Lengthen UST Monitoring Tank Integrity Testing Frequency Field (#490-24) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Lengthen the field from AN(1) to AN(2) to be internally consistent with the two character codes shown in the Title 27 Data Dictionary.
Rationale	The Title 27 Data Dictionary field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. Cal/EPA decided to lengthen the field.
Impacts	#490-24 Tank Integrity Testing Frequency

Lengthen the UST Monitoring Piping Secondary Containment Field (#490-29)

Status	REQUIRED
Description	Correct the length of the AN(1) field to AN(2) to handle the two digit code values
Rationale	Field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. This recommendation is to lengthen the field.
Impacts	Lengthen #490-29 from AN(1) to AN(2)

Lengthen UST Monitoring ELLD Programmed In-Line Testing Field (#490-42) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Lengthen the field from AN(1) to AN(2) to be internally consistent with the two character codes shown in the Title 27 Data Dictionary.
Rationale	The Title 27 Data Dictionary field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. Cal/EPA decided to lengthen the field.
Impacts	#490-42 ELLD Programmed In-Line Testing

Lengthen UST Monitoring UDC Secondary Containment Monitoring Field (#490-64a) [Added June 2011]

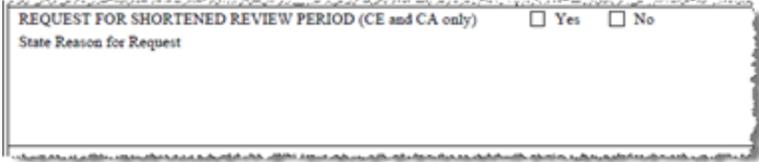
Status	Cal/EPA Required Change as of June 2011
Description	Lengthen the field from AN(1) to AN(2) to be internally consistent with the two character codes shown in the Title 27 Data Dictionary.
Rationale	The Title 27 Data Dictionary field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. Cal/EPA decided to lengthen the field.
Impacts	#490-64a UDC Secondary Containment Monitoring

Hazardous Waste Generate-related Field Changes

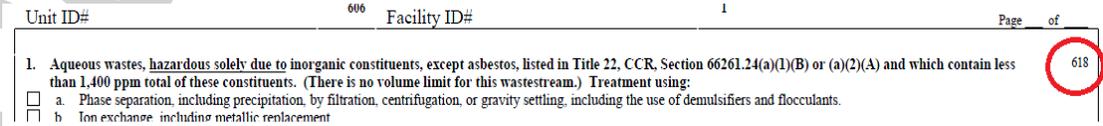
Drop Total Number of Recyclable Materials Field (#519) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Eliminate this numeric field which must be provided on each copy of a <i>Recyclable Materials Report-Page 2</i> form showing the total count of such forms in the facility's submittal.
Rationale	This value can be auto-calculated as necessary in Cal/EPA and UPA data management systems. By dropping this field, it eliminates the need for Cal/EPA and UPA data management systems to reconcile/address discrepancies if the value does not match the record count provided by the business.
Impacts	#519 Total Number of Recyclable Materials

Add Two Fields related to Shortened Review Period to Onsite HazWaste Treatment Notification-Facility (#601f & #601g)

Status	REQUIRED; Direction Provided and Approval Given by DMSC
Description	The Onsite Hazardous Waste Treatment Notification-Facility UPCF includes a Y/N field captioned "Request for Shortened Review Period (CE and CA only)" along with a text field for the reason that does not have a matching field in Title 27. Neither of these fields is represented in the data dictionary. 
Rationale	The DMSC determined these fields should be added to the data dictionary.
Impacts	Add two fields be added to the Data Dictionary: #601f <i>Shortened Review Request</i> AN(1) with valid values Y or N #601g <i>Shortened Review Justification</i> AN(300)

Note on Field Labeling Error on Conditionally Authorized (CA) UPCF (#629)

Status	INFORMATIONAL ONLY NOTE
Description	The Conditionally Authorized (CA) UPCF mislabels the Data Dictionary field as #618 when it should be #629. 
Rationale	Designers of Unified Program-related user interfaces and data exchanges should be aware of this error on the UPCF and consult the data dictionary.
Impacts	The UPCF form will be corrected as time and resources allow.

Note on Missing Field Label on Conditionally Exempt-Limited (CEL) UPCF (#631)

Status	INFORMATIONAL ONLY NOTE
Description	The Conditionally Exempt-Limited (CEL) UPCF is missing a label for the data dictionary field

	<p>#631.</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>UNIFIED PROGRAM CONSOLIDATED FORM ONSITE TIERED PERMITTING CONDITIONALLY EXEMPT – LIMITED (CEL) PAGE WASTE AND TREATMENT PROCESS COMBINATIONS</p> <p><small>Use page per treatment unit - check all that apply.</small></p> <p>Unit ID# _____ Facility ID# _____ Page ____ of ____</p> <p><input type="checkbox"/> 1. Puncturing, draining, or crushing of aerosol cans, at ambient temperature, using equipment or technology combination certified by the Department of Toxic Substances control (DTSC) pursuant to section 25200.1.5 of the Health and Safety Code. The equipment must capture gaseous and liquid contents, prevent fire, explosion, and unauthorized releases of hazardous constituents, and prevent worker exposure. The aerosol cans must be recycled as scrap metal.</p> <p style="text-align: center;">Certified Technology Number _____</p> <p><i>NOTE: This category is not available until DTSC certifies a manufacturer's equipment.</i></p> <p>2. The separation of used oil from water, provided that the wastestream is <u>hazardous solely due to</u> the oil and the used oil is properly transported to an authorized offsite oil recycler. Treatment using:</p> <p><input type="checkbox"/> a. Gravity separation. <input type="checkbox"/> b. A centrifuge. <input type="checkbox"/> c. A membrane technology. <input type="checkbox"/> d. Heating of the water containing used oil to a temperature that is not more than 20 degrees Fahrenheit below the flashpoint of the used oil component of the mixture at atmospheric pressure. <input type="checkbox"/> e. The addition of demulsifiers to the water containing used oil.</p> <p><small><i>NOTE: The authorized separation of used oil from water under this wastestream may not include contaminated groundwater or water containing any measurable amounts of gasoline or more than two percent (2%) diesel fuel (combination of Number 1 or 2 fuel).</i></small></p> </div>
Rationale	Designers of Unified Program-related user interfaces and data exchanges should be aware of this omission on the UPCF and consult the data dictionary.
Impacts	The UPCF form will be corrected as time and resources allow.

Lengthen Description of Remote Consolidation Location(s) (#724) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Field #724 is for providing a description of the type of remote location(s) and sources(s) from which non-RCRA hazardous waste will be collected. The field length will be increased from AN(150), which is approximately a sentence, to AN(700), which is approximately a long paragraph.
Rationale	Field is very short to support much description or other information. This lengthening would allow the field to act as the equivalent of a comments field on this form.
Impacts	Lengthen #724 from AN(150) to AN(700).

Lengthen Basis for Not Needing a Federal Permit (Remote Consolidation) = Other Field (#729b)

Status	REQUIRED; Direction Provided and Approval Given by DMSC
Description	The Remote Waste Consolidation Site Annual Notification field #729b is AN(60) for providing a description of other reason(s) activity is not subject to permitting requirements under Federal law. The field would be lengthened to AN(300).
Rationale	Field is very short to support much description or other information. This lengthening would allow the field to act as the equivalent of a comments field on this form.
Impacts	Lengthen #729b from AN(60) to AN(300).

Inspection Field Changes

Drop Pct RTC 90 Field (#909)

Status	REQUIRED; Direction provided and approval given by DMSC
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Description	Remove field #909 (Pct RTC 90) from Inspection.
Rationale	The T27-DD definition for Field #909 is: “Percent (whole number) of routine inspections with Class I or Class II Violations that Returns to Compliance within 90 Days.” Because this field attempts to summarize Return To Compliance data for multiple inspections, it is not appropriate to include at the Inspection detail level. Additionally, this information can be derived from inspection detail data submitted to Cal/EPA by UPAs.
Impacts	#909 Pct RTC 90

Drop/Move Red Tag Issued Field (#913b)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #913b (Red Tag Issued) from Inspection; field belongs in Enforcement definition.
Rationale	Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#913b Red Tag Issued

Drop/Move Red Tag Number Field (#913c)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #913c (Red Tag Number) from Inspection; field belongs in Enforcement.
Rationale	Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#913c Red Tag Number

Drop/Move Violations Causing Red Tag Field (#913d)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #913d (Violations Causing Red Tag) from Inspection; field belongs in Enforcement.
Rationale	Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#913d Violations Causing Red Tag

Drop/Move Date Red Tag Affixed Field (#913e)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #913e (Date Red Tag Affixed) from Inspection; field belongs in Enforcement.
Rationale	Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#913e Date Red Tag Affixed

Drop/Move Date Red Tag Removed Field (#913f)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #913f (Date Red Tag Removed) from Inspection; field belongs in Enforcement.
Rationale	Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#913f Date Red Tag Removed

Drop/Move Type of Enforcement Action Field (#914)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #914 (Type of Enforcement Action) from Inspection; field belongs in Enforcement.
Rationale	Field #914 (Type of Enforcement Action) provides additional information about an Enforcement and was incorrectly placed in the Inspection definition.
Impacts	#914 Type of Enforcement

Drop/Move Date a Referred Case Settled or Dropped Field (#917a) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Remove field #917a (Date a Referred Case Settled or Dropped) from Inspection; field belongs in Enforcement.
Rationale	This field provides additional information about referred cases initiated as part of an Enforcement Action. As such, this data does not belong as part of the Inspection definition. This field has been removed from the Inspection definition and added to the Enforcement definition.
Impacts	#917a Date a Referred Case Settled or Dropped

Add Inspection Comments Field (#929)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add new field #929 (Inspection Comments) of type AN(1000) to capture additional Inspection data (as necessary).
Rationale	Several smaller regulators have expressed interest in using CERS as their primary repository for managing their Inspection/Enforcement data. This additional field would help these agencies and would not impact other agencies.
Impacts	#929 Inspection Comments

Violation Field Changes

Define New Violation Information Specification

Status	REQUIRED; Direction Provided and Approval Given by DMSC; Fields #933 and #935 are Cal/EPA Required Changes as of June 2011					
Description	ID	ELEMENT	CODES/CRITERIA	LENGTH	TYPE	INFORMATION DESCRIPTION

1	Facility ID Number	2 AN (county) 3 AN (jurisdiction) 6 AN (facility number)	11	AN	Number to allow cross linking of data. County and jurisdiction number are based on the tax code list. This number is assigned by the CUPA. This is the unique number identifying the facility.
1a	CERS ID		9	N	CERS ID used for electronic data exchange.
3	Business Name	Postal standard: 2 lines, 35 characters	70	AN	Full legal name of business.
930	Violation Type ID		7	AN	4-digit or 7-digit number referencing a Violation Type in the Violation Dictionary. The Violation Dictionary defines the Program violated, the type of violation, and the Code/Regulations and Citation(s) violated.
931	Violation Classification	1 = Class 1 2 = Class 2 9 = Minor	1	AN	Defines the Violation Classification for this Violation ('Class I', 'Class II', or 'Minor').
932	Violation Date	YYYY-MM-DD	10	D	Date the violation occurred.
933	Violation Scheduled Return to Compliance Date	YYYY-MM-DD	10	D	Scheduled Return-to-Compliance Date for this violation. [Added June 2011]
934	Violation Actual Return to Compliance Date	YYYY-MM-DD	10	D	Actual Return-to-Compliance Date for this violation.
935	Violation Actual Return to Compliance Qualifier	1 = Documented 2 = Observed 3 = Not Resolvable 4 = Unobserved	1	AN	Actual Return-to-Compliance Qualifier for this violation. [Added June 2011]
936	Violation Comment		1000	AN	Additional details about this violation (for example, a UST Tank #, location within a facility, etc.)

Rationale Cal/EPA intends to support expanded EDT of inspection and enforcement data that includes detailed violation information for inspections and a listing of relevant violations and enforcements. Creation of a new "Violation Information" specification in the Unified Program Data Dictionary would address various mandates that are not yet fully expressed in Title 27 regulations. After the DMSC approved the Violation definition, Cal/EPA staff identified two additional fields that needed to be added to the definition to meet federal reporting requirements (#933 and #936).

Impacts New "Violation Information" specification added to Unified Program Data Dictionary. New field #'s added to the Data Dictionary include the following:
 #930 Violation Type ID
 #931 Violation Classification
 #932 Violation Date
 #933 Violation Scheduled Return to Compliance Date **[Added June 2011]**
 #934 Violation Actual Return to Compliance Date
 #935 Violation Actual Return to Compliance Qualifier **[Added June 2011]**
 #936 Violation Comment

Add Violation Scheduled Return to Compliance Date Field (#933) **[Added June 2011]**

Status	Cal/EPA Required Change as of June 2011
Description	Add new date field #933 (Violation Scheduled Return to Compliance) (YYYY-MM-DD) to the Violation definition to allow tracking Scheduled RTC for outstanding Violations.
Rationale	This field is conditionally-required as part of electronic exchange of Violation Details with US

	EPA's RCRAInfo system. Violations must have either a Scheduled RTC or Actual RTC to satisfy RCRA electronic change rules. Therefore, this field must be added to the Violation definition to allow exchange of Violations that have not yet returned to compliance.
Impacts	#933 Violation Scheduled Return to Compliance Date

Add Violation Actual Return to Compliance Qualifier Field (#935) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Add new field #935 (Violation Actual Return to Compliance Qualifier) to the Violation definition to allow tracking the method used to determine that the Violation has returned to compliance.
Rationale	This field is conditionally-required as part of electronic exchange of Violation Details with RCRAInfo. Violations with a 'Violation Actual Return to Compliance Date' must also specify the method with which this compliance was determined through the use of a Qualifier. Therefore, this field must be added to the Violation definition to allow exchange of Violations that have returned to compliance.
Impacts	#935 Violation Actual Return to Compliance Qualifier

Enforcement Field Changes

Drop Program Element field description for Enforcement reporting (#905) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Drop field #905 from the Enforcement portion of the data dictionary. It would still be retained in the Inspection portion of the data dictionary.
Rationale	This is a needed correction to reflect reporting enforcement actions on a per action basis, rather than as a summary of actions per program element . Current business practices allow an enforcement action to span multiple program elements. CUPAs will provide this level of detail using the Unified Program data dictionary fields for enforcements and violations. Note: The Enforcement fields in the data dictionary do NOT reflect the fields needed for the mandated annual summary report on enforcements which are submitted by CUPAs (Report 4). The required data elements for the UPA Enforcement Summary (Report 4) are defined separately from the Unified Program Data Dictionary in CCR 27 §15290(a)(3).
Impacts	#905 Program Element [Enforcement]

Add Red Tag Issued Field (#913b)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add field #913b (Red Tag Issued) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field was dropped from the Inspection definition and moved into the Enforcement definition. Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement.
Impacts	#913b Red Tag Issued

Add Red Tag Number Field (#913c)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add field #913c (Red Tag Number) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field was dropped from the Inspection definition and moved into the Enforcement definition. Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement.
Impacts	#913c Red Tag Number

Add Violations Causing Red Tag Field (#913d)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add field #913d (Violations Causing Red Tag) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field was dropped from the Inspection definition and moved into the Enforcement definition. Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement.
Impacts	#913d Violations Causing Red Tag

Add Date Red Tag Affixed Field (#913e)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add field #913e (Date Red Tag Affixed) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field was dropped from the Inspection definition and moved into the Enforcement definition. Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement.
Impacts	#913e Date Red Tag Affixed

Add Date Red Tag Removed Field (#913f)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add field #913f (Date Red Tag Removed) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field was dropped from the Inspection definition and moved into the Enforcement definition. Red Tagging an Underground Storage Tank is considered an Enforcement Action for the purposes of summary information, and therefore the associated data belongs in Enforcement.
Impacts	#913f Date Red Tag Removed

Add Type of Enforcement Action Field (#914)

Status	Cal/EPA Required Change as of June 2011
Description	Add field #914 (Type of Enforcement Action) to the Enforcement definition. This field was originally part of the Inspection definition.

Rationale	Field #914 (Type of Enforcement Action) provides additional information about an Enforcement and was incorrectly placed in the Inspection definition.
Impacts	#914 Type of Enforcement Action

Add Date a Referred Case Settled or Dropped Field (#917a) [Added June 2011]

Status	Cal/EPA Required Change as of June 2011
Description	Add field #917a (Date a Referred Case Settled or Dropped) to Enforcement. Field was previously part of Inspection; remove from Inspection and add to Enforcement.
Rationale	This field defines additional information about the status of a specific enforcement action, and was incorrectly associated with the Inspection definition.
Impacts	#917a Date a Referred Case Settled or Dropped

Drop Significant Non-Complier Field (#921)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Remove field #921 (Significant Non-Complier) from Enforcement.
Rationale	The T27-DD definition for Field #921 is: "Only applies to RCRA hazardous waste facilities. SNC is defined under federal rules." Because this data is not collected in California, this field can be removed from the Title 27 Enforcement definition, and would not be included in Enforcement EDT. Where Cal/EPA needs to provide this data to US EPA, this field's value can be derived from a facility's Inspection records.
Impacts	#921 Significant Non-Complier Field

Add Enforcement Comments Field (#925)

Status	REQUIRED; Direction provided and approval given by DMSC
Description	Add new field #925 (Enforcement Comments) of type AN(1000) to capture additional Enforcement data (as necessary).
Rationale	Several smaller regulators have expressed interest in using CERS as their primary repository for managing their inspection/enforcement data. This additional field would help these agencies and would not impact other agencies.
Impacts	#925 Enforcement Comments

C. Miscellaneous Notes

Availability of CERS XML Data Exchange Schemas

Cal/EPA staff anticipates draft versions of the CERS XML data exchange schemas to be available during July 2011 and final versions in August 2011. Information about and links to these schemas will be available at <https://cers.calepa.ca.gov/edt/>.

CERS System-Required Fields

The Title 27/Unified Program Data Dictionaries define the *facility-specific* data elements that businesses report to government. However, to successfully transfer data in XML format between businesses, UPAs, and Cal/EPA, various additional *control and status fields* need to be exchanged as well. A listing of these system-required

fields with definitions and usage is available on the CERS Data Registry at <https://cers.calepa.ca.gov/Data/Registry/DataSources/> under “CERS System Fields”

Hazardous Waste Tank Closure Certification Fields (#740-764)

Cal/EPA staff have determined that this form is typically prepared/edited in the field by multiple parties and is not amenable to electronic submission by businesses. So the form will only be accepted as a document upload into CERS via the user interface or XML data exchange. Although the fields on this form #740-#764 will continue to be shown in the Unified Program Data Dictionary, they will NOT be included in the CERS XML data exchange schemas.

Compliance Activity Information Fields (#900-#904)

Title 27 Data Dictionary fields listed under “Compliance Activity Information” will not be implemented in the initial CERS XML schemas. This includes fields #900 through #904. Field #900 (*RCRA Large Quantity Generator (LQG) of Hazardous Waste*) is nearly equivalent to the value of #14a (*RCRA Large Quantity Generator (LQG)*) for a reviewed/accepted business plan.

Tiered Permitting Release Information Fields (#922-#924)

Title 27 Data Dictionary fields listed under “Tiered Permitting Release Information” will not be implemented in the initial CERS XML schemas. This includes fields #922 through #924.

Future Revisions of the Data Dictionary (and XML Data Exchange Schemas)

Due to the complexity of the Unified Program Data Dictionary and the associated code for generating, using, and/or consuming this data in Cal/EPA’s CERS system and the various UPA data management systems, Cal/EPA anticipates data dictionary/schema revisions will occur no more than on an annual basis. Any revisions would need to be reviewed, prioritized, and approved by the [CERS Change Management Committee](#) following a proscribed annual schedule adopted by the DMSC. After approval, Cal/EPA would announce an implementation schedule for the changes which would include several months for CERS implementation of the changes, followed by several months for UPA implementation of the changes where data formatted with either the old or new dictionary/schemas would be accepted into CERS.

Constituent Reporting for Hazard materials and Recyclable Materials

The *Chemical Description* and *Recyclable Materials Report-Page 2* UPCFs indicate reporting of additional constituents beyond what is shown on the form should be done as attachments. However, the Title 27 Data Dictionary explicitly defines a limited number of constituent fields (5 for hazardous materials, 4 for recyclable materials). For CERS electronic reporting purposes, Cal/EPA has opted to follow the standards provided in the Title 27 Data Dictionary, which means businesses can report on no more than the number of constituents allowed by the Data Dictionary.