

CERS2 Document Uploads Policies

Prepared by Cal/EPA Unified Program Staff March 2011

To allow businesses to submit all pertinent Unified Program information to their local regulators, CERS2 will support businesses uploading around a dozen different specific types of document uploads (e.g., facility map, Emergency Response Plan, UST Response Plan, etc.). This is needed because a business may need to provide one or more mandated documents to meet their facility reporting obligations for a program element.

To keep document storage costs low for the State of California and Unified Program fee payers, the Cal/EPA Unified Program intends to implement in CERS2 the document upload limitations/policies shown below. These are based both upon technical needs, as well as concurrence by the Unified Program Administration and Advisory Group (UPAAG) and the Unified Program Data Management Steering Committee (DMSC) during their March 2011 meetings that Cal/EPA's should establish limits on CERS2 document uploads. Additionally, these advisory bodies concurred with Cal/EPA's recommendations allowing business users to indicate their document uploads are available at a publicly-available Internet URL, are stored on-site at the facility, or had been previously provided physically to their local regulator.

Questions or concerns about these policies should be directed to Chris Allen (callen@calepa.ca.gov) as soon as possible, and no later than March 25th, 2011.

File/Data Compression Encouraged

Business users are strongly encouraged to minimize the file size of their required documents before they upload them into CERS. Techniques they could use include saving pictures or document scans at lower resolutions (e.g., JPEG, scanned PDFs), and use of ZIP files to compress one or more documents (as long as all zipped documents relate to the specified CERS document upload type (e.g., facility site map).

Maximum Single Document Upload Size

25 MB

A single document upload cannot exceed 25 MB. If a business needs to upload a document larger than this, they need to divide the document into smaller pieces of <25MB and upload each separately.

Maximum Total Document Uploads Size for a Single Submittal Element

100 MB

The total size of ALL document uploads for a single submittal element cannot exceed 100 MB (e.g., Business Plan, UST, etc.).

Locally-Required Document Uploads

Each submittal element in CERS2 will include the ability for a business to upload any locally-required documents specific to the submittal element. Regulators should minimize the size and count of any locally-required document uploads to ensure businesses will not be at risk of exceeding the 100 MB upper limit of document uploads for each submittal element.

Acceptable document file extensions/types

- **Graphics:** .gif, jpeg, jpg, png, svg
- **Generic Text:** txt, rtf, htm, html, csv, xml
- **Documents:** pdf, doc, docx, xls, xlsx, ppt, odt, ods, pptx, zip

Note: Cal/EPA retains the right to reject or delete uploaded documents whose internal format does not match their file extension. Rejection could occur at the time of a document submittal, or may occur post-submittal, in which case the business user would receive an email indicating the document has been deleted.

Alternate Document Locations

Business users will be able to indicate alternate document storage locations for **ALL** document upload types. These alternate locations will include:

- A publicly-available Internet URL,
- Document is stored on-site at the facility,
- Document has been previously provided physically to their local regulator.

If the regulator does not approve of the alternate document location, they would reject the submittal element and direct the business user to resubmit.

Exempt from Document Requirements

Business users will also be able to indicate their belief they are exempt from the document upload requirement. If the regulator does not approve of the document exemption, they would reject the submittal element and direct the business user to resubmit.

Malicious Files

Business users are responsible for ensuring their document uploads do not contain viruses or other malicious elements. Cal/EPA retains the right to reject or delete “malicious” uploaded documents. Rejection could occur at the time of a document submittal, while deletion would occur post-submittal. Cal/EPA will NOT guarantee that business users will be alerted when malicious files are deleted (post-submittal).

Non-Mandated Documents Uploads Not Supported

CERS2 will only support document uploads for the **specific** documents that must or might be potentially reportable for a facility. This will include support uploading locally-required document uploads. However, CERS2 is not intended as a repository of non-mandated documents for businesses OR regulators.

Document Uploads Not Supported for Inspections or Enforcement Actions

CERS2 will not support regulators uploading supplemental documents for their inspections or enforcement actions.