

EPA ID Validation Overview

For CUPAs

July 2022

Background

Businesses in California subject to regulation under the Certified Unified Program Agency (CUPA) are required to electronically report and submit required information to the California Environmental Reporting System (CERS) in accordance with Title 27 California Code of Regulations section 151888(b). All data fields on CERS web pages and defined in the Unified Program Data Dictionary are required to be completed by law. It is the responsibility of businesses and UPA's¹ (Unified Program Agencies) to ensure data in CERS is accurate.

Data accuracy in CERS has been a longstanding issue and is a documented pain point of the system. This was identified based on UPA feedback on CERS in 2019. Lack of validation of the Environmental Protection Agency (EPA) ID number is one pain point that has been discussed with UPAs for the last few years. EPA ID number inaccuracy has limited the ability of CalEPA to pass compliance, monitoring, and enforcement data (CME data) to other systems, including but not limited to US EPA.

To abate this pain point with minimal UPA effort, CalEPA has created a database validation tool for use during the CERS submittal process. Based on testing the validation process should successfully correct **more than 95%** of the EPA ID data in CERS. The two phased implementation of the validation tool described below should clean data prior to migration to CERS NextGen in 2025. This document explains the validation tool and potential impacts on UPAs.

EPA IDs

In California, generators of hazardous waste are required to have an EPA ID² issued by the Department of Toxic Substances Control (DTSC) and they are regulated by a UPA.

¹ UPA refers to both CUPAs and PAs

² Silver only generators who generate only silver waste less than or equal to 100 kg per month are not required to have an EPA ID number.

EPA IDs must be verified by the facility annually through the completion of DTSC's Electronic Verification Questionnaire (EVQ). Failure to complete the EVQ results in the EPA ID status being changed from active to inactive. An inactive facility may still generate and dispose of hazardous waste.

Certain EPA ID numbers regulate activities outside the jurisdiction of UPAs. CERS is not designed to collect data regarding these facilities. (EPA IDs start with CA99, CAI, CAE, CAF, CAS, and CLU)

Temporary or Provisional EPA ID numbers are not regulated by UPAs and will not be validated in CERS. (EPA IDs start with CAP, CAC, or CAE)

HWTS is the official state record of hazardous waste generators and will be used to provide EPA ID numbers for selection in CERS with this project. As of June 2022, DTSC reports that it is taking 5-7 business days to issue a new EPA ID, reactivate an EPA ID, or correct mistakes in HWTS at the request of a facility.

Implementation

CalEPA will be implementing the validation tool in two phases.

Phase 1 – August 29th, 2022

A facility that reports activities pertaining to hazardous waste in CERS requiring an EPA ID will be triggered to validate their EPA ID number.

Failure to successfully validate the EPA ID will result in a warning message but will not prevent submittal of any section of CERS. CUPAs will see the warning when reviewing the submittal through the Submittal Element Processing.

The warning is a notification to facilities that the handler's Owner/Operator portion of the business plan is deficient in satisfying the requirements in accordance with CA HSC § 25508. The handler shall electronically submit a corrected Owner/Operator portion of the business plan within 30 days from the date of the notice.

Phase 2 -Spring of 2023 pending feedback

A facility that reports activities pertaining to hazardous waste in CERS requiring an EPA ID will not be able to submit in CERS without a validated EPA ID number.

In cases where the EPA ID cannot be validated, the facility will be directed to contact their CUPA for assistance. CUPAs will coordinate with their PA's and the CERS Help Desk staff to correct the issue and complete their submittal.

Failure to accurately complete and electronically submit initially, annually, or triennially, should be addressed in accordance with the Inspection and Enforcement Plan of the UPA. Potential violations in this scenario are:

CERS Violation number 1010003 (19 CCR 4 2652(a)(1); HSC 6.95 25508(a)(1), 25508(a)(3)):

“Failure to electronically submit the Business Activities Page and/or Business Owner Operator Identification Page, or failure to report complete or accurate information on these forms.”

CERS Violation number 3010036 27 CCR 1 15188(b), 15188(c); HSC 6.11 25404(e)(4):

“Failure to report, and report accurately, program data (such as hazardous waste generation activities) electronically.”

Validation Tool

Historically, a facility has been required to manually enter their EPA ID number into CERS. This project will change that process and instead an EPA ID number will be provided to the user for selection and confirmation. The validation tool will compare the CERS facility name and address against records in HWTS. Four different interfaces are possible with the validation tool:

1. Automatic Validation - the EPA ID number and facility information in CERS match HWTS. No action will be needed by the facility.
2. Validation Needed –EPA ID number in CERS is not a direct match to HWTS. Warning message to validate the EPA ID number in the business activates section of CERS. The submittal of an HMBP is permitted with warning messages, although not advised.
3. Validation Failed – No EPA ID number identified as a match from HWTS. Pop-up message to obtain EPA ID or contact CUPA for assistance. CUPA contact information provided in pop-up on screen. The submittal of an HMBP is permitted with warning messages, although not advised.

Once the EPA ID number has been validated no future action will be required. A validated EPA ID may be updated by re-running the validation process.

For the **less than 5%** of facilities where validation fails, CalEPA has created work arounds available to CERS IT staff.

CUPA's Role

Facilities are being provided with the phone number and name of the CUPA in CERS when validation fails. It is the CUPA's responsibility to oversee programmatic implementation of the Program by their UPA. It is the expectation of CalEPA that CUPAs will share the information provided with their PAs as needed.

When a facility reaches out for help, the first step is to check for an EPA ID number in HWTS at [Hazardous Waste Tracking System: Home \(ca.gov\)](#). HWTS is the official State record of facility locations, names, and owners.

If differences are identified between CERS and HWTS which cannot be resolved by updating the information in CERS, the UPA should e-mail the CERS help desk the following information:

- ✓ CERS ID
- ✓ Facility EPA ID, or silver only generator status
- ✓ Any differences observed between HWTS and CERS as applicable. This includes noting if contiguous properties operated by the same facility are sharing an EPA ID number.