Accepting the Facility Information Submittal Element

How should a submittal be processed if the facility submittal element is not acceptable but other submittal elements are? Can the Facility Information submittal status be set to 'not accepted' and 'the others be set to 'accepted'? (1/20/2015)

Answer: That depends. If a CUPA and any PAs to that CUPA manage all submittals in CERS then the answer is yes, the Facility Information submittal element can be set to 'not accepted' and the others can be set to 'accepted'. However, if submittal information is electronically exchanged from CERS to a local data management system such as EnvisionConnect the answer may be different as there may be a potential for incomplete submittal elements data association in the local system.

Accepting submittal elements separately from the submittal element is a likely occurrence for CUPAs that have PAs responsible for other submittal elements and may occur for other CUPAs when a facility submittal element is significantly deficient. This may be an issue for a CUPA using a local data management system. For example, if a business submits Facility Information and HMIS submittal elements but only the HMIS is accepted, the HMIS submittal data may not be associated with the facility in the local system because the facility information submittal was not accepted. However, the facility will have fulfilled their legal reporting requirements.

Facility	Inventory	Plans
Accepted 6/3/2014		
Not Accepted 3/28/2014	Accepted 3/28/2014	Accepted 3/28/2014

Only the facility information submittal data points will be imported into the local database via EDT. The HMIS and Emergency Response and Training Plan submittal data points/attachments will be excluded because the facility information submittal element was not accepted.

In order to avoid a potential for this to occur, CalEPA recommends that CUPAs utilizing EDT to exchange submittals between CERS and their local data management system check with their provider. If the provider indicates that this is a possibility the CUPA may 'accept' minimally deficient Facility Information submittals with appropriate conditions (such as requiring a resubmittal within xx days to address any minor deficiencies). Exception: If there are significant errors or omissions in the Facility Information submittal element CalEPA recommends that the CUPA set the status for all of the associated submittal elements to 'not accepted', provide an explanatory comment and require the business to make a complete new submittal of all applicable submittal elements with the corrected Facility Information submittal element. CUPAs with PAs will need to coordinate their processing accordingly.