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Alameda County CUPA

2017 ANNUAL CUPA PROGRAM LETTER TO REGULATED BUSINESS

This is Alameda County Department of Environmental Health's (ACDEH) ninth annual Certified Unified Program Agency (CUPA) Program Letter. The purpose of this letter is to share information that may affect your facility in the CUPA Program.



Reminder:

July 1, 2017 marks the final step of the three-year rollout for changes in annual fees through the ACDEH CUPA Program.

Most Common CERS Reporting Errors

Since the statewide implementation of CERS five years ago, common reporting errors with submittals have been identified. Avoiding these types of errors when submitting to CERS will help increase the likelihood that your submittal will be accepted, saving you time and effort.



Facility Submittal Element: Partial submittals of only the facility information can cause errors, which results in a rejected submittal. **When** submitting CERS elements such as the Hazardous Materials Inventory, Emergency Response and Training Plan, Tiered Permitting, Underground Tanks, etc., the Facility Information submittal element is also required to be submitted **at the same time**. In order to prevent needing to track multiple due dates, it is recommended to submit all elements of a CERS submittal on the same date.

Site map: Inadequate or incomplete facility maps will result in a rejected submittal. Review the Instructions/Help section on the Site Map upload screen. Note: All uploaded documents including site maps should be in a pdf (portable document format) format. Site maps are intended to be used by emergency response agencies. The map elements include a North orientation, loading areas, internal roads, adjacent streets, storm and sewer true drains, access and exit points, emergency shut-offs, evacuation staging areas, hazardous materials handling and storage areas, and emergency response equipment. All items must be included on the site map in order for it to be complete. For additional CERS tips, please visit <http://cers.calepa.ca.gov/>.

Proposed Increases to State Surcharge for Regulated Facilities

CalePA has proposed increases to both the Oversight and Underground Storage Tank (UST) surcharges, which are expected to become effective May 4, 2017. All CUPA-regulated facilities currently pay a \$35 annual fee for oversight, which will increase to \$49. USTs facilities currently pay an annual fee of \$15 per tank, which will increase \$20 per tank. These CalePA surcharges, and any changes to them, are included in the annual permit fee invoice sent by ACDEH.

Storing Diesel in Steel Underground Storage Tanks

The United States Environmental Protection Agency (US EPA) released a report identifying corrosion risks in underground storage tanks (USTs) storing diesel and gasoline-ethanol blends. The risk of corrosion may affect the functionality of UST equipment, and can even lead to a complete failure of the tank system. The risk is greater for steel tanks containing diesel.

The US EPA report and Notice of Corrosion Risk can be found at <https://www.epa.gov/ust/alternative-fuels-and-underground-storage-tanks-usts#corrinternal>. Questions and answers about corrosion in diesel USTs can be found at <https://www.epa.gov/ust/questions-and-answers-about-corrosion-underground-tanks-storing-diesel-fuel>.

If you believe that you have corrosion in your UST or associated equipment please contact your UST service technician for further evaluation.





Single-walled Underground Storage Tanks (USTs)

The deadline for removal of all single-walled USTs is December 31, 2025. Loans and grants are available through the RUST program to assist eligible small businesses to remove single-walled USTs and to replace them with double-walled USTs. If you are eligible for RUST funding, you cannot begin working until you have a grant or loan executed by the State Water Board. Upon UST removal, if a release has occurred, owners/operators may need to undertake corrective action (i.e., investigate and clean up the release). Filing a claim application with the UST Cleanup Fund, completing corrective action, and receiving reimbursement for eligible corrective action costs is a lengthy process. The deadline for submittal of a claim application to the UST Cleanup Fund for reimbursement of eligible costs for corrective action is December 31, 2024. The UST Cleanup Fund sunsets on January 1, 2026. Information on the UST Cleanup Fund can be found at http://www.waterboards.ca.gov/water_issues/programs/ustcf/.

www.waterboards.ca.gov/water_issues/programs/ustcf/

Replacing, Removing, or Upgrading Underground Storage Tanks (RUST) Program

RUST grants and loans may be used to finance up to 100 percent of the costs necessary to upgrade, remove or replace project tanks, including corrective actions, to meet applicable local state, or federal standards, including, but not limited to, any design, construction, monitoring, operation, or maintenance requirements adopted to Health and Safety Code sections 25284.1, 25292.05, 25292.4, 25292.5 or 41954.



Clean Water & Waste Tire Programs

In addition to the CUPA programs, ACDEH also implements the Clean Water Program (CWP) and the Waste Tire Program (WTP). The CWP for unincorporated Alameda County includes inspection of facilities for compliance with clean water regulations, and provides outreach and education of best management practices to businesses. A new Municipal Regional Permit was granted on November 19, 2015. ACDEH now uses electronic inspection forms for CWP inspections.

Beginning July 2003, ACDEH began implementing a grant from the California Department of Resources Recycle and Recovery (CalRecycle) to survey and inspect waste tire facilities within all of Alameda County with the exception of the City of Berkeley. The Waste Tire Program applies to facilities that generate, transport, or accept waste tires. Although the waste tire facility inspection program is independent of the CUPA programs, the CUPA Inspector conducts inspections for both programs at facilities where ACDEH is the CUPA. On July 1, 2016, electronic reporting was mandated for all waste tire inspections. In order to receive your copy of the inspection report your facility must have an email address.



Training for Hazardous Materials Business Plan and Hazardous Waste Generator Facilities

ACDEH will be offering training courses to assist regulated businesses in complying with their hazardous materials business plan and hazardous waste generation requirements. ACDEH also offers training to Designated Operators for UST facilities. More information with specific training topics, dates, and times will be posted to our website. If you are interested in attending the training sessions or have ideas for additional training topics or areas of interest, please send an email to: dehalame-dacers@acgov.org.

California Environmental Reporting System (CERS)

CERS was implemented in 2013. Please log into the CERS website to submit your annual Hazardous Materials Business Plan by your submittal anniversary date or if there are any changes in facility information. More information is available on Cal EPA's website at <http://cers.calepa.ca.gov/>.

www.acgov.org/aceh

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH



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DISPUTES:



We conduct numerous facility inspections every year for compliance with laws and regulations related to hazardous materials, hazardous waste and aboveground and underground storage tanks. If there are differing opinions on the result of the findings made during the inspection and you cannot resolve the matter with your inspector to your satisfaction, we have a process for review. Our goal is to provide a fair and objective compliance program that is facility-specific without compromising the CUPA compliance requirements.

Please feel free to contact us for more information or suggestions that would improve our services for you. For more information, please contact your CUPA Inspector or CUPA Chief, Susan Hugo at 510-567-6780.