Deficiency Progress Report – Update 4

Report Submitted: April 26, 2010

CUPA: **San Bernardino Fire Department, Hazardous Materials Division**

Evaluation Date: **December 2 and 3, 2008**

Evaluation Team:

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Corrected Deficiencies: **1, 2, 4, 5**
Next Progress Report (Update 5) Due: **August 23, 2010**

Please update the deficiencies below that remain outstanding.

1. **Deficiency:** The CUPA is not conducting hazardous waste generator inspections with a frequency that is consistent with its Inspection and Enforcement (I&E) Program Plan. The CUPA has not inspected all 4,407 hazardous waste generators that have been identified by the CUPA. The last three annual inspection summary reports indicate the following:

   1) 4,302 hazardous waste generators were identified in fiscal year (FY) 05/06 of which 781 were inspected.
   2) 4,389 hazardous waste generators were identified in FY 06/07 of which 708 were inspected.
   3) 4,407 hazardous waste generators were identified in FY 07/08 of which 687 were inspected.

   The CUPA has inspected approximately 49% of all known facilities generating hazardous waste over the past three fiscal years.

   Improvements have been made in terms of inspecting more than a third of the Resource Conservation Recovery Act (RCRA) large quantity generators and Permit by Rule (conditionally authorized and conditionally exempt) facilities in FY 07/08, and further improvement may still be made.

   Preliminary Corrective Actions: The CUPA will continue to implement its action plan as noted in its FY 07/08 Self-Audit report. By April 30, 2009, the CUPA will

submit a progress report, including the number of facilities inspected within the current fiscal year.

CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

Cal/EPA's 1st Response: Please refer to DTSC's response.

- **DTSC's response:** Please continue to keep DTSC informed as to your progress in inspecting the number of facilities within your jurisdiction during your next quarterly report.

CUPA's 2nd Update (8-18-09): See Table 1. Currently there are 4372 active generator facilities, 47 permitted RCRA Large Quantity Generators, and 79 Tiered Permitting Facilities. The CUPA did routine inspections at 717 generator facilities, an increase of 37 % over the 523 routine generator inspections in the previous 6 months and a number larger than the previous fiscal year. This is very close to the 3 year target based on the snapshot. With respect to RCRA LQGs actually under permit as RCRA LQGs, the CUPA inspected 16 which would be above the frequency based on the snapshot. Combined Tiered Permitting facilities are within frequency, since the CUPA intentionally trades off the years that PBR-HHWs are done with the years that other onsite HW Treatment facilities are done. 31% of the TP units are due in FY 2009-10, 49% are due in 2010-11, and 20% are due in 2011-12.

Cal/EPA's 2nd Response: Cal/EPA appreciates the CUPA's efforts to meet its scheduled inspection frequency for HWG facilities. The CUPA has inspected 28% of its HWG facilities in FY 2008/2009, and in the last 6 months, has increased its inspections by 37% over the first 6 months of the FY. Please continue to update Cal/EPA and DTSC on the HWG inspection progress. The supplemental spreadsheet provided was very helpful in presenting the CUPA's progress in meeting its inspection frequencies across program elements. Please refer to DTSC's response.

- **DTSC's response:** Please continue to keep DTSC informed as to your progress in inspecting the number of facilities within your jurisdiction during your next quarterly report.

CUPA's 3rd Update (12-4-09): See Table 2. The CUPA continues to approach or now meets inspection frequency annual targets for generator, handler, and CalARP, depending on whether you look at quarterly or annual statistics. The CalARP program is currently focused on processing June 2009 5-year submissions but still within frequency for the past 12 months. The UST program does not yet meet frequency as it has been struggling to meet the demand for inspections surrounding the EVR Phase II and ISD upgrades.

Cal/EPA's 3rd Response: The CUPA continues to increase its HWG facility inspections and meets its targeted frequencies for TP and RCRA LQG facilities. Please continue to work towards meeting the inspection goals set forth in the self audit. Continue to update Cal/EPA on the HWG inspection progress. Please provide current HWG inspection numbers in the next progress report. Also, include the CUPA's projected timeframe for increasing HWG inspections enough to meet the scheduled triennial inspection frequency.

CUPA's 4th Update (4-26-10):

Please see Table 3: Inspection Data for April 2010 CUPA Update.

For the small categories (RCRA LQG and Tiered Permitting) 3 year targets are not even from year to year. High priority facilities are separately tracked for inspection frequency based on previous inspection date. The CUPA is also now performing an overall number of annual routine hazardous waste inspections that meets the general target of 1/3 of the permitted population.

Cal/EPA's 4th Response: Cal/EPA considers this deficiency corrected.

2. **Deficiency:** The CUPA has not met the state mandated inspection frequency for its hazardous materials business plan facilities. This deficiency was identified in the CUPA's 2005 evaluation. In addition, based on the Annual Inspection Summary Reports, the CUPA inspected approximately 21% of its hazardous materials business plan facilities in FY 05/06 and 18% in both FY 06/07 and FY 07/08.

   Preliminary Corrective Actions: The CUPA will continue to implement its action plan as noted in its FY 07/08 Self-Audit report. By April 30, 2009, the CUPA will submit a progress report, including the number of facilities inspected within the current fiscal year.

   CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

   Cal/EPA's 1st Response: Please refer to CalEMA's response.

   - **CalEMA's response:** The actions taken by the CUPA appears to be a successful measure in correcting this deficiency. The numbers provided by the CUPA shows that the CUPA is on pace to accomplish 27% of inspections for the fiscal year and with the new hires, as well as future hires, the goal of meeting the State mandated inspection frequencies for the HMBP program appear to be attainable. However the numbers provided for the CalARP program seem to be falling short of the state mandated inspection frequency of 33%. In the CUPA's next progress

report, please report any new numbers to show the progress towards correcting this deficiency. Keep up the good work!

CUPA's 2nd Update (8-18-09): See Table 1. Currently there are 6590 active handlers. The CUPA did routine inspections at 1155 of these facilities, an increase of 35% over the 855 routine handler inspections in the previous 6 months. If the CUPA can maintain this inspection rate, we can meet the expected 3 year frequency. Note that the number of facilities is expected to increase substantially as the CUPA is now systematically permitting CO2 handling at restaurants, something that previously was a low priority. This will increase the number of handlers, but many of these will not be due for inspection for until FY 2012/13. However, the CUPA would also like to explore some kind of self-certification alternative only inspecting a sample of these facilities for these limited risk situations.

Cal/EPA's 2nd Response: Cal/EPA appreciates the CUPA's efforts to meet its mandated inspection frequency for BP facilities. The CUPA has inspected 30% of its BP facilities in FY 2008/2009, and in the last 6 months, has increased its inspections by 35% over the first 6 months of the FY. Please continue to update Cal/EPA and CalEMA on the BP inspection progress. Please refer to CalEMA's response.

- **CalEMA's response:** With the next quarterly report, please update your progress on maintaining your greatly improved inspection rate for business plan facilities. In addition, please update any progress on the carbon dioxide exemption proposed in conversation with CalEMA staff.

CUPA's 3rd Update: See Deficiency 1 Response and Table 2 regarding inspection frequency. With regard to CO2 facilities, the CUPA has proposed several alternatives to the governing Board representatives following some industry concerns and discussions are still taking place.

Cal/EPA's 3rd Response: The CUPA has significantly improved its HMBP facility inspections in the last half of FY 08/09. Cal/EPA and CalEMA consider this deficiency corrected. Please refer to CalEMA's response.

- **CalEMA's response:** The inspection numbers supplied by the CUPA shows a gratifying increase in inspections. If this level of effort is maintained, the CUPA is on track to meet or exceed the three-year goal.

3. **Deficiency:** The CUPA is not ensuring that some hazardous materials business plans being submitted contain either an annual certification or new submittal of their annual inventory. Of the 17 facility files reviewed, five were found without an annual inventory or certification of no change.

Preliminary Corrective Actions: By April 30, 2009, the CUPA will develop and implement an action plan to maintain current annual inventory certifications of all businesses within the business plan program. By April 30, 2009, the CUPA will submit the action plan and report the CUPA's progress in implementing the action plan.

CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

Cal/EPA's 1st Response: Please refer to CalEMA's response.

- **CalEMA's response:** The actions taken by the CUPA appears to be a successful measure in correcting this deficiency. In the CUPA's next progress report, please report the effectiveness of the reminder notice and any numbers the CUPA may have obtained from this action to show the CUPA's progress towards correcting this deficiency. Keep up the good work!

CUPA's 2nd Update (8-18-09): The San Bernardino CUPA received 20% more business plan submissions 2008-09 than in 2007-08. The transition from manual filing to electronic filing via CERS is expected to expand the number of facilities that can be reached by email notifications and to also simplify the recertification process for those with established plans.

Cal/EPA's 2nd Response: Please refer to CalEMA's response.

- **CalEMA's response:** With the next quarterly report, please update your progress in obtaining annual certifications or inventory submittals.

CUPA's 3rd Update: The CUPA is actively working on the Electronic Reporting Workgroup and is planning on outreach activities to help businesses comply by using CERS. The CUPA has a user authorization process in place and is actively authorizing users on CERS. The number of business plan submissions (plans & updates) increased by 25% from Fiscal year 2007-2008 to 2008-2009. We attribute that largely to the increase in handler inspections. An annual notification by email is planned for the end of January of 2010 for the March 1, 2010 annual deadline. That annual notification will include information on electronic filing.

Cal/EPA's 3rd Response: Please refer to CalEMA's response.

- **CalEMA's response:** With the next quarterly report, please update your progress in obtaining annual certifications or inventory submittals. Please indicate how many facilities have submitted their annual inventory or inventory certification.

CUPA's 4th Update (4-26-10):

Approximately 2500 facilities have filed annual inventories for the March 1, 2010 inventory deadline that have been entered into Envision. Another 1000 still await entry, so we estimate 3500 facilities have filed for the 2010 deadline. For the previous whole year of filing, the CUPA received 6971 submissions from 4388 distinct facilities. In the last 2 years, 5043 distinct facilities have filed 10,597 inventories. The reality is that sometimes it is the visit from the inspector on the triennial inspection that forces the issue of filing the annual inventory. Over 358 facilities have requested to file on CERS since January of 2010 and 130 of those have gone through the CUPA's approval process.

Cal/EPA's 4th Response: The CUPA has collected approximately 53% of their businesses annual inventories or annual certifications. This amount is significantly below what should be collected by the federal deadline of March 1. The CUPA should follow-up with those facilities that do not respond and implement enforcement as needed. Cal/EPA does consider the effects that staff turnover and county budgetary issues have on the CUPA. Please continue to update Cal/EPA on the number of annual inventories or annual certifications received for 2010. Please refer to Cal EMA's response.

- **Cal EMA's Response:** With the next quarterly report, please update your progress in obtaining all the annual certifications or inventory submittals. Please indicate how many facilities have submitted their annual inventory or inventory certification.

4. **Deficiency:** The CUPA has not maintained the state mandated inspection frequency for its California Accidental Release Prevention (CalARP) facilities. However, the CUPA is on its way toward correcting this deficiency. At least five of 150 CalARP facilities have not been inspected within the last three fiscal years.

   Preliminary Corrective Actions: By April 30, 2009, the CUPA will submit a progress report, including the number of CalARP facilities that have been inspected during the current fiscal year.

   CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

   Cal/EPA's 1st Response: Please refer to CalEMA's response in #2.

   CUPA's 2nd Update (8-18-09): See Table 1. Currently there are 134 active CalARP facilities. The CUPA did routine inspections at 67 of these facilities in the past 6 months, an increase of 10 fold over the previous 6 months and more inspections than in the previous fiscal year. With CalARP facilities, annual numbers can be misleading as a single complex facility can easily require the

resources of 10 municipal water wells. So, looking back over the past 2 fiscal years, of the 134 facilities, 49 were inspected in 07/08 (and therefore will become due in 10/11), 68 were inspected in 08/09 (and therefore become due in 11/12) leaving 17 that need to be inspected in 09/10. The inspectors are being provided with priority lists for inspection based on risk.

New CalARP facilities enter the inspection cycle based on the program level of their RMPs since RMP verification is accomplished at the time of inspection. Program level 3 facilities are targeted within 2 years and Program level 2 facilities within 3 years, to meet RMP verification requirements.

Many municipal water facilities continue to replace gas chlorine with other alternative disinfectants so the CUPA anticipates a reduction in the number of facilities regulated under CalARP.

Cal/EPA's 2nd Response: Cal/EPA and CalEMA consider this deficiency corrected. Please refer to CalEMA's response.

- **CalEMA's response:** The CUPA's efforts (approximately 50% of the stationary sources inspected in 6 months) are greatly appreciated. The deficiency has been corrected. Good job.

5. **Deficiency:** The CUPA's permit does not include some required underground storage tank (UST)-specific elements. It is missing monitoring requirements of both tanks and piping or an attached approved monitoring plan.

   Preliminary Corrective Actions: By April 30, 2009, the CUPA will issue permits with monitoring requirements or attach an approved Monitoring Plan. The monitoring requirements may be shown as: "Monitoring or programming for monitoring will be conducted at the locations of the following equipment, if installed: monitoring system control panels; sensors monitoring tank annular spaces, sumps, dispenser pans, spill containers, or other secondary containment areas (e,g. double-walled piping); mechanical or electronic line leak detectors; and in-tank liquid level probes (if used for leak detection)."

   CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

   Cal/EPA's 1st Response: Cal/EPA and the SWRCB consider this deficiency corrected. Please refer to the SWRCB's response.

   - **SWRCB's response:** SWRCB considers Deficiency #5 corrected and looks forward to seeing the final permit template.

   See Attachment 1 for the permit conditions for the reverse of the permit, anticipated to be adopted with the next order of invoice paper.

6. **Deficiency:** The CUPA has not met the mandated inspection frequency for UST facility compliance inspections. This deficiency was also identified during the CUPA's last evaluation in 2005 and plans were made to improve the number of inspections. Inspection frequencies for the last three fiscal years were 73% (05/06), 70% (06/07), and 62% (07/08). The CUPA's goal is to meet the inspection frequencies and conduct the compliance inspection during the annual monitoring certification. The CUPA's challenges have been due to losing staff positions and reassignment of some staff time to other departmental duties. The CUPA stated that they are using a risk-based evaluation process to first inspect the facilities with the highest potential for environmental impacts or are recalcitrant in returning to compliance after issuance of a Notice of Violation. This provides maximum protection for the environment yet may reduce compliance frequencies.

   Preliminary Corrective Actions: The CUPA will conduct compliance inspections for all UST facilities each year, which will be reflected on their Annual Summary Report 3 and Semi-Annual Report 6.

   The CUPA already has a plan to add additional resources to assist in meeting its scheduled inspection frequencies.

   The CUPA has been seeking approval for additional staff or to fill vacant positions. This deficiency will be considered corrected when approval is granted.

   The SWRCB recommends that this approval be obtained as soon as possible. Please report the status in the first deficiency progress report.

   CUPA's 1st Update (4-1-09): Please refer to the CUPA's progress report form attached to this document.

   Cal/EPA's 1st Response: Please refer to the SWRCB's response.

   - **SWRCB's response:** SWRCB appreciates the CUPAs efforts to increase the inspections frequencies for UST facilities which were identified in Deficiency #6 as not meeting the required annual inspection frequency. The CUPA has reached about 76% of UST facilities inspected annually. The CUPA will continue to update their inspection activities in the next progress report.

   CUPA's 2nd Update (9-18-09): See Table 1: Currently there are 846 active UST facilities with active UST permits. The CUPA did routine inspections at 362 of these facilities, an increase of 18 % over the 313 routine UST inspections in the previous 6 months. The San Bernardino CUPA has increased the number of routine inspections from the previous 6 months but still falls short of annual frequency. The number of inspections required due to EVR upgrades and the

additional plan check time has reduced the availability of the limited staff. Also, 1 member of UST staff has been unavailable for inspections since October 2008 and off entirely on medical leave since March 2009. 3 "hybrids" (district inspectors part-time assigned to UST inspections also) have contributed to getting these inspections completed. We now are identifying 2-4 additional district inspectors who may be appropriate to assignment as "hybrids". The CUPA did hire 3 new inspectors in 08-09, one that was already ICC-certified. For 09-10, due to County-wide hiring restrictions, the CUPA is limited in the ability to add to the inspection staff. However, the CUPA continues to close and transfer LOP cases with the intention of reassigning the majority of those positions to UST with just a minimal LIA program. San Bernardino County is planning to exit the LOP program at the end of the 2010-11 fiscal year.

Cal/EPA's 2nd Response: Cal/EPA appreciates the CUPA's efforts to meet its mandated inspection frequency for UST facilities. The CUPA has inspected 80% of its UST facilities in FY 2008/2009, and in the last 6 months, has increased its inspections by 16% over the first 6 months of the FY. Please continue to update Cal/EPA and SWRCB on the UST inspection progress. Please refer to the SWRCB's response.

- **SWRCB's response:** SWRCB appreciates the CUPAs efforts to increase the inspections frequencies by 16-18% for UST facilities which were identified in Deficiency #6 as not meeting the required annual inspection frequency. The CUPA has reached about 85% of UST facilities inspected annually based on the last 6 months of inspections conducted. The CUPA will continue to update their inspection activities in the next progress report.

CUPA's 3rd Update: See Deficiency 1 Response and Table 2 regarding inspection frequency.

Cal/EPA's 3rd Response: The CUPA continues to struggle to meet its UST inspection frequency due to EVR Phase II and ISD upgrades. Continue to update Cal/EPA on the UST inspection progress. On the next progress report, please provide current UST inspection numbers. Also, include the CUPA's projected timeframe for increasing UST inspections enough to meet the annual inspection frequency. Please refer to the SWRCB's response.

- **SWRCB's response:** SWRCB appreciates the CUPAs efforts to increase the inspections frequencies for UST facilities which were identified in Deficiency #6 as not meeting the required annual inspection frequency. The CUPA has unfortunately attained a lower projected inspection frequency and the SWRCB realizes the difficulties that these current budget constraints are placing on public agencies. The CUPA will continue to update their inspection activities in the next progress report.

CUPA's 4th Update (4-26-10):

Please see Table 3: Inspection Data for April 2010 CUPA Update.

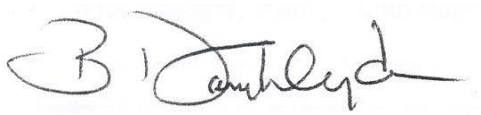
The UST program performed 676 annual inspections and 591 other inspections (many related to phase 2 EVR) in the 12 months ending 1/31/2010. The permitted facilities that did not receive annual inspections include sites under construction, abandoned USTs, facilities who have not called to notify of monitoring certifications, a few facilities who have called but we had to let monitoring certification activities go unwitnessed and delay our annual inspection due to lack of UST inspection staff. So the UST program continues to be short of ICC-certified staff. Related UST staffing issues:

- The UST program has 2 full-time UST inspectors who are also plan checkers, 2 UST inspectors who are also LOP caseworkers, and 1 LOP staff person who also does UST removals.
- The CUPA also has 3 "hybrids" (Field Services district inspectors who primarily do handler/generator/CalARP inspections) who spend 1 day per week in UST, and currently has 2 additional hybrids in ICC training. That will be the equivalent of 1 full time field UST position.
- On April 1, 2010, 1 fulltime UST/LOP program staff person retired.
- San Bernardino County's last projected LOP contract year is 2010-11 and the caseload and percent of time being spent in LOP is being reduced which may provide a small increase in time available for UST. New LIA work is anticipated to be less than previous LOP work.
- The CUPA's attempts to fill vacant positions are complicated by uncertainty in organizational structure, union contract terms, and other situations beyond the CUPA's control.

Cal/EPA's 4th Response: Due to staffing problems and other circumstances outside of the CUPA's control, the CUPA continues to struggle to meet its UST inspection frequency. Continue to update Cal/EPA on the UST inspection and staffing progress. Please refer to the SWRCB's response.

- **SWRCB's response:** The SWRCB appreciates the CUPAs efforts to increase the inspection frequencies of UST facilities. The CUPA's inspection frequency has remained at approximately 80% over a 24 month period. The SWRCB realizes the difficulties that these current budget constraints and other contributing factors are placing on public agencies. The SWRCB is pleased to notice that the CUPA has been using Red Tags as a way to get non-compliant UST facilities back into compliance. The CUPA will continue to update their inspection activities in the next progress report.

If you have any questions, please contact me or Marilyn Kraft or Susan Williams at (909) 386-8401.



B. DOUGLAS SNYDER, ASSISTANT FIRE MARSHAL
SAN BERNARDINO COUNTY FIRE DEPARTMENT
HAZARDOUS MATERIALS DIVISION

BDS:mk
cc: Tim Sappok, Assistant Fire Chief
Pat Dennen, Fire Chief

Attachment 1: Permit Conditions Language

PERMIT CONDITIONS

As a condition of the permit to operate, the owner, operator, and permit holder shall comply with the following:

a. Hazardous Materials Release Response Plans and Inventories Program (HMRRP):
California Health and Safety Code (CHSC) Division 20, Chapter 6.95, Article 1 and Title 19 California Code of Regulations (CCR).

b. California Accidental Release Prevention Program (CalARP): CHSC Division 20, Chapter 6.95, Article 2 and Title 19 CCR.

c. Underground Storage Tanks (USTs): CHSC Division 20, Chapters 6.5, 6.7, 6.75, and Title 23 CCR, Chapters 16 & 18.

(1) **Monitoring, Response and Plot Plans shall be approved by the San Bernardino County CUPA.**
(2) **The owner and operator are subject to all applicable requirements of Chapter 6.7 and 6.75 of the CHSC and the applicable regulations.**
(3) **This permit and permit conditions including the Monitoring, Response and Plot Plans shall be maintained on site.**
(4) **Monitoring or programming for monitoring shall be conducted at the locations of the following UST equipment, if installed: monitoring system control panels; sensors monitoring tank annular spaces, sumps, dispenser pans, spill containers, or other secondary containment areas (e.g. double-walled piping); mechanical or electronic line leak detectors; and in-tank liquid level probes used for leak detection.**

Note: The UST ID Number is listed on the front of the permit for each UST.

d. Aboveground Petroleum Storage Act SPCC Plans: CHSC Division 20, Chapter 6.67 and 40 CFR 112

e. Hazardous Waste Generator and Hazardous Waste Onsite Treatment: CHSC Division 20, Chapter 6.5 and Title 22 CCR, Division 4.5, Chapters 10, 11, 12, 20 and 31.

f. Uniform Fire Code, Hazardous Materials Management Plans and Inventories: CHSC Division 12, Part 2, Chapter 1, Article 2, Section 13143.9, CHSC 25509.2, California Fire Code Chapter 27, Section 2701.5.1 and Section 2701.5.2, formerly referred to as UFC Section 80.103.

g. Unified Program Forms and Electronic Reporting: CHSC Division 20, Chapter 6.11, Section 25404(e)(4) and Title 27 CCR.

Table 1: Inspection Data

The following table summarizes the number of regulated businesses and inspections for the latest available period (1/1/2009 – 6/30/2009) compared to the previous period (7/1/2008 through 12/31/2008). Note that regulated during the year does not represent the number of businesses regulated at any one time. Per previous CalEPA instruction, it includes any business regulated during the period, even if it didn't exist at the beginning of the period or is inactive at the end of the period. The snapshot (used by some CUPAs on annual reports because it is simpler to calculate) represents the number of regulated facilities actively regulated for that CUPA element as of that date.

			Routine Inspections		Percent increase from previous 6 months	Projected Frequency based on last 6 months compared to current snapshot	Other Inspections	
Program	Regulated during the year as of 6/30/09	Snapshot on 8/14/09	7/1/08-12/31/08	1/1/09 – 6/30/09		Years	7/1/08 - 12/31/08	1/1/09 – 6/30/09
HMRRP	6575	6590	854	1155	35%	2.85	184	226
CalARP	158	134	6	67	1017%	1.00	7	4
UST Facilities	846	846	313	362	16%	1.17	310	329
HW Generators	4464	4372	523	717	37%	3.05	184	174
RCRA LQGs	52	47	2	16	700%	1.47	2	0
Onsite HW Treatment	63	45	3	5	67%	4.50	0	1
PBR – HHW	16	16	1	12	1100%	0.67	0	1
Combined Tiered Permitting	*79*	*61*	*4*	*17*	*325%*	*1.79*	*0*	*2*

Note: The San Bernardino County CUPA inspection frequency by mandates and application is once every 1 year for USTs and once every 3 years for all other categories. This will not mean that 33% of each type of facility in the 3 year category will be inspected each year. The date of inspection drives when the next inspection is due. And the categories cycle and the CUPA intentionally trades off the years that PBR-HHWs are done with the years that other onsite HW Treatment facilities are done. Also number of facilities inspected does not necessarily translate into proportion of inspection work. A large complex CalARP facility may easily take longer to inspect than 10 municipal water wells. The CUPA is addressing this issue with target inspection lists for high priority facilities. The CUPA believes that it is meeting targeted frequencies for CalARP, Tiered Permitting, and RCRA LQGs.

Table 2: Inspection Data for December 2009 CUPA Update

Program	Regulated during from 10/1/08 until 9/30/09	Annual Inspection Target	Routine Inspections 7/1/09-9/30/09	Annualized Equivalent	%Target based latest quarter	Routine Inspections 10/1/08 - 9/30/09	% Target based on 12 months from 10/1/08 – 9/30/09
HMRRP	6523	2175	575	2300	109%	2104	97%
CalARP	150	50	3	12	8%	77	154%
UST Facilities	843	843	171	684	81%	650	77%
HW Generators	4401	1467	368	1472	100%	1308	89%

Table 3: Inspection Data for April 2010 CUPA Update

Program	Regulated during from 02/01/2009 until 01/31/2010	Annual Inspection Target	Routine Inspections 02/01/2009 until 01/31/2010	%Target
HMRRP	6620	2206	2346	106%
CalARP	154	51	69	135%
UST Facilities	840	840	676	80%
HW Generators	4466	1489	1443	97%
RCRA LQGs	58	19	27	142%
Tiered Permitting	69	23	20	87%