

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**

902



**FROM:** Community Health Agency/Department of Environmental Health

**SUBMITTAL DATE:**

November 14, 2011

**SUBJECT:** Acceptance of a Grant from the State of California Environmental Protection Agency

**RECOMMENDED MOTION:**

Authorize the Director of Environmental Health or designee to sign the grant agreement (Attachment A) and accept \$292,114 to help fund the creation of a Regional Web Portal and expand electronic data collection capabilities.

**BACKGROUND:** The Community Health Agency, Department of Environmental Health Hazardous Materials Branch, was designated by the State of California, Environmental Protection Agency as the Certified Unified Program Agency (CUPA) or lead agency for the County in 1997.

(continued)

SVS:JSW

Steve Van Stockum, Director

**FINANCIAL DATA**

Current F.Y. Total Cost:	\$ 160,000	In Current Year Budget:	Yes
Current F.Y. Net County Cost:	\$ 0	Budget Adjustment:	No
Annual Net County Cost:	\$ 0	For Fiscal Year:	11/12

**SOURCE OF FUNDS:** State of California

Positions To Be Deleted Per A-30	<input type="checkbox"/>
Requires 4/5 Vote	<input type="checkbox"/>

**C.E.O. RECOMMENDATION:**

APPROVE

BY:   
Debra Cournoyer

**County Executive Office Signature**

FORM APPROVED COUNTY COUNSEL

DATE 11/14/11  
BY: BRUCE G. FORDON

Departmental Concurrence

- Policy
- Policy
- Consent
- Consent

Dept's Recomm.:  
Per Exec. Ofc.:

Prev. Agn. Ref.:

District: All

Agenda Number:

ATTACHMENTS FILED  
WITH THE CLERK OF THE BOARD

2.2

The State's goal in creating the CUPA was to make hazardous materials and hazardous waste management programs within cities and counties more coordinated, consolidated, and consistent.

The County, as the CUPA, is responsible for coordinating and implementing hazardous material/waste management programs countywide in order to accomplish this goal. The State requires electronic data reporting of hazardous material information by January 2013. Most of the infrastructure cost is paid via a surcharge on permit fees statewide that funds the majority of the reporting costs

The State of California is awarding \$292,114.00 to the Department to assist in implementing this new reporting requirement. These funds, as well as others from the surcharge, will fully subsidize the development of a Regional Web Portal and electronic reporting requirements to integrate information from the two Participating Agencies (Corona and Riverside) and the County. The Portal will be available to the facility operators to provide documents electronically to the agencies to meet State requirements. The Department is fortunate to be receiving these funds.

## **FISCAL**

The approval of this item will result in no cost to the County.

CERTIFIED UNIFIED PROGRAM AGENCY ELECTRONIC REPORTING  
GRANT AGREEMENT  
BETWEEN THE  
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
AND  
RIVERSIDE COUNTY ENVIRONMENTAL HEALTH  
CERTIFIED UNIFIED PROGRAM AGENCY  
AGREEMENT NO. G10-UPA-73

State and Grantee hereby agree as follows:

1. PROVISIONS. The following statute authorizes the State to enter into this Grant Agreement:
  - a. California Health and Safety Code, division 20, chapter 6.11, section 25404
2. PURPOSE. The State shall provide a grant to and for the benefit of the Grantee for the purpose of allocating monies from the regulated businesses oversight surcharge to the Certified Unified Program Agencies (CUPAs). Assembly Bill 2286 authorizes the Secretary to use funds from the oversight surcharge to provide certified unified program agencies and participating agencies assistance in implementing electronic reporting requirements through grant funds for the purposes of the system. Up to 25% of the grant is authorized to be paid in advance on approval of the grant application.
3. GRANT AMOUNT. \$ 292,114.00
  - a. Advanced Payment Amount. \$ 78,028.50
4. TERM OF AGREEMENT. The term of the Agreement shall begin on January 1, 2010, and end on March 31, 2013. ABSOLUTELY NO GRANT DISBURSEMENT REQUESTS WILL BE ACCEPTED AFTER June 1, 2013.
5. REPRESENTATIVES. Either party may change its Representative(s) upon written notice to the other party. The Representatives during the term of this Agreement will be:

California Environmental Protection Agency <b>GRANT MANAGER</b>
James Bohon
1001 "I" Street, 2nd Floor
Sacramento, California 95814
Phone (916) 327-5097
Fax (916) 322-5615
Email: <a href="mailto:jbohon@calepa.ca.gov">jbohon@calepa.ca.gov</a>
Riverside County Environmental Health <b>GRANTEE</b>
Name of Project Director, Title: John Watkins, Deputy Director
Street Address: 4065 County Circle Dr., #104
City, Zip: Riverside, 92503
Phone: 951-358-5055
Fax: 951-358-5017
e-mail: <a href="mailto:JWatkins@rivcocha.org">JWatkins@rivcocha.org</a>

6. STANDARD AND SPECIAL PROVISIONS. The following exhibits are attached and made a part of this Agreement by this reference:

- |           |   |
|-----------|---|
| Exhibit A | REPORTING AND GRANT DISBURSEMENT PROVISIONS |
| Exhibit B | SPECIAL AND GENERAL PROVISIONS              |
| Exhibit C | GRANT APPLICATION                           |
| Exhibit D | TRANSITION PLAN                             |

7. GRANTEE REPRESENTATIONS. The Grantee accepts and agrees to comply with all terms, provisions, conditions, and commitments of this Agreement, including all incorporated documents, and to fulfill all assurances, declarations, representations, and commitments made by the Grantee in its application, accompanying documents, and communications filed in support of its request for grant funding.
8. DEFINITIONS. The following defined terms apply throughout this Agreement:  
"Cal/EPA" means the California Environmental Protection Agency;  
"CUPA" means the Certified Unified Program Agency;  
"Grantee" means the Riverside County Environmental Health;  
"PA" means the Participating Agency;  
"Electronic Reporting" means the Electronic Reporting requirements of Assembly Bill 2286  
"Secretary" means the Secretary of the California Environmental Protection Agency; and  
"State" means the State of California, including Cal/EPA.

IN WITNESS THEREOF, the parties have executed this Agreement on the dates set forth below.

By:

By:

\_\_\_\_\_  
Grantee Signature

\_\_\_\_\_  
Donald A. Johnson, Assistant Secretary  
California Environmental Protection Agency

\_\_\_\_\_  
Grantee Name, Title (Typed/Printed)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

**EXHIBIT A**  
**REPORTING AND GRANT DISBURSEMENT PROVISIONS**

**A. REPORTING PROVISIONS**

1. The Grantee shall prepare and submit a Transition Plan Status Reports, including Grant Disbursement Request form for documentation of expenditures, to the Cal/EPA Grant Manager at the following address:

California Environmental Protection Agency  
Unified Program Section  
Attn: Shinita Bryson  
1001 "I" Street, 2nd Floor  
Sacramento, California 95814

2. The Transition Plan Status Report and Grant Disbursement Request Form will be provided by Cal/EPA upon the approval of the Grant Application.
3. Each report shall have a cover letter certified by the Project Director or the Grant Contact.
4. For purposes of the Electronic Reporting Implementation Status Reports, the reporting period is as follows:

<u>Report</u>	<u>Reporting Period</u>	<u>Report Due Date</u>
Report 1	June 1, 2010, to September 30, 2010	November 1, 2010
Report 2	October 1, 2010, to December 31, 2010	February 1, 2011
Report 3	January 1, 2011, to March 31, 2011	May 1, 2011
Report 4	April 1, 2011, to June 30, 2011	August 1, 2011
Report 5	July 1, 2011, to September 30, 2011	November 1, 2011
Report 6	October 1, 2011, to December 31, 2011	February 1, 2012
Report 7	January 1, 2012, to March 31, 2012	May 1, 2012
Report 8	April 1, 2012, to June 30, 2012	August 1, 2012
Report 9	July 1, 2012, to September 30, 2012	November 1, 2012
Report 10	October 1, 2012, to December 31, 2012	February 1, 2013
Report 11	January 1, 2013, to March 31, 2013	May 1, 2013

**B. GRANT DISBURSEMENT PROVISIONS**

1. Grant Disbursement Request Forms shall be used to depict the expenditures incurred by the Grantee in implementation of Electronic Reporting throughout the period of performance.
2. The Grant Disbursement Request Form shall be submitted as an attachment to the Transition Status Report, in accordance with the submission schedule provided above.
3. The Grantee shall use the Grant Disbursement Request Form provided by Cal/EPA.

**EXHIBIT B  
SPECIAL AND GENERAL PROVISIONS**

**A. SPECIAL PROVISIONS**

1. **AMENDMENTS:** No amendment or variation of the terms of this Agreement shall be valid unless made in writing, signed by the parties and approved as required. No oral understanding or agreement not incorporated in the Agreement is binding on any of the parties.
2. **WAIVERS:** Any term, provision, condition, or commitment of this Agreement may be waived at the discretion of Cal/EPA. All waivers shall be documented in writing.
3. **DISPUTES:** The Grantee shall continue with the responsibilities under this Agreement during any dispute. Any dispute arising under this Agreement which is not otherwise disposed of by agreement shall be decided by the Cal/EPA Assistant Secretary for Local Programs or an authorized representative. The decision shall be in writing and a copy thereof furnished to the Representatives of this Agreement. The decision of the Assistant Secretary shall be final and conclusive unless, within thirty (30) calendar days after mailing of the decision to the Grantee, the Grantee furnishes a written appeal of the decision to the Secretary for Environmental Protection, with carbon copies furnished to the Cal/EPA Assistant Secretary for Local Programs and the Cal/EPA Grant Manager. The decision of the Secretary shall be final and conclusive unless determined by a court of competent jurisdiction to have been fraudulent, or capricious, or arbitrary, or so grossly erroneous as necessarily to imply bad faith, or not supported by substantial evidence. In connection with any appeal under this clause, the Grantee shall be afforded an opportunity to be heard and to offer evidence in support of its appeal. Pending final decision of a dispute hereunder, the Grantee shall continue to fulfill and comply with all the terms, provisions, commitments, and requirements of this Agreement. This clause does not preclude consideration of legal questions, provided that nothing herein shall be construed to make final the decision of the Cal/EPA Assistant Secretary for Local Programs or the Secretary, on any question of law.
4. **FISCAL MANAGEMENT SYSTEMS AND ACCOUNTING STANDARDS:** The Grantee agrees that, at a minimum, its fiscal control and accounting procedures will be sufficient to permit tracing of grant funds to a level of expenditure adequate to establish that such funds have not been used in violation of state law or this Agreement. The Grantee further agrees that it will maintain financial accounts in accordance with generally accepted accounting principles. Without limitation of the requirement to maintain financial management systems and accounting standards in accordance with generally accepted fiscal and accounting principles, the Grantee agrees to:
  - a. Establish a financial account(s) and accounting system(s) that will adequately and accurately depict all Electronic Reporting Grant amounts received and expended during the term of this Agreement, including but not limited to:
    - i. All Electronic Reporting implementation expenditures; and
    - ii. Running balance of grant allocations and expenditures.
5. **RECORDS MANAGEMENT:** Maintain all documentation and financial records, as may be necessary, for the state to fulfill federal reporting requirements, including any and all reporting requirements under federal tax statutes or regulations. Establish an official file for the allocation that shall adequately document all significant activities and actions relative to the Implementation of the Electronic Reporting Implementation, including but not limited to:
  - a. Fiscal accounting;
  - b. Electronic Reporting Implementation Status Reports; and,
  - c. Grant Disbursement Requests and supporting documentation.
6. **TIMELINESS:** Time is of the essence in this Agreement. The Grantee shall proceed with Electronic Reporting implementation in an expeditious manner. The Grantee shall prepare and submit all required reports and Grant Disbursement Request Forms as stipulated in this Agreement.

7. WITHHOLDING OF GRANT DISBURSEMENTS: Cal/EPA may withhold all or any portion of the allocations provided for by this Agreement in the event the Grantee:
  - a. Materially violates, or threatens to materially violate, any term, provision, condition, or commitment of this Agreement; or
  - b. Fails to maintain reasonable progress toward Electronic Reporting implementation.
8. FUNDS CONTINGENCY: Cal/EPA's obligations under this Grant Agreement are contingent upon the availability of funds. In the event funds are not available, the State shall have no liability to pay any funds whatsoever to the Grantee or to furnish any other considerations under this Grant Agreement.
9. BUDGET REVISIONS: Budget revisions of 15% or less of the total agreement allocation may be made in writing and approved by Cal/EPA without an amendment to the agreement.

**B. GENERAL PROVISIONS**

1. ASSIGNMENT: This grant is not assignable by the Grantee, either in whole or in part, without the consent of the State.
2. AUDIT: Grantee agrees that the Cal/EPA, the Bureau of State Audits, or their designated representative shall have the right to review and to copy any records and supporting documentation pertaining to the expenditure of allocated moneys and performance of this Agreement. The Grantee agrees to maintain such records for a possible audit for a minimum of three (3) years after term of the Agreement, unless a longer period of records retention is stipulated. Grantee agrees to allow the auditor(s) access to such records during normal business hours and to allow interviews of any employees who might reasonably have information related to such records. Further, the Grantee agrees to include a similar right of the State to audit records and interview staff in any contract related to performance of this Agreement.
3. COMPUTER SOFTWARE: The Grantee certifies that it has appropriate systems and controls in place to ensure that state funds will not be used in the performance of this Agreement for the acquisition, operation or maintenance of computer software in violation of copyright laws.
4. CONFLICT OF INTEREST: The Grantee certifies that it is in compliance with applicable state and/or federal conflict of interest laws.
5. GOVERNING LAW: This grant is governed by and shall be interpreted in accordance with the laws of the State of California.
6. INDEPENDENT ACTOR: The Grantee, and its agents and employees, if any, in the performance of this Agreement, shall act in an independent capacity and not as officers, employees or agents of the State.
7. NONDISCRIMINATION: During the performance of this Agreement, the Grantee and its contractors shall not unlawfully discriminate against, harass, or allow harassment against any employee or applicant for employment because of sex, race, religion, color, national origin, ancestry, disability, sexual orientation, medical condition, marital status, age (over 40) or denial of family-care leave, medical-care leave, or pregnancy-disability leave. The Grantee and its contractors shall ensure that the evaluation and treatment of their employees and applicants for employment are free of such discrimination and harassment.
8. NO THIRD PARTY RIGHTS: The parties to this grant Agreement do not create rights in, or grant remedies to, any third party as a beneficiary of this grant Agreement, or of any duty, covenant, obligation or undertaking established herein.
9. TERMINATION: The State may terminate this Agreement and be relieved of any payments should the Grantee fail to perform the requirements of this Agreement at the time and in the manner herein provided. In the event of such termination, the Grantee agrees, upon demand, to immediately return the remaining unused portion, if any, of the Grantee's allocation.

10. **UNENFORCEABLE PROVISION:** In the event that any provision of this Agreement is unenforceable or held to be unenforceable, then the parties agree that all other provisions of this Agreement shall continue to have full force and effect and shall not be affected thereby.



## GRANT APPLICATION FORM

### 1. Entity Information:

Unified Program Agency Name: Riverside County Environmental Health

GRANTEE	GRANT CONTACT
Name of Project Director, Title: John Watkins, Deputy Director	Name: SAME
Street Address: 4065 County Circle Dr., #104	Street Address:
City, Zip: Riverside, 92503	City, Zip:
Phone: 951-358-5055	Phone:
Fax: 951-358-5017	Fax:
e-mail: JWatkins@rivcocha.org	e-mail:

### 2. Grant Amount: \$ 292,114.00

#### a. Advanced payment Requested: \$78,028.50

(Up to 25% of the grant is authorized to be paid in advance on approval of the grant.)

### 3. Scope of Work

In order to become compliant with AB 2286, which requires the Unified Program Consolidated Forms (UPCF) information electronic data exchange between the Certified Unified Program Agency (CUPA) and Cal/EPA, Riverside County Department of Environmental Health CUPA will transition from Envision to the latest version of EnvisionConnect, and establish a Regional Portal with electronic data exchange capability with the California Environmental Reporting System (CERS). The CUPA's two Participating Agencies (PAs)- Corona and Riverside City Fire Departments will each have Portal connections designed to feed information to EnvisionConnect before the data is uploaded to CERS.

It is important to note that the transition is descriptive and not prescriptive. It is understood that the final system design may not completely reflect the conceptual design described in this plan.

Awarded grant funds will be used to purchase necessary computer hardware equipment, conduct business outreach and training, and pay for database software upgrades from Envision to EnvisionConnect along with other vendor services associated with the Regional Portal implementation.

A detailed description of activities associated with meeting the electronic reporting requirements are outlined in the attached Electronic Reporting Transition Plan and in the Work Plan section of this application. CUPA and PA regulated businesses will be expected to submit UPCF information electronically via the Regional Portal by January 1, 2013.

#### 4. Work Plan

Period of Performance: July 1, 2010 through March 31, 2013

1. Schedule EnvisionConnect upgrade and complete all preliminary steps prior to upgrade.
  - a. Complete data assessment and any necessary data remediation.
  - b. Complete configuration wizard.
  - c. Run EnvisionConnect in test environment.
2. Purchase tablet PCs, laptop carriers, portable printers and printer paper for inspection staff and begin implementation of electronic field inspection program.
  - a. Develop inspection forms in Crystal Reports.
  - b. Train inspectors on use of EnvisionConnect field inspection system.
3. Complete EnvisionConnect upgrade and initial onsite staff training by Decade.
4. Implement the EnvisionConnect upload/download feature to CERS for UPCF information and inspection and enforcement data.
5. The CUPA will provide CERS training as needed to both CUPA and PA staff based on the state's training curriculum.
6. Complete one-time initial data transfer of existing data from EnvisionConnect database to CERS system.
7. Complete implementation of the Regional Portal.
8. Complete Regional Portal training by Decade to both CUPA and PA staff.
9. Conduct business educational outreach and training. Businesses will be trained on the use of the Regional Portal.
  - a. Create and send Portal information notification letter to all permitted businesses.
  - b. Post information relating to electronic information reporting on the CUPA's website.
  - c. Host multiple training workshops at various locations. Training sessions will be held at multiple times at strategic locations within the county to better serve all areas.
  - d. Provide assistance while onsite, over phone or email to businesses on electronic information submittals.
10. Accommodate businesses that do not use a computer by establishing 4 Portal kiosks in various offices.

#### 5. Projected Budget:

Program Costs	Fiscal Year 09/10	Fiscal Year 10/11	Fiscal Year 11/12	Fiscal Year 12/13
Personnel Services*	\$	\$	\$25,014	\$24,000
Operating Expenses				
Travel Expenses	\$	\$	\$	\$
Supplies/Materials	\$	\$1,350	\$	\$20,000
Equipment/Software	\$	\$187,000	\$	\$20,000
Professional/Consultant Services	\$	\$14,750	\$	\$
<b>FISCAL YEAR TOTAL</b>	\$	\$203,100	\$25,014	\$64,000
<b>TOTAL</b>				<b>\$292,114</b>

\*Indirect costs may not exceed 35% of grant allotment

**CERTIFICATION**

I certify under penalty of perjury that the information I have entered on this application is true and complete to the best of my knowledge and that I am an employee of the applicant authorized to submit the application on behalf of the applicant. I further understand that any false, incomplete, or incorrect statements may result in the disqualification of this application. By signing this application, I waive any and all rights to privacy and confidentiality of the proposal on behalf of the applicant, to the extent provided in this program.

Applicant Signature

Date

Printed Name of Applicant

<b>ELECTRONIC REPORTING TRANSITION PLAN</b>
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Unified Program Agency Name: Riverside County Environmental Health

<b>TRANSITION PLAN REPRESENTATIVE</b>
Name of Project Director, Title: John Watkins, Deputy Director, and Jim Ray, Program Chief
Street Address: 4065 County Circle Dr., #104
City, Zip: Riverside, 92503
Phone: 951-358-5055
Fax: 951-358-5017
E-mail: jray@rivcocha.org

**1. General Description of Transition Plan**

Assembly Bill (AB) 2286 requires that, by January 1, 2013, all regulated businesses must submit Unified Program Consolidated Forms (UPCFs) information electronically. In order to become compliant with AB 2286, Riverside County Department of Environmental Health Certified Unified Program Agency (CUPA) will upgrade Envision to EnvisionConnect as a foundation to implement a Regional Portal with electronic data exchange capability to the California Environmental Reporting System (CERS). It is important to note that the transition is descriptive and not prescriptive. It is understood that the final system design may not completely reflect the conceptual design described in this plan. This joint transition plan covers the CUPA and two PAs. Any variations in the PAs' plan from the CUPA's plan will be specifically mentioned in this joint plan.

Currently, the CUPA and its two Participating Agencies (PAs) Corona and Riverside City Fire Departments collect all hazardous materials business plan, underground storage tank, and hazardous waste generator forms in paper/hardcopy format for 7,121 Regulated Businesses. UPCFs have been submitted by mail, fax, email or directly to CUPA staff in the field. Non-responders are contacted via phone calls and/or facility visits. Corona PA has always sent letter mail and email notifications to non-responders and will continue to do so.

The summary table in the following page shows a breakdown of Riverside County's Unified Program with estimated dates of connections to the Regional Portal. Each specific Agency listed in the table is responsible for the existing review and submittal of paper UPCFs for the program element(s) listed and will be responsible for the new electronic submittal review and approval. This includes assisting the businesses with their electronic submittals and sending mailers/public outreach information on the mandated electronic submittals to the regulated businesses.

AGENCY	CUPA/PA	PROGRAM ELEMENTS	ESTIMATED DATES OF PORTAL CONNECTION
Corona Fire	PA	Hazardous Materials Business Plan/Fire Code/California Accidental Release Prevention Program	7/1/12
Riverside Fire	PA	Hazardous Materials Business Plan/Fire Code/California Accidental Release Prevention Program/Aboveground Petroleum Storage Act	7/1/12
Riverside County Environmental Health	CUPA	All six program elements	3/1/12

This option will allow all regulated businesses to be able to submit Title 27 Unified Program Consolidated Forms (UPCFs) information electronically via the Regional Portal by January 1, 2013. It will also allow Corona and Riverside PAs' data to be transmitted from the Portal to the CUPA's system of records EnvisionConnect database, and then uploaded to CERS. Conversely, multi-jurisdictional businesses may submit information directly into CERS which will be downloaded into EnvisionConnect and the Portal. The CUPA will conduct a one-time initial upload of existing owner and facility information to CERS. EnvisionConnect will capture the assigned CERS ID for future data exchanges. After the initial upload, data exchanges between EnvisionConnect and CERS will be conducted daily to ensure that all agencies involved will have the latest information.

The initial implementation of the Portal will involve uploading UPCF data into the Portal from EnvisionConnect and PA databases as well as some manual entry. Initial data will be validated by either CUPA or PA staff depending on which agency oversees the specific program element. After data transition is completed, businesses will be required to verify their Portal information and submit any changes if necessary. The CUPA and PAs will notify businesses by mailers, email, phone call, workshop training, and/or inspection report of their data availability in the Portal, and ask them to verify their data.

CUPA and PA staff (depending on program element) will review ongoing electronic submissions to determine submittal status. Emails will be sent out by the Portal notifying the businesses of the submittal status and providing them with the information necessary to achieve compliance. Final approval decisions will be made by CUPA and PA staff within 15 days of initial completeness review. After data transition is completed, paper UPCFs will be accepted, reviewed, and entered by the CUPA and PA only on a case-by-case basis with the understanding that the businesses must ultimately submit the information electronically on their own.

Educational materials about the transition to electronic data submission will be sent to businesses in the form of mailers. The CUPA will also post any helpful Cal/EPA resource links on its website to provide some general guidance on what businesses need to do to comply. Corona PA will utilize their economic development staff to post outreach announcement notifications about electronic reporting on the City's website, the Fire Department home page, and other City web pages. Businesses may also take advantage of electronic reporting workshop trainings that will be held at various locations throughout the county and PA cities in the year 2012.

The Portal's inspection and enforcement module is currently under development pending the release of data elements in CERS2, scheduled for October, 2011. Once the module is complete, it will enable PAs to enter inspection and enforcement information into the eCompliance Portal. The PAs'

inspection and enforcement data can then be uploaded into EnvisionConnect, combined with the CUPA's data, and then uploaded to CERS. The CUPA is planning to transition to implement the EnvisionConnect Remote field inspection module that utilizes the tablet PCs which will automatically upload inspection and enforcement information into EnvisionConnect. The CUPA encourages the PAs to make this transition in order to reduce the burden of manual entries. Riverside and Corona PAs are exploring options to conduct field inspections using iPads or tablet PCs. The Portal will eventually be able to upload inspection and enforcement information into CERS. However, until this module is fully developed and operational, the CUPA will continue to submit paper versions of the Summary Reports to the state.

Currently, the CUPA and PAs collect Title 27 information based on the following methods:

CURRENT COLLECTION METHOD	COLLECTED BY	CUPA PROGRAM
Electronic / Paper	CUPA / PA	Hazardous Materials Business Plan information collected electronically by City of Riverside only. Paper collection method is utilized for the rest of the county by the CUPA and City of Corona.
Paper	CUPA only	Hazardous Waste Generator and Hazardous Waste Onsite Treatment Programs.
Paper	CUPA / PA	California Accidental Release Preventions (CalARP) Program collected by the Cities of Riverside and Corona for businesses within their jurisdictions, and by the CUPA for the rest of the county.
Paper	CUPA only	Underground Storage Tanks.
Paper	CUPA / PA	Aboveground Petroleum Storage Tanks information collected by the City of Riverside for facilities within the city's jurisdiction, and by the CUPA for the rest of the county.

**2. Needs Assessment**

The CUPA and its PAs recognize that converting their business-to-CUPA reporting system from paper/hardcopy to electronic will require an assessment of the resources needed to implement the new system. There are some critical needs that must be addressed in order to efficiently and effectively convert to and manage electronically data exchange with CERS. The needs and the plans to address them are listed in the next page:

- i. Apply for both CUPA Forum and Cal/EPA electronic reporting grant funds to fully implement the Regional Portal. The CUPA and each of its PAs will apply for the Cal/EPA CERS funds separately and submit a single joint transition plan. The funds will be necessary for PA connection to the Portal and for the CUPA to establish Portal operability. Recently, the CUPA

received approval from the CUPA Forum Board to receive additional grant funding to help pay for the startup cost of the Portal.

- ii. Currently, the CUPA uses Decade Software Company's Envision data management system to store inspection and enforcement information and all UPCF information for permitting and accounting purposes. The Envision system is scheduled to be upgraded to EnvisionConnect in the fall of 2011 in order to prepare for electronic data exchange.
- iii. Transfer CUPA and PA hardcopy documents to EnvisionConnect, EnvisionConnect/Regional Portal, and CERS. Owner, Facility, and Program Element data will be transferred from the CUPA's EnvisionConnect database into the Portal.
- iv. Assess existing data for completeness, accuracy, and compliance with Title 27 Data Dictionary.
- v. Obtain an architectural design of the Portal project from the software vendors.
- vi. CUPA with Decade Software Company will provide the EnvisionConnect upload/download feature to CERS for UPCF information and inspection and enforcement data.
- vii. Decade and eCompliance will ensure seamless exchange of PAs' inspection and enforcement data between Regional portal and EnvisionConnect systems.
- viii. CUPA and PAs review and consider fee adjustments, if any, to cover long-term operational costs. Reductions in staff resources to perform manual data entries will be considered.
- ix. Review and update procedures for managing CUPA and PA's data in the Portal.
- x. CUPA, Corona and Riverside PAs will need to connect to the Portal.
- xi. Corona PA will need to transfer UPCF data from its Access database to eCompliance Portal.
- xii. Vendors to conduct Portal training to CUPA and PA staff.
- xiii. CUPA to conduct Portal training to businesses.
- xiv. CUPA and PA staff need to learn how CERS operates in order to assist those businesses that choose to use CERS for their electronic data submissions.
- xv. Businesses that do not regularly use a computer will need assistance from the CUPA and PAs to report data electronically. The CUPA currently has plans to provide 4 computer kiosks for businesses that do not have access to computers. In some situations, CUPA and PAs may need to manually input data for businesses either onsite or during appointments at the CUPA or PA's office.
- xvi. CUPA and PAs need to secure EnvisionConnect and Regional Portal technical support from Decade. CUPA needs to maintain annual contracts with Decade for EnvisionConnect and the Portal. PAs need to maintain annual contract with eCompliance for the Portal.
- xvii. CUPA staff will conduct inspections using tablet laptops that upload inspection and enforcement data into EnvisionConnect through hardwired docking stations that inspectors plug into once they return from the field. The CUPA encourages the PAs to transition to field computers that can upload information into the Portal electronically. Riverside and Corona

PAs are currently in discussions with vendors about the transition to conducting electronic field inspections. Until the inspection and enforcement automatic data upload feature is fully developed, PAs will manually enter their inspection and enforcement data into the Portal, which will upload this data to EnvisionConnect.

### **3. Collecting, Submitting, and Storing Unified Program Related Information**

Riverside County CUPA will be responsible for the oversight of the electronic data exchange with CERS for both CUPA and PA data through EnvisionConnect's upload/download feature. The Regional Portal will synchronize with EnvisionConnect, which will then synchronize with CERS. EnvisionConnect and CERS will conduct daily automatic data exchange which includes data submitted by the regulated community through the Portal. Regulated businesses will submit their information electronically into the Regional Portal. Under unique circumstances, the CUPA and its PAs may collect paper/hardcopy data from the regulated businesses. The CUPA will enter the data into EnvisionConnect, and Riverside and Corona PAs will enter the data into the Portal.

### **4. Management of Data Changes/Updates**

The Regional Portal will allow businesses to electronically submit UPCF data changes/updates. The CUPA is responsible for addressing the UPCF changes/updates for their program elements. The PAs are responsible for addressing the UPCF changes/updates for their program elements. Please see table on page 2 that lists the CUPA and PA agencies with their program elements.

CUPA and PA staff (depending on program element and jurisdiction) will review business submissions, compare with previously submitted information using the Portal's comparison tool, and will make a determination on the approval status. If a business submission is not approved, CUPA and PA staff will enter a notation in the Portal and the business will be notified via email specifying what is needed to complete the submittal process. Businesses that receive an incomplete approval status email will need to click on the email link to their UPCF information to review the CUPA or PA staff's notations and make the required corrections.

The required data submitted by businesses will be transferred to EnvisionConnect. Data upload to CERS will be performed at a predetermined time schedule with an agreed upon data transfer. The CUPA will be responsible for the oversight of the exchange between the Portal and the CUPA's EnvisionConnect database as well as the exchange between EnvisionConnect and CERS.

### **5. Inspection/Enforcement**

The CUPA will use EnvisionConnect to collect and manage inspection and enforcement information obtained from the field. The Department of Environmental Health purchased tablet PCs for all field staff, 30 of which were assigned to CUPA inspectors and supervisors. The CUPA will utilize grant funds to pay for the 30 tablet PCs. The inspection and enforcement information will be transferred and stored into the EnvisionConnect database upon the inspector's return to the CUPA's offices via a hardwired docking station. EnvisionConnect will upload inspection and enforcement data to CERS at a yet to be determined frequency acceptable to Cal/EPA.

PA inspectors will use paper forms to record inspection and enforcement information in the field. However, Riverside and Corona PAs are currently in discussions with vendors regarding the transition to conduct electronic field inspections using iPad or tablet laptop technology. Until the inspection and enforcement automatic data upload feature is fully developed, Corona and Riverside inspectors or clerical staff will manually input inspection results into eCompliance portal. Inspection



and enforcement data in eCompliance portal will be uploaded to the CUPA's EnvisionConnect database, and then onto CERS. The PAs will not be able to electronically upload inspection and enforcement information before 1/1/13. Automation of this function will be developed in the future. The CUPA strongly encourages and fully supports the PAs to make this transition.

Currently, Corona PA has budgeted for at least one laptop, and the CUPA has also agreed to utilize the grant funds to purchase an additional tablet laptop to facilitate the inspection and enforcement electronic data upload process.

Riverside PA currently is planning to transition to conducting field inspections using iPads. The CUPA has agreed to utilize the grant funds to purchase an additional iPad to facilitate the inspection and enforcement electronic data upload process.

Inspection and enforcement information needed to complete Summary Reports will be managed in EnvisionConnect. The CUPA will continue to submit paper versions of the Summary Reports to the state until inspection and enforcement data can be submitted into CERS. At which time, the CUPA will configure EnvisionConnect to upload inspection and enforcement information into CERS. This will complete the conversion to electronic records management.

## **6. Billing/Invoicing**

The CUPA is currently and will continue to be responsible for conducting the Unified Program billing for all CUPA and PA regulated businesses. The CUPA will use EnvisionConnect to generate invoices for regulated businesses. Billing/invoicing will be performed by the CUPA's accounting staff using EnvisionConnect's billing system. Data that is downloaded from CERS will not be needed to generate invoices.

Permit fees are determined based on the cost of administering the programs. CUPA and PAs will evaluate whether fee increases are needed to cover long term cost of managing electronic reporting such as the ongoing maintenance cost of the Portal, staff and business community training and technical staff workload increases, if any. Each PA will need to conduct a similar assessment. The CUPA will factor in the reduction in data entry staff hours to determine the impact of Portal implementation on program fees.

## **7. Training**

Existing CUPA and PA staff will be trained by the Portal vendors on the use of the Regional Portal when the initial data transfer to CERS is complete. CUPA staff will also be trained by Decade on the use of EnvisionConnect. The CUPA will schedule training events for the CUPA and PA staff who will be involved in using the Portal in any fashion. Additionally, CUPA and PA will train any new staff on the use of the Portal within a month after hire.

CUPA and PA staff will conduct regular Portal educational outreach and training to the regulated businesses. The CUPA has designated a team of support staff to coordinate public outreach and training efforts. Grant funding will be used to cover all outreach and training costs. During the initial implementation phase, the transition will require a significant amount of staff time and other resources to educate and guide facility owners and operators through the electronic reporting process and offer support when needed. Training will be in the form of workshops, in-person field training, and phone/email assistance. Riverside PA has already transitioned to electronic submittals and therefore no additional business training will be required. Corona PA will conduct at least 1-2 workshops, and in-person, phone/email assistance. The CUPA is planning to conduct 5-7 training workshops at various locations throughout the county before 1/1/2013.

Since the CUPA provides billing and invoicing services for all CUPA and PA regulated businesses, the CUPA plans to include a paper insert containing educational information about the electronic reporting requirement, the Portal, and training workshop dates and locations with all outgoing invoices starting in October, 2011. Additionally, the CUPA will conduct CERS training as needed based on the state's curriculum to both CUPA and PA staff for the small percentage of businesses (mainly large corporations such as AT&T, Verizon, etc.) that choose to submit information directly into CERS. The CUPA will utilize the many CERS resources offered by the state on its electronic reporting website: <http://www.calepa.ca.gov/CUPA/EReporting/>. The CUPA will also encourage the PAs to send staff to the 2012 CUPA Conference to learn more about CERS.

## 8. Help System

The CUPA and PAs will offer basic level of assistance to businesses for the Regional Portal. Businesses may call or email CUPA and PA staff for this assistance, but inspection and clerical staff may help as well. For more technical or complex issues with the EnvisionConnect Portal, CUPA staff will contact Decade's Technical Support by email at [support@decadesoftware.com](mailto:support@decadesoftware.com) or the help line at 800-233-9232. For technical issues with the eCompliance Portal, PA staff will contact eCompliance's Technical Support by email at [info@eCompliance.net](mailto:info@eCompliance.net) or the help line at (415) 437-3979. The CUPA and PAs' websites will also contain helpful guidance documents and links on the general operation of the Portal.

To assist businesses that choose to report information via CERS, the CUPA and PAs will offer basic level of assistance. For more technical issues, businesses and CUPA or PA staff will contact the CERS administrator by email at [cers@calepa.ca.gov](mailto:cers@calepa.ca.gov) or at the designated help line number.

## 9. Service Contract and Grant (fiscal)

CUPA and PA will apply for electronic reporting grants individually using the application provided by Cal/EPA. The CUPA requests to shift Banning PA's funds to CUPA. The funds will be used to cover the start up costs of implementing the Regional Portal. The fund distribution request is as follows:

The CUPA's funds will be used as follows (figures are approximations as costs may fluctuate):

- a. Hardware purchases (tablet computers, portable printers, and server) (Grant Category, Equipment/Software) - \$187,000 total
  - Tablet PCs - \$75,300 (30 @ \$2,510/per)
  - Mobile printers - \$13,980 (30 @ \$466/per)
  - Server and server software - \$97,720
- b. Supplies/materials purchase (printer paper, mailers) (Grant Category, Operating Expenses – Supplies/Materials) - \$1,350
- c. Computer kiosks (hardware, software, setup) (Grant Category, Equipment/Software) - \$20,000
- d. IT contractor services (EnvisionConnect upgrade) (Grant Category, Equipment/Software)- \$14,750
- e. Business outreach (paper inserts, flyers, brochures) (Grant Category, Operating Expenses – Supplies/Materials) - \$20,000
- f. Training (businesses, CUPA staff, )(Grant Category, Personnel Services) - \$49,014
- g. \*EnvisionConnect Portal connection - \$90,000 \*(funding to be covered by CUPA Forum grant)

Corona PA's funds will be used as follows (figures are approximations as costs may fluctuate):

- a. eCompliance Portal connection - \$15,000

- b. Hardware purchases - \$3,500
- c. PA staff overtime for data entry and verification of data transfer - \$1,500

Riverside PA's funds will be used as follows (figures are approximations as costs may fluctuate):

- a. Vendor services for data integration with current back-office system and Portal networking - \$20,000

**10. Ongoing Support and Maintenance**

The CUPA's annual contract with Decade for the maintenance cost of the database will increase with the implementation of the Regional Portal. The ongoing maintenance costs of the database and Portal will be a part of the CUPA's future budgets. In the long term, the CUPA will consider an increase of permit fees due to any additional recurring costs.

The PAs will be responsible for annual Portal connection maintenance fees that will be paid through permit fees collected. The PAs will evaluate future fee modifications as needed. Any costs associated with the automation of the PA's inspection and enforcement data will be the responsibility of the PAs that must be addressed through their program fees, enforcement settlements, or other funding sources.

Riverside PA's ongoing maintenance fees will be based on their negotiated contract with eCompliance.

**11. Electronic Reporting Transition Plan Tracking**

The CUPA will submit their Electronic Reporting Transition Plan and grant application to Cal/EPA by June 1, 2011. Quarterly, as stated in the Grant Agreement, the CUPA will submit a status report and invoice to Cal/EPA. The following tables denote the list of milestones that will be tracked and reported to Cal/EPA.

Milestones Reported to Cal/EPA		Date
1	Estimated/actual start date of the CUPA Electronic Reporting Transition Plan	[5/2010]
2	Date CUPA select preferred data exchange methodology	[5/2011]
3	Date Electronic Reporting Transition Plan & Grant Application submitted	[5/2011]
4	Date Cal/EPA awards grant	[9/2011]
5	Date transfer of existing data from UPA system to CERS complete	[8/2012]
6	Date authorized business electronic submission	[9/2012]
7	Date CERS data exchange operational: business data	[9/2012]
8	Date CERS data exchange operational: inspection & enforcement data	[9/2012]
9	Date CUPA electronic reporting transition process complete (including PAs)	[1/2013]

Milestones Tracked by CUPA		Date
1	Upgrade to current version of EnvisionConnect	[9/2011]
2	Regional Portal implementation	[3/2012]
3	Transfer CUPA hardcopy documents to EnvisionConnect	[ongoing]
4	Data remediation complete	[12/2012]
5	Business outreach and training complete	[12/2012]

**12. SB 2286 Grant Application Process**

The CUPA will submit a joint Electronic Reporting Transition Plan covering both the CUPA and PAs' transition efforts. PAs will submit their individual grant applications to Cal/EPA. The CUPA will review the PAs' Grant Applications before they are submitted to the state to ensure that they are consistent with the CUPA's plans for Portal implementation.

Grant Agreement is developed by Cal/EPA and sent to the CUPA for review and approval before it is returned back to Cal/EPA. The executed Grant Agreement and allocation are sent to the CUPA. Each individual PA will receive \$20,000. Status reports and invoices on the use of grant funds will be submitted to Cal/EPA quarterly as required before release of grant funds to the CUPA and PAs.

**Riverside County's Unified Program Contact List**

Agency	CUPA/PA	Program(s)	Contact Name	Phone	Email
Corona Fire	PA	Hazardous Materials, CalARP	Diedre Locati	(951) 279-3762	Diedre.Locati@ci.corona.ca.us
Riverside County Environmental Health	CUPA	HM, HW, UST, APSA, CalARP	Jim Ray	(951) 358-5055	jray@rivcocha.org
Riverside Fire	PA	Hazardous Materials, APSA, CalARP	Bill Schellhous	(951) 826-5333	WSchellhous@riversideca.gov