



ELECTRONIC REPORTING FREQUENTLY ASKED QUESTIONS

What is electronic reporting?

In 2008 a new law took effect that will require all regulated facilities and all Unified Program Agencies (UPAs) to use computers to enter Unified Program data into a Statewide information system called the California Electronic Reporting System (CERS). This includes facility data regarding hazardous material regulatory activities, chemical inventories, underground storage tanks, and hazardous waste generation. It also includes agency data such as inspections and enforcement actions.

When will I have to file electronically?

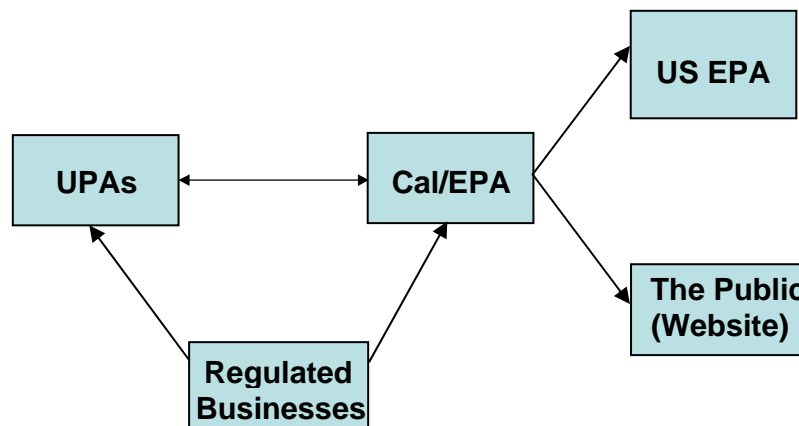
All regulated facilities and Unified Program Agencies in the State of California must be filing and accepting all included data completely by **January 1, 2013**. Facilities in the San Bernardino County CUPA will be able to file paper forms up through December 31, 2012 and will be required to print paper forms until our local systems are fully functional for data exchange. We expect to require paper forms through at least May 1, 2012. Paper-filing will no longer be an option as of January 1, 2013.

Is this a brand new system?

For the regulated facility filing portion of the system, the State of California took over a system most commonly known as Unidocs. For many years, some agencies and businesses have accomplished filing of business plan data through the Unidocs Hazardous Materials Online Inventory Project. The basis of the State system is an e-filing system that has worked for many businesses reporting to multiple agencies. The State has to meet its own security and interface requirements but the functionality will be largely that of Unidocs as expanded for UST and other CUPA forms under several federal grants. This part of the system is now being called the California Environmental Reporting System (CERS). If you are familiar with Unidocs, CERS will look different but probably be easy to understand.

Will all agencies be approaching e-reporting the same way?

No. Some agencies are designing their own e-reporting portals. The requirement is to be able to electronically report, but the exact path is not specified. The model looks like this:





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For the near future (expected until at least May 1, 2012), the San Bernardino County CUPA will only be accepting signed paper forms to meet compliance requirements. As of 2013, we are required to receive all CUPA form data electronically, and we expect that data to come through the facility having filed with CERS. Compliance documentation that is not collected by CERS will be collected directly by the CUPA.

Does San Bernardino County CUPA have its own local portal?

No. Currently the San Bernardino County CUPA does not plan to have its own portal. The expectation is that San Bernardino County regulated facilities will file their data electronically with CERS, and the CUPA will exchange electronic information with CERS using Decade's EnvisionConnect software. San Bernardino County CUPA made the transition to EnvisionConnect in December 2010.

Businesses can get forms and find links to the State e-reporting site and other resources through our web page, <http://www.sbcfire.org/hazmat/efile.asp>.

Are all required submissions or documentation included in the Statewide database?

No. The data item has to be defined in the data dictionary in California Code of Regulations (CCR) Title 27 in order for it to be a required part of the Statewide data management system. For example:

- While the inventory portion of the business plan has owner/operator and chemical inventory forms included in the data dictionary, the Emergency Response Plans and Procedures and Training parts of the Business Plan do not have a specific form. These documents may be scanned and uploaded into CERS.
- Risk Management Plans (RMPs) do have specific required data elements in CCR Title 19. However they are not defined in CCR Title 27; therefore RMPs are not included in CERS.
- Records maintained onsite to demonstrate compliance are not included.
- The Statewide system does not manage local agency billing, acceptance of payments, or issuance of permits. The extent to which additional billing information is required is dependent on local fee structures and the use of limited locally collected inventory information in the Statewide information system.

Our CUPA staff will help you identify how to file or maintain that required compliance documentation which is not part of the CCR Title 27 data dictionary and therefore not part of the Statewide information system.

How will electronic reporting help businesses and agencies?

The Statewide data system will allow:

- regulated facilities to more easily update existing information.
- multi-jurisdictional businesses to file their data using one system location.
- response agencies access to current data.
- federal, State, and local regulators to have more efficient access to current data.
- saving of space, paper, and time involved in physical processing and reentering of data already typed into a form by the business.



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How do I get started?

If you use a computer now to fill out chemical inventories or other Unified Program forms, the Statewide information system will seem very familiar. If you do not use a computer now, you are not required to do this until January 1, 2013. A major software upgrade in the Statewide system referred to as CERS2 is scheduled to be introduced in late fall 2011. It will have more upload capabilities, help functions, training videos, and wizards built into it. Therefore we are advising facilities to wait at least until after CERS2 is launched before investing a lot of time entering information into CERS.

Current Unidocs users were already converted over to CERS and will be among the first users to test and use the new system. Your username and password will be assigned through the State system and you can prepare documents online and print them until your agency is ready to accept/exchange data electronically. San Bernardino County CUPA currently verifies authorized users with a form available at <http://www.sbcfire.org/hazmat/efile.asp>. Additional information on getting started with electronic filing is being developed by Cal/EPA and will be posted on Cal/EPA's web page, <http://www.calepa.ca.gov/CUPA/EReporting/default.htm>.

How does the surcharge work?

To pay for the costs of implementing electronic reporting, **the State is temporarily increasing the surcharge that you currently pay by \$25 per year for three years.** These funds will be used for additional system development, outreach and training, and technical development and support for local agencies to be able to accept data electronically. Starting with invoices due after July 1, 2009, San Bernardino County CUPA customers began seeing two State surcharges on their invoice: the \$24 "All Facility State Service Charge" and the new \$25 "State Electronic Reporting Surcharge". Both are transmitted to Cal/EPA. The CUPA will be eligible to apply for performance grants to use a portion of the Electronic Reporting Surcharge funds directly for the local costs of transitioning to e-reporting.

How do I get started if I have businesses in multiple jurisdictions?

Exactly when electronic reporting can replace paper reporting is a decision that must be made by each individual jurisdiction, based on its own unique manual, automated, and emergency information systems. For example, the exchange arrangements must be created between the EnvisionConnect software used by San Bernardino County and the State system before data can be exchanged. Some jurisdictions are developing their own portals that will also enable the agency to conduct related e-commerce or provide other electronic services. Therefore, if you have facilities in more than one jurisdiction, you will need to know when each jurisdiction can accept data electronically.

If you have a large number of sites, we suggest that you contact Cal/EPA about multi-jurisdiction filing options prior to manually entering your data for each site. If you have just a few sites but they are scattered among jurisdictions, you will want to contact each jurisdiction. In San Bernardino County, you can get established in CERS and print the available forms from CERS until the CUPA can exchange data with CERS.

Cal/EPA does not have a specific interested party list for e-Reporting, but they use their more general Unified Program listserv. To join the listserv, you can go to: <http://www.calepa.ca.gov/Listservs/ListSubscribe.asp?LID=8>.

How does this affect public records?

According to Cal/EPA, public records requests will continue to be submitted to each Unified Program Agency. Our procedures for this are on our website at <http://www.sbcfire.org/hazmat/hmadmin.aspx>.