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Countdown: 31 Months

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS)

BULLETIN #3

CERS Implementation Guide

This bulletin provides an update to the EReporting Work Group and serves as an introduction to the CERS Implementation Guide

1. **Updates:** Information to help you implement electronic reporting in your jurisdiction.
2. **Action Items:** These are suggestions for actions that you should be taking RIGHT NOW to aid in the transition process
3. **New FAQs:** Aimed at answering many of your questions
4. **What's Coming:** A preview of what will be published in upcoming bulletins and what the Work Group is currently working on.

Please send your comments and ideas to improve these bulletins to cupa@calepa.ca.gov.

UPDATES

- The Work Group continues to meet regularly via teleconference. In an effort to include the regulated community in the CERS implementation process, several business representatives have been invited to attend the Work Group meetings. Input from the business community will be valuable to facilitate the business transition process and to get insight from another perspective.
- The UPA Implementation Guide has been finalized. It can be accessed on the Cal/EPA Electronic Reporting web page at <http://www.calepa.ca.gov/CUPA/EReporting/>. This guide is designed to help UPAs understand and prepare for the electronic reporting requirements.
- The Work Group has drafted an information sheet regarding the increased oversight surcharge, which goes into effect on 7/1/09. It is a single page and is designed to be inserted in bills or other mailings to regulated businesses. The information sheet has been translated into 14 languages, and the translated versions are posted on the Cal/EPA Electronic Reporting web page.

ACTION ITEMS

- Review the UPA Implementation Guide and share it with your IT staff.
- Perform a Needs Assessment for your program. You can use Appendix B of the Implementation Guide to assist you in this process.
- Begin to plan to collect the Electronic Reporting surcharge of \$25/year for the next three years. This is especially important for those UPAs who bill continuously throughout the year or who bill immediately after the beginning of the fiscal year. Although you are not required to show the Electronic Reporting surcharge as a separate line-item on your invoices, you will nonetheless need to report it separately to Cal/EPA when you submit your quarterly surcharge payments.

NEW FAQs

Q1: Does submittal of electronic files such as pdf's via email constitute electronic reporting?

A1: No, it does not. For businesses Electronic Reporting means that a business uses the CERS web site or a UPA web site to report required information or data is uploaded to the UPA or state. For UPAs, Electronic Reporting means that the UPA uses the state web sites to report required information, exchanges data with the state machine to machine or uploads and downloads data to/from the state system.

Q2: If I use CERS to file, does this meet all of my filing requirements?

A2: Not necessarily. There are a number of business plan requirements other than filling out forms. For example:

- While the inventory portion of the business plan has a owner/operator and chemical inventory online submission, the Emergency Response Plans and Procedures and Training parts of the Business Plan do not have a specific form. A business can scan these documents and attach them to its web filing though.
- Risk Management Plans (RMPs) have specific required data elements defined in CCR Title 19 but those data elements are not incorporated in CCR Title 27 so RMPs are not included.
- Records that a business maintains onsite to demonstrate compliance are not required to be reported electronically. Your UPA will help you identify how to file or maintain the required compliance documentation which is not part of the CCR Title 27 data dictionary and therefore not part of the statewide information system
- CERS 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.

Q3: When will I have to file electronically?

A3: All regulated facilities and Unified Program Agencies in the State of California must be filing and accepting all included data by January 1, 2013. The earliest electronic filers will be using the statewide system by September of 2009. When the Statewide system goes live, facilities may still have a period of time in which they will can file paper forms or use the statewide system to print paper forms for the local agencies. Based on when the local agency information systems can receive the data from the statewide system, the local UPA agencies will determine when paper-filing is no longer an option. This can be no later than January 1, 2013.

Q4: How will electronic reporting help businesses & agencies?

A4 The Statewide data system will allow:

- regulated facilities to more easily update existing information.
- multi-jurisdictional businesses to file at one 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.

Q5: How do I get started?

A5: 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, your UPA will help you submit your information electronically. Upload capability, help functions, and wizards are being built into the Statewide system. Information on electronic filing is being developed by CalEPA and will be posted on CalEPA's web page, <http://www.calepa.ca.gov/CUPA/EReporting/> Your local UPAs are also in the process of developing plans to meet these deadlines. It is the local UPA plans that will control the timing of when a facility in that jurisdiction must file electronically. As local plans are developed, you should talk to your local UPAs and check for additional information they may have available on their web sites.