

COUNTY OF AMADOR

Unified Program Education and Outreach Plan

Supplement to Unified Program Inspection and Enforcement Plan
(Health and Safety Code section 25404.2. (a) (3))

Amador County Environmental Health Department

June 3, 2009

Developed by the Hazardous Materials Advisory Committee and Unified Program staff, the Education and Outreach program provides education –based principals under which the CUPA will carry out its regulatory duties, and identifies specific activities to be implemented in support of those principals.

Unified Program (CUPA) Education and Outreach Policy (ver. 6/03/09)

Statement of Purpose - The Amador County Hazardous Materials Advisory Committee and Certified Unified Program Agency (“CUPA”) staff have developed a state-mandated Inspection and Enforcement Plan to achieve compliance with CUPA program requirements with a minimal impact on the regulated community. The Inspection Plan is education-based with an emphasis on obtaining compliance through the education in the requirements of the various programs implemented by the CUPA. This Education Plan sets forth the education-based principles under which the CUPA will carry out its regulatory duties, and summarizes specific activities to be implemented in support of those principles.

Guiding Principles - The intent of the CUPA and the regulation of hazardous materials is to protect human health, safety, and the environment by facilitating, encouraging, and ensuring compliance with environmental laws and regulations. Compliance with hazardous materials laws within the regulated community will ensure public safety, eliminate the economic incentives to violate environmental laws, and ensure a level playing field for all regulated entities.

Compliance is best accomplished through a balanced regulatory approach of education, inspection, and enforcement; as the majority of regulated facilities will operate in compliance with established standards when the laws and regulations are clearly stated and the regulatory process is understood.

A variety of educational options are available to inform regulated facilities of compliance standards. These tools may include providing the regulated facilities with newsletters, informational brochures, on-line resources, information on available training workshops and seminars, as well as technical assistance, compliance manuals and checklists. New program elements and changes in program requirements will be initially implemented by providing education and outreach efforts to inform the regulated community of the forthcoming changes prior to commencing compliance inspections and enforcement actions. As described in the Enforcement Plan, minor violations are addressed through a combination of education and immediate correction of the violation without sanctions.

During the initial period following adoption of the Inspection and Enforcement Plan by the Board of Supervisors facility compliance inspections will focus on the education of facility operators on CUPA program requirements applicable to the specific facility. For example, the intent will be to provide a cooperative facility time to correct inaccurate Hazardous Materials Business Plans and modify hazardous materials handling procedures using an established compliance schedule without penalty.

This initial “educational period” will not prohibit the CUPA from taking appropriate enforcement action with respect to intentional violations, such as intentional failure to submit a business plan after repeated notices from the CUPA, or intentional illegal disposal of a hazardous waste. The initial educational focus of the program will be reduced when the specific activities listed below have been completed. The CUPA will utilize all appropriate volunteer resources, including members of the Hazardous Materials Advisory Committee, to assist in performing the activities listed below, including the production of educational workshops and compliance assistance documents.

Education and Outreach Activities in Support of New Program Elements and Changes in Program Requirements:

- A. Initial Notice - An inventory of potentially newly regulated businesses will be generated from the inventory of existing regulated facilities and available public domain information. An initial one page letter / fact sheet will be mailed to all identified potentially regulated businesses informing the businesses of the legal requirements of new program elements or program change and the proposed local implementation of the program. The anticipated impact on the regulated community including reporting requirements, regulatory oversight, and fees will be included in the program summary.

- B. Public Meetings and Workshops - The CUPA will host meetings and workshops to provide program information to potentially newly regulated businesses and the general public including workshops for the Board of Supervisors at convenient times and locations. Additional meetings will be hosted for interested community groups, service groups, and industry-specific trade associations. Hazardous Materials Advisory Committee members will be utilized, as appropriate, as an additional resource to educate the public.

Ongoing Outreach Activities in Support of Existing Program Elements

- A. The CUPA will develop and distribute compliance assistance documents for specific unified program elements, hazardous materials management activities and industry groups. Fact sheets will be distributed by mail to target audiences, placed on hazardous materials web site, and made available at Environmental Health counter.

- B. The CUPA will develop “self inspection” compliance check lists for specific unified program elements, hazardous materials management activities and industry groups to allow CUPA-regulated facilities to evaluate and, where necessary, correct hazardous materials handling and management practices.

- C. The CUPA will host meetings and workshops on the completion of the Hazardous Materials Business Plan, and compliance with other CUPA program requirements, and will also provide individual compliance assistance as requested.

- D. Non-regulatory instructional site visits will be conducted at the request of regulated facilities to review hazardous materials usage and to suggest improvements. Formal enforcement actions for minor unintentional violations will not be taken if corrections are implemented in a timely manner.

- E. Initial facility compliance inspections will focus on the education of facility operators on hazardous materials requirements and instruction on proper hazardous materials handling.