## Annual Hazardous Materials Inventory Certification

Can a business annually submit only the Facility Information submittal element with a comment that there has been no change to the Hazardous Materials Inventory Statement (HMIS) to meet the requirement for an annual resubmittal or certification as specified in California Health and Safety Code (HSC) section 25508(c)?

**Answer**: No. California Code of Regulations (CCR) Title 19 section 2729.2 specifies that Hazardous Materials Inventory Reporting includes the business activities, owner/operator identification, the Hazardous Materials description and the site map. In CERS, the first two pages have been created as the Facility Information submittal element and the second two as the HMIS submittal element. The business meets the reporting requirement of CCR section 2729.2 by electronically submitting both the Facility Information and the HMIS submittal elements. Reporting only the Facility submittal element does not meet this requirement.

HSC section 25508(c) requires a business to annually resubmit or certify as correct in the statewide environmental reporting system (CERS or an approved local reporting portal that can exchange data with CERS). CERS was designed for the business to meet this annual requirement by submitting the two submittal elements as described above. At this time CERS does not include a separate 'certification' process. This approach ensures that the inventory and site map information in CERS is associated with the most recent submittal date.

A recent enhancement added in July 2014 to simplify the submittal process for the Hazardous Materials Business Plan (HMBP), which includes the HMIS submittal element, is shown below. This process can also be used for the annual HMIS resubmittal. When there have been no changes to the previous HMBP submittal, the business user can use this consolidated submittal process: select 'Create All HMBP Submittal Elements', select 'Confirm', and select 'Submit Selected Elements'. The process takes less than a minute. The three step process includes text reminders and confirmations to ensure that the business user is making an accurate submittal. See the screenshots below.

The business user can also elect to submit just the Facility Submittal and the HMIS submittal elements by following the standard submittal process and selecting both of these submittal elements. This process does not include the submittal of the Emergency Contingency and Training Plan submittal element included in the consolidated submittal process described above. Either process is acceptable for the annual HMIS resubmittal.

If there has been NO CHANGE in the HMBP submittal elements (*Facility Information, Hazardous Material Inventory, and Emergency Response/Training Plans*) since the last submittal, you may select the following button to prepare them. **Create All HMBP Submittal Elements**

**Facility Information**   SUBMITTED Jul. 29, 2014   Start   Not Applicable

- Business Activities
- Business Owner/Operator Identification

**Hazardous Materials Inventory**   SUBMITTED Jul. 8, 2014   Start   Not Applicable

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## HMBP Submittal Elements Creation Confirmation   ✕

By selecting the Confirm button, you are certifying that:

- The information contained in the HMBP most recently submitted is complete, accurate, and up-to-date; **and**
- There has been no change since the last submitted HMBP Submittal Elements

Confirm   Cancel

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**Final Submittal Checklist**
- **Does your Submittal include a** *Facility Information* **submittal element?**
  Your submittals must always include a *Facility Information* element with current business activities and owner/operator forms. The "Submit Selected Elements" button below will be disabled if you have not met this requirement. You will need to return to the Prepare Draft Submittal page and "Start" one.
- **Are you submitting all of the elements needed by your facility's regulator?**
  If you must submit multiple elements for your facility (e.g., Inventory, UST), return to Prepare Draft Submittal to "Start" other elements, and then "Submit" all the elements at the same time.
- **Is your CERS Account authorized to submit data to the Regulator?**
  The "Submit Selected Elements" button will be disabled if you CERS Account does not have "Lead Business User" or "Approver" permissions.
- **Have you reviewed the Certification Statement shown below?**
- **Select "Submit Selected Elements" below to submit information to your regulator.**

**Confirm, Certify, and Submit Your Facility Submittal**   Submit Selected Elements

**Certification Statement:** Based on my own knowledge and/or on my inquiry of those individuals responsible for obtaining the information, I, Dan Firth (CERS Account username *dfirth*), certify on 8/19/2014 under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete.

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**For additional CERS assistance contact your facility's local regulator**
Technical problems can be referred to CERS Technical Support (cers@calepa.ca.gov)