

When should a Regulated Facility's CERS ID be changed?

Should a new CERS ID number be assigned when there is a change of facility name, facility owner or facility address?

Answer: The CERS ID, once issued, should remain with the facility regardless of owner or operator changes or changes of the business or facility name. A new CERS ID number should be assigned to a regulated facility only when the facility physically moves to a different location. (Often, in the case of a physical relocation, the new location may already have an existing CERS ID so the business that relocates should be assigned that existing CERS ID.) California Code of Regulations Title 27 Division 3, Subdivision 1, Data Dictionary for Regulated Activities describes the CERS ID number as a 'CalEPA assigned, 8 or 9 digit ID to uniquely identify a facility in CERS. ***The CERS ID should remain unchanged across different owners/operators of a facility.***' (emphasis added)

Similarly, if the facility address is changed but its' physical location does not, the CERS ID should remain unchanged. For example, the CERS ID would not be changed because a local jurisdiction renames a street or renumbers the street addresses. Since the physical location of the facility has not changed the CERS ID should not be changed.

In plain language, the CERS ID should 'stay with the dirt', similar to an APN number. A new CERS ID should be assigned for new facilities where there was no previous facility regulated in CERS, when a regulated business at one address ***physically moves*** to another address, or when an existing facility subdivides into more than one regulated facility. The newly created regulated facilities would be assigned new CERS ID numbers.

This use of the CERS ID number ensures that all records in CERS pertaining to a specific location are always associated with the same CERS ID, thereby making all facility information retrieval fast and efficient. If a new CERS ID were assigned each time a facility name or owner changed, very quickly there would be many facilities in CERS with have multiple CERS ID numbers. Responding to public records requests would become increasingly complex because a one-time search by CERS ID to gather all historical data would be impossible. Instead every search for facility information would require the user to enter the ***exact*** address for every public records request. An extra space, misspelling, or any other variation in the search criteria will fail to retrieve the requested data; potentially creating future issues if a requestor makes decisions (such as whether to buy a property) based on an incomplete response to a public records request.

When a new CERS ID is assigned to an existing facility, the new facility owner/operator will have no access to previous submittal information even if the previous owner/operator desires it or the previous owner/operator and current operator are one and the same unless the previous owner/operator adds the new facility owner/operator as a business user. Submittal information cannot be transferred between CERS IDs so a new owner/operator would need to start all of the business submittals from scratch. This could be a large work effort for a UST site(s). If the CERS ID stays the same, the old owner

or the CUPA can add the new owner to the previous business to allow access to previously submitted data and new submittals can be based on previous submittals.

There may be an issue with the ease of access and accuracy of information for emergency response. If an emergency responder uses CERS or downloads data from CERS to use in their local system and they use an address as the search criteria for an incident response the results may begin to show multiple CERS IDs for the same address. Potentially even more problematic is the possibility that incorrect address searches or multiple similar addresses, such as streets with the same or similar name may make it very difficult to quickly determine which data is applicable to the incident location.