



COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH (DEH)
HAZARDOUS MATERIALS DIVISION (HMD)



"Environmental and Public Health through leadership, partnership and science"

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ENVIRONMENTAL PRESS

Program Update

1

HMD's Featured Employee

1

Below Grade Tanks: ASTs or USTs?

2

Properly Managing Containers

4

DEH Disaster Service Workers

5

APSA Update

7

RMP Workshop

8

CERS

9

HMD's Outreach Corner

10



HAZARDOUS MATERIALS DIVISION

HMD Program Update

By Michael Vizzier, Chief

There will be two significant changes to our regulatory programs during this fiscal year. Certified Unified Program Agencies (CUPAs) are beginning to implement the new California Aboveground Petroleum Storage Act (APSA). We are also making a gradual transition to electronic reporting using the California Environmental Reporting System (CERS). These are significant changes to the Unified Program that require careful planning. This newsletter features articles from Sande Pence and Michelle Price describing some of these efforts. We will continue to give you more details on these programs in future issues of the Environmental Press.

The APSA is an old law that was revised in 2008. The revision transferred the authority to implement this law from the state and regional water boards to the CUPAs. This change takes advantage of our knowledge of local facilities and the proven efficiency in consolidating the implementation of various environmental protection programs. CUPAs throughout the state accepted this additional responsibility with some reluctance because there are literally tens of thousands of pages of guidance documents for the existing Unified Program and APSA adds about a thousand more. The US EPA inspector's guide alone adds 521 pages.

The APSA requires that our inspectors attend training and pass a test before conducting inspections. Although we completed training and testing in May, this is only the beginning. Training and testing alone does not make us experts; we need time inspecting and working with industry before I will be confident that we will correctly identify violations and propose reasonable corrective action in all cases.

(continued on page 3)

HMD's FEATURED EMPLOYEE

Kelly Brown



Kelly is one of San Diego County's newest and upcoming CUPA inspectors. She has been a California girl all of her life and loves it. Born and raised in Bakersfield, she lived there until she graduated from high school.

At South High, Kelly was well known and respected by her teachers and peers for her involvement in academic, leadership and sport activities. She was first chair in clarinet for the marching band, captain of the volleyball and softball teams, Student Body secretary, school mascot (the Rebels) and Prom Queen for the Class of 2002.

It was during a field trip in her sophomore year that Kelly decided to pursue environmental science in college. It all started when one of her advanced science classes took a field trip to a local waste water treatment plant. The students in the class *hated* the experience; it was hot, smelly, and boring...to them. Kelly found it fascinating! Following her teacher's advice, she pursued more science and math classes.

(Continued on page 10)

Tanks in Below Grade Structures Management Requirements

By Cecilia Lewallen, EHS III
UST Plan Check Specialist

California Underground Storage Tank (UST) laws and regulations went into effect in 1984. Since then, there have been some misconceptions about the regulation of tanks located in below grade sub-containment structures. Examples of below grade sub-containment structures include basements, underground parking garages, underground vaults and sub-surface vaults or sumps and service bay pits. The most common misconception is what criteria is applied to determine if a storage tank is an aboveground tank or an underground tank.



Chapter 6.7 of the California Health & Safety Code (HSC) defines **underground storage tank** as “any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground.” Title 23 of the California Code of Regulations (23 CCR) defines **substantially beneath the surface of the ground** as “at least 10 percent of the underground tank system volume, including the volume of any connected piping, is below the ground surface or enclosed below earthen materials.”

In California, any tank located in below grade sub-containment structure, by definition, is an **underground storage tank**. However, these types of tanks may be exempt from UST regulations if they meet the exemption listed in HSC 6.7, Section 25283.5. The four exemption criteria are as follows:

(1) All exterior surfaces of the tank, including connected piping, and the floor directly beneath the tank, can be monitored by direct viewing.

- Physical access must be available to the tank system within the structure where it is located for direct viewing.
- The tank must not be flushed against a wall or other permanent structure. A minimum distance must be maintained that would allow visual access to each surface.
- The bottom of the tank must be elevated to a minimum height that would allow visual access to the tank bottom and the floor beneath the tank.
- Additionally, all associated piping must be visually accessible. If a pipe goes through a wall or ceiling, then this exemption criterion is not met.

(2) The structure in which the tank is located is constructed in such a manner that the structure provides for secondary containment of the contents of the tank, as determined by the local agency designated pursuant to Section 25283.

- Examples of appropriate structures include, but are not limited to basements, parking garages and vaults.
- The structure must be constructed out of a material that is compatible with the product being stored.
- The structure must be intact and should not have any floor drains or automated sumps that would allow a release of any contents.

- Consideration must be given to its location in relation to any outdoor elements, such as rainwater. The accumulation of rainwater may compromise the available secondary space.

(3) The owner or operator of the underground storage tank conducts weekly inspections of the tank and maintains a log of inspection results for review by the local agency, designated pursuant to Section 25283, as requested by the local agency.

- In order to maintain an exempt status, a facility owner or operator must visually inspect the tank system on a weekly basis at minimum.
- Complete physical access to all aspects of the tank allows for this required inspection.
- The weekly inspections must be logged and maintained on site. The log will be reviewed during the local agency inspection. Failure to maintain this log may retract a tank system’s exempt status.

(4) The local agency designated pursuant to Section 25283 determines without objection from the board that the underground storage tank meets requirements that are equal to or more stringent than those imposed by this chapter.

- The installation date of a tank will dictate the level of stringency required in order to meet the exemption.
- Tanks systems installed after July 1, 2004, will have a design and monitoring protocol that is more stringent than those tanks installed prior to this date.

HMD has a process in place to evaluate exemption applications for existing below grade tanks and a new program to assist in the proper installation of new tanks.

(continued on page 3)

Program Update

(continued from page 1)

HMD seeks stakeholder input for the local implementation of the APSA program

We have found that successful implementation of a program requires a collaborative effort with the regulated community, so HMD held five APSA workshops and established an APSA stakeholder group that meets quarterly. This group is made up of consultants and representatives of facilities from the private and public sector that provide valuable input for the local implementation of this law.

The APSA requires facilities that store 1320 gallons or more of petroleum aboveground to comply with federal Spill Prevention Control and Countermeasures (SPCC) requirements. The federal SPCC rules were amended in 2006, and 2008. Litigation and a change in the federal administration delayed the implementation of these changes to November 10, 2010.

This deadline requires an amendment of the SPCC plan for those facilities that were in operation and were required to have an SPCC prior to 2002. For newer facilities, which started business after 2002, the requirement is to implement an SPCC

plan by the November 10, 2010 deadline.

With this in mind, I have proposed to our stakeholder group that we start inspecting using the regulations that will be effective November 10, 2010 with a compliance date of November 10, 2010 so we only have to use one set of regulations. This approach will give us time to learn and will give facilities time to plan and budget improvements if necessary.

Please contact us if you have questions about APSA or if you would like to participate in the APSA stakeholder group.

THE HAZMAT DUTY DESK RESPONDS TO OVER 700 CUSTOMER INQUIRES PER YEAR

Call 619-338-2231 or E-mail hmdutyeh@sdcounty.ca.gov

Tanks in Below Grade Structures

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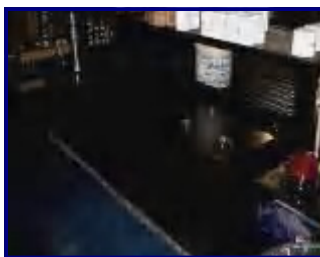
Exemption process for existing below grade tanks

The facility operator must file a request for exemption using form (HM-978) the "Claim of exemption from UST Regulation and Law." Applicant must attach to this form any additional information that supports the claim that the below grade tank is not subject to exempt from the regulations.

Upon receipt of the form, the HMD Specialist responsible for the area where the tanks are located will review the application and will conduct an inspection of the UST system to determine if it meets all of the requirements for the exemption.

After the inspection, the Specialist will draft a letter, either granting or

denying the exemption. If the exemption criteria have been met, the UST system will have an exempt status. Any modifications to the system will require an additional evaluation by HMD.



Waste oil and used oil filters are drained into a below grade tank

Exemption process for tanks that have not yet been installed

DEH offers a Special Projects Assistance Program for facilities that are planning to install a below grade tank. The Purpose of the Special Projects Assistance Program is to ensure that the facility will meet regulatory requirements through HMD project review and oversight.

HMD will provide guidance throughout the tank installation process to assure that all criteria necessary for the exemption are met and the request can be granted.

This is a general overview of regulatory requirements for the management of tanks in below grade structures and a guide on how to meet the requirements for UST exempt status. Please contact [Cecilia Lewallen](#), UST Plan Check Specialist, at (619) 338-2207 if you need additional information regarding requirements for tanks in below grade structures, USTs, or HMD's Special Projects Assistance Program.

These Web sites can provide additional information on the regulatory requirements for storage tanks.

[U. S. Environmental Protection Agency](#)

Links to UST related publications

[State Water Resources Control Board](#)

Links to Storage Tank Information

[HMD's UST Program](#)

Links to UST Plan Check information.

<http://www.sdcounty.ca.gov/deh/>

Properly Managing Contaminated Containers

By Leon Wirschem,
Env. Health Specialist III

We use chemicals every day to make our lives better. We begin our day using soaps, conditioners, shampoos, deodorants, hair sprays, gels, and toothpaste. Most of us have a wide variety of chemicals in our kitchens and bathrooms for cleaning and sanitizing purposes and we may even keep some pest control chemicals around the house.

What types of containers are used for Hazardous Materials?

Hazardous materials containers come in a variety of shapes and sizes: from small tubes, aerosols cans, and bags that are used in the home, to much larger containers such as drums, cylinders, totes and tanks that are used at various businesses and industries regulated by the Hazardous Materials Division (HMD). Hazardous materials that are bought in bulk may be transferred into smaller containers or process equipment for use at the workplace. Some facilities have established procedures to rinse contaminated containers so they can be recycled and the chemical residuals can be used as stock solution for one of their processes. Facilities that don't rinse and recycle their containers must find a way to properly manage them along with their chemical residues.

The Department of Toxic Substances Control (DTSC) publishes excellent fact sheets about hazardous waste management. Their [Management of Empty Containers](#) fact sheet explains that properties throughout California have been contaminated due to improper management of containers that held re-

sidual hazardous materials or waste. As a result of these incidents, regulations have been developed to prevent contamination to the environment. These regulations have specific requirements for the management of both container residues and contaminated containers.

The HMD's Hazardous Materials Duty Desk routinely receives calls from businesses and residents asking about the proper management of contaminated containers. We have compiled the most common questions and have answered them to provide guidance that can help you manage these containers.

What is considered empty?

A simplified answer is that a container is empty when all the material has been removed by practical means. Other considerations must be taken into account when making a determination of whether a container is empty and will be discussed below.

What can I do to make my container empty?

A container with liquid can be made empty by pouring, pumping or draining. For solids, this could mean scraping or chipping. For acutely or extremely hazardous waste or materials, the container is considered empty only after triple rinsing with a suitable solvent.

Contaminated containers and chemical residuals must be properly managed.

If I rinse out my container to get it empty, do I need a treatment permit?

Maybe. Depending on what the container previously held (solid vs. liquid), the container's size, and final disposition of the rinseate, you may need to pre-notify the HMD of your rinsing of contaminated containers. See online Tiered Permitting guidance:

<http://www.dtsc.ca.gov/HazardousWaste/TieredPermitGuidance.cfm>

<http://www.sdcounty.ca.gov/deh/>

The [onsite treatment notification forms](#) are posted online at [HMD's Web site](#).

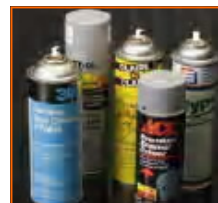
Do I need to label the empty containers?

Yes. You must label empty containers that are greater than five gallons in size with the date emptied and manage the containers within a year per according to section 66261.7(f) of the California Code of Regulations. Records of disposal for these containers need to be kept by the business for three years.

What should I do with the residue after rinsing my container?

A container can be rinsed and the material inserted into a process for use. If the rinseate can't be used on-site, it is a waste and must be properly characterized. Hazardous waste can be sent to a permitted facility for treatment, or may qualify for treatment on site under a Tiered Permit. Contact HMD for additional information.

Question: Is it true that aerosol containers are hazardous waste?



An aerosol container that is not empty may contain hazardous waste and require special

handling. If the nozzle is clogged, damaged, or the propellant gone, an aerosol container that is not empty must be managed as hazardous waste or it can be processed as a universal waste in an approved container puncturing device.

What can I do with my small, empty containers (capacity equal to or less than five gallons)?

Empty metal or plastic containers with a capacity of five gallons or less can be recycled or disposed in the trash. Contact your local solid

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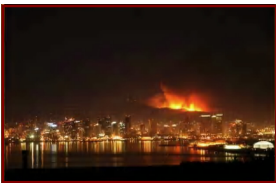
Environmental Disaster Service Worker Training

By Todd Burton, EHS III
Disaster Worker Training
Coordinator

The County of San Diego Hazardous Incident Response Team (HIRT) is an integral part of the response and recovery efforts in our region when disasters occur. Over the years, as an emergency responder and member of HIRT, I have seen disasters destroy property, the environment, and even lives. Although we are fortunate not to experience devastating disasters such as volcanic eruptions, tornadoes, cyclones, typhoons, floods and blizzards that affect other areas, living in Southern California makes us susceptible to wildfires and earthquakes.

I can remember at least two earthquakes and I worked on the recovery efforts for the last two wildfires. In 1992, when the Landers Earthquake struck Yucca Valley, I was in a grocery store at Big Bear. You hear about the aisles moving, and move they did! They looked like massive snakes with groceries flying all over the place. Then, the Northridge Earthquake hit in 1994. As far as wildfires, we are all painfully aware of the 1996 Harmony Grove Fire and the devastating wildfires of 2003 and 2007 in the County of San Diego.

The last wildfire came so close to my neighborhood that my family was among those that had to evacuate their homes. As I started to write this article, I again realized that we should be better prepared for the next time one of these disasters happen. Although we don't know when they'll happen, we know they will happen again.



What are we doing to be ready in the event of a disaster?

Along with almost 17,000 County of San Diego employees, I have been designated as a Disaster Service Worker (DSW) by sections 3100 and 3101 of the Government Code and by sections 31.105 and 31.106 of the County of San Diego Regulatory Ordinance. Essentially, these sections state that "*Disaster Service Workers are subject to such activities as may be assigned to them by their supervisors or by law.*" Are we prepared as individuals and as a department to help others with our expertise in their time of need? I am confident that we have the expertise and equipment necessary, but as a first responder, I also recognize that we need to organize our efforts ahead of time so we will be ready as soon as we are needed.

The County of San Diego has almost 17,000 workers that are designated as Disaster Service Workers that can respond to an emergency.

How is DEH organizing training efforts for staff responding to disasters?

DEH has developed a DSW online training program designed to provide an orientation to all DEH employees on their possible roles during a disaster. Recommended for all DEH employees, the DSW is mandatory for all Environmental Health Specialists and Technicians. This model program will be used by the Office of Emergency Services to train all county employees in the next year. The next disaster may not happen in the County of San Diego but it might hit a neighboring county or another state.

What are DEH's Responsibilities?

The responsibilities for DEH are listed in Annex H of the San Diego

Operational Area Plan. The plan consists of Annexes A to P. Our day-to-day responsibilities in a disaster may change slightly, but our core functions will remain the same. We will be working in areas such as:

- Assessing water and food supplies to ensure they are safe.
- Overseeing proper waste disposal and control of hazardous materials, including radioactives.
- Overseeing debris disposal and ensuring proper control of vectors such as mosquitoes, rats and fleas.
- Assessing shelters to ensure proper management and safety.

What else do we need to do to be ready?

We need to actually train our field staff to respond to disasters; there is a lot to consider on how to prepare our DEH staff for this type of situation. The Centers for Disease Control (CDC) and the Department of Homeland Security (DHS) have a pilot course called Environmental Health Training in Emergency Response EHTER. The CDC EHTER pilot course is currently being edited by the CDPH to meet all of pertinent California laws. Upon completion of the pilot project revision of the course, the California Department of Public Health (CDPH) will be submitting this course for Homeland Security approval. Once this two-day course is approved, DEH will be able to use it to train field staff. This introductory course covers a variety of environmental subjects, including: disaster management, responder safety, drinking water, food Safety, shelters, vector control, solid waste, hazardous waste, waste water and building assessment. There are already plans to develop an intermediate level class which will include more hands-on and field activities, as well as an advanced level class that will round

(Continued on page 6)

<http://www.sdcountry.ca.gov/deh/>

Properly Managing Contaminated Containers

(continued from page 1)

waste hauler for additional requirements. If the containers are not empty, you must determine if the waste is hazardous. Liquids cannot be disposed to the landfill.

What do I do with containers over five gallons in size?

You can manage them as hazardous waste or meet the conditions of the exemption that allows you to manage them as scrap metal. To maintain exemption from having to manage the container as a hazardous waste, empty containers with a capacity greater than five gallons must be managed by one of the following methods:

- Reuse the container onsite.
- Send the container to a person who will recycle the container for scrap value.

- Recondition or remanufacture the container onsite for further use.
- Ship the container to a person who will recondition or remanufacture the container.
- Send the container back to the supplier for refilling and meet their shipment conditions.

My supplier only takes back empty containers. How should I empty containers prior to return to supplier?

For containers less than 110 gallons in size that held a hazardous material acquired from a chemical supplier, the container must meet the following conditions:

- Container must be empty under the federal standards (3% contents by weight or one inch).
- Container must be sent to the supplier for the purpose of being refilled without treatment.
- Container must be refilled by the supplier with a material that

is compatible with the container unless the container has been decontaminated.

What requirements apply to containers with a capacity of 110 gallons or larger?

Bulk containers have separate requirements. In summary, the container is empty enough to transport back to the supplier for reuse without being subject to hazardous waste regulation if the container contains less than 0.3% of contents (approximately one gallon in a 330 gallon tote). In some cases, the residues are subject to hazardous waste regulation. Refer to 22CCR 66261.7 (p) for details.



For additional information on management of empty containers, consult your Area Specialist or contact the HMD's Duty Desk at 619-338-2231. You may also visit the DTSC Web site at <http://www.dtsc.ca.gov/>.

THE HAZARDOUS INCIDENT RESPONSE TEAM (HIRT) RESPONDS TO AN AVERAGE OF 500 HAZARDOUS MATERIALS INCIDENTS ANNUALLY

Disaster Service Worker (continued from page 6)

round out the series with tabletop exercises. HMD conducts an annual Hazwoper course for all Environmental Health Specialists (EHSs); this year the training will focus on disaster preparedness and our training will be used as one of the pilot courses for the CDPH. Although the course will be modified to meet internal DEH needs, it will deliver the core material for CDPH. When the intermediate and advanced CDPH curriculum classes are certified, we hope also to use them here to train all EHSs in DEH.

Disaster response can be a lot of work, but it is a very rewarding activity. Environmental Health Specialists taking this DEH course will receive awareness training so they can use their environmental health skills in a disaster setting and be able to assist their family and neighbors when the next one hits. The next disaster may not happen in the County of San Diego, but it might hit a neighboring county or another state. Specialists may also be called to help another city, county or even another region across the nation. DEH has a number of individuals that are committed to serve the community; during the Katrina disaster, we compiled a list of volunteers that were willing to assist with recovery efforts.

For more information about the ETHER program, visit: <http://www.cdc.gov/nceh/ehs/Resources/EHTER.htm>

We can build an Environmental Health Response Team and be better prepared at the same time!

Let's do it together!

<http://www.sdcounty.ca.gov/deh/>

APSA Update

By *Sande Pence*,
Supervising Env. Health Specialist



The Hazardous Materials Division (HMD) has reached several milestones since the responsibility for implementation, enforcement and administration of the Aboveground Petroleum Storage Act (APSA) was transferred from the Water Resources Control Board (SWRCB) to the local Unified Program Agencies.

In the last few months, HMD has actively worked to provide information for those facilities that are subject to APSA requirements. Among other things, HMD has:

- Created a new [APSA Web page](#) with links to [state](#) and [federal](#) resources.
- Sent a mail-out to over 800 regulated facilities subject to APSA, providing information and the form needed to complete their [facility statements](#). Hundreds of facility statements have been received and processed to update HMD's Kiva database of APSA regulated facilities.
- Conducted five business outreach workshops/presentations to environmental professionals, reaching over 300 business owners and operators, consultants, and other interested parties. Two of these workshops featured Pete Reich with the US Environmental Protection Agency (EPA), who provided an overview of the Federal Spill Prevention Control and Countermeasure (SPCC) Rule.
- Posted all presentations slides for the workshops on HMD's Web

What fuel storage is subject to APSA?

Crude oil, or any fraction thereof, which is liquid at 60 degrees Fahrenheit and 14.7 per square inch absolute pressure. Examples of fuels included are: oil, aviation, automotive and other petroleum-based engine fuels, heating oils, gasoline, petroleum-based lubricating oils, petroleum-based solvents, and waste oil.

site, including:

- [APSA, SPCC & You](#)
- [SPCC, APSA & You Part II](#)
- [US EPA SPCC Presentation](#)

- Trained inspectors by working along with Federal EPA representative during their inspections in our region to learn more about the SPCC Rule and the federal requirements.
- Posted Web site links to SPCC plan templates to guide [small](#) (10,000 gallons or less) and [large](#) (more than 10,000 gallons) facilities in preparing their plan.
- Invited stakeholders to participate in the APSA Advisory Workgroup to gather important stakeholder input in the local implementation of the APSA element of the Unified Program. The first meeting was held in May, and the group plans on meeting quarterly to discuss the implementation of the program.
- In May 2009 HMD Specialists completed the training and testing requirements and became certified APSA inspectors.

The APSA program development team continues working at a rapid pace preparing an inspection checklist for APSA inspections, an inspection guidance document, and updating Kiva database with information received from regulated facilities. As a regional leader for the APSA program, the County of San Diego has been assisting with implementation of the program statewide. Mike Vizzier, HMD Chief, participates in CalEPA's APSA Steering Committee, which developed an informative document that contains approximately 80 [Frequently Asked Questions](#) related to implementation and compliance with the APSA program. You can find this document and <http://www.sdcounty.ca.gov/deh/>

other helpful links and information for the APSA program at HMD's [APSA Web page](#).

Looking towards the future and to further assist the regulated community, HMD is planning on developing an online tool that can assist qualified facilities in completing their SPCC plan.

We continue to seek input from our industry partners in development of this new program; if you are interested in being part of the APSA Advisory Workgroup or if you have questions or comments related to the program, please contact HMD's APSA technical lead, [Sande Pence](#), at 858-495-5213.



APSA FACTS

- Facilities with total petroleum storage capacity $\geq 1,320$ gallons must prepare and implement an SPCC.
- Owners/operators must report to the CUPA and OES, immediately upon discovery, a petroleum spillage/release of ≥ 42 gallons (one barrel).
- APSA establishes civil penalties and penalty recovery procedures for non-compliance.
- CUPA inspectors must complete training and pass an exam to do APSA inspections.
- CUPAs must inspect all facilities with petroleum storage capacity $\geq 10,000$ gallons at least once every three years.



RISK MANAGEMENT WORKSHOP

*By Mark McCabe
Env. Health Specialist III
CalARP Coordinator*

On January 15, 2009 the Hazardous Materials Division (HMD) held a one-day California Accidental Release Prevention Program (CalARP) workshop at the San Marcos Fire Department Training Center. A total of 91 people from industry, interested parties, and the other regulatory agencies attended the workshop. The main focus of the workshop was to explain how to update Risk Management Plans (RMP) and let attendees know when an update is required.

After a brief welcome and introduction, Jack Harrah from the California State Emergency Management Agency (CalEMA) explained how CalEMA works with the Administering Agencies (AAs) to oversee the CalARP Program and discussed the process for regulated facilities to receive assistance with dispute resolution. Although local AAs are the first point of contact with CalEMA for all matters concerning CalARP, regulated facilities may contact CalEMA when they disagree with the findings of their AA. CalEMA receives the appeal from the regulated facility and conducts a hearing to resolve the dispute.

After [Jack Harrah's presentation](#), I presented RMP [Update Triggers](#), [RMP Review at the AA Level](#) and [Keeping your CalARP Program in Compliance](#). All of these presentations directly affect anyone subject to the CalARP program within the County of San Diego. The presentations were designed to help facilities get in compliance with both, their Risk Management Plan and their Risk Management Program before an official inspection.

As we move forward in the age of electronic reporting, there are now mandates for facilities subject to Federal RMP regulations to start using a new

software, [RMP e-Submit](#), to file RMPs with the USEPA; Robert Lucas, from US EPA provided an overview, although as of this writing, this program is not available on the USEPA Web site. You may check USEPA's Web site at http://www.epa.gov/emergencies/content/rmp/rmp_submit_2009.htm to find it at a later date.

The workshop also featured a discussion panel with Robert Lehman, Riverside County Environmental Health, Richard Kallman, Santa Fe Springs Fire Department, Anna Olekszyk, City of Los Angeles Fire Department, Jack Harrah, CalEMA, and me. Questions from attendees ranged from CalARP requirements to the upcoming RMP update. After going through the list of questions, the attendees were invited to ask any additional questions about CalARP to the panel. The audience had several new questions for the panel about the upcoming RMP update.

After a short break for lunch that was kindly provided by *Risk Management Professionals*, Michelle Price from HMD presented an overview of the [Unidocs Hazardous Materials Inventory Management System](#), an online reporting system that HMD is planning to use for businesses to submit their Tier II/Hazardous Materials Business Plan Inventory electronically instead of mailing it in.

Michelle was followed by Lance Richman, from USEPA, and John Kolb from HMD, who gave a presentation on the [Local Area Plan](#) and how this plan affects businesses and agencies. Local Area Plans are vital for coordination between citizens, business, and response agencies during emergencies. All non-emergency responses to CalARP regulated facilities must be specifically addressed in the Local Area Plan since they are expected to pose a greater hazard to the surrounding community.

The final classroom presentations were given by Brad Long with the HMD, who presented on the [County of San Diego First Responder Compact Disk](#). This CD was developed from the Hazardous

Materials Business Plan information provided to the HMD.

The First Responders Hazardous Materials Business Plan contains information about the hazardous materials and wastes stored at a facility; provides current emergency contact information; and a facility site map to assist first responders during a hazardous incident response. Brad followed this with a presentation on [industry and responding agency coordination](#). During an actual incident, it is imperative that business representatives communicate with emergency responders to understand the situation and possible hazardous outcomes.

The last part of the workshop was composed of outdoor demonstrations in the training yard of the Fire Training Center. Attendees were able to see the Hazardous Incident Response Team (HIRT) from the City of San Diego in action. HIRT demonstrated how to use a *Chlorine A kit* to stop the release of chlorine from a leaking 150 pound chlorine cylinder while suited up in personal protective equipment level A. After the demonstration, there was a discussion of the response capabilities of the San Diego Regional HIRT, comprised of both the County and City of San Diego responders. The Regional HIRT serves all of the San Diego County Region with the exception of Camp Pendleton and several Indian Reservations.

The participants rated the workshop as very helpful and requested that presentations be made available to train other employees. All presentations given at the workshop are now available at: http://www.sdcounty.ca.gov/deh/hazmat/hmd_calarp.html.

The HMD plans on having a half-day CalARP workshop in 2010. The date has not been established yet, but if you would like to receive information as it develops, or would like to suggest topics to be covered in the workshop, please call John Kolb at 619-338-2472 or Mark McCabe at 619-338-2453.

CERS

California Environmental Reporting System

*By Michelle Price,
Env. Health Specialist II*

Assembly Bill 2286 (AB 2286) was signed by the governor in September 2008, requiring all regulated businesses as well as Certified Unified Program Agencies and Participating Agencies to use the Internet to submit and accept program data by January 1, 2013. To facilitate this exchange, AB 2286 requires CalEPA to develop a Web-based format that will allow businesses and Unified Program Agencies (UPAs) to transfer data.

CalEPA is currently working in the development of the California Environmental Reporting System (CERS), which is modeled after the Hazardous Material Online Inventory Project in Unidocs, a Web-based reporting system used throughout the state that was developed by regulatory agencies in Northern California.

What is HMD doing to prepare for this change?

HMD is currently using Unidocs as part of a pilot project with a small number of businesses to test the exchange of data while CalEPA prepares for the new CERS. Working with a small number of businesses during this process will allow HMD to fine tune submittal and review procedures for hazardous materials inventory. Businesses participating in HMD's pilot project have been successful in the electronic submission and updates of inventory through Unidocs.

HMD has been working closely with CalEPA and other CUPAs in a state-wide workgroup working on the design and implementation of CERS. Some regulated businesses, including one from San Diego, are participating in this workgroup and providing important input on this process.

How is this project being funded?

To pay for the costs of implementing electronic reporting statewide, the legislature is temporarily increasing the minimum state surcharge by \$25

per year for three years. Funds will be used for system development, outreach and training, and technical support for UPAs so they are able to accept the information electronically. This means that the amount of the minimum state surcharge will increase from \$24 per year to \$49 per year for the next three years.

The HMD will collect and remit to the State the electronic reporting surcharge starting with the July 2009 billing statements.

For more information about the State surcharge, please visit: <http://www1.calepa.ca.gov/CUPA/EReporting/>; you can also see a video clip at: <http://www.calepa.ca.gov/CUPA/CERS/>.

How can you prepare for this change?

At this time, HMD is developing internal processes to comply with AB2286. If you are interested in participating in the pilot project and have a discloseable inventory of 20 or more chemicals, please contact your Area Specialist or contact the HMD's Hazardous Materials Duty Specialist at 619-338-2231.

USEFUL HMD PHONE NUMBERS

WHO TO CALL:	PHONE #	FOR INFORMATION REGARDING:
Hazmat Duty Desk	619-338-2231	Technical information about the Unified Program
Permitting	619-338-2251	Permitting of new sites; changes of ownership inactivation of permits; billing questions
Hazmat Plan Check	619-338-2232	Stamps of Hazardous Materials Questionnaires
UST Plan Check	619-237-8451	Applications for Construction, Repair and Removal of USTs
Special Projects Assistance Program	619-338-2207	Technical requirements and exemptions for USTs, ASTs, and tanks in below grade structures
UST Appointments	619-237-8451	Appointments for inspection of UST projects

Current and past issues of the Environmental Press are available online at: http://www.sdcounty.ca.gov/deh/hazmat/hmd_newsletter.html

For comments about this newsletter and for suggestions about upcoming articles, please contact: Gloria.Estolano@sdcounty.ca.gov

<http://www.sdcounty.ca.gov/deh/>

HMD'S OUTREACH CORNER

Upcoming Presentations and Training for Industry and the Community

Fall of 2009: Significant and Top Ten Violations for Biotech and Research Labs

Please call the Hazardous Materials Duty Desk at 619-338-2231 for additional information.



Training Completed Recently

- Aboveground Petroleum Storage Act Informational Workshops
- Hazardous Waste Management and Pollution Prevention Presentation at the California Association of School Business Officials Workshop
- High School Compliance Workshop for School Administrators

Updates to the Public Document for facilities subject to the Risk Management Program are due on November 1st, 2009.

KELLY BROWN

(continued from page 1)

Early in her senior year, Kelly applied to every campus in the UC system with hopes of following in her grandfather's footsteps and attending UCLA. She was accepted at every school and after visiting the campuses, Kelly had to make an important decision on where to get her education.

She found UC Santa Barbara so impressive and mesmerizing that she couldn't see herself going anywhere else. So leaving her Mom, Dad, and little brother in hot, dry Bakersfield, she moved to the beach and obtained a BS in environmental studies with an emphasis in hydrology at UCSB.

It was at Santa Barbara that Kelly developed a love for the ocean and its beaches. She shared a small house in the college town of Isla Vista with six roommates; they lived on the top of a cliff overlooking the ocean, just a few feet from the sand.

While at UCSB, Kelly broke the cardinal rule about dating one of your roommates; in doing so, she found the love of her life. In 2006, upon

graduation, Kelly and her boyfriend, Malcolm, moved to San Diego to start a new chapter in their lives.

During college, and for a couple of years after, Kelly worked at In-N-Out Burger where she learned to cook burgers, make french fries, run the drive-thru, and work with the public. She quickly realized the value of excellent customer service and teamwork. Working her way up the ranks and about to start the company's *University for Managers*, Kelly got a call to interview with the County's Hazardous Materials Division (HMD). The job sounded interesting, but she was not sure of exactly what the job would entail. She was pleasantly surprised to find out she would be working with an amazing group of people and conducting a variety of Unified Program inspections. She accepted an Environmental Health Specialist (EHS) Trainee position and joined HMD in February 2008.

Since her hire, Kelly has trained for and successfully taken state exams required for underground and above-ground storage tank inspectors. She is responsible for inspecting businesses in the cities of San Marcos

and Carlsbad and has conducted presentations to promote environmental health and pollution prevention to students in high school.

No longer a trainee, Kelly is now an EHS I and is working towards becoming a Registered Environmental Health Specialist. Her favorite part of the job is being able to go "behind the scenes" and learn about so many different types of businesses.

Kelly is a great addition to HMD. Her desire to learn along with her excellent customer service and teamwork skills has quickly earned her recognition among her peers and managers. This October, Kelly will be getting married to her boyfriend of five years and will soon be known as Kelly Robertson.

In her spare time, Kelly enjoys spending time with her fiancé and their black Labrador puppy, Moose, at the beach, the park or on a hike. She also enjoys beautiful sunsets, good friends, and good beer. San Diego is just the place to have all that. Even though she's not a San Diego native, Kelly can't see herself starting a family anywhere else.