

Solano County Department of Environmental Management
Environmental Health Services Division

Hazardous Materials

Hazardous Materials

Presented by Mr. Brad Nicolet, Senior Environmental Health Specialist

Introduction

Regulatory Authority:

- California Health and Safety Code (HSC)
- California Code of Regulations (CCR) Title 19, 22, 23, 27
- Uniform Fire Code Article 80 (Business Plans & Inventories only)

What We Do: Six Programs

- Hazardous Materials Mgmt
Article 1
Plan and Disclosure
CHS Ch. 6.95
- Underground Storage Tanks
CHS Ch. 6.7
- Hazardous Waste
CHS Ch. 6.5
- Risk Management Program
Article 2
(Plan)
CHS CH. 6.95
- Aboveground Storage Tanks
CHS Ch. 6.67
- Business Plan & Inventories
UFC Article 80

In Addition:

Emergency Response:

Unk. Substance, derail, spills, NIHIT, etc.

Complaints:

Residential business/hobbyist, sick
Bldg

Prop 65 Reports:

Spills, releases, tank leaks

Catch-All:

Shell tanker spill, SP derail, Elmira
Pipeline Leak. Contract with FF/SS
Sewer District.

Certified Unified Program Agency “CUPA”

- Implemented in 1996.
- Intent: Reduce the burden on business by eliminating multiple inspections and fees.
- Consolidate six separate programs into single inspection, permit and fee.
- Applies to incorporated and unincorporated areas.

Hazardous Materials Release Response Plan and Inventory

- “Community Right to Know”
- HMMP Applies to “business” only
- Threshold limits:
55 gallons, 500, pounds, 200 cu/ft
- Chemical Inventory, Spill/Fire Response and notification, Site Map
- Hazardous Materials Communication Labeling, MSDS, Training



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24 10:22 AM

Underground Storage Tanks (UST)

- Purpose is to protect groundwater from contamination through prevention using secondary containment and continuous monitoring systems / equipment.

1. Installation of UST's including plan checks and construction inspections
2. Annual inspections
3. Tank Removal inspections

UST Common Violations:

- No leak monitoring / broken equipment
- No annual certification of monitoring equipment
- Failure to follow permit conditions
- No approved UST monitoring/response plan
- No proof of financial responsibility

UST Excavation



UST Removal



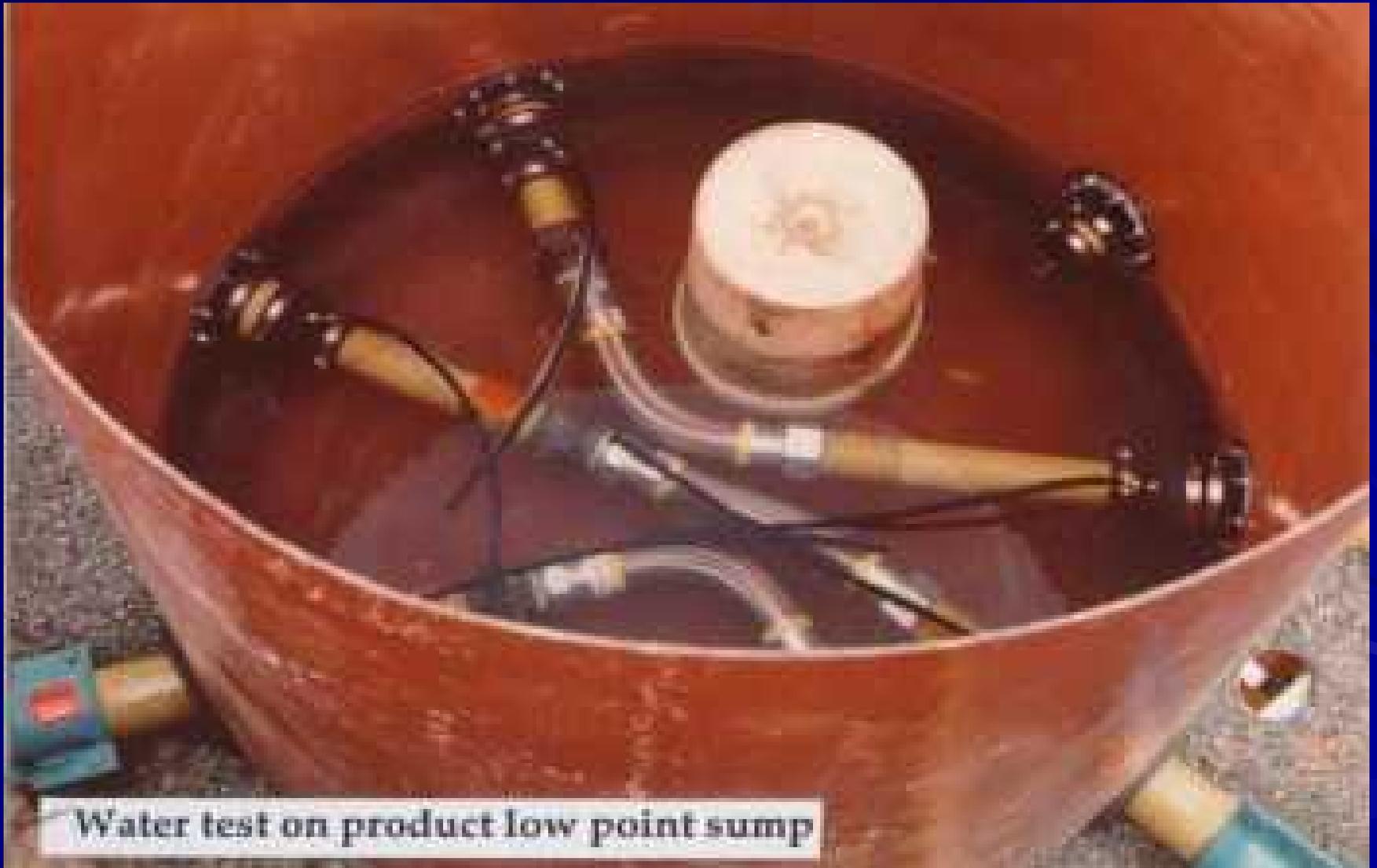
UST Installations



Who said tank installations aren't orderly?

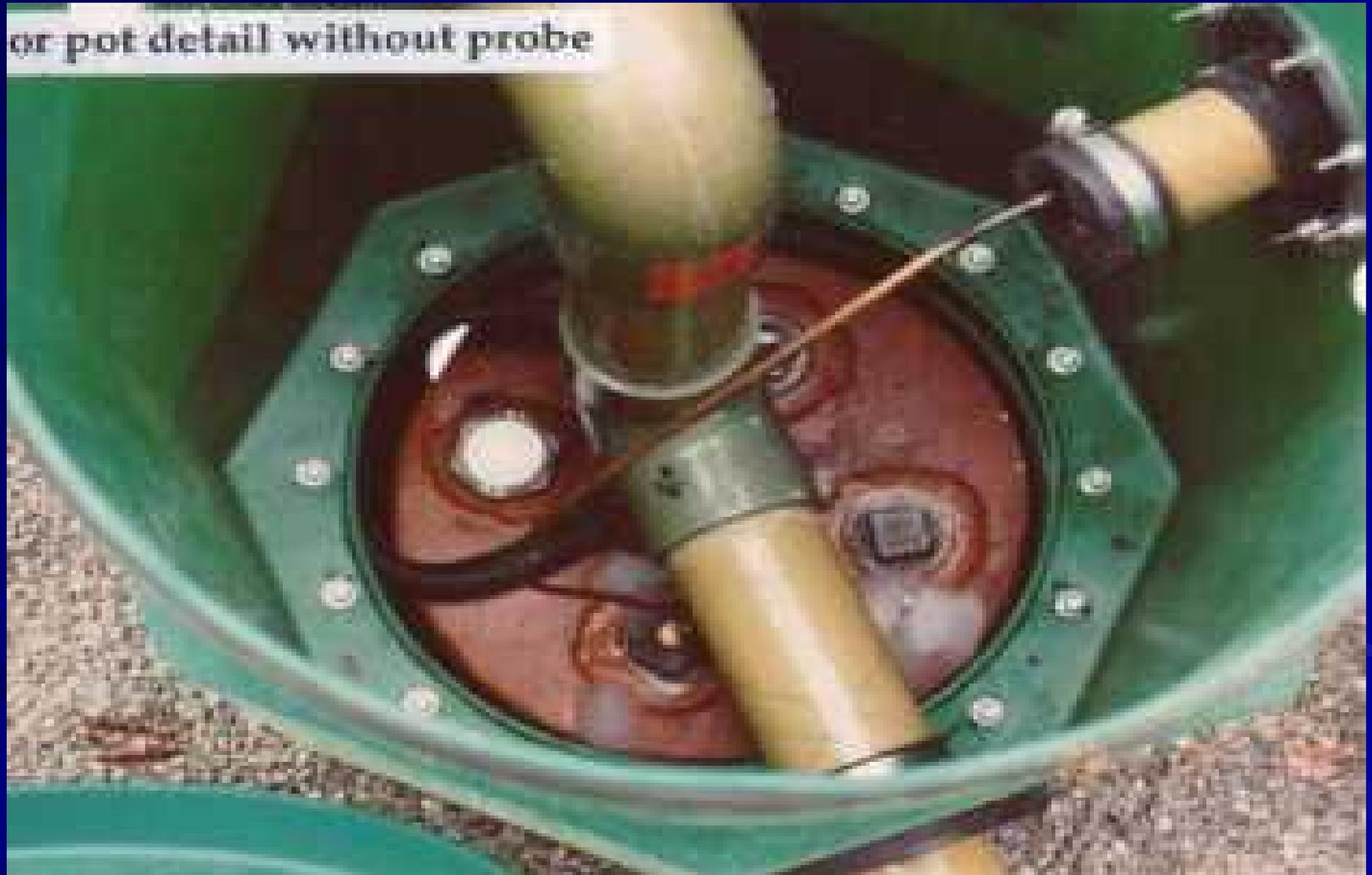


Integrity Test



Water test on product low point sump

Equipment Checks



Under Dispenser Containment



Construction Inspection







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Waste vs. Hazardous Waste

- These rules apply to everyone!
- Hazardous Waste determination
- EPA ID Numbers
- Labeling
- Chemical Incompatibility Issues
- Facility Design Specifications
- Management: manifests, receipts, training
- Risk Communication: alarms, spill kit

Common Violations

- Labeling, labeling, labeling
- Containers not closed or secured
- Waste manifests not available
- No waste determination / illegal disposal
- No weekly or daily inspections
- Contingency/Emergency Response Plans and employee training inadequate

Upper left shows proper label of back flush and boiler blow down drum.
Remaining photos show inadequate labeling of heat transfer oil tank, wastewater tank (WW1) and alkyd/resin product drums.



Risk Management Prevention Program (RMP)

- **Acutely hazardous materials that exceed thresholds listed on three tables.**
- **Ex. Chlorine, Anhydrous Ammonia**
- **Review potential for offsite consequences of airborne release**
- **Up to one year to three years to complete**

Risk Management Prevention Program (RMP) cont'n

- Uses a professional team of experts to review processes, equipment, and training
- Assess worst case and reasonable loss condition from accident, earthquake, sabotage, etc.
- Subjected to third party review
- Public Participation Period (45 days)

Emergency Response

- **Technical assistance to other agencies such as, fire, police, and public works**
- **Activate “toxics” superfund cleanup for hazardous waste and illegal drug labs.**
- **Hazcat contract for emergency Hazardous Materials Identification**
- **Prop 65 notification**

Additional Areas: Complaints

- Complaints of possible HAZMAT violations are reviewed ASAP. Typical examples and response:
 1. Disposal of Household Hazardous Wastes
 2. Neighbor violations: illegal disposal of waste oil or antifreeze
 3. Odors and Sick Building

Aboveground Storage Tanks (AST's) and Article 80, Uniform Fire Code

- Petroleum threat to navigable waters (AST)
- Spill Prevention and countermeasure and control plans (SPCC) (AST)
- Article 80 Section 8001.3 duplicates HMBP in the Fire Code and calls the document HMMP