

Business Perspective On Managing Hazardous Materials & Wastes





Topics To Cover

- Your Hazardous Materials Business Plan
 - Facility Information
 - Hazardous Materials & Hazardous Wastes
 Inventory
 - Thresholds
 - Site Map
 - CERS (CA Env. Reporting System) Online Reporting
 - When Required; When Due; Updates
- Emergency & Training Plans
 - Emergency Response & Business Continuity Plans
 - Training
- Inspections
 - External
 - Internal (Best Practices)









Your Hazardous Materials Business Plan (HMBP)

- Is my facility covered?
 - Uses, handles or stores haz/mat (including haz/waste)
 - 500 pounds of a solid hazardous substance
 - 55 gallons of a hazardous liquid
 - 200 cubic feet of a compressed gas
 - Extremely hazardous substances (40 CFR Part 355)
 - Other toxic gases, combustible metals, etc.
- Facility Information
 - Business Activity
 - Owner/Operator ID
 - Other Required Documentation
- Hazardous Materials (& Hazardous Wastes) Inventory
 - Thresholds
 - Guidance

https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_chem_reporting_changes.html

- Site Map
- Recordkeeping
 - HMBP; inspection reports (internal/external); waste manifests & profiles; training docs



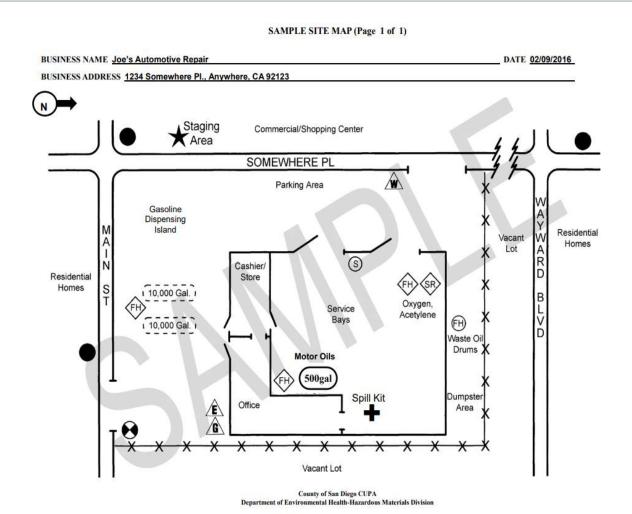






Hazardous Materials/Wastes Inventory & Site Map

- It's not just a list of chemicals you use or store, but <u>where</u> you use and store them
 - IPA
 - 67-63-1
 - B2, 3, 4
 - 110g
 - Underground & aboveground tanks
- Other information:
 - Utilities
 - Equipment
 - Evac/Staging
 - Surroundings & sensitive areas





Guidance Information & Exemptions

Combustible Metals Guidance

https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/Combustible_Metal_HMBP_Reporting.pdf

Exemptions

- SDCC 68.1116, 68.1117 & 68.1119
 - Carbon dioxide for beverage carbonation up to 6000 cu.ft. or 3500cu.ft. if cryogenic
 - Propane at commercial buildings, restaurants and RV hookup stations that handle 1000gals or less for heating, cooling or cooking
 - This does NOT include sites that dispense propane
 - Closed loop fire suppression systems









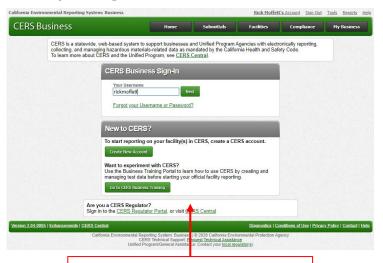


CERS Reporting

Completing the HMBP, instructions...

https://www.sandiegocouny.gov/content/dam/sdc/deh/hmd/hmbp

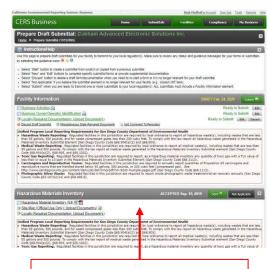
Completing the HMBP online - CERS



Create new or log in; "How To" button



Entering or uploading info



Facility; Inventory (site map); Plans

** Call CUPA for "Create New Account" – CERS Helpdesk 858-505-6990



Emergency Response & Training Plans

- Emergency Response & Business Continuity Plan
 - In an emergency, what will you do?
 - In-house capabilities
 - Outside help
 - Recovery & business resumption
 - Is it safe?
- Training Plan
 - Familiarity with the "Plan" who knows what
 - Emergency response procedures in the event of a release
 - Notification procedures
 - Procedures for the mitigation of a release to minimize potential harm to people or the environment
- Other Training
 - HazWOPER & RCRA
 - Haz/Comm









Passing An Inspection – What You Need to Know

- So an inspector from the Department of Environmental Health (DEH), Hazardous Materials Division, shows up at your front door. Be prepared to...
 - 1. Conduct a thorough tour of the facility
 - First time tour could be extensive
 - Annual tour based on HMBP info & past inspections
 - 2. Review paperwork (past inspections)
 - 3. Produce training records and any other support docs
- You have the right to...
 - 1. Inquire about the scope of the inspection
 - 2. Enlist help from other on-site "experts"
 - 3. Provide information at a later date
- Close out meetings
 - 1. Information requests (at inspection)
 - 2. Final draft review & signatures









Cobham Advanced Electronic Solutions





Questions?



Rick Moffett 858-560-1301

Rick.Moffett@Cobham.com

Sande Pence

858-505-6893

Sande.pence@sdcounty.ca.gov