

THANK YOU TO OUR 2021 SPONSORS



Slido – For Polls/Q&A

- Most of you will see a Q&A/Polls panel on the right side of your screen. You can just participate in the Polls and Q&A there.
- Some of you won't see that so either go to slido.com and enter meeting ID# XXXX (see next slide)
- From your smartphone, visit this QR Code (see next slide)



A screenshot of a Slido meeting interface. The main content area shows a slide with two bullet points: "➤ Designated facility must submit all manifests to e-Manifest system w/i 30 days." and "➤ Electronic only after 06.30.21". Below the text is an illustration of a factory with smokestacks and a document labeled "VOID". A green thought bubble above the document says "EPA's e-Manifest System". On the right side of the screen, there is a Q&A/Polls panel with a list of participants and their messages. A large yellow arrow points from the text on the left towards the Q&A panel. The top of the screen shows the meeting title "23rd California Unified Program Annual Training Conference February 2 through March 18, 2021" and the user profile of "Tim Snellings".



Your Unique Slido Meeting Info

- Your Tech Team will add your unique slido meeting info on this page with QR Code and [slido.com/meeting ID](https://slido.com/meeting)
- This info is helpful for those that choose to use their smartphone or browser for Q&A/Polls

Post Session Zoom Rooms Reminder (Most Sessions)

The screenshot shows the event website interface for the 23rd California Unified Program Annual Training Conference. The left navigation menu is visible, with the 'Zoom Room Link' option highlighted in a yellow box. The main content area features a large image of a conference lobby with various sponsor logos (NES, TAIT, Kier, The Home Depot, pointcare, CAL FIRE, Cal OES, DTSC, Water Research) and a central 'CALIFORNIA CUPA FORUM' logo. A 'WELCOME VIDEO' player is also visible. The bottom of the page includes a 'Thank you to our GOLD SPONSORS' section with logos for Edison, Booster, and Tanknology.

- After our Session is over, we are offering a NEW Zoom Room opportunity for you to continue the conversation started in this Session
- Near the end of the Session in the Q&A box, we will post the Zoom Room link
- To access the Zoom Room link, you can also click on the link below Home on the left menu
- In this Zoom Room, you may meet with the Speaker, Moderator and/or fellow Attendees for a 'post meeting de-brief'



Session Evaluation Codes Reminder

The screenshot shows the website for the 23rd California Unified Program Annual Training Conference, held from February 2 through March 18, 2021. The browser address bar shows the URL: event-app4.eventpower.com/event_app/display/index/21CALCUPA-FORUM. The left-hand navigation menu is visible, with the 'Session Evaluation Links' item highlighted in a yellow box. The main content area features a virtual event scene with a central counter labeled 'CALIFORNIA CUPA FORUM' and various sponsor logos including NBS, TAIT, paintcare, and others. A 'WELCOME VIDEO' player is at the top, and a 'THANK YOU TO OUR STATE PARTNERS' section lists CalEPA, CAL FIRE, Cal OES, and DTSC. At the bottom, there is a 'Thank you to our GOLD SPONSORS' section with logos for HCL, CleanEarth, CALYTERA, and esri.

- After our Session is over, if you want to earn CEUs or offer feedback, please click on the Session Evaluation link at the top of the Session Screen before “Leaving the Session”
- To complete the evaluation later, come back to the “Session Evaluation Links” menu item, find your session and click on the link to complete the Session Evaluation

23rd Annual California CUPA Training Conference
February-March 2021





HMBP 201: Beyond the Basics

Presented by

Apollonia Helm and Erin Thomas

3/18/2021

23Rd Annual California CUPA Training Conference

February 2 thru March 18, 2021

Virtual Conference



www.calcupa.org



➤ <https://youtu.be/FTCfVshsjEM>



23rd Annual California CUPA Training Conference
February-March 2021

Why are you here?

Regulators

- Knowledge → Role of Educator
- Build rapport with facilities
- Improve data: Planning & safety

Businesses

- Understand → Clear guidance
- Improve submissions
- Reduce re-submissions

Introductions

➤ Erin Thomas:

- Hazardous Materials Specialist, REHS
- San Mateo County Env. Health – CUPA
- ethomas@smcgov.org
- (650) 464-7200

➤ Apollonia (Polly) Helm

- Hazardous Materials Specialist , REHS
- San Mateo County Env. Health – CUPA
- ahelm@smcgov.org
- (650) 207-9133



Poll Question #1

How many years of experience do you have with the hazardous materials business plan program?

- A. None
- B. 1-5 years
- C. 5+ years

Poll Question #2

What is your background?

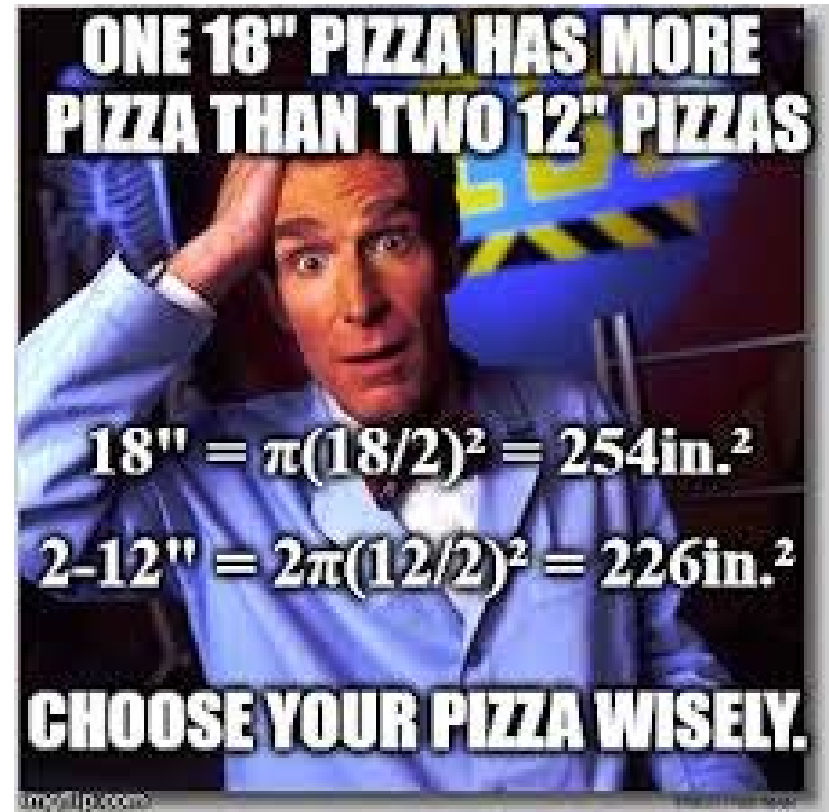
- A. CUPA
- B. Other Regulator
- C. Fire agency
- D. Consultant
- E. Private industry
- F. Utility
- G. Other

Agenda

- Exemptions & Higher thresholds
- Mixtures
- Updates
- *Not talking about...*

Housekeeping

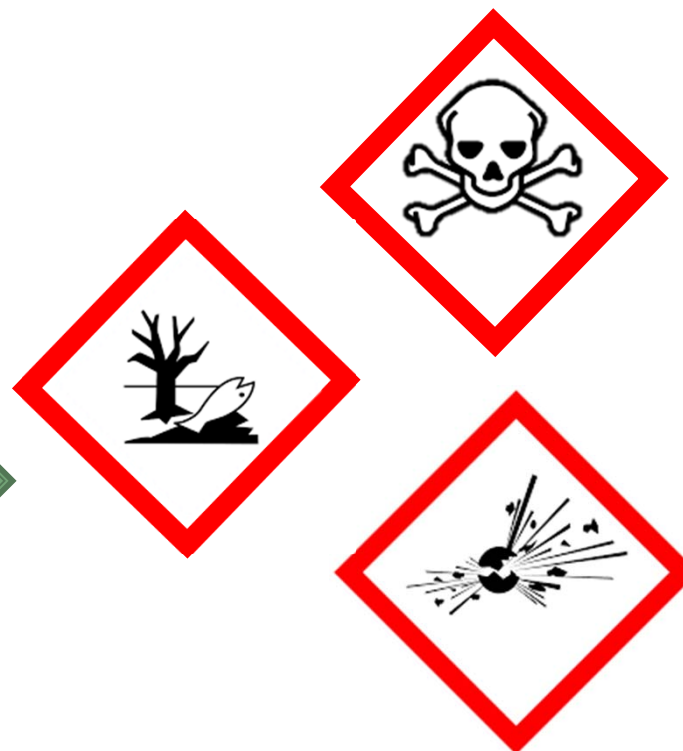
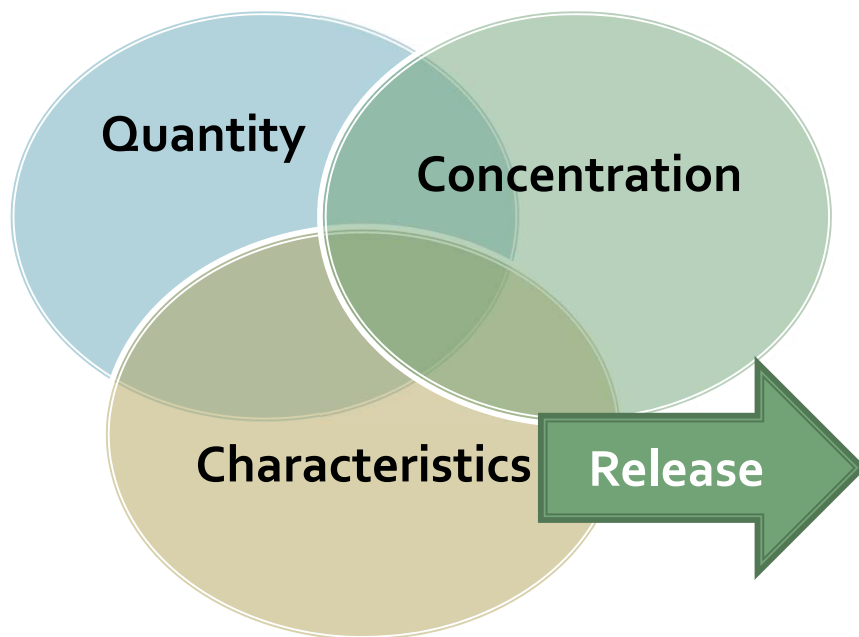
- Get your pen and paper!
- Slides are available.



Reminder – Check the local ordinance!

- Based on our experience, HSC, and CUPA policies. Read the code/reg. and decide.
- Local jurisdiction ordinances
- HMBP TAG – Items needing clarification
 - Contact Fred Chun and Darwin Cheng
 - Please use the [discussion center](#) to ask your questions.

Definition of Hazardous Material



Listed in Paragraph 2 (HSC 25501(n)(1))

- **(2) Hazardous materials include all of the following:**
 - A. MSDS is required by CLC.
 - B. Radioactive material listed by NRC (ER plan)
 - C. Hazardous materials table by DOT
 - D. List of hazardous substances in the CLC
 - E. Listed as a hazardous waste in HSC

List of Substances Requiring an SDS

➤ (A) Items requiring an SDS – (Labor Code 6382 (b)(1-5) and (d)).

1. Human / animal carcinogen listed by IARC.
2. Toxic Pollutants (CWA) & Hazardous Air pollutants (CAA) by EPA.
3. Airborne chemical contaminants list by OSHA.
4. Restricted Materials listed by Food and Ag.
5. Alerts by Hazard Evaluation & Information Services.

d. Substances in the scope of the Hazard Communication Standard

Exemptions & Higher thresholds

Examples using 4 facilities

- Big Box store
- Farm
- Utility Site
- Fire Department

Poll Question #3

How Familiar are you with HMBP exemptions / higher thresholds?

- A. I know all of them
- B. I know some of them
- C. I am not familiar with any
- D. A quick review is all I need



LARGE RETAIL STORES

They Have it All

Poll #4 Big Box Activity – What is not exempt? (Word Cloud)

Not Exempt

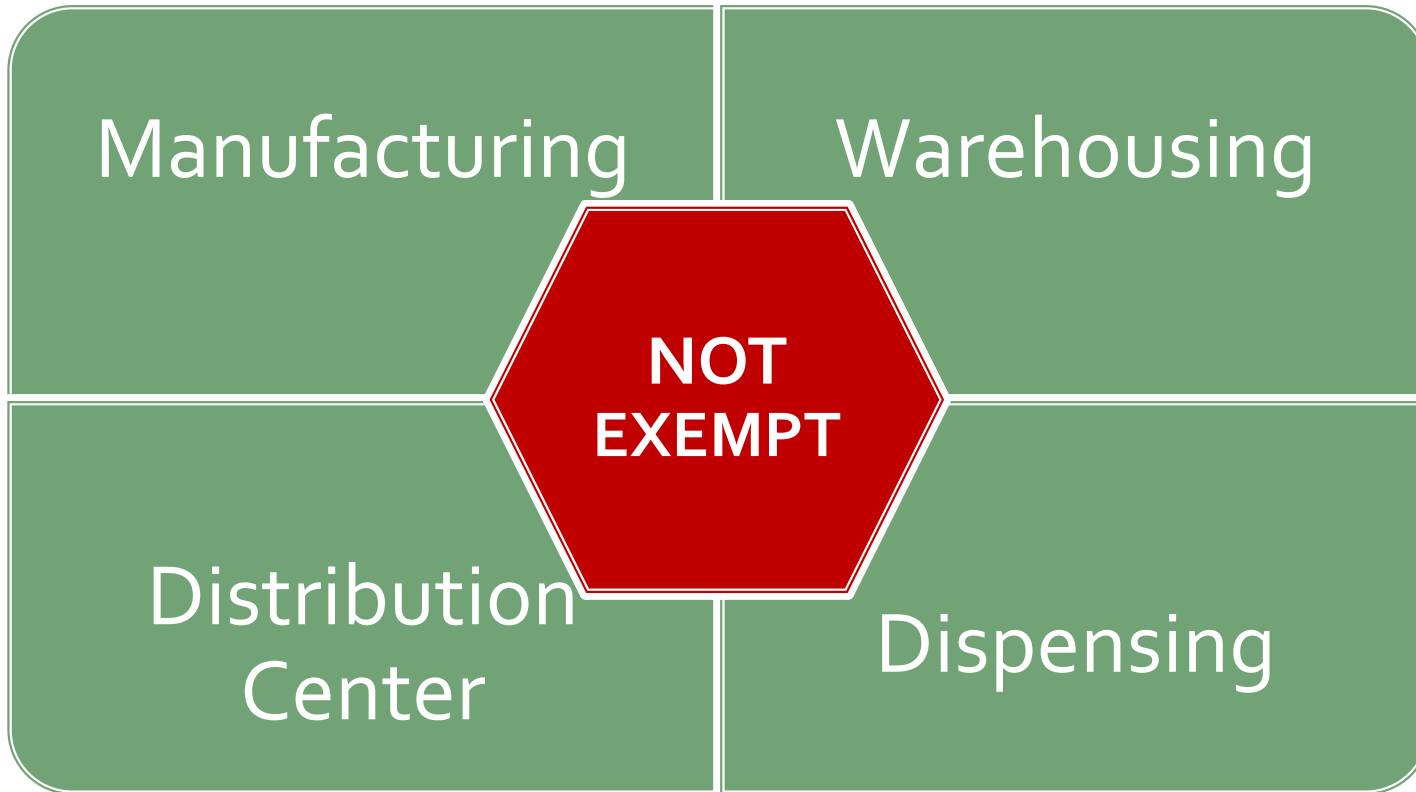
Poll #5 Big Box Activity – Word Cloud

Exempt

What is Retail?

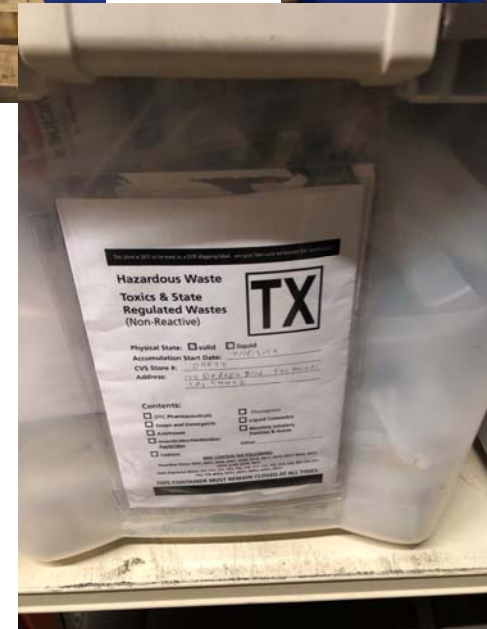
- Facility sells *consumer products*
- For personal, family or household use
- Concentration + quantity for general public





Hazardous Waste

- In San Mateo - Standard reporting thresholds.
- Other Places - **any hazardous waste** amount may be required to be reported.
- **Universal Waste:** Fluorescent bulbs, batteries, electronics, non empty aerosol cans
- **Medical Waste**



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Paint Department

Is “waste” paint required to be reported if stored over 55 gallons?



When managed through PaintCare program, report if:

- **10,000+ lbs solid**
- **1,000+ gal liquid**

What about flammable gases?



JUST THAT KIND OF DAY

Gas Cylinders



<https://youtu.be/YjgtRcCTKIY>

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Warehouse- Propane

Is Propane Exempt?



Forklift Fuel



Extra Fuel Storage

Threshold & Reporting Units: Propane

1. What is it used for? ➤ Forklift
2. What is the threshold? ➤ 200 CF
3. Delivered in pounds? ➤ Convert to CF
4. Physical state on site? ➤ Stored as a liquid
5. Reporting units? ➤ Report as a liquid in gallons (convert again to gallons)

Employee Break Area - Propane

Is Propane Exempt?

Up to 500 gallons



Cooking food
Heating water



Heating
Employee Area

Threshold & Reporting Units: Propane

1. What is it used for? ➤ Cooking / Empl. Heat
2. What is the threshold? ➤ 500 gal
3. Delivered in pounds? ➤ Convert to gallons
4. Physical state on site? ➤ Stored as a liquid
5. Reporting units? ➤ Report as a liquid in gallons if applicable.

Retail area- Propane

Is Propane Exempt?









Retail
Containers



Dispensing

Propane

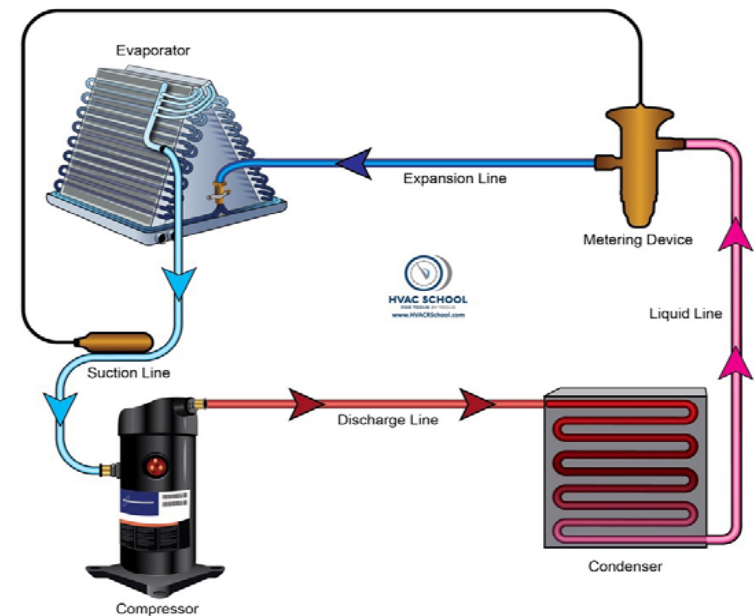


					
20# 11.5"	30# 11.5"	40# 11.5"	100# 12"	40# Forklift 12"	33# Forklift 12"
169 CF	253.5 CF	338 CF	845 CF	338 CF	279 CF
4.74 gal	7.11 gal	9.48 gal	23.7 gal	9.48 gal	7.82 gal



Refrigerants

- Refrigerators
- Building cooling
- Data / equipment cooling



Refrigeration

13 x 30 lbs

R404A are used
in a commercial
refrigerator.

Is this exempt?



Threshold & Reporting Units: Refrigerant

1. What is it used for?
 - Refrigeration
2. What is the threshold?
 - 1000 CF (non-flam refrigerant gas)
3. Delivered in pounds?
 - Convert to CF
4. Physical state on site?
 - Both liquid and gas?
5. Reporting units?
 - Report as either.

Note: UPAs may require reporting in specific physical state

Refrigerant Calculations

- 13x30 lbs of refrigerant for walk-in freezer R404A

390 pounds of R404A on site: A blend of R-125, R-134a, and R-143a.

Hazards: Pressure release, simple asphyxiant.

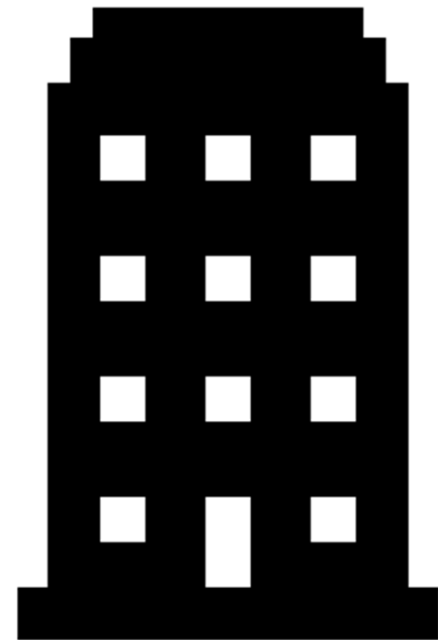
Conversion Factor: 72.63 cubic feet per 30 pounds.

$$390 \text{ pounds} * \frac{72.63 \text{ Cubic Feet}}{30 \text{ pounds}} = 944.19 \text{ CF} < 1000$$

BELOW THRESHOLD

Cooling

- Big Box Store cooling system contains 13x30 lbs of R-22.
- $4.3 \text{ cubic feet / lbs} * 390 \text{ lbs} = 1,677 \text{ cubic feet total}$
- Is this reportable?

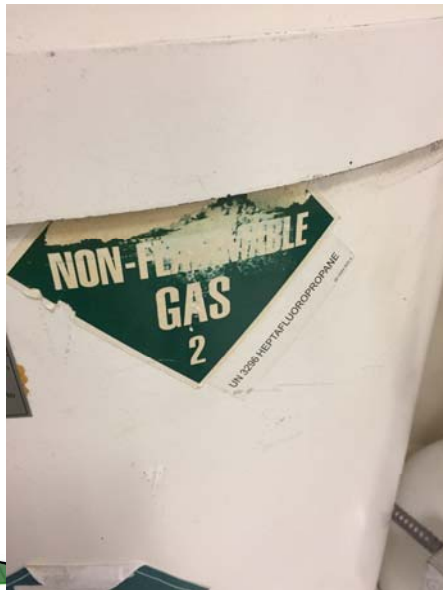


Threshold & Reporting Units: Refrigerant

- | | |
|---|---------------------------------------|
| 1. What is the material used for? | ✓ Comfort cooling in a closed system. |
| 2. Is the product flammable or ammonia? | ✓ No |
| 3. What is the threshold? | ✓ Exempt |

Data Room

Site uses FM-200 or Halon 1301 fire suppression system in computer / battery storage room. Are they required to report at 300 CF?



No! 1000 CF threshold for closed fire suppression systems.



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Poll #6 – Refrigerant Gases

- Which refrigerant gases are 100% exempt?
 - a. R-134a comfort cooling system (**Correct Answer**)
 - b. Refrigerants in a freezer/refrigerator
 - c. Ammonia cooling system
 - d. Computer room cooling
 - e. All of the above

Summary of Refrigerant exemptions

➤ **ENTIRELY EXEMPT:**

- Comfort cooling
- Computer room cooling
- Must be: nonflammable, not ammonia, closed system.

➤ **HIGHER THRESHOLD: 1000 CF**

- Refrigeration system
- Cryo / refrigerated / compressed gas, nonflammable

Other Gases



Florist Area – Helium



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Inert gas threshold

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA H (29 CFR 1910.1200).

Classification of the substance or mixture : GASES UNDER PRESSURE - Compressed gas

GHS label elements

Hazard pictograms :



Signal word :

Warning

Hazard statements :

Contains gas under pressure: may explode if heated.
May displace oxygen and cause rapid suffocation.

6 cylinders of Helium

- Facility is storing 6 cylinders (bulk discount).
198 CF each.
- $6 * 198 = 1188 > 1000$
REPORT IT.
- *however, removal of 1 cylinder
= 990 cubic feet.



1000 CF threshold gases

➤ Noble or Inert gases often found in laboratory/R&D.

- Argon
- Helium
- Krypton
- Neon
- Nitrogen
- Xenon

➤ And non-enriched air



Mini Clinic & Pharmacy – Medical Gases

The clinic is storing four, M-60 sized oxygen cylinders.

$$60 \text{ CF} * 4 = 240 \text{ CF}$$

Not required to report < 1000 CF

Includes:

1. **Oxygen**
2. **Nitrogen**
3. **Nitrous Oxide**



Reference Cylinder Sizes



CYLINDER	M2	M4	ML6	M6,B	M7	M9,C	D	JD	E	M60	M	H,T	LL
DIA./in.	2.5	3.2	4.3	3.2	4.3	4.3	4.3	5.3	4.3	7.3	8	9.3	21
HT./in. w/o valve	5.3	8.5	7.5	11.5	9	12	16.5	16.5	25.5	23	36	50-52	62-67

Lightweight Aluminum Cylinders

Style	Oxygen Capacity ft ³	Oxygen Capacity L	Weight No Valve, lb.	Service Pressure (psig)
M60	60	1699	22.5	2216
E	24	679	8	2015
M22	22.9	648	9	2216
M18	18	510	7.7	2216
D	15	425	5.5	2015
M9	8.7	246	3.9	2015
M7	7	198	3.5	2015
M6	5.8	164	2.4	2216
M4	4.0	113	1.8	2216

Featherweight Composite Cylinders

Style	Oxygen Capacity ft ³	Oxygen Capacity L	Weight No Valve, lb.	Service Pressure (psig)
M21T	21.8	616	4.0	3000
M16T	16	453	2.9	2216
M06T	6.4	182	1.5	3000
M05T	5.7	160	1.4	3000
M04T	4.4	125	1.1	3000

Food Court – CO₂

Facility is operating a soda machine connected to a CO₂ dewar tank. Typical delivery is 250 lbs.

Reportable?



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Threshold & Reporting Units: CO₂ Dewar

1. What is it used for?
 - Food*
2. What is the threshold?
 - 1000 CF
3. Delivered in pounds?
 - Convert to CF
4. Physical state on site?
 - Stored as a liquid
5. Reporting units?
 - Report as a liquid in gallons
(convert again to gallons)

CO₂ Example

An organization has CO₂ stored in 3 locations. Restaurants in San Francisco, San Mateo, and a warehouse in San Francisco (non-food). Each restaurant has 300 lbs delivered to each dewar tank. Warehouse has 2 x 20 lbs containers. **Reportable?**

Note: CO₂ conversions = 8.74 cf/lb,
8.46 lbs/gal, 73.94 CF/gal



Size	2.5 LB	5 LB	10 LB	15 LB	20 LB	50 LB
Height (Inches)	14	18	22	26	27	55
Diameter (Inches)	4	5	6	7	8	9

Converting to CF

- Both Restaurants

$300 \text{ lbs} * 8.74 \text{ CF/lb} = 2,622 \text{ CF} > 1000 \text{ CF}$, Report it!

- Warehouse:

$40 \text{ lbs} * 8.74 \text{ CF/lbs} = 350 \text{ CF}$

***However, in San Francisco, 200 CF is reportable for a non-food facility. Remember to check the ordinance.**

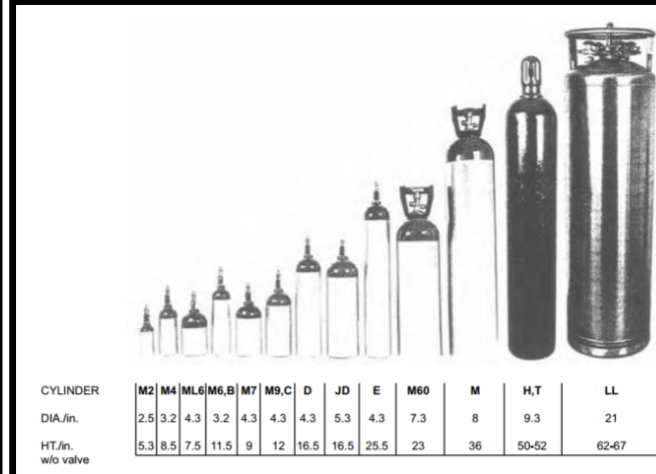
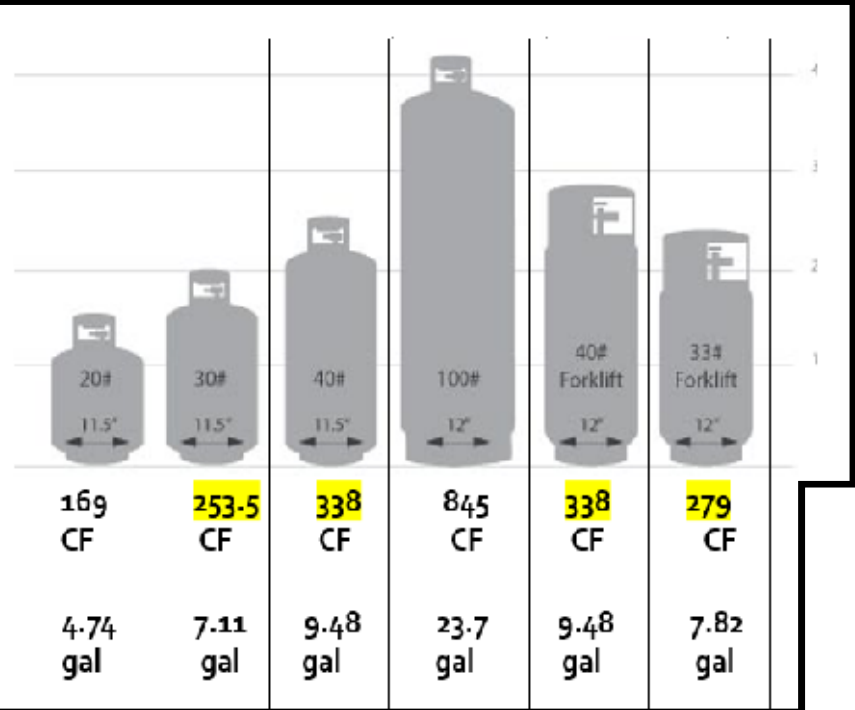
Summary for Gases

➤ **HIGHER THRESHOLD: 1000 CF**

- **Hazard:** Simple asphyxiant & pressure release **only**
- **Use:** Refrigeration, Fire suppression, medical use by provider.
- **Materials:** CO₂. Oxygen, Nitrogen, nitrous oxide by medical provider.

➤ **ENTIRELY EXEMPT:**

- Comfort cooling, Computer room cooling
 - >>Remember additional conditions may apply<<

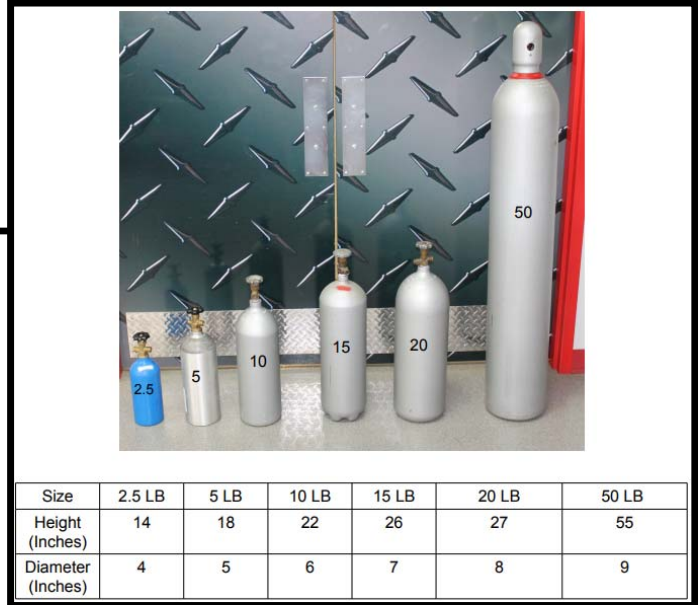


Lightweight Aluminum Cylinders

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Featherweight Composite Cylinders

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M06T	6.4	182	1.5	3000
M05T	5.7	160	1.4	3000
M04T	4.4	125	1.1	3000



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Auto Shop - Lubricating oil

Auto repair shop has 5 * 55 gal drums of oil (each drum a different grade) and **30** gal used oil drum which is picked up weekly.

Exempt! <275 gal



Lubricating oil exemption

1. Exempt if:

- 55 gallon maximum for each type of oil
- 275 gallon maximum for lubricating oil.

Elevators and Transformers

- Transformers and hydraulic elevators on site store 1000 gallons of oil based fluid.

Report it?

- 275 gal new oil + 1000 gal hydraulic oil oil-filled electrical = 1,275 gal petroleum on site.

- **Not reportable**



Oil Exemption Summary

➤ Exempt for...

1. Lubricating oil stored at 55 gallon maximum for each type and 275 gallon maximum for all lubricating oil on site.
2. Hydraulic and electrical systems at a facility with less than 1,320 gallons of petroleum total on site and no SPCC plan required by 40 CFR 112.

Facilities Department – Non-toxic detergent

- 9 x 55 gallon drums detergent. 495 gallons total. **Reportable?**
- Higher threshold for liquid or solid materials with ONLY irritant or sensitizer hazards.
- 550 gallons liquid
- 5000 pounds solid
- Verification: Cal EPA guidance, *Check the SDS*, European standard: ECHA CLP Annex VI Table 3.



Index No	Chemical name	EC No	CAS No	Classification	Labelling
005-009-00-3	tetrabutylammonium butyltriphenylborate	418-080-4	120307-06-4	Skin Sens. 1 Aquatic Acute 1 Aquatic Chronic 1	H317 H400 H410 GHS07 GHS09 Wng H317 H410



Clarification?



FARMS

Reduced Reporting Requirements

#7. Are any of your facilities farms?

- Yes
- No

#8 Activity – What is exempt for a farm? (word cloud)

Agricultural Exemption

- **Is it a Farm?** Harvests an agricultural commodity.
- **MUST MEET 3 REQUIREMENTS**
- **If Yes: Exempt from submitting:**
 - Emergency response plan
 - Training plan



[HSC 25507.1](#)

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Requirements: Paperwork and Postings

1. **Do Submit** facility information and inventory annually.
2. **Training.** Document initial and annual ER training equivalent to HMBP training.
3. **Post signs** on buildings - pesticide, petroleum oil, fuel and fertilizers.



Signage for Ag. Buildings

- Visible in from any direction of approach.
- Readable from 25 feet

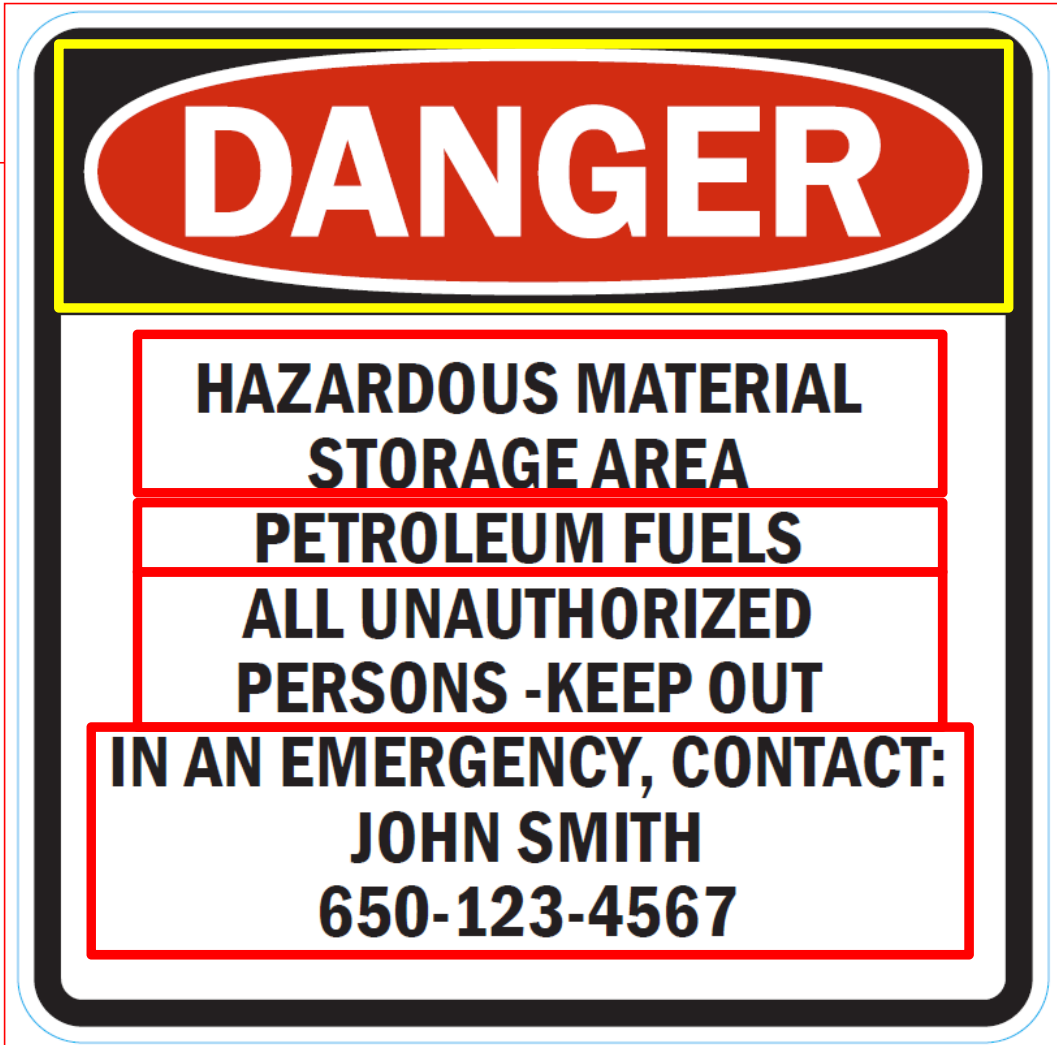


25 Feet

- Contains the specified information.
- Note: In all necessary languages to allow understanding.

19 CCR 2670, 2671





Other Ag. Reporting difference



A Training Conference
February-March 2021

#9 Poll

Have you seen this exemption used in your jurisdiction or experience?

- a) Yes
- b) No
- c) Unsure



Unstaffed Facility

Reduced Reporting Requirements

Poll # 10 – Do you have any unstaffed facilities?

- Yes
- No
- Unsure

Does Reduced Reporting Apply?

- Typically: Pump stations, water systems, Electrical grid, Cell sites
- Does it meet the definition?
 - 1/2 mile from nearest occupied structure.
- If yes: Must meet 4 additional requirements. (SSSS)



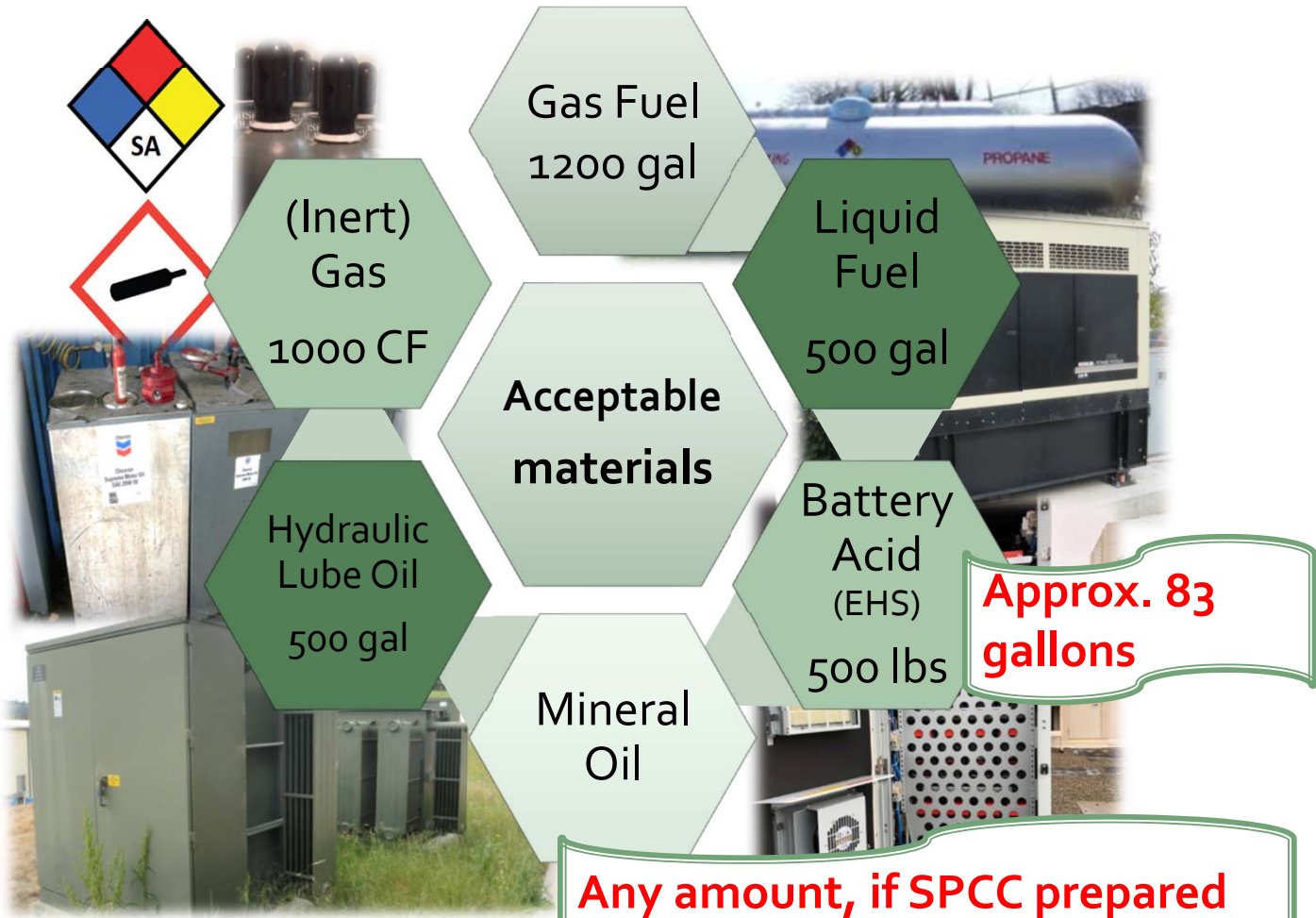
Unstaffed Facility Requirements

1. **Signs - Posted warning** according to Fire Code.
2. **Secured** and not accessible to the public.
3. **Submission:** Modified requirements
4. **Storage is limited** to specified hazardous materials and quantities.



[HSC 25507.2](#)

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Modified Submission and Inspection Requirements

Typical → Modified Requirements

1. Annual Reporting (25508.2) → 1-time* reporting
 - ER and Training Plan 25505(a) (3&4) → **Exempt**
2. Regular Inspections (25511) → 1-time* inspection + billing
3. Standard Inventory (25506, 25507) → Higher thresholds

**Unless changes in place for greater than 30 days.*

Compare Physical Requirements

<u>Requirements</u>	<u>Farm</u>	<u>Unstaffed</u>
1. Posted warning signs	✓	✓
2. Secured	✗	✓
3. Employees trained	✓	✗
4. Specified thresholds	✗	✓



Compare Reporting Requirements

Requirements:

	<u>Farm</u>	<u>Unstaffed</u>
1. Facility Information	✓	✓*
2. Inventory + Map	✓	✓*
3. ER + Training plan	✗	✗
4. Annual submission	✓	✗*
5. Regular Inspection	✓	✗**

*One-time submission. ** One-time inspection & billing. Unless changes > 30 days



Moving on...

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EMERGENCY RESPONSE ORGANIZATIONS

Fire Department – Air Storage

- Central storage facility for air tanks for all fire stations.
- Over 1000 cubic feet of compressed air in cylinders stored in this building.
- Is it exempt?

Yes! Exempt at any amount!



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A Final Word on Exemptions

- **What if you think something should be exempt?**
- **CUPA** may initiate exemption of a hazardous material (25507(c)).
- **Handler** may apply for exemption from HMBP (25507(d)) or hazardous material (25507(e)). (ex: Temp. Emergency Generators)
- **Requires:** Public input, hearing. 15 day notice to secretary.
- What if your CUPA says your exemption is invalid? If they believe there is a public health, safety, or Env. concern CUPA can require it to be reported.

Clarification?

Agenda

- ✓ Exemptions and higher reporting thresholds.
- Mixtures
- Update



MIXTURES



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The 1% Rule

- Do not count a hazardous chemical in a mixture if: concentration is $\leq 1\%$, or $\leq 0.1\%$ for a carcinogenic chemical.
- Example: Chlorine generator creates 500 gallon tank of .8% Chlorine in water.

Not reportable



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Reporting Mixtures in CERS

- If using percentage range from SDS, report the highest percentage in the range.
- % by Weight box does not accept dashes (ie: 12-20% should be reported as 20%)
- Total can add up to > 100%.
- Estimate components of waste mixtures to the best of your ability.

3 - Composition/Information on Ingredients

Ingredient	CAS #	Weight Percent
LVP Aliphatic Hydrocarbon	64742-47-8	40-50%
Petroleum Base Oil	64742-56-9 64742-65-0 64742-53-6 64742-54-7 64742-71-8	<35%
Aliphatic Hydrocarbon	64742-47-8	<25%

Calculating Mixture Components

- 25 gals of 90% Acetic Acid is mixed with 40 gals of water (65 gallons total)
- 25 gals X .90 = 22.5 gals pure Acetic Acid
- 22.5 gals/65 gals = .35 x 100 = 35% Acetic acid
- Reportable? **YES (65 gals 35% Acetic Acid)**


Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Acetic Acid	64-19-7	35	<input type="radio"/> Yes <input checked="" type="radio"/> No
Water	7732-18-5	65	<input type="radio"/> Yes <input checked="" type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No

Mixtures of EHS & Non-EHS Chemicals

- Is the whole chemical reported as an EHS?
 - Check 40 CFR Part 355, Appendices A and B, or "List of Lists"
 - No. Do not check the "EHS" box for the whole chemical. Check the "EHS" box next to each EHS component in the mixtures section.
 - If mixture contains EHS component, report quantities in lbs.

Field Help

 **EHS**
Data Registry Field Number: 208

Check "Yes" if the hazardous material is an Extremely Hazardous Substance (EHS), as defined in 40 CFR, Part 355, Appendix A. If the material is a mixture containing an EHS, leave this section blank and complete the section in the Mixture Components table below.

Close

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Sodium Cyanide	143-33-9	5	<input checked="" type="radio"/> Yes <input type="radio"/> No
Copper Cyanide	544-92-3	3	<input type="radio"/> Yes <input checked="" type="radio"/> No
Water	7732-18-5	92	<input type="radio"/> Yes <input checked="" type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No

Mixtures of EHS & Non-EHS Chemicals

➤ Plating Bath Example

- 16.6 lbs potassium cyanide mixed with 16.6 lbs copper cyanide in 96 gallons of water (100 gallons total)
- Is this reportable on the HMBP?
 - Quantity is >55 gals, so yes, as long as components are >1% of the mixture



Mixtures of EHS & non EHS

Calculate the % by weight of each component

➤ 16.6 lbs potassium cyanide mixed with 16.6 lbs copper cyanide in 96 gallons of water (100 gallons total)

- Hint – water ~ 8.34 lbs/gallon
- 96 gals * 8.34 lbs/gallon = 800.64 lbs
- 800.64 lbs of water + 33.2 lbs of cyanides = 833.84 lbs total
- 16.6 lbs/833.84 lbs = .02 x 100 = 2% by weight for each cyanide

◦ Water

Inventory Location

Chemical Location: Plating shop

Chemical Location: Yes No

Map # (Optional)

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Potassium Cyanide	151-50-8	2	<input checked="" type="radio"/> Yes <input type="radio"/> No
Copper Cyanide	544-92-3	2	<input type="radio"/> Yes <input checked="" type="radio"/> No
Water	7732-18-5	96	<input type="radio"/> Yes <input checked="" type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No
			<input type="radio"/> Yes <input type="radio"/> No

Units

gallons

cubic feet

pounds

tons

Plating bath

- 2 lbs sodium cyanide mixed with 2 lbs copper cyanide in 100 gallons of water
- Determine the percentages of each component
- $100 \text{ gals} * 8.34 \text{ lbs/gal} = 834 \text{ lbs total} + 4 \text{ lbs of cyanides} = 838 \text{ lbs}$
- $2 \text{ lbs} / 838 \text{ lbs} = .0024 * 100 = .24\%$ for each component.
- **Not Reportable - <1% (unless CUPA states otherwise)**



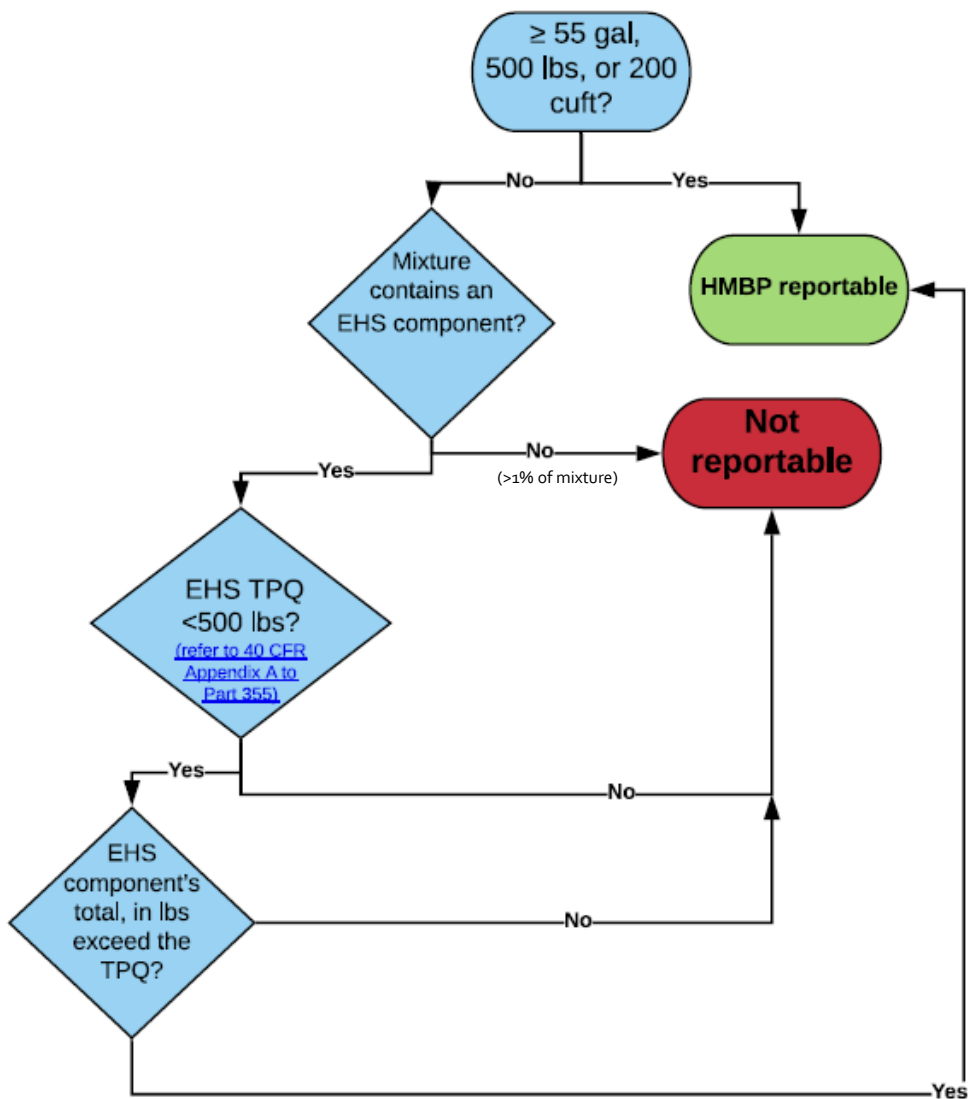
EHS Gases

- 100 cubic feet of hydrogen selenide gas
 - >200 CF threshold
 - Does mixture Contain an EHS
 - Is the EHS TPQ <500 lbs
 - Does the total in mixture exceed TPQ?
- No
 - Yes
 - Yes, 10 lbs
 - Calculate it!



EHS Gases

- 100 cubic feet of hydrogen selenide gas. Note: TPQ for hydrogen selenide gas = 10 lbs. 4.43 cf/lb conversion factor:
- Calculate:
 - $100 \text{ cf} / (4.43 \text{ cf/lb}) = 22.57 \text{ lbs}$
 - $22.57 \text{ lbs} > 10 \text{ lbs}$, so gas would need to be reported.
- What about a 100 CF mixture of 5% hydrogen selenide & 95% hydrogen gas?
 - $22.57 \text{ lbs} * .05 = 1.13 \text{ lbs}$





23rd Annual California CUPA Training Conference
February-March 2021

Poll #11 Would Argon/CO₂ qualify for the 1000 cf higher reporting threshold? Both gases qualify individually...

- A. Yes
- B. No
- C. I don't know

(No correct answer)

Gas Mixtures

➤ Cal EPA guidance - The following gases pure/mixture did not meet the higher reporting threshold:

- Acetylene
- CO₂
- CO
- Fluorocarbons
- Hydrogen
- Sulfur Hexafluoride

➤ What does the SDS say?



Clarification?

Lead-Acid Batteries

- 14 batteries, 71 pounds each. 994 lbs total. **Reportable or not?**
- Cal/EPA Policy Memo (2011) - Main hazard is electrolyte.
- Title 27 Sec. 15186.1: Specifies how to report each item on the inventory page.



Lead-Acid Batteries Template on CERS

CERS Chemical Library Search Results

Chemical ID	Material Name	Type	CAS #	CCL ID
View	Lead Acid Batteries	Mixture		CCL-106669
View	Lead Acid Batteries			
View	Lead acid batteries, utility type			
View	Lead Acid Battery			

1 10 items per page

Chemical Identification and Physical Properties

Chemical Name
-

Common Name
Lead Acid

Physical State
Liquid

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Sulfuric Acid	7664-93-9	10.00	Yes
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

February-March 2021

Lead-Acid Battery Calculation

Example: AGM-12125T

12 batteries * 1.50 gallons
Electrolyte per battery

$12 * 1.50 = 18$ gallons electrolyte

BELOW THRESHOLD



Part Number	Gallons of Electrolyte*
AGM-1234T	0.38
AGM-1240T	0.46
AGM-1248T	0.81
AGM-1255T	0.64
AGM-1265T	0.99
AGM-1280T	0.92
AGM-1285T	1.22
AGM-12100T	1.11
AGM-12125T	1.50
AGM-12125L	1.50
AGM-12148T	1.88
AGM-12210L	2.19
AGM-12255L	2.52
AGM-6100T	0.63
AGM-6220T	1.35
AGM-6300T	1.87
AGM-6400HT	2.54
AGM-2660T	1.35
AGM-2900T	1.87
AGM-21200HT	2.54

*Specific gravity of electrolyte when battery is fully charged ranges from 1.28 to 1.36.

Lead-Acid Battery Calculation

Material	Quantity	Material ID	Section 9 -- PHYSICAL AND CHEMICAL PROPERTIES
EnerSys DataSafe 12HX330-FR Battery Specification Chemistry: Rechargeable Voltage: 12 volts Nominal Capacity: 82.0Ah 33 Terminals: M6 Insert Dimensions (L x W x H): 11.8 x 6.8 Weight (pounds): 71			SECTION 9 -- PHYSICAL AND CHEMICAL PROPERTIES Properties Listed Below are for Electrolyte: Specific Gravity (H2O = 1): 1.215 to 1.350 Solubility in Water: 100% Evaporation Rate: (Butyl Acetate = 1) Less than 1 pH: ~1 to 2 LEL (Lower Explosive Limit) 4.1% (Hydrogen) UEL (Upper Explosive Limit) 74.2% (Hydrogen) Appearance and Odor: Manufactured article; no apparent odor. Electrolyte is a clear liquid with a sharp, penetrating, pungent odor.
Lead			
Lead Peroxide	31	1309-60-	
Lead Sulfate	1		
Sulfuric Acid (35%)	34	7664-93-	

Summary:

- 34% sulfuric acid by weight.
- 71 pounds per battery
- Minimum specific gravity is 1.215
- Remember: 8.34 pound/gallon for water to calculate the gallons.



Lead-Acid Battery Calculation

Total Electrolyte Volume = (%Weight/100) x (pounds per battery) /
((Specific Gravity electrolyte) x (8.34 pounds/gallon))

$$\frac{(\%34/100) \times (71 \text{ pounds})}{(1.215) \times (8.34 \text{ pounds/gal})} = 0.34 * 71 / (1.215 * 8.34) = 2.38 \text{ gallons per battery}$$

2.38 gallons per battery * 14 batteries = 33.32 ≈ 33 gallons
33 gallons < 55 gallons, below threshold.

Poll # 12: True or false, Title 27 requires lead-acid batteries to be reported in liquid, gallons?

- True (**correct answer**)
- False

Agenda

- ✓ Exemptions – Common facilities
- ✓ Mixtures

- Updates
- Questions

HMBP PROGRAM UPDATES

Poll # 13: Which update would you like to know more about?

- Which update would you like to know more about?
 - A. New battery reporting guidance *in draft*
 - B. Triennial HMBP reporting (AB 1429)
 - C. Temporary Generator exemption

Reporting Batteries

- Work Group Update – Guidance currently in DRAFT
- When complete - posted on CUPA forum website
- CUPA / Fire representatives from across the state

HansenRooks, Summer	Orange County
Helm, Apollonia (Polly) and Erin Thomas	San Mateo County
Keene, Matt	Sacramento County
Kirby, Lee	Downey Fire
Matt Stueber	Ventura County
Whittle, Jim	Shasta County
James Pawlonek, John Wallace, and Nriya Hosamane	Riverside County
Resources	
Darwin Cheng	OC Health, Env. Health
Frederick Chun	Santa Clara Fire

Reviewed Data & Types

Common name of battery

Type of Facility

Hazardous Materials & EPCRA

Hazards Presented

Reportable vs. Non-reportable

Report as Solid or Liquid?



Reviewed Data

Nickel-Metal Hydride "NiMH", Nickel type

Nickel Cadmium "NiCd" , Nickel type

Lead-Acid, Sodium Nickel Chloride, Nickel type, Sodium-sulfur
Alkaline Batteries, Alkaline Manganese Dioxide-Zinc, alkaline FC

Lithium Ion "Li-ion", **Lithium-ion type** , (rechargeable secondary)(LCO), (LFP), (LMO), (NMC), (NCA), polymer

Zinc-Air, Silver-Zinc, Lithium metal batteries, Non-rechargeable (primary cell)

PEMFC – Proton exchange membrane fuel cell

Fuel cell: Direct Methanol FC(catalytic reformer generates hydrogen from methanol). Phosphoric Acid FC (PAFC), Molten Carbonate F C (MCFC), zinc–air fuel cells (mechanically rechargeable), solid oxide FC

Hazards

➤ Thermal Runaway



CBS2

“We extinguished the initial fire very quickly,” Murphy said. Shortly afterwards, the firefighters saw gas and steam coming off the car- which began venting gas, which Murphy said they believed was a sign of batteries burning. He said his crew again doused the car with water before flames could erupt and contacted Tesla, which recommended propping up the car to access its underbody where the battery is located, Murphy said. They continued to monitor the car for about 6 hours to ensure there was no lingering heat, Murphy added. His crew doused it with an estimated 2,000 gallons of water. <https://abcnews.go.com/Technology/tesla-opens-investigation-car-burst-flames-times/story?id=59930420>

Critical Issues

- **Hazardous Material definition, 25501(n)(1),(2)**
- **Exemptions by definition:**
 - "Article"
 - "Consumer Product"
- **Changes to fire code reporting: Now based on Capacity**
- **Lead-Acid Battery Reporting "template"**

Consumer Product

- HSC Exemption – “**consumer product**” at “**retail establishments**” HSC 25507(b)(5).
- If used for commercial and industrial processes?
- Definition: HSC 25501 (j), Consumer Product Safety Act
 - For things we don't regulate: **Personal, family, household, residence, school, recreation**
 - Hazard: form, concentration, quantity

Article Definition

- **Manufacturer lists battery as article → No SDS required.**
- **No SDS required → Excluded from hazardous material definition (HSC 25501(n)(2)) - Hazard Communication standard in CFR 1910.1200(b)(6)(v).**
- **KEY CRITERIA: “under normal conditions of use does not release ... a hazardous chemical and does not pose a physical hazard or health risk to employees” (1910.1200(c)).**

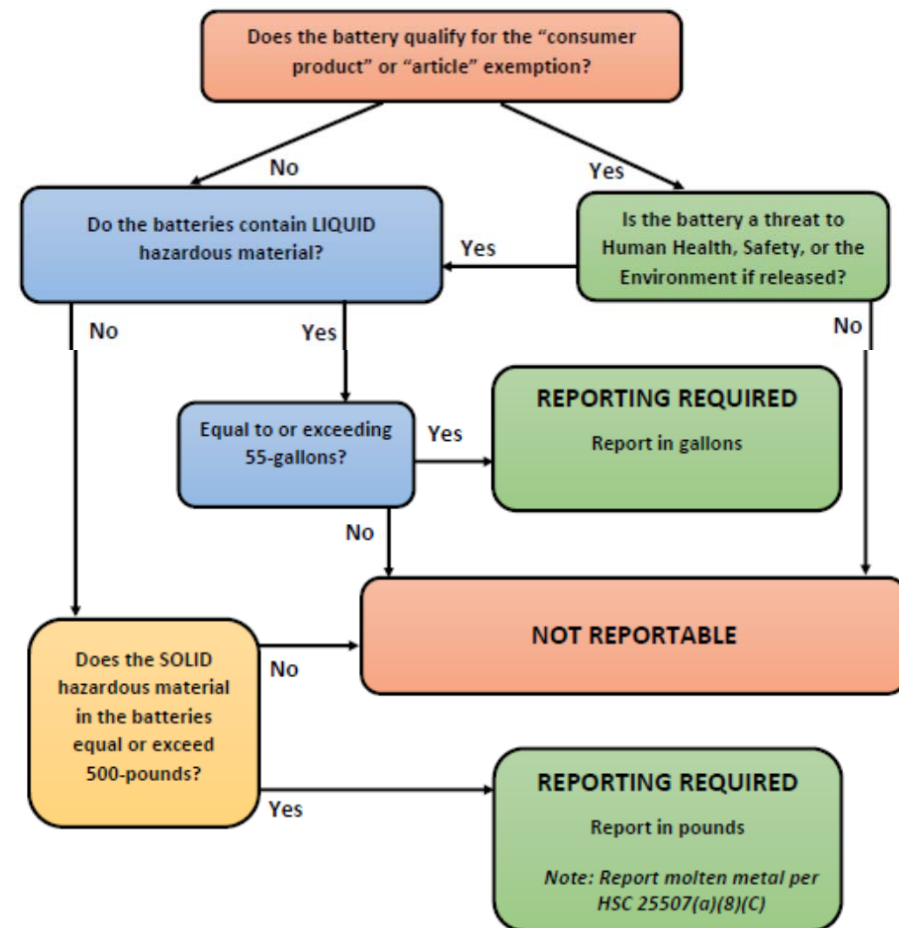
Article – What is not an article

- ***OSHA has excluded some batteries:***
 - lead-acid batteries
 - lithium ion batteries (non-consumer)
- **Conclusion – TAG should recommend facilities not to use article exemption and report batteries if over threshold.**

Proposed Guidance

Liquid Electrolyte: Primary immediate hazard. Used for threshold determination when over 55 gallons.

Solid materials still present hazard and are capable of release, exposure, fires. These should be reported when stored over the threshold for solids, 500 lbs.



CERS Inventory Examples Provided

Discard Save Cancel

Chemical Identification and Physical Properties

Identification Name
 Nickel-Metal Hydride "NiMH" battery
 Common Name: Nickel-Metal Hydride "NiMH" battery (large battery cells)
 CAS Number: _____
 CERS Chemical Library ID: _____
 US EPA SRS ID: _____

Physical State
 Solid Liquid Gas
 Hazardous Material Type
 Pure Mixture Waste
 Trade Secret
 Yes No

Chemical Hazard Classification

Fire
 Yes No
 Fire Code Hazard Classes (by priority): Corrosive
 DOT Hazard Class: 9 - Misc. Hazardous Materials
 State Waste Code: _____
 View/Edit Additional Firecodes
 Lookup Code: _____

Radioactive
 Yes No
 Curies: _____

Federal Hazard Categories

Fire (Obsolete)
 Reactive (Obsolete)
 Pressure Release (Obsolete)
 Acute Health (Obsolete)
 Chronic Health (Obsolete)

Federal Hazard Categories

PHYSICAL: Flammable
 PHYSICAL: Gas Under Pressure
 PHYSICAL: Explosive
 PHYSICAL: Self-heating
 PHYSICAL: Pyrophoric
 PHYSICAL: Oxidizer
 PHYSICAL: Organic Peroxide
 PHYSICAL: Self-reactive
 PHYSICAL: Pyrophoric Gas
 PHYSICAL: Corrosive to Metal
 PHYSICAL: In Contact with Water Emits Flammable Gas
 PHYSICAL: Combustible Dust
 PHYSICAL: Hazard Not Otherwise Classified (HNOC)
 HEALTH: Carcinogenicity
 HEALTH: Acute Toxicity
 HEALTH: Reproductive Toxicity
 HEALTH: Skin Corrosion or Irritation
 HEALTH: Respiratory or Skin Sensitization
 HEALTH: Serious Eye Damage or Eye Irritation
 HEALTH: Specific Target Organ Toxicity
 HEALTH: Aspiration Hazard
 HEALTH: Germ Cell Mutagenicity
 HEALTH: Simple Asphyxiant
 HEALTH: Hazard Not Otherwise Classified (HNOC)

Inventory Location and Quantity

Chemical Location: North West Shed
 Average Daily Amount: 70
 Maximum Daily Amount: 75
 Units: gallons
 cubic feet
 pounds
 tons

Chemical Location Confidential EPCRA
 Yes No
 Largest Container: 3.5
 Annual Waste Amount: _____
 Map # (Optional): _____
 Grid # (Optional): _____
 Days on Site: 365

Inventory Storage Information

Aboveground Tank Can Box Tank Truck, Tank Wagon
 Underground Tank Carboy Cylinder Tank Car, Rail Car
 Tank Inside Building Silo Glass Bottle Other
 Steel Drum Fiber Drum Plastic Bottle
 Plastic/Non-Metallic Drum Bag Tote Bin
 Storage Pressure: Ambient Above Ambient Below Ambient
 Storage Temperature: Ambient Above Ambient Below Ambient Cryogenic

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Hydrogen Absorbing Alloy		40.00	<input type="radio"/> Yes <input checked="" type="radio"/> No
Nickel-Cobalt-Zinc oxide		25.00	<input type="radio"/> Yes <input checked="" type="radio"/> No
Nickel	7440-02-0	15.00	<input type="radio"/> Yes <input checked="" type="radio"/> No
Iron	7439-89-6	40.00	<input type="radio"/> Yes <input checked="" type="radio"/> No
Potassium Hydroxide	1310-58-3	15.00	<input type="radio"/> Yes <input checked="" type="radio"/> No

Additional Mixture Components

Sodium Hydroxide 1310-73-2 0-15%
 Lithium Hydroxide 1310-65-2 0-15%
 Carbon Black 1333-86-4 0-1%

CERS Central



Welcome to the California Environmental Reporting System (CERS)



[Business Portal Sign In](#)

[Regulator Sign In](#)

[Business Training Portal Sign In](#)

[Regulator Training Portal Sign In](#)

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- [EDT](#)
- [Resources](#)
- [About CERS](#)

New CERS Feature: Hazardous Materials Business Plan (HMBP) Annual Certification

Assembly Bill 1429 went into effect January 1, 2020 and may change Hazardous Materials Business Plan (HMBP) reporting timeframes for your facility.

In collaboration with the Governor's Office of Emergency Services (Cal OES) and the California CUPA Forum Board, CalEPA deployed a new feature in the California Environmental Reporting System (CERS) on September 18, 2020, allowing a business owner/operator to easily certify Hazardous Material Business Plan (HMBP) information in CERS as complete, accurate and, if applicable, meeting EPCRA reporting requirements.

For further information and guidance, please reference CalEPA's

[CERS Business and Regulator Portal Help document](#)



AB1429

- As of Jan 1, 2020 complete full submission once every 3 years if not subject to EPCRA Tier II reporting or APSA reporting
- **All** HMBP facilities (regardless of size or EPCRA applicability) must still complete annual certification



Environmental California 2021 Training Conference
February-March 2021

Report Within 30 Days When:

- 100% or more increase in the quantity of a previously disclosed material
- Handling a new material over threshold amounts
- Change of business or facility address
- Change of business ownership
- Change of business name
- A substantial change in operations



Facilities					
	Facility Name	Address	Last Submittal	CERS ID	
Start / Edit / Certify Submittal	Facility 2	2000 Alameda De Las Pulgas, San Mateo 94403	12/22/2020		
Start / Edit / Certify Submittal	Facility 3	2000 Alameda De Las Pulgas, San Mateo 94403	2/11/2019		

Annual HMBP Certification (AB 1429)

This feature allows a business owner/operator to annually certify that the information in their last HMBP submittal in CERS is complete, accurate, and complies with EPCRA, if applicable. This option may only be used for facilities that meet the eligibility requirements for annual certification, and that are not subject to EPCRA reporting or APSA requirements. Please click [here](#) to review eligibility requirements. It is strongly advised that you carefully review your last HMBP submittal for accuracy before certifying.

Certify

Create All HMBP Submittal Elements

This feature allows a business owner/operator to prepare a complete draft HMBP (Facility Information, HMI, E RTP) automatically from your last submittal for submission to your regulator for review. This option should only be used if you are not eligible to certify, there are no changes to your last submitted HMBP elements, and those HMBP elements do not have a status of "Not Accepted."

Create All HMBP Submittal Elements

Facility Information

SUBMITTED Dec. 22, 2020 **Start** Not Applicable

- Business Activities
- Business Owner/Operator Identification

Certify button only enabled if certain conditions are met.

EPCRA REPORTING

- Up to facility to determine EPCRA Tier II applicability
- Don't just rely on whether CERS "CERTIFY" is enabled

EPCRA Tier II Reporting Chemicals	EPCRA Reportable Thresholds
Extremely Hazardous Substances (EHSs, EPCRA Section 302)	500 pounds or the threshold planning quantity, whichever is lower (40 CFR Part 355, Appendices A and B, or "List of Lists")
Gasoline in underground storage tanks at retail gas stations	75,000 gallons (all grades combined)*
Diesel fuel in underground storage tanks at retail gas stations	100,000 gallons (all grades combined)*
All other hazardous chemicals for which Safety Data Sheets are required	10,000 pounds

40 CFR Part 370

*If UST facility was not in compliance at all times during the preceding calendar year then EPCRA reporting is applicable regardless of quantity stored.

Annual Certification Confirmation



Certification Statement: Based on my own knowledge and/or on my inquiry of those individuals responsible for obtaining the information, I, Apollonia Helm (CERS Account username *ahelm*), certify on 12/22/2020 **under penalty of law** that I have personally examined and am familiar with the information being submitted, and agree to the following:

- The information contained in the most recently submitted HMBP is complete, accurate, and up-to-date, **and** there has been no change since the last submitted HMBP submittal elements.
- The information being submitted meets the requirements of Chapter 6.95, Article 1 of the California Health and Safety Code.
- The information being submitted is in compliance with section 11022 of Title 42 of the United States Code, if applicable.

By selecting "Confirm", I am confirming that the above is true, that this facility is NOT subject to EPCRA reporting or APSA requirements, and that I am authorizing the automated creation and submission of this Annual HMBP Certification.

Once confirmed, the Certification cannot be retracted, deleted, or changed. It is strongly advised that you carefully review your last HMBP submittal for accuracy before certifying. If you have not reviewed your last HMBP and need to do so now, please select "Cancel" and review your last submittal before certifying.

Confirm

Cancel



Annual Certification Confirmation



Creating HMI

Testing Use Only Testing Submitters Here Build: 3.05.0001

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[Certify](#)

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[Create All HMBP Submittal Elements](#)

Facility Information

CERTIFIED Aug. 26, 2020 [Start](#) [Not Applicable](#)

- [Business Activities](#)
- [Business Owner/Operator Identification](#)

Hazardous Materials Inventory

CERTIFIED Aug. 26, 2020 [Start](#) [Not Applicable](#)

- [Hazardous Material Inventory](#)
- [Site Map \(Official Use Only\) Upload Document\(s\)](#)

Emergency Response and Training Plans

CERTIFIED Aug. 26, 2020 [Start](#) [Not Applicable](#)

- [Emergency Response/Contingency Plan Upload Document\(s\)](#)
- [Employee Training Plan Upload Document\(s\)](#)

[Close](#)

Annual Certification Confir



- No regulator action required.
- Review options : “Not Accepted”, “Not Applicable”, or “No Status Change”

CERSID	Address	Submitted	Facility	Inventory	Plans
[Redacted]	[Redacted]	12/11/2020 12:52PM	Certified 12/11/2020	Certified 12/11/2020	Certified 12/11/2020
		12/3/2019 9:01AM	Accepted 12/3/2019	Accepted 12/3/2019	Accepted 12/3/2019
					Not Accepted 11/26/2019
					Accepted 10/16/2018

WARNING! You are about to change a finalized submittal status (Accepted, Certified, Not Accepted, or Not Applicable). Consider carefully if you should change the status and provide a detailed explanation to the business.

Current Status
Certified The submittal element has been certified by the facility's owner/operator in accordance with AB 1429 Annual HMBP Certification requirements.
 Status last updated by 12/11/2020 12:52 PM

New Status

Not Accepted Regulator has reviewed the submitted program element and finds the data/documents do not meet state and local reporting requirements. Regulator has required the business to make a new submission of the submittal element.

Not Accepted (1,500 characters maximum)

Not Applicable Business, include regulator contact information and sufficient explanation of what to do.

No Status Change



HMBP Exemption Application for Temporary Emergency Generators



Hazardous Materials Business Plan Exemption Application For Temporary Emergency Generator Deployment



This exemption application is to be completed and returned to the appropriate local administering agency (see Page 2) if you are responsible for deploying an emergency power system (generator) for disaster responses and/or emergency events that would otherwise be subject to the reporting requirements of California Health and Safety Code Chapter 6.95.

Applicant Company Name: _____ Date: _____
 Applicant Mailing Address: _____ City: _____ Zip Code: _____
 Applicant Contact Name: _____ Business Phone: _____
 Applicant Email Address: _____

Public Safety Power Shutoff Event Other Emergency Event. Please provide a brief description and initial date of event.

Complete the table for equipment pertaining to the site address below. Use additional pages if necessary.

Company Name (where unit is to be deployed)				
Site Address (Provide coordinates if no address):		Latitude:	Longitude:	
Street:		City:	Zip:	
Equipment	Rating (kWh)	Fuel Type	Quantity (gal)	Estimated Days on Site
Disposition of equipment <input type="checkbox"/> Staged at Site <input type="checkbox"/> Deployed (in use at Site) <input type="checkbox"/> Removed from Site				
Local Air Quality District Notified <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
Local Building Department Notified <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
Local Fire Department Notified <input type="checkbox"/> Yes <input type="checkbox"/> No				
Will site be subject to Aboveground Petroleum Storage Act (APSA)? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Local Emergency Contact Name:		24/7 Phone:		
Alternate Emergency Contact Name:		24/7 Phone:		

I certify that this site meets the terms and conditions noted in page two of this application, and I request that this emergency power system (generator) be exempted from the hazardous material establishment, reporting, and submittal requirements of California Health and Safety Code Sections 25505(a), 25507, 25508(a) and Title 19 of the California Code of Regulations.

Applicant Name (Print) _____ Applicant Signature _____ Date _____

For Official Use Only

Pursuant to California Health and Safety Code Section 25507(d), this local agency finds that exempting these emergency power systems (generator) from the hazardous material reporting requirement will not pose a present or potential hazard to human health or safety or to the environment or affect the ability of the administering agency and emergency rescue personnel to effectively respond to a release of a hazardous material.

This exemption does not relieve the Business from any requirements other than those listed, and this local agency reserves the right to rescind this exemption if the conditions are not adhered to or if the above finding can no longer be made.

Exemption Approved Exemption Denied Exemption Completed (Generator Removed from Site)

Representative Name (Print) _____ Representative Signature _____ Date _____

Comments/ Conditions: _____



HMBP Exemption Application for Temporary Emergency Generators

- CA HSC 6.95, Section 25507(d) allows CUPAs/PAs to exempt a handler from HMBP requirements
- Form adopted by UPAAG on July 22, 2020
- Found on CAL OES [Website](#) or your CUPA/Ps website
- Exemption for sites not currently submitting an HMBP

- CUPA/PAs must allow for public input when approving applications. HSC 25507(f)
- “Temporary” is not defined, typically 30 - 60 days. CUPA/PAs should discuss this with facilities

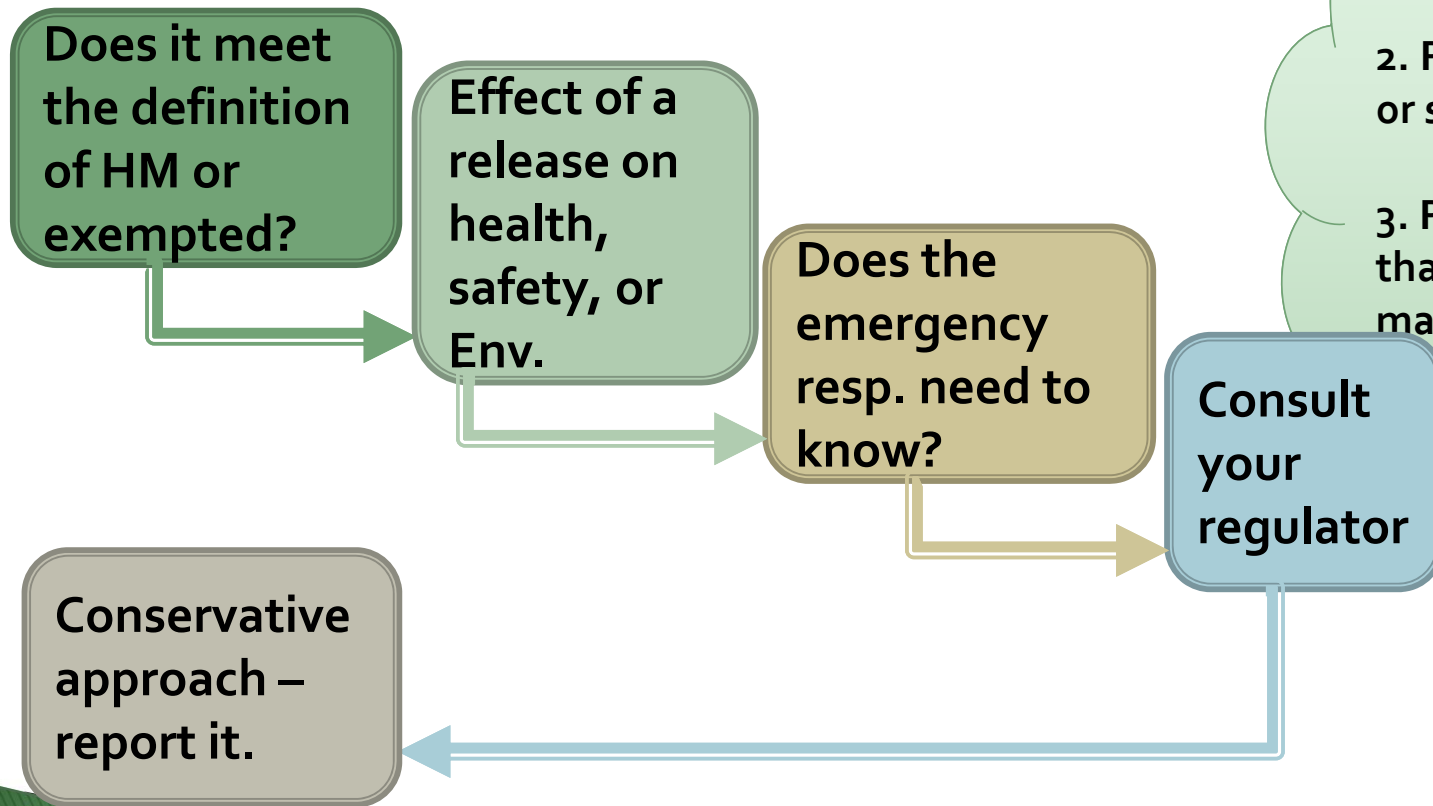


- HMBP exemption only
- APSA requirements still apply
- CUPA/PAs will evaluate applicability of APSA & SPCC plans



CONCLUSION

Is Reporting Required?



Consider:

1. Nature of business.
2. Proximity to people or sensitive sites.
3. Potential damage that the hazardous material may cause.

Materials Excluded by Definition

(EPCRA 40 CFR 370.66)

1. Food, Additive, Drug, Cosmetic ➤ **FDA**

2. Conditions of use:

- Solid manufactured item like an "Article"
- General public product for personal or family use like "Consumer products"
- Research lab / hospital with Tech. Qual. Individual.
- Routine Ag / Fertilizer for sale to customer

***Also take a look at what is excluded from Haz Com 29 CFR 1910.1200(b)(6)**



DANGER

FLAMMABLE SUBSTANCE: Use adequate ventilation. Wash thoroughly after handling.
STORAGE: Store in cool, well ventilated dry place. Store in tightly closed container. Keep away from heat/ flame.

**FLAVOR,
VANILLA
EXTRACT**



23rd Annual California CUPA T

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Introductions

➤ Erin Thomas:

- Hazardous Materials Specialist, REHS
- San Mateo County Env. Health – CUPA
- ethomas@smcgov.org
- (650) 464-7200

➤ Apollonia (Polly) Helm

- Hazardous Materials Specialist , REHS
- San Mateo County Env. Health – CUPA
- ahelm@smcgov.org
- (650) 207-9133



Questions?