



# Identifying Common Mistakes in HMBP Reporting

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**W-M<sub>3</sub>**

**2/28/2024**



**26th California Unified Program  
Annual Training Conference  
February 26-29, 2024**

# Agenda

- Trinity/Speaker Introduction
- HMBP Basics
- Common Mistakes
- Key Takeaways

# Speaker Introduction



**Colleen Grainger, QISP**  
Senior Consultant



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Senior Consultant

# About Trinity Consultants

Started in 1974 by **one consultant** in Dallas, Texas, serving clients' **air quality** regulatory compliance needs.

Today, we are **nearly 1,700 employees** in more than **85 locations** on **four continents**.

We help organizations overcome complex, mission-critical **EHS, engineering, and science** challenges through **consulting, technology, training, and staffing** support.

# About Trinity Consultants



## AIR QUALITY

Air quality permitting and compliance support with federal and state/local regulatory requirements.



## ESG, EJ AND SUSTAINABILITY

Comprehensive ESG and sustainability program support for companies across many industries.



## EHS MANAGEMENT

Trinity's EHS Performance & Risk Management team assists in addressing EHS challenges from various perspectives - strategic planning, program evaluation, and systems development.



## WASTE MANAGEMENT

Provides regulatory waste management support for industrial facilities.

## CHEMICAL COMPLIANCE

Compliance support for chemical-related compliance and reporting requirements.



## EHS LITIGATION SUPPORT

Provides technical support and expert testimony for legal issues regarding air quality, noise impact, industrial air quality and weather-related litigation.



## HEALTH AND SAFETY

Support with OSHA, EPA, and local/state agencies regulations that protect the health and safety of workers and surrounding communities.



## WATER QUALITY

Water quality permitting, compliance, and sampling.



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# HMBP Basics

# EPCRA Reporting



## Section 302

Emergency Planning  
Notification



## Section 311

SDS Reporting



## Section 312

Inventory Reporting  
(Tier I/II)



## Section 313

Toxic Release  
Inventory  
(TRI) Reporting



## Section 304

Emergency Release  
Reporting

# Business Plan Applicability

*Title 19 California Code of Regulations, Division 2, Chapter 4, Article 4, Section 2729.1*

- ▶ Handles a hazardous material or a mixture containing a hazardous material:
  - Equal to or greater than federal threshold planning quantity (TPQ) for an extremely hazardous substance (EHS); or
  - Equal to or greater than 500 pounds of a solid, 55 gallons of a liquid, or 200 cubic feet of gas (STP); or
  - Radioactive materials that are handled in quantities for which an emergency plan is required to be adopted pursuant to Part 30, Part 40, or Part 70, of Chapter 10 of Title 10 of the CFR, or pursuant to any regulations adopted by the state in accordance with those regulations



# Hazardous Material Definition

- ▶ Under the Hazard communication standard, any chemical that presents a physical hazard or a health hazard is considered a hazardous chemical. The HCS definitions for physical and health hazards are:
  - **Physical hazard** is a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
  - **Health hazard** is a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

<https://www.osha.gov/dsg/hazcom/ghdo53107.html#process>

# 2018 Hazard Categories

- To align with OSHA's HCS, EPA has revised the 5 hazard categories in 40 CFR 370 to more than 20 hazards used in the revised OSHA HCS

Physical Hazards	Health Hazards
Flammable (gasses, aerosols, liquids, or solids)	Carcinogenicity
Gas under pressure	Acute toxicity (any route of exposure)
Explosive	Reproductive toxicity
Self-heating	Skin corrosion or irritation
Pyrophoric (liquid or solids)	Respiratory or skin sensitization
Oxidizer (liquid, solid, or gas)	Serious eye damage or eye irritation
Organic peroxide	Specific target organ toxicity (single or repeated exposure)
Self-reactive	Aspiration hazard
Pyrophoric gas	Germ cell mutagenicity
Corrosive to metal	Simple asphyxiant
In contact with water emits flammable gas	Hazard Not Otherwise Classified (HNOC)
Combustible dust	
Hazard Not Otherwise Classified (HNOC)	

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29 CFR 1910.1200 & 40 CFR 370.66

# California Environmental Reporting System (CERS)

- ▶ Converted paper reporting to electronic reporting
- ▶ Data is instantaneously submitted to local CUPA and Cal/EPA (UPA)
- ▶ UPA can evaluate and assess compliance in a quicker timeframe
- ▶ Any submitted data is public
- ▶ HMBP typically submitted by 3/1 in CERS
  - Local CUPA may have more stringent timelines, mandates, and reporting requirements

# Minimum Business Plan Requirements



## Facility Information

Business Activities  
Business Owner/Operator  
Information



## Hazardous Material Inventory



## Emergency Response and Training Program



## Site Map



## Other Programs

UST, PBR, APSA

# Business Activities

- Question based form that pre-populates required forms for submission:

Generate  
Hazardous  
Waste

Underground  
Storage Tank

Hazardous  
Waste ID  
Number

Aboveground  
Petroleum  
Storage

Regulated  
Substances

Excluded and/or  
Exempted  
Material

On-Site  
Treatment

# Business Activities

## Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive local inventory reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70? [?](#)

### Unified Program Local Reporting Requirements for Los Angeles County Fire Department

Regulated facilities in the City of Pasadena are additionally required to report any quantity of hazardous material (PMC 8.80.010).

Regulated facilities in the City of Monrovia are required to report quantities of hazardous materials equal to or more than the state thresholds or the California Fire Code permit amounts, whichever is lower. (California Fire Code Chapter 105 and section 2701.5.2)

☒ Yes

## Underground Storage Tank(s) (UST)

Does your facility own or operate underground storage tanks? [?](#)

☐ No

## Hazardous Waste

Does your Facility...

Does your facility generate Hazardous Waste? [?](#)

☒ Yes

If yes, provide an EPA Identification Number (EPA ID).

Does your facility treat hazardous waste on-site? [?](#)

☐ No

Is your facility's treatment subject to financial assurance requirements (for Permit by Rule or Conditional Authorization)? [?](#)


☐ No


Does your facility consolidate hazardous waste generated at a remote site? [?](#)

☐ No

# Business Owner/Operator Information

 Site Address

 Emergency Contacts

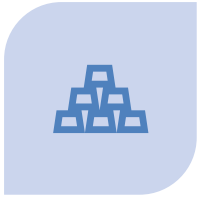
 Owner Information

 Billing Information

 SIC/NAICS Number

 Site Identification

# Hazardous Material Inventory



QUANTITY,  
STORAGE TYPE



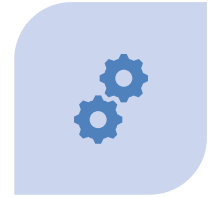
LOCATION



FIRE HAZARDOUS  
CODE



DOT HAZARD



COMPONENTS



# Hazardous Material Inventory

**Hazardous Material Inventory:** [Redacted]

[Home](#) » [Submittal History](#) » [Redacted] » [Materials Inventory: Hazardous Material Inventory \(Submitted\)](#)

[Instructions/Help](#)

Submittal Element History

Submitted for [Redacted]

[View Entire Submittal](#) [Start New Submittal](#)

Inventory Actions

[Download Inventory](#) [Inventory Reports](#)  
[Search Facility's Inventory](#) [CERS Chemical Library](#)

**Hazardous Materials Inventory (21)** Submitted Max: 12, 2013

☐ Only show materials with errors/warnings

	Common Name	CAS	Location	Max Daily Amount
<a href="#">View</a>	<a href="#">Oxygen, Compressed Gas</a>	7782-44-7	Production	999 cubic feet
<a href="#">View</a>	<a href="#">Argon / Carbon Dioxide, Compressed Gas</a>		Production	333 cubic feet
<a href="#">View</a>	<a href="#">Propane, Compressed Gas</a>	74-98-6	Production	1,600 gallons
<a href="#">View</a>	<a href="#">Argon, Compressed Gas</a>	7740-37-1	Production	333 cubic feet

# Inventory Spreadsheet

	A	B	G	H	I	J	K	L	S	T	U	V	W	X
1	Location Information		Chemical Identification			Fire Code Hazard Class Information								
2	1a*	201	206	207*	208	209	210a	210b	211	212	213	214*	215	216a
3	CERSID	ChemicalLocation	TradeSecret	CommonName	EHS	CASNumber	PFCodeHazardClass	SFCodeHazardClass	HMTType	RadioActive	Curies	PhysicalState	LargestContainer	FHCFire
4		OIL/WATER SEPARATOR		OIL	N		4		b	N		b		1998 Y
5		CHEMICAL STORAGE AREA		SHELL TELLUS S2 M100	N		4		b	N		b		250 Y
6		CHEMICAL STORAGE AREA		SHELL TELLUS OIL M32	N		4	14 b	N			b		275 Y
7		CHEMICAL STORAGE AREA		PINK SOAP	N		14	31 b	N			b		55 N
8		FABRICATION DEPARTMENT		PINK SOAP	N		14	31 b	N			b		55 N
9		CHEMICAL STORAGE AREA		AMERICAN AMERILUBE 10	N		4	14 b	N			b		55 Y
10		CHEMICAL STORAGE AREA		AMCOL CORP 331 WLX	N		4	14 b	N			b		55 Y
11		CHEMICAL STORAGE AREA		SHELL SPIRAX S3 ATF MD3	N		4	31 b	N			b		55 Y
12		CHEMICAL STORAGE AREA		SHELL ROTELLA T1 SAE 30	N		4	31 b	N			b		55 Y
13		CHEMICAL STORAGE AREA		GREASE (VARIETY)	N		4		b	N		b		121 Y
14		CHEMICAL STORAGE AREA		SHELL S2 MX68	N		4	31 b	N			b		55 Y
15		BILLET SAW DEPARTMENT		Oxygen, Liquid	N	7782-44-7	6	22 a	N			b		2100 N
16		NE CORNER OF PROPERTY		Argon Compressed	N	7440-37-1	39	a	N			c		336 N
17		NE CORNER OF PROPERTY		Acetylene	N	74-86-2	33	8 a	N			c		334 Y
18		NE CORNER OF PROPERTY		ARGON, CO2	N		39	b	N			c		336 N
19		NE CORNER OF PROPERTY		Oxygen	N	7782-44-7	18	a	N			c		251 N
20		DIE SHOP		Sodium Hydroxide	N	1310-73-2	5	31 a	N			b		1500 N
21		DIE SHOP		CAUSTIC WASTE	N		5	c	N			b		3050 N
22		NW CORNER OF PROPERTY		PROPANE AST	N	74-98-6	8	a	N			b		1150 Y
23		MAINTENANCE DEPARTMENT		Oxygen	N	7782-44-7	18	a	N			c		N
24		MAINTENANCE DEPARTMENT	N	ACETYLENE	N	74-86-2	33	8 a	N			c		Y
25		MAINTENANCE DEPARTMENT		ARGON, CO2	N		39	b	N			c		N
26		FABRICATION DEPARTMENT		Argon	N	7440-37-1	39	a	N			c		N
27		FABRICATION DEPARTMENT		CRC 336 LUBRICANT	N		14	31 b	N			b		Y
28		FABRICATION DEPARTMENT	N	OXYGEN	N	7782-44-7	6	22 a	N			c		N
29		WELDING	N	ACETYLENE	N	74-86-2	33	8 a	N			c		Y
30		WELDING		Oxygen	N	7782-44-7	18	a	N			c		N
31		WELDING		ARGON CO2 MIXTURE	N		39	b	N			c		363 N

Physical State  
Physical state of the  
hazardous material stored.

a = Solid  
b = Liquid  
c = Gas

# Site Map

North Orientation

Loading Areas

Internal Roads

Adjacent Streets

Storm and Sewer  
Drains

Access and Exit  
Points

Emergency  
Shutoffs

Evacuation  
Staging Areas

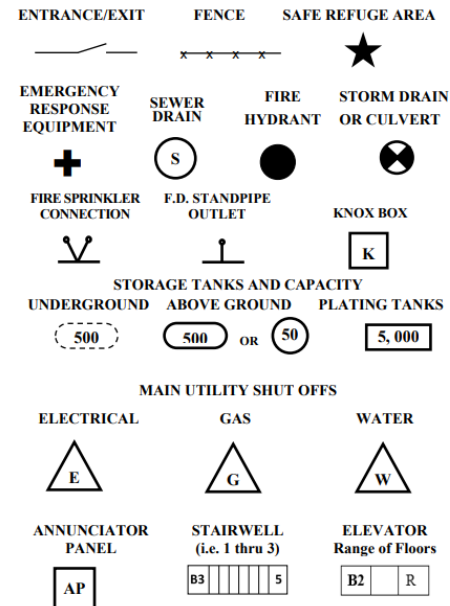
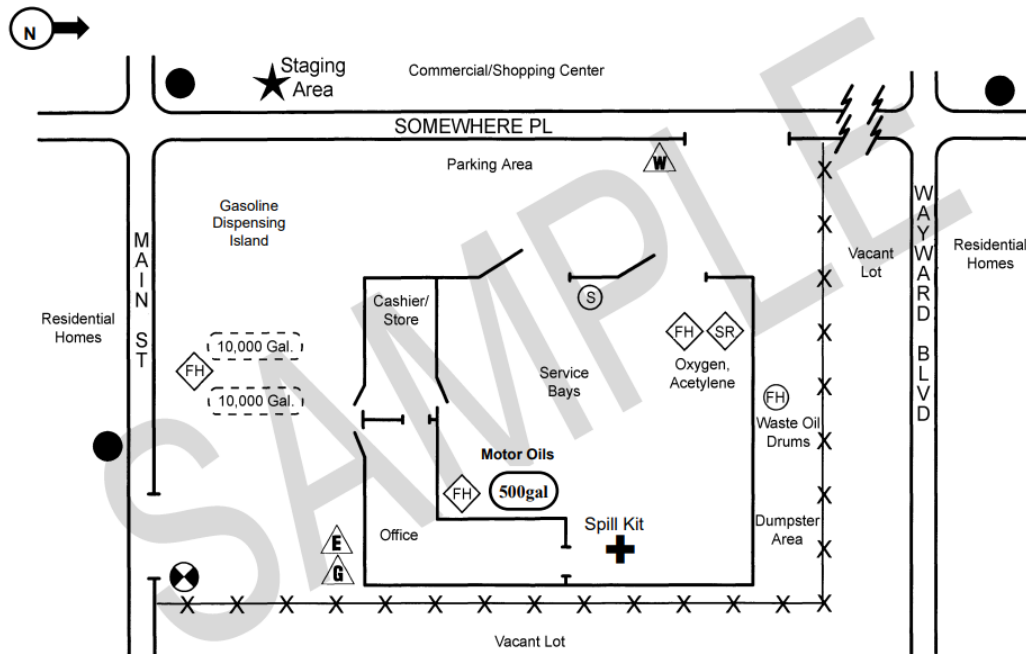
Hazardous  
Material Handling  
& Storage Areas

Emergency  
Response  
Equipment

# Site Map - Example

BUSINESS NAME Joe's Automotive Repair DATE 02/09/2016

BUSINESS ADDRESS 1234 Somewhere PL, Anywhere, CA 92123



Source: County of San Diego, [HMD HMBP HM-952 HMBP Packet \(sandiegocounty.gov\)](https://www.sandiegocounty.gov/hmd-hmbp)

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# Contingency Plan

- ▶ Purpose: emergency response procedures for a release or threatened release of HM
- ▶ Required elements:
  - Immediate notification of emergency response personnel, CUPA, CalOES
  - Identification of local emergency medical assistance
  - Mitigation, prevention, or abatement of hazards to persons, property, or the environment
  - Immediate notification and evacuation of the facility
  - Identification of earthquake vulnerability areas

[CERS Consolidated Contingency Plan Template \(ca.gov\)](https://www.ca.gov/cupa)

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS) CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN									
Provide completion date (Date), please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN									
<b>A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW</b>									
FACILITY ID #		F A 0 0		CERS ID #		DATE OF PLAN PREPARATION/REVISION		MM/DD/YYYY	
BUSINESS NAME (Name as Facility Name or DBA - Doing Business As)									
BUSINESS SITE ADDRESS									
BUSINESS SITE CITY									
TYPE OF BUSINESS (e.g., Painting Contractor)									
INCIDENTAL OPERATIONS (e.g., Fleet Maintenance)									
THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING (Check all that apply):									
<input type="checkbox"/> 1. HAZARDOUS MATERIALS; <input type="checkbox"/> 2. HAZARDOUS WASTES									
<b>B. INTERNAL RESPONSE</b>									
INTERNAL FACILITY EMERGENCY RESPONSE WILL OCCUR BY (Check all that apply):									
<input type="checkbox"/> 1. CALLING PUBLIC EMERGENCY RESPONDERS (e.g., 9-1-1)									
<input type="checkbox"/> 2. CALLING HAZARDOUS WASTE CONTRACTOR									
<input type="checkbox"/> 3. ACTIVATING IN-HOUSE EMERGENCY RESPONSE TEAM									
<b>C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS</b>									
In the event of an emergency involving hazardous materials and/or hazardous waste, all facilities must IMMEDIATELY:									
1. Notify facility personnel and evacuate if necessary in accordance with the Emergency Action Plan (Title 8 California Code of Regulations §3220);									
2. Notify local emergency responders by calling 9-1-1;									
3. Notify the local Unified Program Agency (UPA) at the phone number below; and									
4. Notify the State Warning Center at (800) 852-7550.									
Facilities that generate, treat, store or dispose of hazardous waste have additional responsibilities to notify and coordinate with other response agencies. Whenever there is an imminent or actual emergency situation such as an explosion, fire, or release, the Emergency Coordinator must follow the appropriate requirements for the category of facility and type of release involved:									
1. Title 22 California Code of Regulations §66285.56, Emergency Procedures for generators of 1,000 kilograms or more of hazardous waste in any calendar month.									
2. Title 22 California Code of Regulations §66286.198, Response to Leaks or Spills and Disposition of Leaking or Unfit-for-Use Tank Systems.									
3. Title 40 Code of Federal Regulations §302.6, Notification requirements for a release of a hazardous substance equal to or greater than the reportable quantity.									
4. Title 22 California Code of Regulations §66282.34(d)(2) and Title 40 Code of Federal Regulations §262.34(d)(5)(i) for generators of less than 1000 kilograms of hazardous waste in any calendar month.									
Following notification and before facility operations are resumed in areas of the facility affected by the incident, the Emergency Coordinator shall notify the local UPA and the local fire department's hazardous materials program, if necessary, that the facility is in compliance with requirements to:									
1. Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire, or release at the facility; and									
2. Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.									
<b>EMERGENCY RESPONSE PHONE NUMBERS:</b>									
AMBULANCE, FIRE, POLICE AND CHP ..... 9-1-1									
CALIFORNIA STATE WARNING CENTER (CSWC)/CAL OES ..... (800) 852-7550									
NATIONAL RESPONSE CENTER (NRC) ..... (800) 424-8802									
POISON CONTROL CENTER ..... (800) 222-1222									
LOCAL UNIFIED PROGRAM AGENCY (UPA) ..... C1									
OTHER (Specify): ..... C2									
NEAREST MEDICAL FACILITY / HOSPITAL NAME: ..... C4									
<b>AGENCY NOTIFICATION PHONE NUMBERS:</b>									
CALIFORNIA DEPT. OF TOXIC SUBSTANCES CONTROL (DTSC) ..... (916) 255-3545									
REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) ..... C6									
U.S. ENVIRONMENTAL PROTECTION AGENCY (US EPA) ..... (800) 300-2193									
CALIFORNIA DEPT. OF FISH AND WILDLIFE (CDFW) ..... (916) 358-2900									
U.S. COAST GUARD (USCG) ..... (202) 267-2180									
CAL OSHA ..... (916) 263-2800									
CAL FIRE OFFICE OF THE STATE FIRE MARSHAL (OSFM) ..... (916) 568-3800									
OTHER (Specify): ..... C8									
OTHER (Specify): ..... C10									

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# HMBP Deadline Updates

- Effective January 1, 2020, AB 1429 went into effect and changed some HMBP reporting timeframes for some facilities

If hazardous materials handlers...	then they...
are <b>not</b> subject to EPCRA and APSA requirements	<ul style="list-style-type: none"> <li>• must provide annual certification in CERS</li> <li>• <b>may</b> submit their business plan <b>every 3 years</b> rather than annually</li> </ul>
are subject to EPCRA or APSA requirements	<ul style="list-style-type: none"> <li>• must provide annual certification in CERS</li> <li>• <b>must</b> submit their business plan <b>annually</b></li> </ul>

# Hazardous Materials Inventory Submittal Amendment

- Facilities are required to update their HMBP within 30 days of

100% or more increase  
in the quantity of a  
previously disclosed  
material

Business address  
change






Business ownership  
change

Business name change

# Common Mistakes in HMBPs



# Common Mistakes in HMBPs

-  Facility Information
-  Hazardous Materials Inventory
-  Site Map
-  Emergency Response and Training Plans
-  CERS

# Facility Information

- ▶ Incorrect business site address or business owner information
- ▶ Outdated emergency contact information
- ▶ Marking “no” for the first business activities form question
  - This prevents you from submitting a hazardous materials inventory

## Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive inventory local reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?

No

# Hazardous Materials Inventory

## ► Thresholding Mistakes

Using the wrong units

Thresholding solids using volume (55-gal drum of oily rags)

Not aggregating smaller containers for thresholding

Ignoring smaller containers storing HM (12 x 5-gal pails of paint)

Not including batteries

Threshold volume of electrolyte or total weight of battery

Not including “seasonal” hazardous materials

Hazardous materials which are stored onsite intermittently

# Lead Acid Battery Guidance

- ▶ Should be listed as one inventory item
- ▶ Threshold based on electrolyte quantity (>55 gal)

**Inventory Storage Information**

<input type="checkbox"/> Aboveground Tank	<input type="checkbox"/> Can	<input type="checkbox"/> Box	<input type="checkbox"/> Tank Truck, Tank Wagon
<input type="checkbox"/> Underground Tank	<input type="checkbox"/> Carboy	<input type="checkbox"/> Cylinder	<input type="checkbox"/> Tank Car, Rail Car
<input type="checkbox"/> Tank Inside Building	<input type="checkbox"/> Silo	<input type="checkbox"/> Glass Bottle	<input checked="" type="checkbox"/> Other
<input type="checkbox"/> Steel Drum	<input type="checkbox"/> Fiber Drum	<input type="checkbox"/> Plastic Bottle	<input type="text" value="Battery"/>
<input type="checkbox"/> Plastic/Non-Metallic Drum	<input type="checkbox"/> Bag	<input type="checkbox"/> 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
Sulfuric Acid	7664-93-9	40.00	<input checked="" type="radio"/> Yes <input 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
			<input type="radio"/> Yes <input type="radio"/> No

Additional Mixture Components

**Chemical Identification and Physical Properties**

Chemical Name:

Common Name:  CAS Number:

Lead Acid Batteries

Physical State: ☐ Solid ☒ Liquid ☐ Gas

Hazardous Material Type: ☐ Pure ☒ Mixture ☐ Waste

Trade Secret: ☐ Yes ☒ No

CERS Chemical Library ID:

US EPA SRS ID:

**Chemical Hazard Classification**

EHS: ☒ Yes ☐ No

Radioactive: ☐ Yes ☒ No

Curies:

Fire Code Hazard Classes (by priority):

DOT Hazard Class:

State Waste Code:  [Lookup Code](#)

[View/Edit Additional Firecodes](#)

**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)

# Hazardous Materials Inventory

## ► EHS Mistakes

- EHS inventory must be reported pounds
- Not checking EHS
  - ◆ See Appendix A of 40 CFR Part 355 for a full list of EHS and their TPQs

## Common EHS

- Anhydrous Ammonia
- Sulfuric Acid
- Formaldehyde
- Hydrogen Peroxide (Conc >52%)
- Nitric Acid

The screenshot shows a web-based form for "Chemical Identification and Physical Properties". The chemical is identified as "Sulfuric Acid". The form includes fields for "Common Name", "CAS Number" (7664-93-9), and "US EPA SRS ID" (152405). It also has radio buttons for "Physical State" (Solid, Liquid, Gas) and "Hazardous Material Type" (Pure, Mixture, Waste). The "EHS" section is highlighted with a red box, showing "EHS" with a "Yes" radio button selected. Below this, there are sections for "Chemical Hazard Classification", "Fire Code Hazard Classes", "DOT Hazard Class", "State Waste Code", and "Federal Hazard Categories". The "Federal Hazard Categories" section lists various physical hazards, with "Corrosive to Metal" checked.

# Hazardous Materials Inventory

- ▶ Incorrect selection of HM type
- ▶ Required fields for each HM type:

## Pure Substances

- Include chemical name & common name
- Include CAS No.

## Mixtures

- Include only common name
- Include mixture components

## Waste

- Include only common name
- Include waste information

# Hazardous Materials Inventory

## ► Hazardous Waste

- Inventory does not include hazardous waste
- Not including annual waste amount
- Not including state waste code

Hazardous Materials And Wastes Inventory Matrix Report										
CERS Business/Org. Facility Name			Chemical Location OIL/WATER SEPARATOR				CERS ID Facility ID Status			
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
Combustible Liquid, Class III-B	Waste Oily Water	Gallons	4455	330	2970	46229	- Physical			
	CAS No.	State	Storage Container		Pressure	Waste Code	Flammable			
		Liquid	Tote Bin		Ambient	223	- Health Skin			
		Type			Temperature		Corrosion			
		Waste	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			

# Hazardous Materials Inventory

- ▶ Missing/incorrect required inventory information
  - Maximum daily amount/units
    - ◆ Reporting throughput or usage of hazardous materials rather than inventory at the storage location.
  - Storage container
  - Using obsolete CA Fire Codes
    - ◆ Will cause warnings when you submit your inventory
  - Using outdated SDS

Table 1			
Federal Hazard Categories Adopted by U.S. EPA (40 CFR part 370.66)			
Existing Categories (CERS Data Fields 216a-216e)		NEW Categories (New CERS Data Fields 216f-216cc)	
PHYSICAL	HEALTH HAZARD	PHYSICAL	HEALTH HAZARD
Fire	Acute (Immediate)	Flammable (gases, aerosols, liquids, or solids)	Carcinogenicity
Reactive	Chronic (Delayed)	Gas under pressure (compressed gas)	Acute toxicity (any route of exposure)
Sudden release of pressure		Explosive	Reproductive toxicity
		Self-heating	Skin corrosion or irritation
		Pyrophoric (liquid or solid)	Respiratory or skin sensitization
		Oxidizer (liquid, solid or gas)	Serious eye damage or eye irritation
		Organic peroxide	Specific target organ toxicity (single or repeated exposure)
		Self-reactive	Aspiration Hazard
		Pyrophoric gas	Germ cell mutagenicity
		Corrosive to metal	Simple asphyxiant
		In contact with water emits flammable gas	Hazard Not Otherwise Classified (HNOC)
		Combustible dust	
		Hazard Not Otherwise Classified (HNOC)	



# Site Map

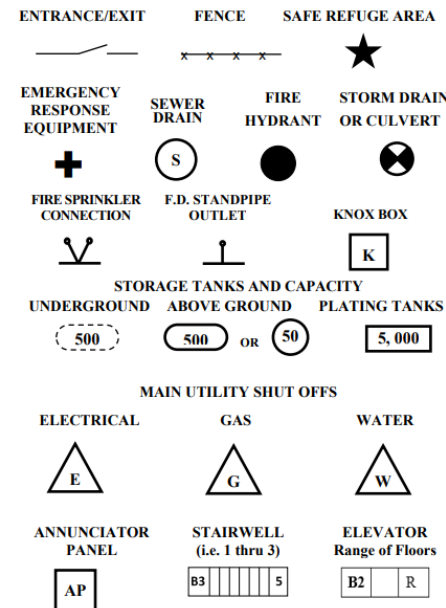
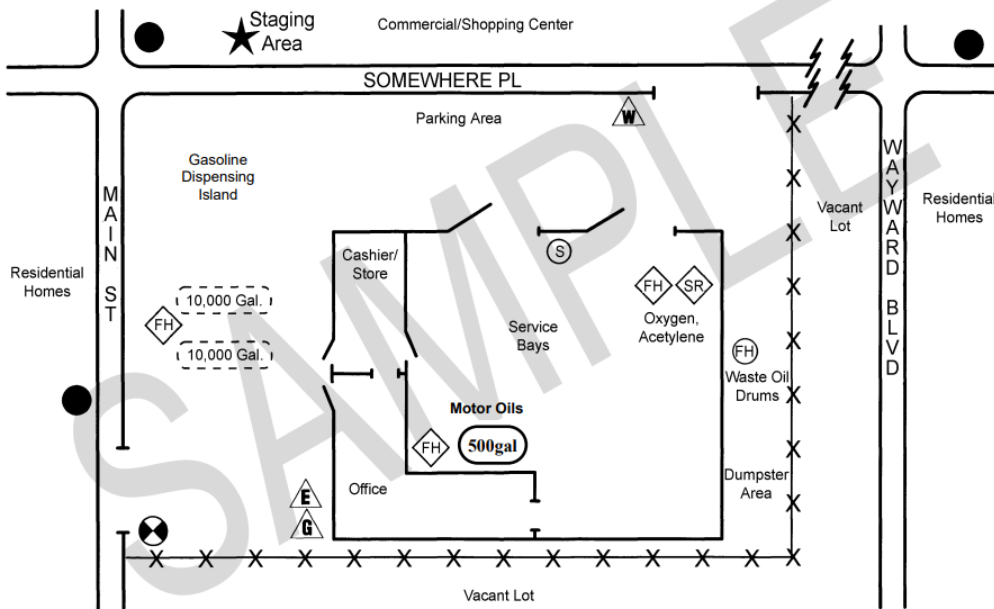
- ▶ Site map illegible or missing required elements
  - Reminder – required elements:
    - ◆ North orientation
    - ◆ Loading areas
    - ◆ Internal roads
    - ◆ Adjacent streets
    - ◆ Storm and sewer drains
    - ◆ Access and exit points
    - ◆ Emergency shutoffs
    - ◆ Evacuation staging areas
    - ◆ Hazardous material handling and storage areas
    - ◆ Emergency response equipment.

# Site Map

## What's Missing Here?

BUSINESS NAME Joe's Automotive Repair DATE 02/09/2016

BUSINESS ADDRESS 1234 Somewhere Pl., Anywhere, CA 92123



Source: County of San Diego, [HMD\\_HMBP\\_HM-952 HMBP Packet \(sandiegocounty.gov\)](#) (EDITED)

26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

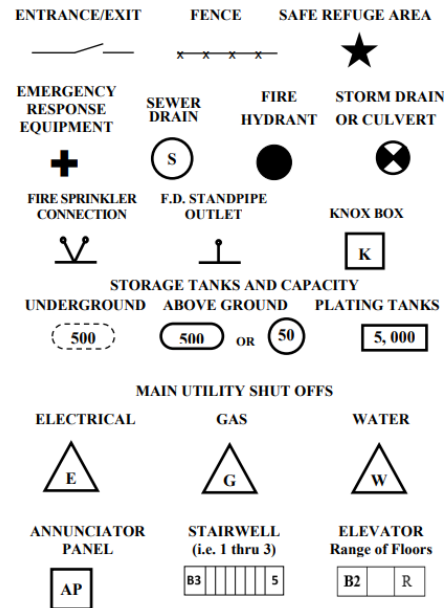
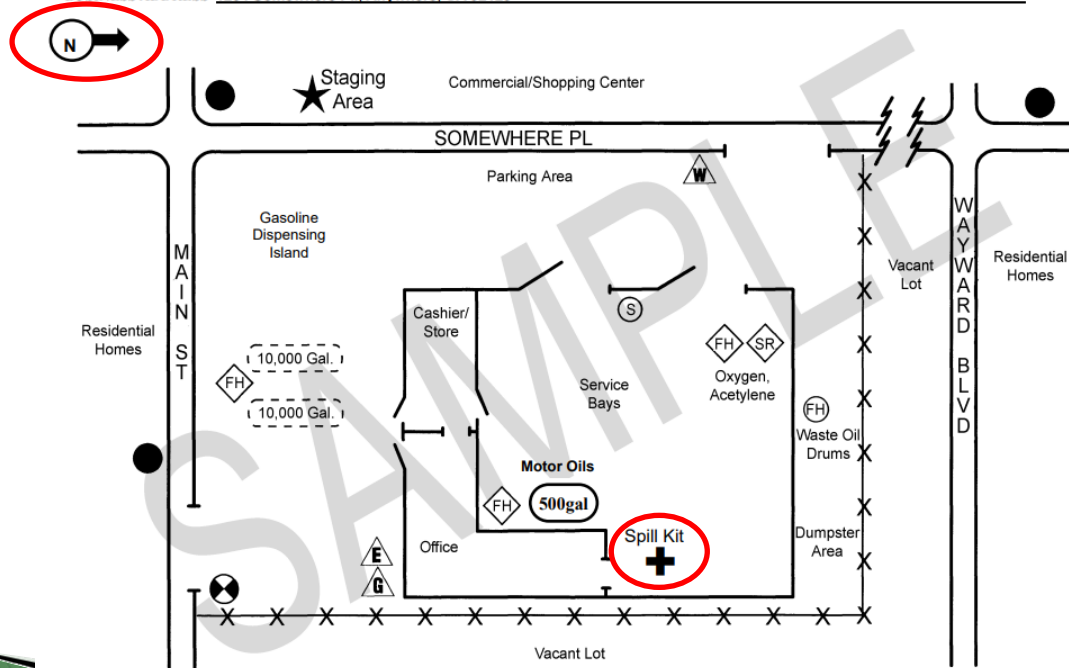
# Site Map

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26th California Unified Program  
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February 26-29, 2024

# Site Map

- ▶ Other common mistakes
  - Not updating site map with facility, operational, or other changes.
  - Missing some emergency response equipment



# Site Map

- ▶ Best practices
  - Use black and white
  - Upload multiple maps as a single file
  - Do not make overly complicated
    - ◆ Engineering markings and other non-essential items should be removed for clarity
  - Review site map annually (at the minimum)

# Emergency Response/ Training Plans

- Failure to provide local phone numbers for emergency response/  
reporting releases

C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS			
EMERGENCY RESPONSE	AMBULANCE, FIRE, POLICE AND CHP .....	9-1-1	
PHONE NUMBERS:	CALIFORNIA STATE WARNING CENTER (CSWC)/CAL OES .....	(800) 852-7550	
	NATIONAL RESPONSE CENTER (NRC) .....	(800) 424-8802	
	POISON CONTROL CENTER .....	(800) 222-1222	
	LOCAL UNIFIED PROGRAM AGENCY (UPA) .....		C1.
	OTHER (Specify): .....		C2.
	NEAREST MEDICAL FACILITY / HOSPITAL NAME: .....		C3.
			C4.
			C5.
AGENCY NOTIFICATION PHONE NUMBERS:	CALIFORNIA DEPT. OF TOXIC SUBSTANCES CONTROL (DTSC) ....	(916) 255-3545	
	REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) .....		C6.
	U.S. ENVIRONMENTAL PROTECTION AGENCY (US EPA) .....	(800) 300-2193	
	CALIFORNIA DEPT. OF FISH AND WILDLIFE (CDFW) .....	(916) 358-2900	
	U.S. COAST GUARD (USCG) .....	(202) 267-2180	
	CAL OSHA .....	(916) 263-2800	
	CAL FIRE OFFICE OF THE STATE FIRE MARSHAL (OSFM) .....	(916) 568-3800	
	OTHER (Specify): .....		C7.
	OTHER (Specify): .....		C8.
			C9.
			C10.

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February 26-29, 2024

# Emergency Response/ Training Plans

- Contact information out of date for emergency coordinators

C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS		
INTERNAL FACILITY EMERGENCY COMMUNICATIONS OR ALARM NOTIFICATION WILL OCCUR BY (Check all that apply): C11.		
<input type="checkbox"/> 1. VERBAL WARNINGS;	<input type="checkbox"/> 2. PUBLIC ADDRESS OR INTERCOM SYSTEM;	<input type="checkbox"/> 3. TELEPHONE;
<input type="checkbox"/> 4. PAGERS;	<input type="checkbox"/> 5. ALARM SYSTEM;	<input type="checkbox"/> 6. PORTABLE RADIO
NOTIFICATIONS TO NEIGHBORING FACILITIES THAT MAY BE AFFECTED BY AN OFF-SITE RELEASE WILL OCCUR BY (Check all that apply): C12.		
<input type="checkbox"/> 1. VERBAL WARNINGS;	<input type="checkbox"/> 2. PUBLIC ADDRESS OR INTERCOM SYSTEM;	<input type="checkbox"/> 3. TELEPHONE;
<input type="checkbox"/> 4. PAGERS;	<input type="checkbox"/> 5. ALARM SYSTEM;	<input type="checkbox"/> 6. PORTABLE RADIO
EMERGENCY COORDINATOR CONTACT INFORMATION: C13.		
PRIMARY EMERGENCY COORDINATOR NAME:	PHONE NO.:	PHONE NO.:
ALTERNATE EMERGENCY COORDINATOR NAME:	PHONE NO.:	PHONE NO.:
<input type="checkbox"/> Check if additional Emergency Coordinator contact and address information is available onsite or by calling PHONE NO.:		
Note: If more than one alternate emergency coordinator is designated, attach a list in order of responsibility.		



# Emergency Response/ Training Plans

- ▶ Failure to provide an employee Training Plan
  - ***Training records are not the same as a training plan!***

I. EMPLOYEE TRAINING	
<p>Employee training is required for all employees and/or contractors handling hazardous materials and/or hazardous wastes during normal and/or emergency operations. Most facilities will need to submit a separate Training Plan. However, your CUPA may accept this section as the Training Plan for some small facilities.</p> <p>Employee training plans may include the following content:</p>	
<ul style="list-style-type: none"> <li>Applicable laws and regulations;</li> <li>Emergency response plans and procedures;</li> <li>Safety Data Sheets;</li> <li>Hazard communication related to health and safety;</li> <li>Methods for safe handling of hazardous substances;</li> <li>Hazards of materials and processes (e.g., fire, explosion, asphyxiation);</li> <li>Hazard mitigation, prevention and abatement procedures;</li> <li>Coordination of emergency response actions;</li> <li>Notification procedures for local emergency responders, CUPA, Cal OES, and onsite personnel;</li> </ul>	<ul style="list-style-type: none"> <li>Communication and alarm systems;</li> <li>Personal protective equipment;</li> <li>Use and maintenance of emergency response equipment and supplies (e.g. Fire extinguishers, respirators, spill control materials);</li> <li>Decontamination procedures;</li> <li>Evacuation procedures and evacuation staging locations;</li> <li>Identification of facility areas, equipment, and systems vulnerable to earthquakes and other natural disasters.</li> <li>OTHER (Specify): <span style="background-color: #e6f2ff; padding: 2px 20px;"></span></li> </ul>
<p>Check the applicable boxes below to indicate how the employee training program is administered.</p>	
<input type="checkbox"/> 1. FORMAL CLASSROOM	<input type="checkbox"/> 2. VIDEOS
<input type="checkbox"/> 5. OTHER (Specify): <span style="background-color: #e6f2ff; padding: 2px 100px;"></span>	<input type="checkbox"/> 3. SAFETY MEETINGS
<input type="checkbox"/> 6. NOT APPLICABLE SINCE FACILITY HAS NO EMPLOYEES	<input type="checkbox"/> 4. STUDY GUIDES / MANUALS
<input type="checkbox"/> 7. CHECK IF A SEPARATE EMPLOYEE TRAINING PLAN IS USED AND UPLOADED TO CERS AS A PDF DOCUMENT	
<input type="checkbox"/> 8. CHECK IF EMPLOYEE TRAINING IS COVERED BY THE ABOVE REFERENCED CONTENT AND OTHER DOCUMENTS ONSITE	

11.  
12.  
13.  
14.

**a Unified Program  
ning Conference**

February 26-29, 2024



# Emergency Response/ Training Plans

- ▶ Failure to provide training on both hazardous waste and HMBP
  - *Hazardous materials and hazardous waste trainings may be different at a given Facility*

**EMPLOYEE TRAINING FREQUENCY AND RECORDKEEPING TRAINING MUST BE:**

- Provided initially for new employees as soon as possible following the date of hire. New employees should not work in an unsupervised position that involves hazardous materials handling and/or hazardous waste management without proper training;
- Provided within six months from the date of hire for new employees at a large quantity generator;
- Ongoing and provided at least annually;
- Amended prior to a change in process or work assignment;
- Given upon modification to the Emergency Response/Contingency Plan.

**Large Quantity Generator Training:** Large quantity generators (1,000 kg or more) must retain written plan and documentation of employee training which includes:

- A written description of the type and amount of both initial and ongoing training that will be given to persons filling each job position having responsibility for hazardous waste management and/or emergency response.
- The name, job title and job description for each position at the facility related to hazardous waste management.
- Current employee training records must be retained until closure of the facility and former employee training records must be retained for at least three years after termination of employment.

**Small Quantity Generator Training:** Small quantity generators (less than 1,000 kg) must include basic hazardous waste management and emergency response procedures but a written employee training plan and training records are not required. In order to show that the facility has met the small quantity generator employee training requirement, an employee training plan and training records may be made available.

**Hazardous Materials Business Plan Training:** Businesses must provide initial and annual employee training that includes the content referenced above. The training may be based on the job position and training records must be made available for a period of at least three years.

# Emergency Response/ Training Plans

## ► Failure to update plan prior to process change or provide training upon Emergency Response/Contingency Plan amendment

### EMPLOYEE TRAINING FREQUENCY AND RECORDKEEPING TRAINING MUST BE:

- Provided initially for new employees as soon as possible following the date of hire. New employees should not work in an unsupervised position that involves hazardous materials handling and/or hazardous waste management without proper training;
- Provided within six months from the date of hire for new employees at a large quantity generator;
- Ongoing and provided at least annually;
- Amended prior to a change in process or work assignment;
- Given upon modification to the Emergency Response/Contingency Plan.

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- The name, job title and job description for each position at the facility related to hazardous waste management.
- Current employee training records must be retained until closure of the facility and former employee training records must be retained for at least three years after termination of employment.

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**Hazardous Materials Business Plan Training:** Businesses must provide initial and annual employee training that includes the content referenced above. The training may be based on the job position and training records must be made available for a period of at least three years.

# Emergency Response/ Training Plans

- ▶ Other common mistakes
  - Missing training records for new employees
  - Missing ongoing training records
  - SQG that becomes LQG missing LQG required documents
  - Not updating Emergency Response/Contingency Plan with internal document updates (evacuation procedures, training plans, release reporting, etc.)
  - Emergency equipment out of date

# CERS Reporting

- Partial submittals of only "facility information" submittal element

### Facility Information

Accepted May. 25, 2023

Submitted for CERS ID [redacted] on 2/28/2023 11:16AM by [Colleen Grainger](#) of [redacted]  
Submittal was **Accepted** on 5/25/2023 by [redacted]  
Comments by regulator: Your submittal has been reviewed and accepted for completeness. However, the accuracy of your submittal will be verified by your assigned inspector.

[Business Activities](#)

[Business Owner/Operator Identification](#)

### Hazardous Materials Inventory

Accepted May. 25, 2023

Submitted for CERS ID [redacted] on 2/28/2023 11:16AM by [Colleen Grainger](#)  
Submittal was **Accepted** on 5/25/2023 by [redacted]  
Comments by regulator: Your submittal has been reviewed and accepted for completeness. However, the accuracy of your submittal will be verified by your assigned inspector.

[Hazardous Material Inventory \(60\)](#)

[Site Map \(Official Use Only\): Upload Document\(s\)](#)

### Emergency Response and Training Plans

Accepted May. 25, 2023

Submitted for CERS ID [redacted] on 2/28/2023 11:16AM by [Colleen Grainger](#) of [redacted]  
Submittal was **Accepted** on 5/25/2023 by [redacted]  
Comments by regulator: Your submittal has been reviewed and accepted for completeness. However, the accuracy of your submittal will be verified by your assigned inspector.

[Emergency Response/Contingency Plan: Upload Document\(s\)](#) (9)

[Employee Training Plan: Upload Document\(s\)](#)

### Recyclable Materials Report

Submitted Feb. 28, 2023

Submitted for CERS ID [redacted] on 2/28/2023 11:16AM by [Colleen Grainger](#) of [redacted]  
[Recyclable Materials Report Documentation: Upload Document\(s\)](#)

### Aboveground Petroleum Storage Act

Accepted May. 25, 2023

Submitted for CERS ID [redacted] on 2/28/2023 11:16AM by [Colleen Grainger](#) of [redacted]  
Submittal was **Accepted** on 5/25/2023 by [redacted]  
Comments by regulator: Your submittal has been reviewed and accepted for completeness. However, the accuracy of your submittal will be verified by your assigned inspector.

*All submittal elements require that the Facility Information submittal element be submitted at the same time.*

# CERS Reporting

- ▶ Duplicate documents in same submittal (i.e., old and revised version of same form or document submitted).
  - Limit document uploads to the most current document.
  - CERS automatically retains copies of previously submitted documents.
  - Always select 'discard' documents if you are uploading a more recent version.

# CERS Reporting


- ▶ Facility creates a new duplicate facility in CERS.
  - CERS ID is tied to the physical location of a facility.
  - Before creating a new facility in CERS search for similar addresses to see if it already exists.
    - ◆ For example, search for partial street names or address numbers to see if the site is already in CERS.
  - Can check with your CUPA/PA to ask them if they can check for you.




**Instructions/Help**



Use this form to search and locate an existing CERS Business/Organization and request access to view/edit the business' facility/reporting data. Only enter data in one or two fields to avoid overly narrowing your results--probably the "Business Name" or facility address fields will suffice.

**Search Businesses in CERS**

Enter information in just one or two fields to search for your business/facility.

Business Name 

Facility Name (if different from Business) Facility Address  City  ZIP Code 

CERS ID  Organization Code 

**Search** **Clear**

# CERS Reporting

- ▶ Updating HMBP in a timely manner
  - HMBP must be revised and submitted in CERS within 30 days of:
    - ◆ 100% or more increase in the quantity of a previously disclosed material;
    - ◆ The facility begins handling a previously undisclosed material at or above HMBP reporting thresholds;
    - ◆ The facility changes address;
    - ◆ Ownership of the facility changes; or
    - ◆ There is a change of business name.

[HSC §25510]

# CERS Reporting

## ► Tips for Facilities

- HMBP should be reviewed annually (don't assume past submittals are correct)
- While CERS houses important documents, it does not have ALL the documents facilities will need during an inspection
- Don't assume an accepted CERS submittal means you are automatically in compliance
  - ◆ Keep lookout for regulator comments on your HMBP submittal (should be notified via email)
- Keep records not in CERS (training records, manifests, inspection logs, etc.) in a centralized location



# Key Takeaways

# Takeaways

- ▶ Proper preparation of the HMBP ensures both facilities and regulators are prepared and informed in the case of required emergency response
- ▶ Remember the "why" behind the HMBP
- ▶ Facilities – compliance is a cooperative effort and requires coordination among departments (production, procurement, etc.)
- ▶ Plan ahead
- ▶ Learn from previous mistakes
- ▶ Work with your local regulator – ask your CUPA/PA questions / ask for help
- ▶ Regulators – be available to help facilities outside an inspection



# Any Questions?

**Find us at Booth #42!**

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