



HMBP 201

TU-M₁ & TU-M₃

March 25th, 2025

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County of San Diego Hazardous Materials Division (CUPA)

**27th California Unified Program
Annual Training Conference
March 24-27, 2025**



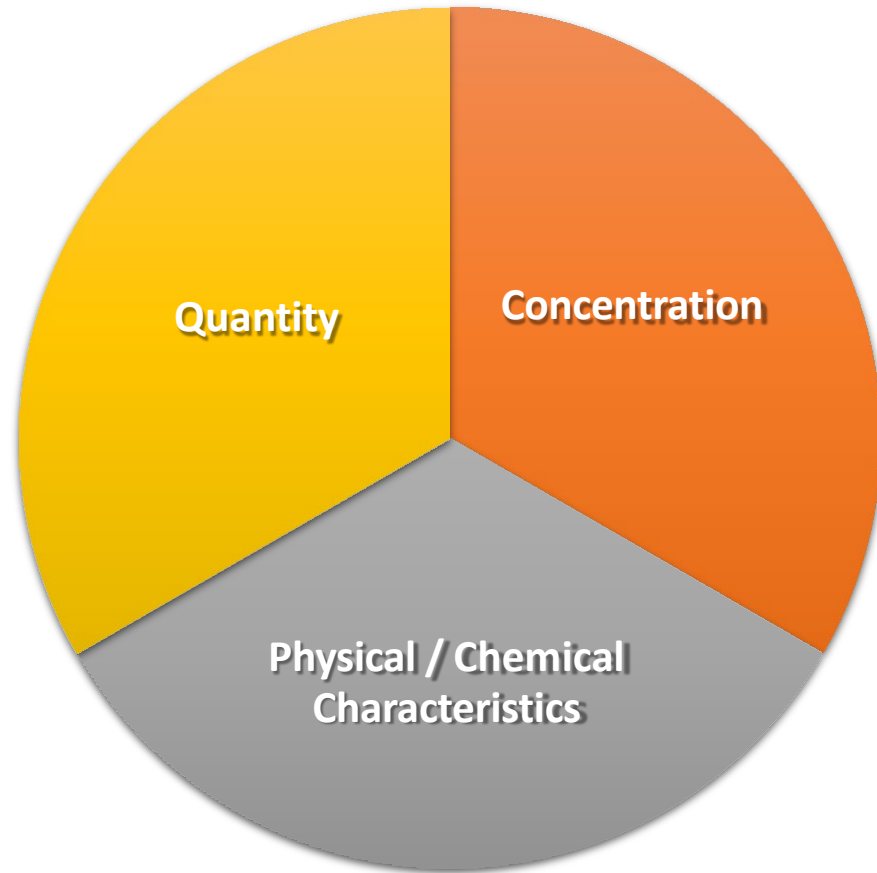


Overview

- Definitions
- Reporting Thresholds
- Compressed Gases
- Mixtures
- Battery Reporting
- Commercial Products
- Trade Secrets
- Farms & Remote Sites
- Previous HMBP Updates

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What is a hazardous material?



HAZARDOUS WASTE
STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.
GENERATOR INFORMATION:
NAME _____ PHONE _____
ADDRESS _____ STATE _____ ZIP _____
CITY _____
EPA IDENTIFICATION NO. / MANIFEST TRACING NO. _____
EPA CA ACCUMULATION _____
WASTE NO. _____ WASTE NO. _____ START DATE _____
CONTENTS, COMPOSITION: _____
PHYSICAL STATE: SOLID LIQUID HAZARDOUS PROPERTIES: FLAMMABLE TOXIC
 CORROSIVE REACTIVITY OTHER _____
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!



Hazardous Materials include...

Materials for which the manufacturer is required to prepare a Safety Data Sheet (SDS) pursuant to the Hazardous Substances Information and Training Act or federal law/regulation

Radioactive materials listed by the Nuclear Regulatory Commission (NRC)

Listed by the Department of Transportation (DOT)

Listed as a hazardous substance in the California Code of Regulations (CCR)

Determined to be a hazardous waste per the Health & Safety Code (HSC)

Specified by a City or County ordinance

SDS Example

Section 2. Hazards identification

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

Classification of the substance or mixture : FLAMMABLE GASES - Category 1
GASES UNDER PRESSURE - Liquefied gas

GHS label elements

Hazard pictograms



Signal word

: Danger

Hazard statements

: Extremely flammable gas.
Contains gas under pressure; may explode if heated.
May cause frostbite.
May displace oxygen and cause rapid suffocation.
May form explosive mixtures with air.

What are basic HMBP reporting thresholds?



55-gal of a liquid



500 lbs of solid



200 cubic feet of a compressed gas

Thresholds are evaluated at standard temperature and pressure.

Note: Not all materials are created equal! Hazards vary and the threshold may be higher or lower...



Extremely Hazardous Substances (EHS)

An EHS is reportable if it is **equal to or greater than the Threshold Planning Quantity (TPQ)**

- TPQs are listed in APPENDICES A & B of 40 CFR 355. Can be found on the EPA “List of Lists”
- TPQs can be less than 500 pounds
- Solid EHSs will have two TPQs (powder/solution)
- Must be reported in pounds in CERS

Common Examples:

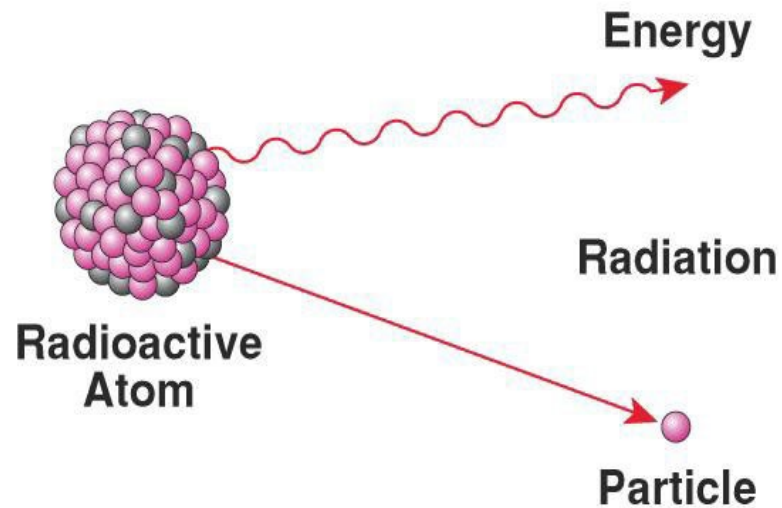
Ammonia used in refrigeration systems or
Chlorine used in wastewater treatment facilities.



Radioactive Materials

Are reportable if handled at any one time during the reporting year in a quantity pursuant to:

Schedule C of Part 30, Part 40, or Part 70 of Chapter I of Title 10 CFR



Combustible Metals or Metal Alloys

The following hazardous materials in raw stock, scrap, or powder form are reportable in the following quantities:

- **PYROPHORIC or WATER-REACTIVE MATERIAL – ANY AMOUNT**

Examples: Group I (Alkali) metals, zinc powder, calcium metal

- **COMBUSTIBLE DUST, FLAMMABLE SOLID, or MAGNESIUM – 100 POUNDS**

Examples: Titanium dust, zirconium, magnesium alloys

- **EXPLOSIVE POTENTIAL (IN MOLTEN FORM) – 500 POUNDS**

Examples: Molten Aluminum



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Exemptions and Alternative Thresholds

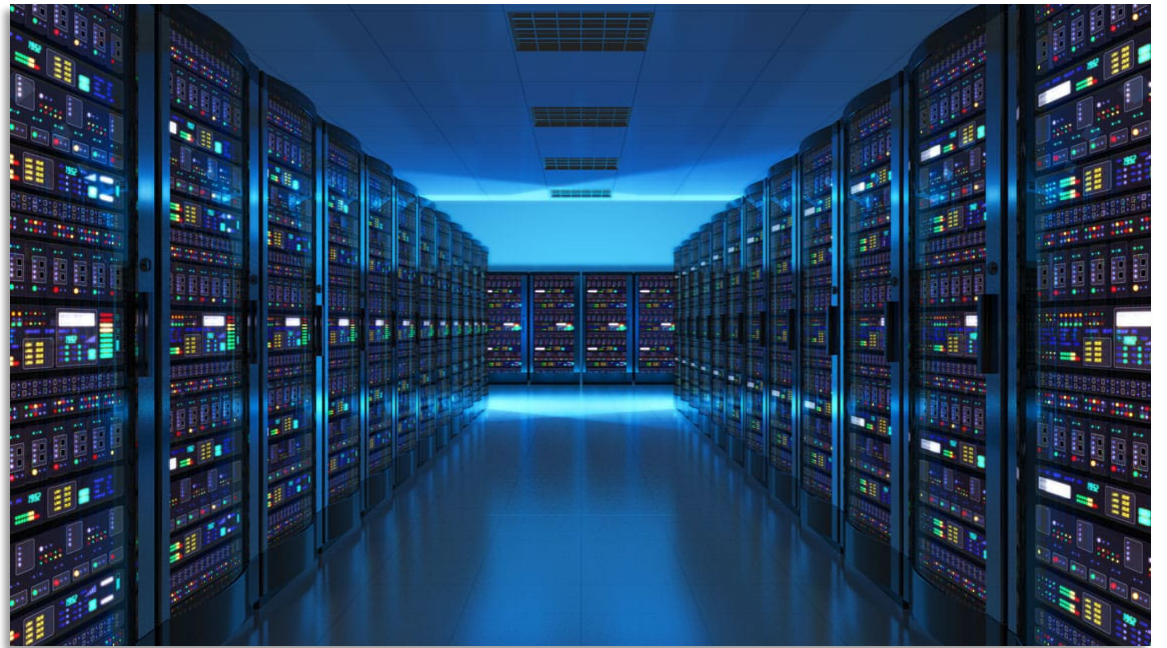


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Refrigerant Gases for Comfort or Space Cooling

Refrigerant gases, other than ammonia or flammable gas, used for comfort cooling or space cooling for computer rooms

Any amount is exempt



Compressed Air for Emergencies

Compressed air in cylinders, bottles, and tanks, used by fire departments and other emergency response organizations for the purpose of emergency response and safety

Any amount is exempt



Treated Wood and Treated Wood Waste

HSC 25507(b)(8)
HSC 25230.1(c & d)

Applies to:

- Wood that is hazardous solely due to being treated with chemical preservative registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.).

Any amount is exempt

Does not apply to:

- Treated wood or wood waste that is subject to Tier I reporting under 42 U.S.C. 11022



Liquid or Gaseous Fuel in Tanks

Liquid or **gaseous** fuel in tanks on vehicles or motorized equipment.

Any amount is exempt

Fuel tank shall be integral to the operation of vehicle/motorized equipment.

This exemption does not apply to batteries in vehicles or motorized equipment.



Recycled Latex Paint

For PaintCare facilities that accept latex paint through the Architectural Paint Recovery Program (AB 1343)

Reporting threshold is **greater than or equal to:**

- **10,000 pounds for solids**
- **1,000 gallons for liquids**



Irritants & Sensitizers

Solid or liquid – classified solely as an irritant or sensitizer

Reporting threshold is **greater than or equal to:**

- **5,000 pounds for solids**
- **550 gallons for liquids**



Propane

Solely for the purpose of cooking, heating employee work areas, and heating water.

Reportable at more than 500 gallons



Fluid in a Hydraulic System or Oil-Filled Electrical Equipment

If the **aggregate storage capacity of oil is < 1,320 gallons** (not an APSA facility):

A) Fluid in a hydraulic system

B) Oil-filled electrical equipment that is not contiguous to an electric facility



Lubricating Oil

Exempt if:

Total volume \leq 55 gallons for each oil type

AND

Total volume \leq 275 gallons for all oil types combined

Note: For use in internal combustion crankcase, transmission, gearbox, differential, hydraulic system in machinery (several types).

This does not apply to Used Oil.



Thresholds for Compressed Gases



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Noble Gases



Classified as hazardous due to **simple asphyxiation or release of pressure**

e.g., Argon, Helium,
Nitrogen, Xenon, Krypton
and Neon

Reportable at 1,000 cubic feet

Medical Gases

Oxygen, Nitrogen, and Nitrous Oxide maintained by a physician, dentist, podiatrist, veterinarian, pharmacist, or emergency medical service provider

Reportable at 1,000 cubic feet



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Carbon Dioxide



Carbon dioxide or carbon dioxide mixed with simple asphyxiation gases that are classified as a hazard for purposes of Section 5194 of Title 8 of the California Code of Regulations

Ex. Argon, Helium, Nitrogen, etc.

Reportable at 1,000 cubic feet

Nonflammable Refrigerant Gases Used in Refrigeration Systems

As defined in the California Fire Code
Ex. R134, R401A, R404A,

Reportable at 1,000 cubic feet



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Gases in Fire Suppression Systems

Closed-loop fire suppression system

Ex. Carbon Dioxide, Nitrogen, Argon, HFCs

Reportable at 1,000 cubic feet



Note for Compressed Gases...

If a hazardous material or mixture is determined to exceed threshold quantities at standard temperature and pressure, it shall be reported in the physical state at which it is stored.

Standard temperature and pressure: 1 atmosphere, 0 degrees Celsius (32 degrees Fahrenheit).



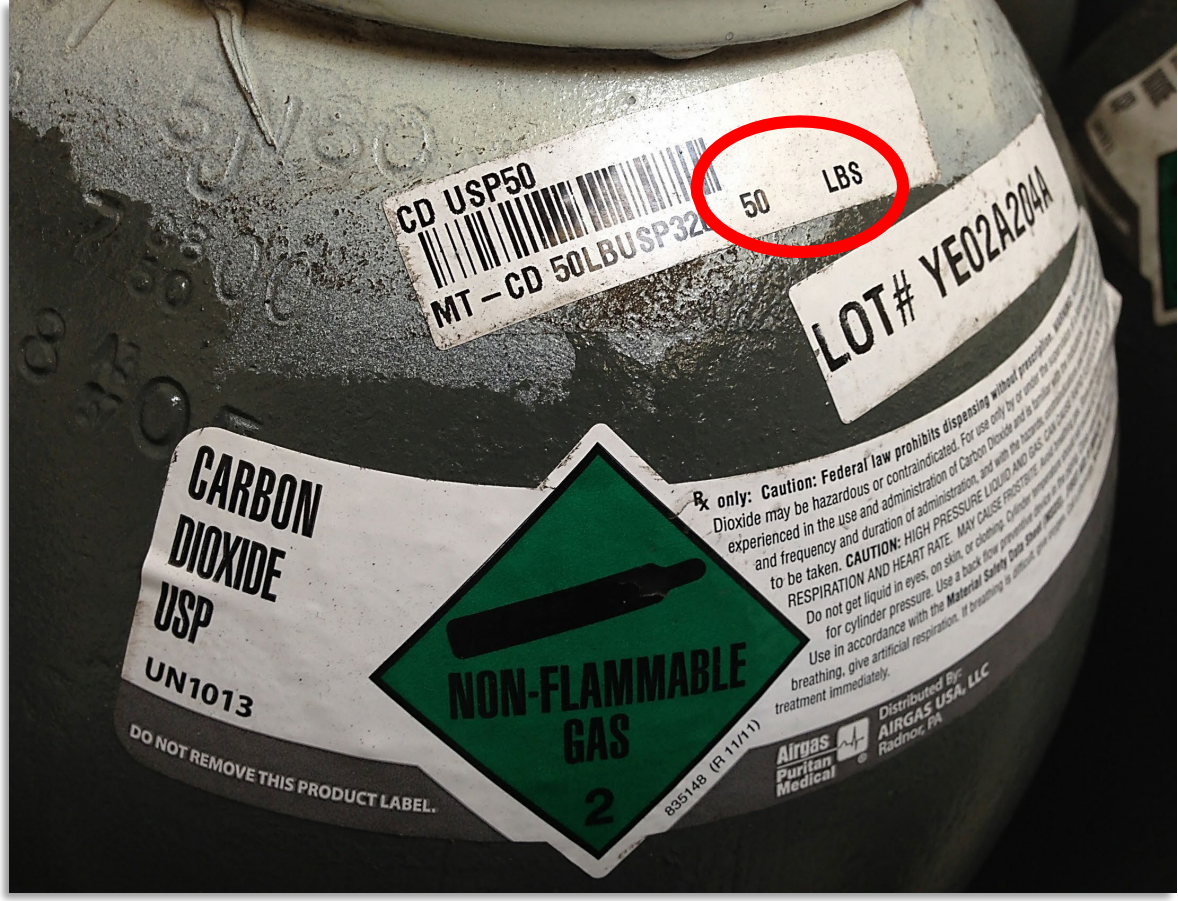
Gaseous Carbon Dioxide Conversion Example

- 50 lbs of Carbon Dioxide compressed gas
- 8.47 cu. ft/lb
- Confirm conversion factors with your local CUPA!

$$50 \text{ lb} * \left(\frac{8.74 \text{ cu. ft}}{1 \text{ lb}} \right) = 437 \text{ cubic feet}$$

Reportable at 1,000 cubic feet!

$$1000 \text{ cu. ft.} * \left(\frac{1 \text{ lb}}{8.74 \text{ cu. ft}} \right) = 114.4 \text{ pounds}$$



Liquid Carbon Dioxide Conversion Example

- 400 lbs of Carbon Dioxide liquified gas
- 8.47 cu. ft/lb (per conversion table)
- **Confirm conversion factors with your local CUPA!**

$$400 \text{ lb} * \left(\frac{8.74 \text{ cu.ft}}{1 \text{ lb}} \right) = 3,496 \text{ cubic feet}$$

Reporting threshold is $\geq 1,000$ cu.ft. Because the CO2 is a liquid, it must be reported in gallons.

- 8.46 lb/gal (per conversion table)

$$400 \text{ lb} * \left(\frac{1 \text{ lb}}{8.46 \text{ gal}} \right) = 47.3 \text{ gallons}$$



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Hazardous Material Mixtures



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Mixture Materials Reporting



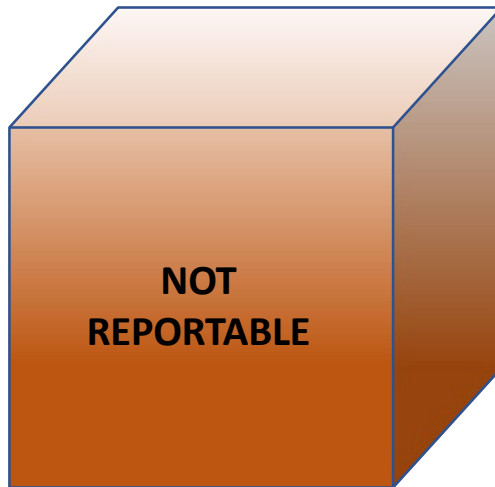
- Any material containing a mixture of hazardous components handled at any one time during the reporting year in quantities at or above:
 - ≥ 55 gallons
 - ≥ 500 pounds
 - ≥ 200 cubic feet

MUST REPORT!

- The physical state and quantity present of mixtures shall be determined by the physical state of the mixture as a whole, not individual components.

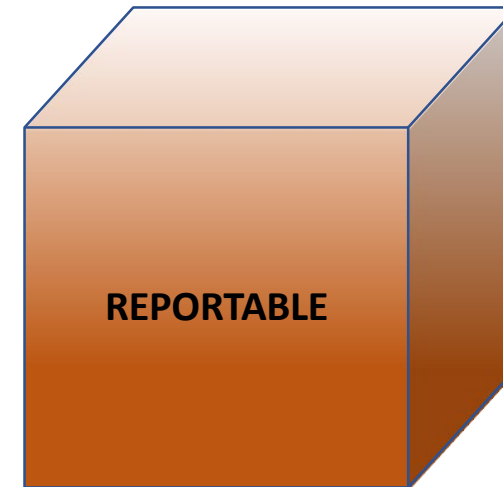
Mixture Materials Reporting

30 gallons of 38% hydrochloric acid



+ 30 gallons of water =

60 gallons of 19% hydrochloric acid



Mixture Materials Reporting

- Example: Plating Shop – Process Tank

Chemical Identification and Physical Properties

Chemical Name

Common Name CAS Number

Physical State Hazardous Material Type
 Solid Liquid Gas Pure Mixture Waste

Check 'Pure' only if you provide a CAS Number.
 Check 'Mixture' if the hazardous material contains more than one component and is not a waste. Check 'Waste' for hazardous wastes.

Chemical Hazard Classification

EHS Yes No

Radioactive Yes No

Curies

Fire Code Hazard Classes (by priority)

[View/Edit Additional Firecodes](#)

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Sodium Cyanide	143-33-9	11.00	Yes
Cadmium Oxide	1306-19-0	2.00	Yes
Sodium Carbonate	497-19-8	2.00	-
Water	7732-18-2	85.00	-
-	-	-	-

Use the EHS box in the Mixture Components Section if it's a mixture of EHS and non-EHS chemicals



Mixture Materials Reporting

- If a mixture, select “mixture” and complete the Mixture Components Section
- If an EHS within mixture, select “No” to EHS under Chemical Hazard Classification and select “Yes” in the Mixture Components Section

Chemical Hazard Classification

EHS 

Yes No

Radioactive

Yes No

Curies

Fire Code Hazard Classes (by priority)

Toxic 





[View/Edit Additional Firecodes](#)

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Sodium Cyanide	143-33-9	11.00	Yes
Cadmium Oxide	1306-19-0	2.00	Yes
Sodium Carbonate	497-19-8	2.00	-
Water	7732-18-2	85.00	-
-	-	-	-

Mixture Materials Reporting

- Use highest percentage in the range (CERS will not accept the dash)
- Total can be over 100%

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Antimony	7440-36-0	5	<input type="radio"/> Yes <input checked="" type="radio"/> No
Electrolyte (Sulfuric Acid)	7664-93-9	44	<input checked="" type="radio"/> Yes <input type="radio"/> No
Lead and lead compounds (inorganic)	7439-92-1	70	<input type="radio"/> Yes <input checked="" type="radio"/> No

Chemical name	CAS number	% by wt.
Antimony	7440-36-0	3 - 5
Electrolyte (Sulfuric acid)	7664-93-9	20 - 44
Lead and lead compounds (inorganic)	7439-92-1	43 - 70



Mixture Materials Reporting

1% Rule

Mixtures consisting of less than 1% of a hazardous material, or 0.1% for carcinogens, do not need to be reported.



Lead-Acid Batteries



Reporting Lead-Acid Batteries

- Reportable if the facility has ≥ 55 -gallons of the hazardous material
- The hazardous material is the **liquid electrolyte = sulfuric acid**
- Obtain the battery specification sheet from manufacturer
 - Look for **gallons of electrolyte per battery.**

Example: 25 batteries \times 1.50 gallons per battery
= 37.5 gallons



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If the specification sheet/manufacturer does not provide the gallons of electrolyte...do an estimate!

Example: 50 batteries that weigh 30 lbs each. Are they reportable?

Obtain the total battery weight, specific gravity, and % hazardous material

Composition: 40% sulfuric acid Specific Gravity = 1.285 Density of Water = 8.34 lbs/gal

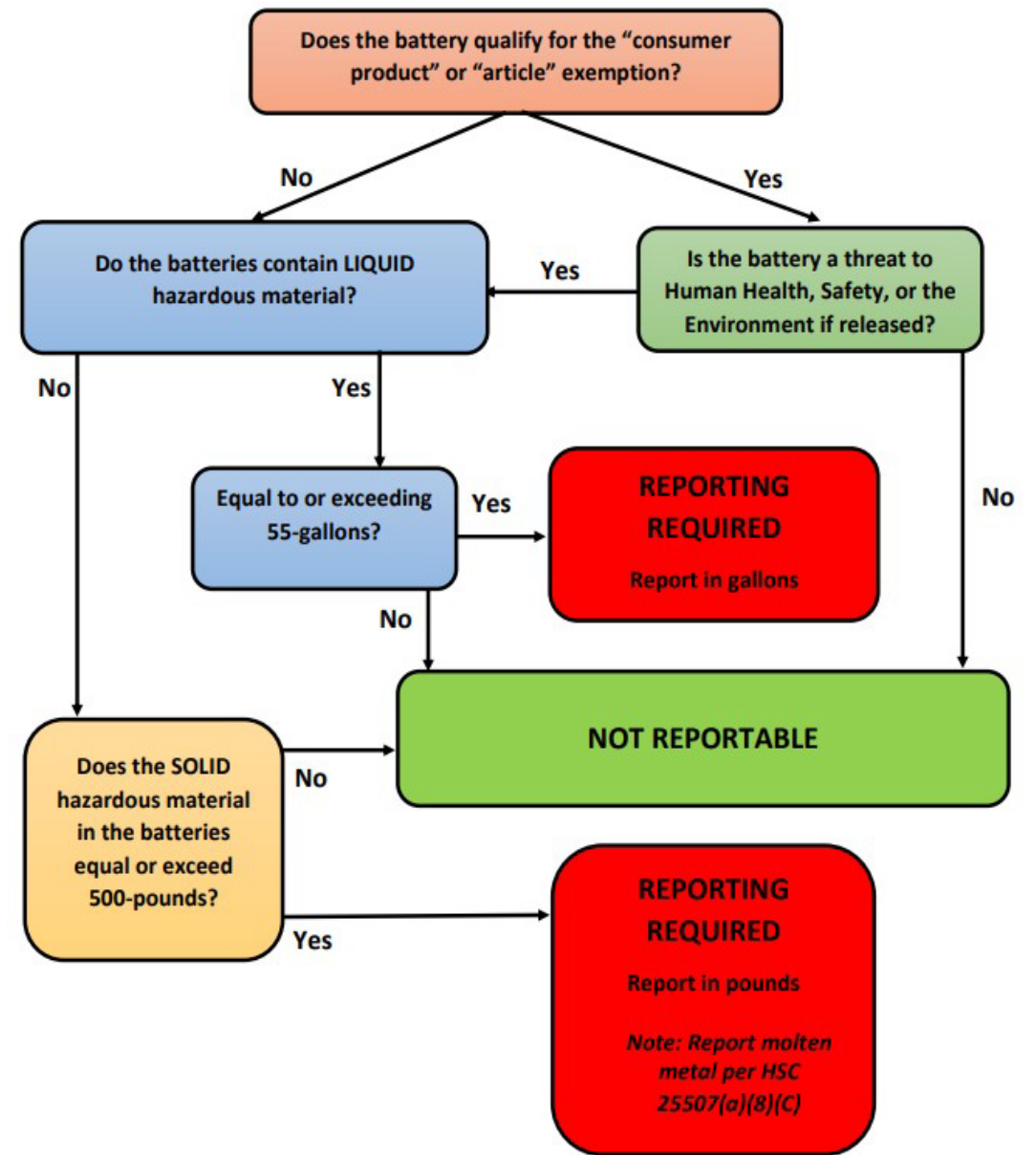
$$\text{Electrolyte volume} = \frac{\left(\frac{\% \text{ sulfuric acid}}{100}\right)(\text{Weight of battery})}{(\text{Specific gravity})(\text{Density of water})} = \frac{\left(\frac{40}{100}\right)(30 \text{ lbs})}{(1.285)(8.34 \frac{\text{lbs}}{\text{gal}})} = 1.12 \text{ gal}$$

Total Electrolyte Volume = 1.12 gal × 50 batteries = 56 gallons



Battery Reporting

Battery Reporting Guidance for UPAs



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Consumer Products and Trade Secrets



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Consumer Product Exemption

Exempt from reporting if:

- Used for personal, family, or household purposes
- Handled at and found in, a retail establishment and intended for direct sale to the end user.



Exemption shall not apply to:



Manufacturer of product



Distribution/Warehouse with no direct sales to consumers



Product dispensed on the retail premises



Materials with NFPA or HMIS ratings of 3 or 4, stored at quantities equal to or greater than 165 gallons, 600 cubic feet, or 1,500 pounds

Consumer Product Exemption does not apply to:



Dispensing on Premises



Distribution/Warehouse/Manufacturing

Common Hazardous Materials that do not meet the consumer product exemption:




- **Propane**
- **Pool Chemicals**
- **Butane**

Trade Secret

What is Considered a Trade Secret?

Classification and Physical Properties

Trade Secret Confirmation

 You have indicated this hazardous material is a trade secret. **Trade secret information must meet one or both of the following criteria.** Please review these criteria and check the appropriate box in order to continue.

- **Civil Code 3426.1(d):** "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.
- **Government Code 6254.7:** ... may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

No This is NOT a trade secret hazardous material

Yes This hazardous material meets one or both of the criteria specified above

PHYSICAL: Organic Peroxide
 PHYSICAL: Self-reactive

What is Considered a Trade Secret?

HSC 15188(e)
HSC 25512

Civil Code
3426.1(d)

- Formula that:
- Derives economic value from not generally being known to the public/persons who can obtain economic value from its disclosure
- The subject of efforts that are reasonable to maintain secrecy

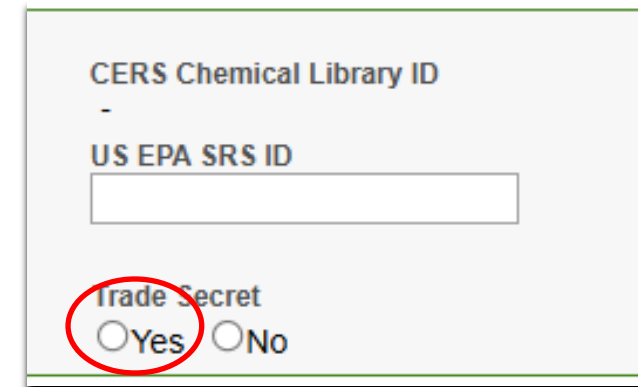
Government
Code 6254.7

- Not public records
- Gives the business advantage over competitors who do not know or use it

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How do I Disclose Trade Secrets?

- If the business believes the material is considered a trade secret, they shall nevertheless disclose the material to the unified program agency.
- Shall notify the unified program agency in is a trade secret by:
 - Checking off the trade secret box in CERS
 - Only required to report via CERS:
 - **Chemical name**
 - **Amount**
 - **Appropriate hazard class code**
 - Submitting a Trade Secret Disclosure Form for each item.
 - If the facility subject to EPCRA, they are also required to submit a “Substantiation to Accompany Claims of Trade Secrecy” form to the US EPA.



CERS Chemical Library ID
-
US EPA SRS ID

 Trade Secret
 Yes No

Trade Secret

How Do I Disclose?

[California Environmental Protection Agency Trade Secret Disclosure Form](#)

[Substantiation to Accompany Claims of Trade Secrecy under EPCRA](#)

The form is titled "California Environmental Protection Agency Trade Secret Disclosure Form for Chemical Inventory Submittals California Code of Regulations, Title 27, Section 15188(e)". It includes instructions for completion and a section for disclosing trade secrets. The form contains the following text and fields:

Chemical:
Chemical or Common Name of the chemical or mixture believed to be trade secret: _____

Regarding the Above Named Chemical or Mixture:
Is the chemical or mixture considered part of any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information believed to be trade secret?
 Yes OR No

Is any reported information about the chemical or mixture part of a patent?
 Yes OR No

If YES, explain why the chemical or mixture is still believed to be trade secret.

Is the chemical or mixture known only by certain individuals with a commercial concern who are using it to fabricate, produce, or compound an article of trade?
 Yes OR No

Page 1 (CalEPA 3/19)

This section of the form includes the EPA logo and header information, followed by a Paperwork Reduction Act Notice and Part 1: Substantiation Category. The form contains the following text and fields:

United States Environmental Protection Agency
EPA
Washington, DC 20460
Substantiation to Accompany Claims of Trade Secrecy
Under the Emergency Planning and
Community Right-To-Know Act of 1986

Form Approved
OMB No. 2050-0078
Approval expires 06/30/2026

Paperwork Reduction Act Notice
The annual public reporting and recordkeeping burden for this collection of information is estimated to average 9.5 hours per claim. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Part 1. Substantiation Category
1.1 Title III Reporting Section (check only one)
 303 311 312 313
1.2 Reporting Year _____

1.3 Indicate Whether This Form is (check only one)

1.3a <input type="checkbox"/> Sanitized (answers 1.3.1a below)	1.3b <input type="checkbox"/> (answer 1.3.1b and 1.3.2b below)
1.3.1a Generic Class or Category _____	1.3.1b CAS Number [][][][][][] - [][] - [][] 1.3.2b Specific Chemical Identity _____

Part 2. Facility Identification Information
2.1 Name _____
2.2 Street Address _____
2.3 City, State, and Zip Code _____
2.4 Dun and Bradstreet Number [][][][][] [][][][][] [][][][][]
EPA Form 9510-1 (7/1988) Page 1 of 5

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Sites with Alternative Reporting Requirements



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Farms

Exempt from submitting the Emergency Response and Training Plan section of CERS if:

- Annually submit the Facility Information, Inventory, and Site Map
- Post signs on each building storing hazmat indicating hazmat inside (pesticides, petroleum fuels/oils, fertilizers)
- Provide annual training to employees



Unstaffed Remote Facilities

Only required to make a one-time submittal of the Facility Information and Hazardous Materials Inventory (including Site Map), if the following conditions are met:

- The facility is secured and not accessible to the public.
- Warning signs are posted and maintained for hazardous materials pursuant to the California Fire Code.
- Located at least one-half mile from the nearest occupied structure.
- Types and quantities of materials onsite meet the requirements listed in 25507.2

Unstaffed Remote Facilities must still update the HMBP within 30 days of any changes, and are subject to inspection by the local UPA upon submittal of the HMBP.

Unstaffed Remote Facilities – Inventory Limitations



1,000 cubic feet of compressed inert gases (asphyxiation and pressure hazards only).



500 gallons of combustible liquid used as a fuel source.



Corrosive liquids, not to exceed 500 pounds of extremely hazardous substances, used as electrolytes, and in closed containers.



500 gallons of lubricating and hydraulic fluids.



1,200 gallons of hydrocarbon gas used as a fuel source.



Any quantity of mineral oil contained within electrical equipment, if a spill prevention control and countermeasure plan has been prepared for quantities that meet or exceed 1,320 gallons.



HMBP
"UPDATES"

AB1716

Effective 1/1/2024

- Site maps must include loading areas, internal roads, storm and sewer drains, and emergency shutoffs only if they are present on the site.
- Clarification added to HSC 25507 (b)(1) to exempt refrigerant gases used for comfort cooling for occupancies or space cooling for computer rooms.
- HSC 25507 (b)(7) has been added to exclude treated wood and treated wood waste from HMBP requirement unless required by Title 42 of US Code.

AB480

Effective 10/9/2021

- Modifies the reporting requirement for threats or actual releases of HM, HW, or hazardous substances.
 - Facility subject to HMBP- must report to CUPA immediately upon discovery
 - Facility not subject to HMBP- reporting required upon discovery of actual release that results in an emergency response.
- Gives the CUPA authority (must consult local Health Officer) to issue an order to suspend or discontinue the activity causing or contributing to the release, spill, escape, or entry of the HM, HW or hazardous substances.
 - The order can remain in effect until the CUPA determines that the imminent and substantial endangerment to public health has been abated or the order is overturned via an appeal.

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AB1429

Effective 1/1/2020

- Handlers not subject to EPCRA and APSA requirements:
 - Must still provide annual certification
 - May **Certify** their business plan every year and submit every three years.
- Handlers subject to EPCRA or APSA requirements:
 - Must submit their business plan annually.

AB1429

The “Certify” button will be enabled if ALL the following conditions are true:

- No active HMBP submittal element in “draft”
- Facility has a completed submittal in CERS
- Last HMBP submittal status is either **Submitted**, **Under Review**, or **Accepted**
- Last HMBP submitted within last 36 months
- APSA submittal element reporting requirement is not set to “Applicable”

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

AB1429

More information:

[CERS Portal Change and New Feature – Hazardous Materials Business Plan Annual Certification \(AB1429\)](#)

The thresholds for Tier II EPCRA can be found in 40 CFR Part 370, and are summarized as:

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

HSC 25507 Reference Guide

Description	Reference
Irritant or Sensitizer	HSC 25507(a)(4)(A)
Combustible Metal or Metal Alloy	HSC 25507(a)(8)(A-C)
Recycled Latex Paint	HSC 25507 (a)(4)(B)
Cryogenic, Refrigerant, and Compressed Gases	HSC 25507(a)(5)(A-E)
Refrigerant Gases for Comfort Cooling	HSC 25507(b)(1)
Compressed Air Used in Emergency Response	HSC 25507(b)(2)
Lubricating Oil: Motor, Hydraulic, ATF, Gear	HSC 25507(b)(3)(A)
Fluid in a Hydraulic System or Oil-Filled Electrical Equipment	HSC 25507(b)(4)(A-B)
Consumer Products Containing Hazardous Material	HSC 25507(b)(5)
Propane	HSC 25507(b)(6)
Vehicle fuel in tanks or motorized equipment	HSC 25507(b)(7)
Treated wood and treated wood waste	HSC 25507(b)(8)
Farms	HSC 25507.1
Unstaffed Remote Facilities	HSC 25507.2

Resources

- EPA List of Lists: [https://www.epa.gov/system/files/documents/2022-12/List of Lists Compiled December%202022.pdf](https://www.epa.gov/system/files/documents/2022-12/List_of_Lists_Compiled_December%202022.pdf)
- Battery Reporting Guidance for UPAs: [https://calcupa.org/CMS15/dropbox/Business Plans/upaag-battery-reporting-guidance-for-upas-2022-03-10.pdf](https://calcupa.org/CMS15/dropbox/Business_Plans/upaag-battery-reporting-guidance-for-upas-2022-03-10.pdf)
- California Environmental Protection Agency Trade Secret Disclosure Form: <https://calepa.ca.gov/wp-content/uploads/2019/04/Trade-Secret-Disclosure-Fillable-PDF-Form-Accessible-4-4-19.pdf>
- CERS Portal Change and New Feature – Hazardous Materials Business Plan Annual Certification (AB1429): <https://cers.calepa.ca.gov/wp-content/uploads/sites/11/2020/09/CERS-Business-Portal-Help-NEW-Feature-AB1429-Self-Certification-9.15.20.pdf>
- CalEPA Unified Program Policy for Hazard Classification (Sensitizers): [CalEPA UP Memorandum Policy UP-11-07](#)





Any Questions?

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