



# CONTRA COSTA COUNTY CUPA PROGRAMS

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# TWO PRIMARY FUNCTIONS

## 1. Regulatory Function (Compliance Inspections)

- ✓ Inspections of Facilities that handle or store hazardous materials and/or generate hazardous waste.
- ✓ Primarily enforcing State regulations (see handout).

## 2. Incident Response (HazMat Team)

- ✓ Responding to releases or threatened releases of hazardous materials to protect public health and/or the environment.



**REGULATORY FUNCTION**

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# CERTIFIED UNIFIED PROGRAM AGENCY

Contra Costa Health Services is certified by the State of California (CalEPA) to enforce State Statutes and Regulations

- California Health and Safety Code, Chapter 6.11, Sections 25404-25404.9
- Title 27 of the California Code of Regulations, Sections 15100-15620

CUPAs implement and enforce six regulatory programs:

1. Hazardous Materials Business Plan Program
2. Hazardous Waste Generator Program
3. Underground Storage Tank Program
4. Aboveground Petroleum Storage Act Program
5. California Uniform Fire Code for Hazardous Materials (Fire Depts Only)
6. California Accidental Release Prevention Program (CalARP)

# HAZARDOUS MATERIALS BUSINESS PLAN PROGRAM

Must file a “Business Plan” with CCHSHMP when a business stores onsite for longer than 30 days a hazardous material/waste above threshold quantities:

- 55 gallons for a liquid
- 500 pounds for a solid
- 200 standard cubic feet for a gas

NOTE: Check local ordinances for additional reporting requirements



# HAZARDOUS MATERIALS BUSINESS PLAN PROGRAM

Documents to have prepared and ready for review include:

- California Environmental Reporting System (CERS) annual submittal
- Emergency Response Plan
- Employee Training Plan
- Site Map
- Employee Training Documentation on Emergency Response Plan

# HAZARDOUS WASTE GENERATOR PROGRAM

Any business that routinely generates “hazardous waste” must apply for a permit to do so.

Criteria for determining a “hazardous waste” is provided in State regulation (Title 22 of the California Code of Regulations)

- Toxic
- Corrosive
- Ignitable
- Reactive
- Listed Wastes

**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 \_\_\_\_\_  
ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
EPA IDENTIFICATION NO. / MANIFEST TRACKING NO. \_\_\_\_\_ / \_\_\_\_\_  
EPA WASTE NO. \_\_\_\_\_ CA WASTE NO. \_\_\_\_\_ ACCUMULATION 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 WASTE GENERATOR PROGRAM

Documents to have prepared and ready for review include:

- Hazardous Waste Determination(s)
- Hazardous Waste Disposal Documentation
- Contingency Plan
- Employee Training Documentation
- Other documents depending upon generation level (RCRA LQG, LQG, SQG, CESQG) → 1,000 kg/mo
- Treating Hazardous Waste?
- Excluded Recyclable Material (ERM)?
- Remote Waste Consolidation?

# UNDERGROUND STORAGE TANK PROGRAM

Any business that owns and/or operates an underground storage tank that stores a hazardous substance is required to obtain a permit from the local CUPA.

Definition of Underground: 10% or more of the system volume is beneath the ground surface (generators in parking structures, basements, etc.).



# UNDERGROUND STORAGE TANK PROGRAM

Documents to have prepared and ready for review include:

- Annual California Environmental Reporting System Submittal
- Underground Storage Tank Permit to Operate
- Testing Reports
- Designated Operator Inspection Reports
- Employee Training Records
- Maintenance Records
- Many more...

# ABOVEGROUND PETROLEUM STORAGE ACT PROGRAM

Any facility handling petroleum products greater than or equal to 1,320 gallons (in containers/tanks of 55 gallons or greater) is required to have a permit from CCHSHMP.



# ABOVEGROUND PETROLEUM STORAGE ACT PROGRAM

Documents to have prepared and ready for review include:

- Annual California Environmental Reporting System Submittal
- Spill Prevention Control and Countermeasure (SPCC) Plan
- Tank Integrity Testing Reports
- Monthly Inspections
- Annual Inspections
- Employee Training Documentation



# CALIFORNIA UNIFORM FIRE CODE

Implemented by local Fire Protection Districts

# REGULATORY FUNCTION

## 1. Routine Compliance Inspection

- Frequency: Every 1-3 years depending upon the regulatory program(s) permitted at that facility.
- Violations are classified as Minor, Class II, or Class I.

## 2. Follow-up Inspection – Informal Enforcement

- Violation is corrected...or it will be “reclassified” as either a Class II or Class I.

## 3. Formal Enforcement Action

- Referral to the District Attorney’s Office
- Administrative Enforcement Order Process

(We also conduct complaint investigations.)

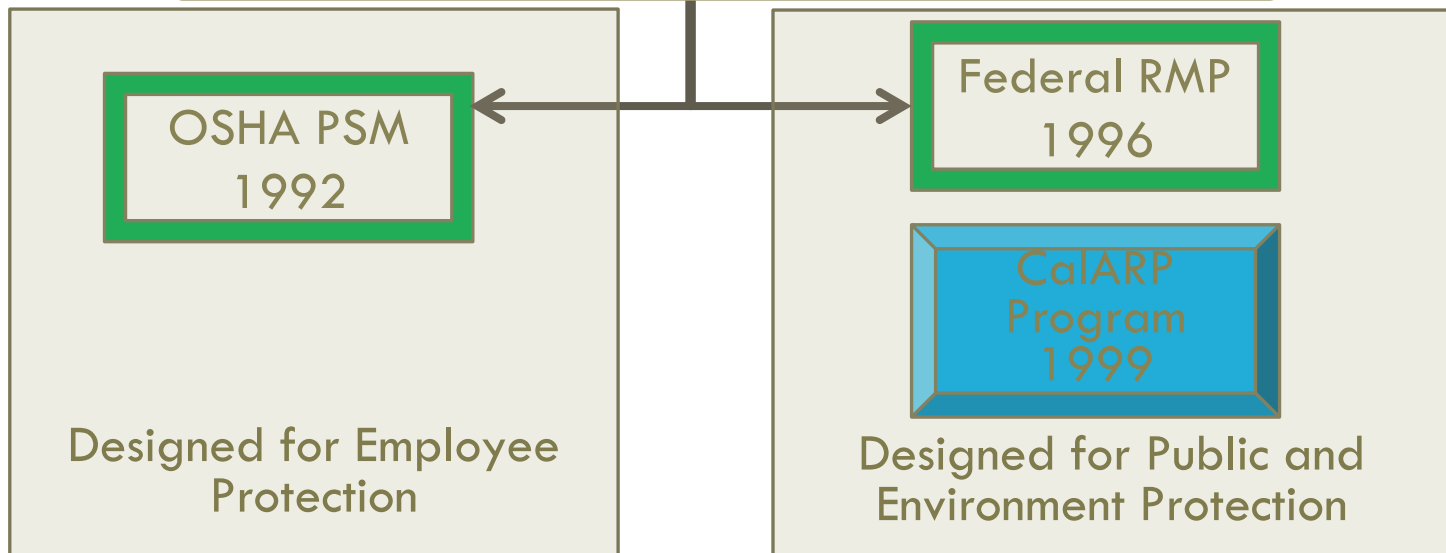


So What is CalARP?





# Facility Safety Program



- Performance Based
- Regulated Substance
- Above Threshold Quantity
- 77 vs. 276 Toxic Chemicals



## PROGRAM 3

Process Safety Information

Process Hazard Analysis

Operating Procedures

Training

Mechanical Integrity

Management of Change

Pre-Startup Safety Review

Submit of a Risk Management Plan

Compliance Audits

Incident Investigation

Employee Participation

Hot Work Permits

Contractors

Emergency Response

Off-Site Consequence Analysis



## INDUSTRIAL SAFETY ORDINANCE (ISO)

(All Program 3 Requirements)

Human Factors

Management of Organizational Change

Inherently Safer Design

Root Cause Analysis Investigations

Safeguard Protection Analysis

Safety Culture Assessment

Common Process Safety Metrics (Indicators)

Submittal of a Safety Plan

# PROGRAM 4

(All Program 3 Requirements)

Damage Mechanisms

Human Factors

Management of Organizational Change

Hierarchy of Hazard Control / Inherently Safer Design

Root Cause Analysis Investigations

Safeguard Protection Analysis

Safety Culture Assessment

Management System



# CALARP FACILITIES

Petroleum Refineries (4)

Chemical Mfg Plants (11)

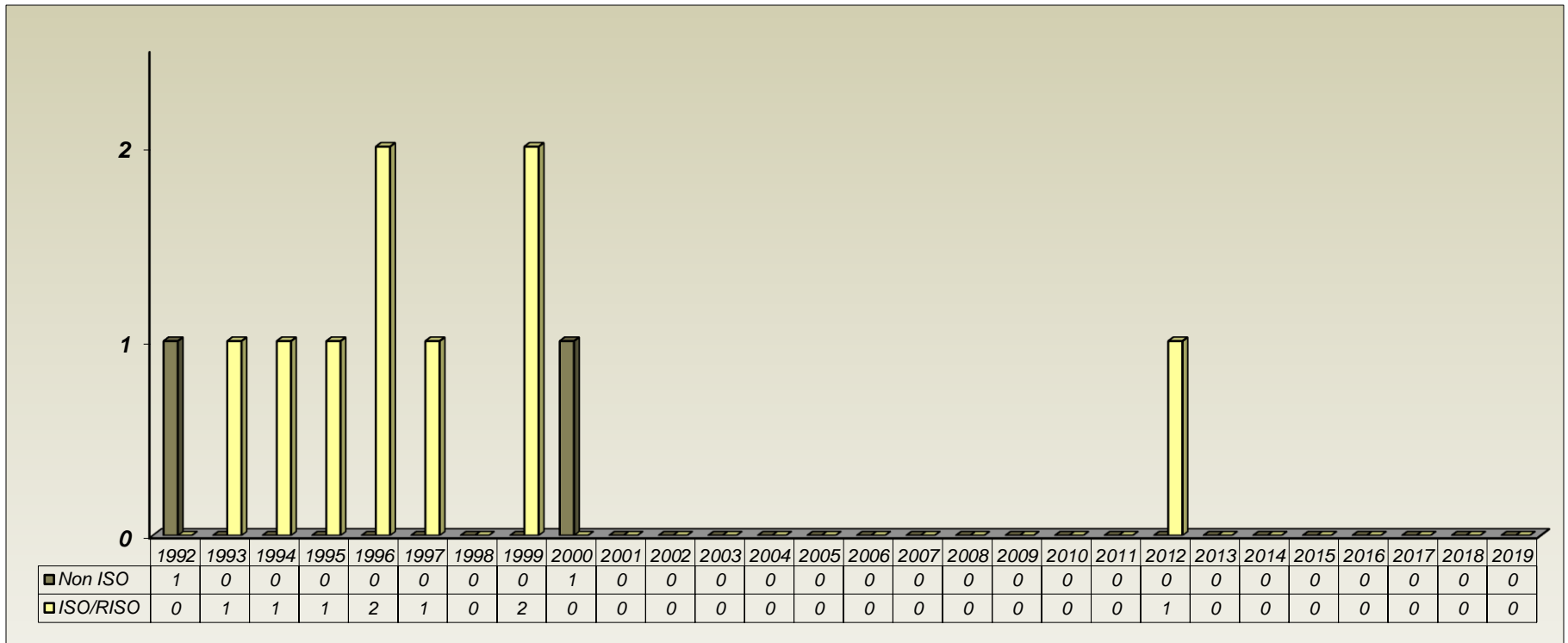
NO<sub>x</sub> Reduction Pollution  
Abatement (8)

Ammonia Refrigeration (9)

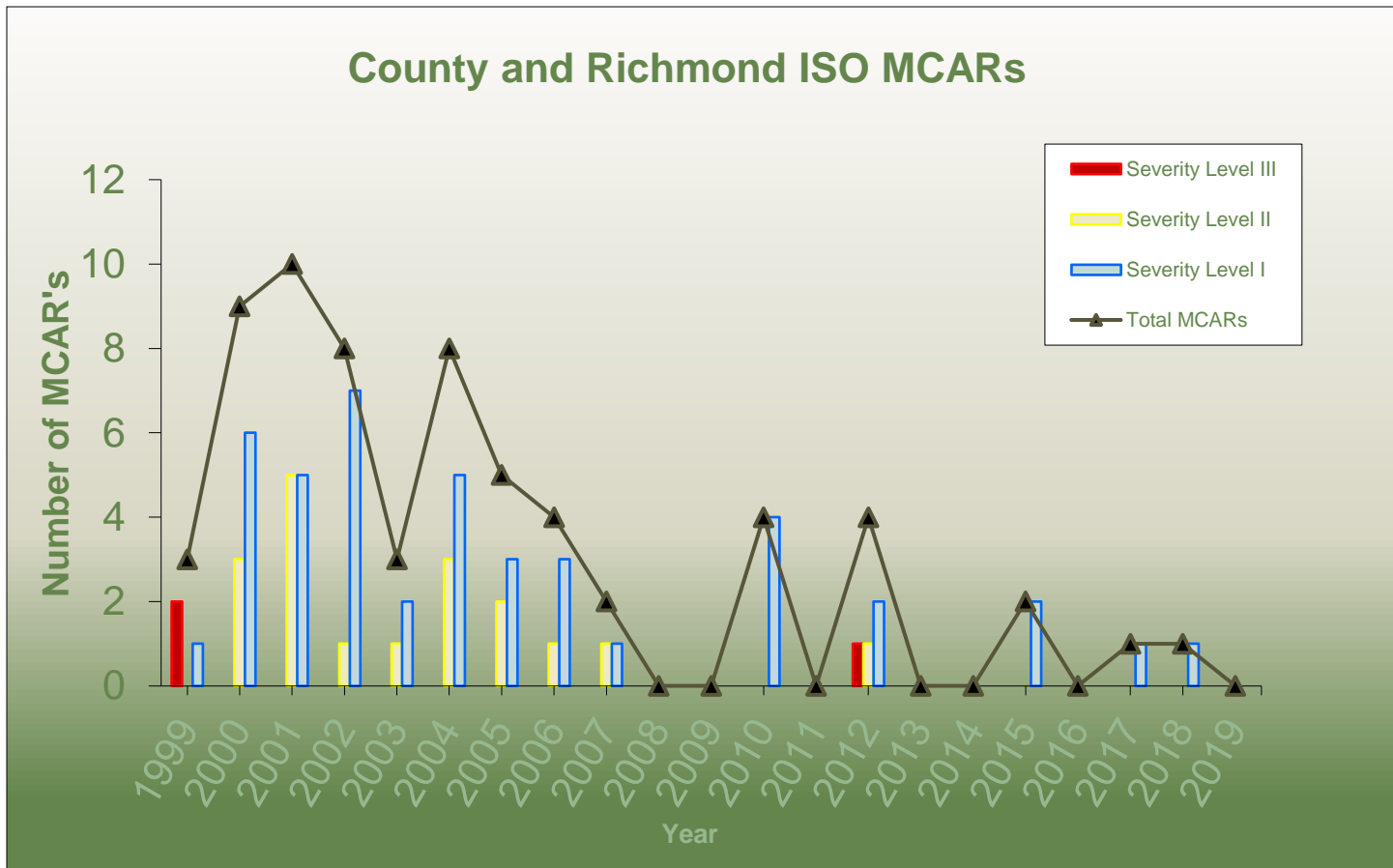
Water Treatment (9)



# MAJOR CHEMICAL ACCIDENTS OR RELEASES SEVERITY TYPE III (1990S – NOW)



# County and Richmond ISO MCARs



# Questions?

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