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ISSUE 1 | VOLUME 8 | 2016

Alameda County CUPA

2016 ANNUAL CUPA PROGRAM LETTER TO REGULATED BUSINESS

This is Alameda County Department of Environmental Health's (ACDEH) eighth annual Certified Unified Program Agency (CUPA) Program Letter. The purpose of this letter is to share information that may affect your facility in the CUPA Program.



Reminder:

ACDEH is now responsible for implementing the CUPA Programs in the City of Oakland.

Most Common CERS Reporting Errors

Since the statewide implementation of CERS four years ago, common reporting errors with submittals have been identified. Avoiding these types of errors when submitting to CERS will help increase the likelihood that your submittal will be accepted, saving you time and effort.



Facility Submittal Element: Partial submittals of only the facility information can cause errors, which results in a rejected submittal. **All** submittal elements such as the Hazardous Materials Inventory, Emergency Response and Training Plan, Tiered Permitting, Underground Tanks, etc., require that the Facility Information submittal element be submitted **at the same time**. Only when updating previously submitted facility information and there are no changes to any other submittal element would the Facility Information submittal element be submitted by itself.

Site map: Inadequate or incomplete facility maps will result in a rejected submittal. Review the Instructions/Help section on the Site Map upload screen. Note: All uploaded documents including site maps should be in a pdf (portable document format) format. This is especially true for site maps as they are intended to be used by emergency response agencies. The map elements include a North orientation, loading areas, internal roads, adjacent streets, storm and sewer true drains, access and exit points, emergency shut-offs, evacuation staging areas, hazardous materials handling and storage areas, and emergency response equipment. All items must be included on the site map in order for it to be complete. For additional CERS tips, please visit <http://cers.calepa.ca.gov/>.

Hazardous Waste Labeling Requirements

Facilities are required to label their hazardous waste as soon as the waste is accumulated in storage or when they determine it to be waste. There are a few things you need to know when generating hazardous waste at your facility. Please keep the following requirements in mind:

-Clearly label each container of hazardous waste with:

1. The words "Hazardous Waste"
2. The contents of the container
3. The name and address of the generator
4. Any hazardous properties of the waste
5. The physical state of the waste (e.g., liquid, solid)
6. The starting date of waste accumulation for the container

-Be sure to maintain proper emergency equipment in the event of a release.

-Maintain a current contingency plan.

-Provide and document training to employees in handling hazardous materials and emergency response.

-Maintain disposal and training records for at least 3 years for your inspector to review.



Single-walled Underground Storage Tanks (USTs)

The deadline for removal of all single-walled USTs is December 31, 2025. Loans and grants are available through the RUST program to assist eligible small businesses to remove single-walled USTs and to replace them with double-walled USTs. If you are eligible for RUST funding, you cannot begin working until you have a grant or loan executed by the State Water Board. Upon UST removal, if a release has occurred, owners/operators may need to undertake corrective action (i.e., investigate and clean up the release). Filing a claim application with the UST Cleanup Fund, completing corrective action, and receiving reimbursement for eligible corrective action costs is a lengthy process. The deadline for submittal of a claim application to the UST Cleanup Fund for UST Cleanup Fund, completing corrective action, and receiving reimbursement for eligible corrective action costs is a lengthy process. The deadline for submittal of a claim application to the UST

Cleanup Fund for reimbursement of eligible costs for corrective action is December 31, 2024. The UST Cleanup Fund sunsets on January 1, 2026. Do not delay. Information on eligibility requirements for reimbursement for corrective action by the UST Cleanup Fund can be found at http://www.waterboards.ca.gov/water_issues/programs/ustcf/.

Replacing, Removing, or Upgrading Underground Storage Tanks (RUST) Program

RUST grants and loans may be used to finance up to 100 percent of the costs necessary to upgrade, remove or replace project tanks, including corrective actions, to meet applicable local state, or federal standards, including, but not limited to, any design, construction, monitoring, operation, or maintenance requirements adopted to Health and Safety Code sections 25284.1, 25292.05, 25292.4, 25292.5 or 41954.



Clean Water & Waste Tire Programs

In addition to the CUPA programs, ACDEH also implements the Clean Water Program (CWP) and the Waste Tire Program (WTP). The CWP for unincorporated Alameda County includes inspection of facilities for compliance with clean water regulations, and provides outreach and education of best management practices to businesses. A new Municipal Regional Permit was granted on November 19, 2015. ACDEH now uses electronic inspection forms for CWP inspections.

Beginning July 2003, ACDEH began implementing a grant from the California Department of Resources Recycle and Recovery (CalRecycle) to survey and inspect waste tire facilities within all of Alameda County with the exception of the City of Berkeley. The Waste Tire Program applies to facilities that generate, transport, or accept waste tires. Although the waste tire facility inspection program is independent of the CUPA programs, the CUPA Inspector conducts inspections for both programs at facilities where ACDEH is the CUPA. Beginning July 1, 2016, electronic reporting will be mandated for all waste tire inspections. In order to receive your copy of the inspection report your facility must have an email address.



Training for Hazardous Materials Business Plan and Hazardous Waste Generator Facilities

ACDEH offers training courses to assist regulated businesses in complying with their hazardous materials business plan and hazardous waste generation requirements. ACDEH also offers training to Designated Operators for UST facilities. More information with specific training topics, dates, and times will be posted to our website. If you are interested in attending the training sessions or have ideas for additional training topics or areas of interest, please send an email to: dehalamedacers@acgov.org.

California Environmental Reporting System (CERS)

This marks the fourth year of CERS implementation statewide. Please log into the CERS website to submit your annual Hazardous Materials Business Plan by your submittal anniversary date or if there are any changes in facility information. More information is available on Cal EPA's website at <http://cers.calepa.ca.gov/>.



We conduct numerous facility inspections every year for compliance with laws and regulations related to hazardous materials, hazardous waste and aboveground and underground storage tanks. If there are differing opinions on the result of the findings made during the inspection and you cannot resolve the matter with your inspector to your satisfaction, we have a process for review. Our goal is to provide a fair and objective compliance program that is facility-specific without compromising the CUPA compliance requirements.

Please feel free to contact us for more information or suggestions that would improve our services for you. For more information, please contact your CUPA Inspector or CUPA Chief, Susan Hugo at 510-567-6780.

www.acgov.org/aceh

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