



# Santa Monica Fire Department CUPA NEWS



March 2012

## Mandated Annual Electronic Reporting

On September 2008, California Assembly Bill AB 2286 was signed into law by the Governor, requiring that by January 1, 2013 all businesses and agencies report program data from Unified Programs including the Hazardous Materials Emergency and Response Plan electronically. As a result, the Santa Monica CUPA program will be requiring electronic reporting effective the 2012/2013 permit reporting period. This entails a full and complete submittal for all regulated facilities by the projected 2012/2013 annual update deadline on or about September 2012. Please note that you may create your account, complete your facility information, chemical inventory, upload emergency response, underground tank information at any time, in anticipation of the pending update deadline of September 2012. We are also encouraging the regulated community to initiate this process during the second quarter of 2012 (April, May, June), as this is the time period that we can offer you personalized One-on-One CERS assistance; One-on-One assistance will be limited after June 2012 as a result of limited resources dedicated to the new permit and inspection cycle. If you have any questions regarding the upcoming electronic reporting requirements please contact: (310) 458-4971.

You may create your account and upload your information at:

<http://cers.calepa.gov>

All businesses must at a minimum include the following in their 2012/2013 Unified Program Electronic Submittal, additional requirements may apply to tank facilities and will be provided in your 2012/2013 update packet.

- Facility Information Section
- Hazardous Materials Inventory
- Facility Site Maps (upload pdf copy)
- Emergency Response/Contingency Plan (uploaded scanned copy through the documents tab or complete template available in CERS system.



**Please note some important changes that might impact communication exchange resulting from the new CERS requirements.**

- this office will continue to issue permits and send any necessary hardcopy mail to the listed environmental contact. If the individual responsible for submitting electronically differs from the listed environmental contact it will remain the responsibility of the business organization to maintain communication within it's staff regarding any program related statuses/ permit requirements.
- When you complete your initial registration, please ensure that your permission status is set as lead user, (only lead users may submit). In addition, we suggest maintaining two lead users whenever possible.
- You will need to upload a scanned copy of your facility site map, if you do not have a scanner please contact our office at (310) 458-4971. Also, please note that the Santa Monica Public Library does not have access to scanners.
- Tank Facility Owners/Operators are encouraged to verify their corresponding information.

*Welcome to the second edition of The Santa Monica Fire Department CUPA Newsletter, an annual publication, comments, ideas and suggestions are encouraged and may be forwarded to [cupasm@smgov.net](mailto:cupasm@smgov.net)*

*Please note that it is our goal to send you future publications of this newsletter via email, in an effort to contribute towards City of Santa Monica sustainability efforts. You may assist us by registering you business through CERS.*

### PC Access at the Santa Monica Library

If you do not have personal computer access to meet the electronic reporting requirements for the CUPA program, you may visit one of the public computer work stations available at the Santa Monica Public Library. The SM Library current hours of operation are as follows:

Mon-Thurs 10am-9pm,  
Friday 10am-5:30pm,  
Saturday 10am-5:30pm  
and Sunday 1pm-5pm.

For additional library information please contact (310) 458-8600.



## Helpful Things to Know

### Underground Tank Inspections

Santa Monica CUPA will conduct annual monitoring certifications and annual UST system inspections between the May 1 and August 31, 2012. In an effort to streamline the scheduling of these inspections, this office will be designating a specific inspection month ( May, June, July, August) to each tank facility. This office will be coordinating inspections via email.

### Aboveground Tank Update

All tank facilities with storage capacities of 1,320 of petroleum based liquid became subject APSA requirements on November 10, 2011. If you have not filed your tank facility statement with this office or prepared your Spill Prevention and Countermeasure Plan (SPCC) please contact our office at [cupasm@smgov.net](mailto:cupasm@smgov.net) for further assistance. You may log onto: <http://www.calcupa.net/programs/abovegroundstorage> tanks for complete program information.

### CUPA Permit Posting

The Santa Monica Fire Department and Los Angeles County Health Haz-Mat Division require that all CUPA program businesses post their current permits in a visible location. If you've lost or misplaced your current permit please contact our office to obtain copy at [cupa@smgov.net](mailto:cupa@smgov.net)

## Conditionally Exempt Small Quantity Generator Program (CESQG)



### Hazardous Waste For Businesses

#### **What is the Conditionally Exempt Small Quantity Generator Collection Program?**

State and Federal laws require all businesses that generate or accumulate hazardous waste to comply with regulations for proper disposal of these wastes. Generators of small quantities of hazardous waste may be conditionally exempt from many of the regulations if they deliver the waste to a permitted collection site. Qualified Santa Monica businesses may utilize the County of Los Angeles Conditionally Exempt Small Quantity Generator Program as legal and affordable alternative to hazardous waste disposal.

#### **Who can qualify for the Program?**

Your business must be located within the County of Los Angeles and generate less than 220 pounds or 27 gallons of hazardous waste (e.g. paints, solvents, aerosol cans, photographic chemicals, automotive fluids) per month.

These guidelines are set out in the Code of Federal Regulations 40 CFR 261.5 and the California Code of Regulations Title 22, Section 66260.10.

#### **Why should you use the Program?**

- Competitive pricing as compared with private hazardous waste transporters.
- Exemption from hazardous waste manifest filing and document fees. The City of Los Angeles will generally assume generator status of the waste collected.
- Reduction in State and Federal taxes on hazardous waste disposal.

#### **How do you participate?**

**Participation is by appointment only.** For more information of to register for the program, please call the City of Los Angeles at (213) 485-2260 or 1-800-98-TOXIC (800-988-6942). A disposal fee will be charged base upon the type and amount of waste. Santa Monica adjacent drop off locations include the UCLA Safe Center located at 2649 Washington Blvd. (2nd Wednesday of the month), and Hyperion Bay Treatment Plant (3rd Wednesday of the month) located at: 7660 West Imperial Highway, Gate B, Playa Del Rey, CA 90293 (3rd Wednesday of the month). Please note that these services are only offered on the days indicated.

#### **What information should I have when I call?**

A clear and complete description of your hazardous waste is necessary to determine whether the waste can be accepted by the program. You will have to provide the following information:

- Name, address and phone number of your company or organization.
- EPA I.D. Number (required)
- Estimate how much waste you generated per month and per year.
- Chemical or trade name of waste (e.g. MSDS)
- Size, type an number of containers.

In order to participate in this program, your company or organization must have an **EPA I.D.** number. This number is issued by the State of California Department of Toxic Substances Control (DTSC). If you do not have an EPA I.D. number you may obtain one by calling DTSC at 1-800-618-6942. or logging on to the following website: [www.dtsc.ca.gov/idmanifest/index.cfm](http://www.dtsc.ca.gov/idmanifest/index.cfm).

# Administrative Enforcement Orders (AEO)s



The goal of the Santa Monica CUPA program is for all businesses regulated under it's jurisdiction to achieve compliance without the use of progressive enforcement or related monetary penalties. Unfortunately, in instances when compliance

cannot be reached through inspections, subsequent request for violation correction or local administrative citations, Santa Monica CUPA is obligated to pursue compliance through the use of Administrative Enforcement Orders (AEO's).

The goal of an AEO is not only to return a facility to compliance in a timely manner but also to eliminate the economic

benefit resulting from non-compliance, provide for site personel /first responder safety, environmental protection and create a deterrent against future non-compliance.

Health and Safety Code Sections 25187, 25404.1, 22502 (a) and 25514.5 authorizes

CUPA's to enforce program related violations under the Health and Safety Code and California Code of Regulations through the use AEO's. AEO's carry substantial penalty amounts for each program element/per violation (see insert) in the CUPA program. The total penalty amount may also be adjusted to a higher basis, based on the number of days each violation occurred or per tank (if tank facility). In addition to penalties, cost recovery amounts may be included to the final penalty calculation. Lastly, once finalized, AEO's may also be subject to a press release.

Program Element	Maximum	Minimum
Hazardous Waste (H&S 25189)	\$25,000	\$1,000
Hazardous Materials (H&S 25514)	\$5,000	\$590
Underground Tank Program (H&S 25299)	\$5,000	\$500
Above Ground Tank Program (H&S 25404.1.1)	\$5,000	\$590
Cal-Arp Program (H&S 25540)	\$25,000	\$3,950

During fiscal year 2011/2012, Santa Monica CUPA issued four Administrative Enforcement Orders to facilities with long standing violations . We encourage CUPA regulated

facilities to carefully review their inspection reports/conduct internal inspections and address all outstanding violations identified by their inspectors. If you any questions regarding how to reach/maintain compliance, please contact your respective CUPA inspector.

## Common Underground Storage Tank (UST) Violations

Shorten inspection time & improve compliance with UST regulations

<p><b>Monthly Visual Inspections Checklist Form</b></p> <p>While the City has no objection to using checklists specific to your facility; it must at a minimum contain all elements found on the State approved form dated November, 2004. Any alternative checklist formats must be approved by the CUPA office.</p>	<p><b>Manway Covers</b></p> <p>Manway Covers associated with tank systems must maintain an appropriate seal. When necessary, drill out and replace bolts for covers to maintain proper seal.</p>	<p><b>Repair/Modification Approvals</b></p> <p>All repairs/modifications made to the tank system outside of the monitoring certifications may be subject to additional permitting by this office. You are required to obtain authorization prior to proceeding with repair activity.</p>	<p><b>Recording Alarm Conditions</b></p> <p>Per Health and Safety Code Section 25293, tank storage facilities must record all alarm conditions and also record the corrective actions taken to correct the alarm condition. At a minimum, all liquid sensor alarms, actions that affect alarm history and</p> <ul style="list-style-type: none"> <li>▶ corrective actions taken shall be included in the alarm log.</li> <li>▶ Documentation detailing work taken to clear alarm condition shall be included.</li> </ul>
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**Important Telephone Numbers**  
**Hazardous Materials Emergency-911**

CITY OF SANTA MONICA FIRE/ CUPA TELPHONE NUMBERS

Eric Binder-CUPA Program Manager, Assistant Fire Marshal.....310-434-2666  
Monica Hanley-Underground Tanks, Environmental Compliance Specialist.....310-458-8227  
Oscar Fernandez-CUPA Admin, CERS, Permit Processing, Environmental Analyst.....310-458-4971  
Water Resources Business Office- CUPA Payments.....310-458-8224  
Santa Monica Fire Prevention.....310-458-8915

LOS ANGELES COUNTY FIRE DEPARTMENT

Hazardous Waste Program, West County Region.....310-348-1792

SANTA MONICA FIRE CUPA/ CERS Website

CUPA- General E-mail Box.....cupasm@smgov.net  
CERS-Website .....http://cers.calepa.gov

California Emergency Management Agency

Region 1.....310-729-8322  
Reporting Hazardous Materials Release:  
Business Hours.....916-845-8911  
After Hours.....800-852-7550

California Environmental Protection Agency

Department of Toxic Substances Control  
Region 3, Glendale.....818-551-2800  
  
Regional Water Quality Control Board  
Region 4, Los Angeles.....323-266-7500

Southern California Air Quality Management  
District, Diamond Bar.....909-396-2000

**Santa Monica Fire Dept.**  
**Certified Unified Program Agency (CUPA)**  
**333 Olympic Drive, 2nd Floor**  
**Santa Monica, CA 90401**