COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH (DEH)
HAZARDOUS MATERIALS DIVISION (HMD)

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CHIEF'S NOTES

By Michael Dorsey, HMD Chief

For the past several years, in order to measure the efficacy of the CUPAs, the USEPA and CalEPA have been looking closely at numbers, such as the number of inspections conducted, the number of enforcement actions initiated in a year, and the penalty dollars collected by such actions. Traditionally, that has been the only way used by environmental regulatory agencies to measure program effectiveness. A decline in these numbers has sometimes made CUPAs the target of criticism by the legislature, non-governmental organizations and oversight regulatory agencies. Under certain circumstances, this criticism may be valid. However, does counting only inspection and enforcement activities provide an accurate reflection of a CUPA's program effectiveness?

Along with supervisors and chiefs from all other DEH Divisions, in May of 2002, my Supervisors and I attended one of the "Performance Measurement" training sessions provided by Dr. Shelly Metzenbaum, Director of the Performance Management Project at the Kennedy School of Government. Dr. Metzenbaum is also a visiting Professor at the University of Maryland School of Public Affairs, where she runs the Environmental Compliance Consortium. In addition, she has served as an Associate Administrator for the USEPA and has published several papers on performance measurement. Needless to say Dr. Metzenbaum is very familiar with how regulatory agencies traditionally measure performance. This training made all participants aware of a key element in performance measurement: Outcome-focused performance goals are more likely to provide the desired results than measurements based on output, activities or inputs. I don't want to imply that measuring the number of inspections and enforcements is not important. However, accurately measuring the performance of an agency needs to be done by combining those numbers with outcome-focused performance.

Due to the increased regulatory activities involving underground storage tanks (UST), the HMD has decided to evaluate an outcome-focused performance measure related to UST compliance. Over the last two decades a significant body of data has been collected and can be used to demonstrate the impact that local regulatory oversight has on reducing the risk to the environment from UST releases.

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HMD FEATURED EMPLOYEE

Nick Vent

Nick Vent is the new Supervising Environmental Health Specialist for the Emergency Response Team of the Hazardous Materials Division (HMD). He oversees the intake and investigation of non-business related complaints handled by HMD staff, the Border Inspection and Education Program and is actively involved in creating a formal process for communication and hazardous materials disclosure between the counties of Tijuana and San Diego.

Nick is one of those rare individuals, a native Californian that grew up in San Diego and completed his education in his hometown. Obtaining a Bachelor's Degree in Occupational Health and Safety got Nick started in the Hazmat field and pretty soon it became his passion. Starting as an analytical chemist in 1974 for a chemical lab in Chula Vista, Nick quickly mastered his job and went on to become the lab manager.

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Nick Vent

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Working in the environmental field gave Nick a taste for how exciting working with hazardous materials could be and gave him a need for adrenaline that test tubes did not satisfy. So, in 1984, he traded in his test tubes for tanker truckloads of hazardous waste when he went to work for a waterfront company that built and operated one of San Diego's first Treatment, Storage and Disposal Facilities. In 1986, when he joined the County of San Diego's newly formed Hazardous Incident Response Team (HIRT), he was one of only a few individuals to move from the private sector into the public sector of environmental health. Working alongside with Mike Handman, the previous HIRT Supervisor, Nick helped shape the HIRT team into one of the most successful emergency response teams in the nation.
Although responding to hazardous materials incidents ranging from anthrax calls to terrorism would be enough for some people, Nick is also involved in many other activities that ensure the smooth operation of a high paced and unique response group. Nick is responsible for ensuring that his team is always up to date in the rigorous training that is required of the HIRT Specialists. As a matter of fact, all the Specialists now working for the HMD-HIRT Team learned their field techniques by riding along with Nick. As the Supervisor to the Border Specialist, Nick collaborates in all training that is offered in the border region and while doing so establishes new partnerships with emergency response officials on both sides of the border. In-house Health and Safety training for all HMD field Specialists is another one of Nick's responsibilities.

Only three years short of his 20th anniversary with the County, Nick is still excited about emergency response, as many of the field Specialists can attest to when there is an emergency and they receive a call from Nick inviting them to assist at one of the businesses they inspect. That call is an invitation to see first hand how the professionals handle hazardous materials emergencies.
In addition to managing a group of seven Specialists at work, Nick has four teenagers at home to contend with, and is looking forward to a couple of them going off to college this coming fall. He admits that the peace and quiet may take some time getting used to, but he will manage by doing some vacation traveling and fishing.

In his spare time Nick enjoys training the new wave of emergency responders. He teaches Emergency Response across the country, trying hard to stay within California as much as possible. (Yes, he finds teaching enjoyable and relaxing!).

Medical Waste vs. Biohazardous Waste

By Clarissa Hart,
Environmental Health Specialist II

What is the difference between medical waste and biohazardous waste? How does it affect handling and disposal?
For years, many companies have handled medical waste and biohazardous waste as the same thing. Prior to changes made effective on January 12, 2001, to Title 6 SDCC, Division 8, Chapter 12 of the San Diego County Code of Regulatory Ordinances (SDCC), medical and biohazardous waste definitions were very similar. Changes to the SDCC removed the definitions of biohazardous waste and medical waste, and adopted the definitions in the Medical Waste Management Act (MWMA), where there is a clear difference between biohazardous waste and medical waste. The MWMA is found in the California Health and Safety Code (HSC), Division 104, Part 14, starting with § 117600.

Biohazardous Waste (BW) HSC §117635)

(a) Laboratory waste, such as:
1. Human or animal specimen cultures from medical and pathology labs.
2. Cultures and stocks of infectious agents from research and industrial labs.
3. Wastes from the production of bacteria, viruses, spores, discarded live and attenuated vaccines, discarded animal vaccines, and culture dishes and devices used to transfer, inoculate, and mix cultures.

(b) Human surgery specimens or tissues and animal parts, tissues, fluids, or carcasses which are suspected of being contaminated with infectious agents known to be contagious to humans.
(c) Waste which contains recognizable fluid blood, fluid blood products, or blood from animals known to be infected with diseases which are highly communicable to humans.
(d) Waste containing discarded materials contaminated with secretions from humans or animals that are required to be isolated to protect others from highly communicable diseases.
(e) Waste that is hazardous only because it is comprised of human surgery specimens or tissues which have been fixed in formaldehyde or other fixatives.
(f) Waste that is hazardous because it is contaminated through contact with, or having previously contained, chemotherapeutic agents.
(g) Waste that is hazardous only because it is comprised of pharmaceuticals (HSC §117747).

Medical Waste (MW, HSC §117690)
Medical waste is waste that meets both of the following requirements:
The waste is generated or produced as a result of any of the following actions:

(a) Diagnosis, treatment, or immunization of human beings or animals and research pertaining to the diagnosis, treatment, or immunization of human beings or animals.
(b) The production or testing of biologicals (medicinal preparations made from living organisms and their products,

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Medical waste vs.

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including, but not limited to, serums, vaccines, antigens, and antitoxins).

(c) The accumulation of home-generated sharps waste brought to a point of consolidation.

(d) Removal of a regulated waste by a trauma scene waste management practitioner.

And the waste is either:

(a) Biohazardous waste.

(b) Sharps waste.

Therefore, for a waste to be **medical waste** it must be either sharps waste (SW) or biohazardous waste (BW) AND be generated by one of the actions listed in the definition of medical waste.

Example #1: A facility samples the air in a clean manufacturing room and cultures the bacteria collected in the sample. The culture meets the BW definition of laboratory waste, but was not generated by one of the actions described in the MW definition. Although the facility generated BW they did not generate MW.

Example #2: A facility uses non-infectious bacteria to replicate proteins. The bacterial culture is purified to collect the proteins. The culture is a BW under the laboratory waste section, but since it was not generated as result of one of the actions described in the MW definition, it is not MW.

To better understand this, here are some **specific exemptions** from the definition of MW under the MWMA.

What is Not Medical Waste (§117700)

(a) Waste generated in food processing or biotechnology that does not contain an infectious agent.

(b) Waste generated in biotechnology that does not contain human blood or blood products or animal blood or blood products suspected of being contaminated with infectious agents known to be communicable to humans.

(c) Urine, feces, saliva, sputum, and other body fluids, unless they contain fluid blood.

(d) Waste which is not biohazardous, such as articles containing non-fluid blood and other medical solid waste products commonly found in the facilities of medical waste generators.

(e) Hazardous waste, radioactive waste, or household waste.

(f) Waste generated from normal and legal veterinarian, agricultural, and animal livestock management practices on a farm or ranch.

So, once you have determined if your waste is MW or just BW, what do you do with it?

If the waste is BW, but not MW, the waste is considered medical solid waste (MSW) in San Diego County. The SDCC still defines MSW (§68.1207) as including, but not being limited to, waste such as empty specimen containers, and bandages containing non-liquid blood, surgical gloves, and decontaminated biohazardous waste. Waste, which is biohazardous, but not medical waste, is considered MSW. It doesn't need to be placed into a red bag or be autoclaved. It must be disposed of in a manner that denies access to unauthorized persons, such as to a locked or secured dumpster.

While autoclaving BHW is not required under the MWMA, it is a generally accepted laboratory practice to autoclave BHW in clear autoclave bags prior to disposal. If the waste is MW, then the full requirements of the MWMA apply. Storage and handling of MW depends on the type and amount of medical waste generated. For more information, please see the full text of the MWMA or contact your area Specialist.

Additional resources:

- Hazardous Materials Duty Desk: (619) 338-2231. M-F, 8:00 am to 5:00 pm
- DHS (for the full text of the MWMA) http://www.dhs.ca.gov/ps/ddwem/environmental/med_waste/medwasteindex.htm
- Hazardous Materials Division http://www.sdcounty.ca.gov/deh/hmd/index.html.
- SDCC http://www.amlegal.com/sandiego_coun

Do I have to have my medical waste picked up every week?

By Michael J. Vizzier, Supervising EHS

Only if you generate 20 pounds or more of biohazardous waste (red bag) per month and store it at room temperature. When calculating the amount of biohazardous waste you generate, remember that medical waste is divided into two major categories: sharps waste and biohazardous waste. The seven-day storage limit is based on the amount of biohazardous waste generated per month, not on the total amount of medical waste generated. Most of the medical waste generated by medical and dental offices in San Diego County is sharps waste, not biohazardous waste. So a 30-day waste removal interval is adequate for many offices. The law requires, however, that you dispose of sharps containers ready for disposal within 7-days.

Does this mean that I still have to have a weekly medical waste pick up?

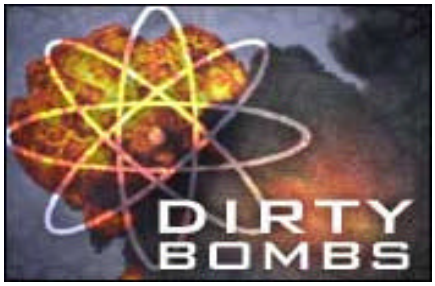
You are correct, if you have sharps containers that are ready for disposal every seven days. However, in most cases you can control when sharps containers are "ready for disposal" by rotating them from areas of high use to low use rooms.

This pollution prevention procedure reduces the number of sharps containers going to the landfill, the number of times that your medical waste hauler must drive to your office, and the number of sharps containers that you have to purchase. Accumulating sharps containers ready for disposal over seven days is a violation of the law, but rotating sharps containers to reduce waste is a good environmental management practice.

Dirty Bomb Facts & Fiction

By Ron Yonemitzu
Senior Health Physicist

WHAT IT IS



The term "Dirty Bomb" is the name given to a Radiological Dispersion Device (RDD). A dirty bomb combines a conventional explosive, such as dynamite, with radioactive materials most likely in the form of powder or pellets. The purpose of a dirty bomb is to spread radioactive material among the general public in order to cause fear and panic and possibly, making land or property unusable for a long period of time.

WHAT IT'S NOT

A dirty bomb is NOT a nuclear weapon. The atomic explosions that occurred in Hiroshima and Nagasaki were conventional nuclear weapons involving a fission reaction. A dirty bomb employs conventional explosives to disperse radioactive material and will not result in a devastating blast like those seen in Japan.

WHAT ARE THE DANGERS?

The main danger of a dirty bomb is the physical damage caused by the conventional explosive. Medical effects from radioactive exposure are known to occur only when a whole body radiation dose exceeds 350 milliSieverts (mSv). The State's limit radiation dose for a member of the public is 1 mSv per year. So, for physical effects to be observed, an individual would have to remain continuously in an area for 100 hours with 1000 Curies of radioactive material spread out over an area with a radius of 100 meters. A whole body exposure of 100 mSv of radiation exposure has been calculated to increase one's risk of fatal cancer from about 20% (the current level from all causes) to about 20.5% (an increase of 0.5%).

WHAT IS BEING DONE TO PREVENT RADIOACTIVE MATERIALS FROM GETTING INTO THE WRONG HANDS?

The Nuclear Regulatory Commission and State of California regulations require users to secure radioactive material from theft and unauthorized access. Since 9/11, agencies have ensured that radioactive material users are aware of their responsibilities under the regulations and that their controls have been reviewed.

Regulations also require users to report any thefts or loss of radioactive materials. The Federal and State agencies acknowledge that there is no evidence that a terrorist group has been collecting radioactive material for a dirty bomb.

WHAT SHOULD YOU DO IF A DEVICE EXPLODES AND A DIRTY BOMB IS SUSPECTED?

- Remain calm.
- Authorities will announce if radioactive materials were involved in the incident.
- Leave the area on foot.
- Go inside a building. This will reduce the exposure to radioactive dust in the outside air.
- Remove/change your clothes as soon as possible.
- Take a shower and/or wash any exposed skin. This will remove radioactive dust that may have settled on body parts.
- If radioactive materials were involved, the County will set up a Decontamination and Reception Center outside the affected area. Anyone who may have been exposed can be tested .

The information in this article was compiled from the NRC and CDC websites.

California Accidental Release Program (CalARP)

By Brad Long
Environmental Health Specialist III

In the early 1990's both the State of California and the federal government passed laws aimed to prevent the release of acutely hazardous materials (regulated substances) and to mitigate the consequences if a release were to occur. In California these regulations are known as the California Accidental Release Prevention Program (CalARP). If a facility (stationary source) is subject to the CalARP the owner/operator is required to prepare a Risk Management Plan (RMP). The RMP is then summarized in a RMP Public Document that is submitted to the Hazardous Materials Division for review.

The RMP Public Document reflects the effort by a facility in the management and prevention of risks associated with the storage, use, or process of a regulated substance. The complexity of the RMP is based on the program level for the stationary source. ***Program 1*** requirements apply to processes for which a worst-case release, "as evaluated in hazard assessment" would not affect the public. ***Program 2*** requirements apply to processes for which a worst-case release would have an offsite impact, and are generally less complex operations that do not involve chemical processing or OSHA's PSM Standard. ***Program* 3** requirements apply to higher risk processes for which a worst case release would have an offsite impact, involve complex chemical processing operations, or are subject to OSHA Process Safety Management.

In San Diego County there are approximately 34 facilities subject to both the

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CalARP

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Federal RMP and CalARP requirements, and 37 facilities subject to CalARP only. A primary objective of the RMP is to encourage facility owners and operators to take preventive and preemptive action to prevent the release of regulated substances. This has proven to be a good incentive. Since July 1999 approximately 27 facilities have either reduced the quantity or concentration of a regulated substance onsite to below the TQ, or eliminated the regulated substance by switching to a less hazardous substance.

Legal requirements for the RMP can be found in both State and Federal Laws and Regulations. The U.S. Environmental Protection Agency (EPA) administers the federal Accidental Release Prevention Requirements, Risk Management Program, commonly referred to as "Fed-RMP". Requirements for the Fed RMP can be found in 40 Code of Federal Regulations (CFR) Part 68, Sections 112 (r) of the Clean Air Act (CAA). The USEPA website is an excellent source of information at *http://yosemite.epa.gov/oswer/ceppoweb.nsf*

In California the Governor's Office of Emergency Services (OES) administers the Cal-ARP Program. Requirements for CalARP can be found in Article 2, Chapter 6.95 of the California Health & Safety Code (HSC), and in Title 19, Division 2, Chapter 4.5 of the California Code of Regulations (19 CCR). For additional information about the CalARP visit the state's website at: www.oes.ca.gov

Here in San Diego County the Hazardous Materials Division (HMD) is the Certified Unified Program Agency (CUPA) Administrative Agency (AA) responsible for implementation of the CalARP.

Frequently Asked Questions:

Who Must Comply?

Any stationary source that has more than a threshold quantity (TQ) of a regulated substance in a process is required to develop and submit a Risk Management Plan (RMP). Simply said these are facilities that handle enough of a specific hazardous material, that if an accidental release were to happen there is a chance of an impact offsite.

The terms stationary source, threshold quantity, regulated substance, and process are defined in Section 2735.3 of 19CCR. Most facilities fall under the terms "stationary source", and "process", the important question is do they have a "regulated substance" above a "threshold quantity"? Examples of regulated substances include chlorine gas, ammonia gas, other toxic gases, or liquids that emit toxic fumes.

How do I know if I am subject to the RMP requirements?

The threshold determination process is defined in section 2770.2 CCR. To assist in this determination process the HMD has developed two handouts: "CalARP Screening Guidelines", and "Regulated Substances -How to Determine Threshold Quantities". An important first step is to review your facility's Hazardous Material Inventory-Chemical Description Forms. Look at the Extremely Hazardous Substance box (#206). If required to be checked "yes" this material may be a regulated substance and should be reviewed for applicability to the Cal-ARP program. This step is not a catchall but rather good start.

If an owner/operator determines that their facility has a regulated substance above the TQ, an RMP will be required. However if the owner or operator can eliminate the regulated substance or reduce its quantity or concentration below the TQ, then an RMP would not be required. The owner or operator would be required to submit a disclaimer to the HMD indicating that they no longer handle the regulated substance or have reduced the quantity or concentration below the TQ.

Who do I submit the RMP to?

If a facility is required to develop an RMP, submission of an RMP Public Document may be to the HMD only (if subject only to the CalARP). If the facility is subject to Federal RMP requirements the document must be submitted to both, the HMD and USEPA.

When do I have to submit?

For any facility with a **new** or **modified** process an RMP Public Document must be submitted prior to the regulated substance being brought onsite. For facilities with an **existing** process subject to the Federal RMP the deadline for submission was June 21, 1999. For facilities with an **existing** process subject to the CalARP the deadline for submission of an RMP is one to three years after the HMD has notified the stationary source.

What type of facilities has the HMD notified that an RMP is required?

In December of 2000 multiple requests for RMPs went out to facilities with **existing** processes that handle toxic gases. Since June of 1999 several facilities with **new** or **modified** processes were built requiring the submission of an RMP prior to the regulated substance being brought onsite. Most of these new facilities used aqueous ammonia (~19.5 % concentration). The methodology used by the HMD to identify existing facilities that have regulated substances has given priority to those regulated substances that are more toxic, or more likely to have an offsite impact if an accidental release were to occur.

Are There Any New Requirements Pending?

Currently there are no significant regulatory or legislative changes proposed for either the state or federal programs. However there are numerous pieces of legislation proposed to improve homeland security. These could indirectly affect some aspects of Federal RMP or CalARP.

For additional information about the CalARP program in San Diego County contact the CalARP coordinator at 619-338-2453, or visit the HMD website at http://www.sdcounty.ca.gov/deh/hmd/

The HMD's Border and Outreach Program

Reaching Out and Sharing Knowledge and Experience

By Aura Quecan,
Environmental Health Specialist II

Since 1992, the Department of Environmental Health (DEH) of the County of San Diego has worked closely with the Department of Toxic Substances Control (DTSC) to develop and implement working plans to carry on the goals of the La Paz Agreement. This has lead to multi-agency coordination in issues related to hazardous and solid waste, pollution prevention, and enforcement.

Coordinating efforts, the California Environmental Protection Agency (CalEPA), the DTSC and the Hazardous Materials Division (HMD) of the DEH created a pilot program in 1992 to address the growing concern that some hazardous wastes generated in the United States were being smuggled into Mexico for illegal disposal. This program started small and has evolved over the years to become a leader for other border programs in activities such as inspections, enforcement and outreach.

The HMD's Border Inspection and Education Program has two main goals. The first one is the detection of illegal hazardous waste disposal activities along the border region. Illegal activities can range from the transportation of hazardous wastes into Mexico for illegal disposal to erroneous classification of wastes brought from Mexico into the United States followed by illegal disposal in sanitary landfill. To prevent these occurrences, the HMD inspects transporters going to Mexico and transporters coming from Mexico. When illegal transportation or disposal activities are detected through these inspections, enforcement is conducted in coordination with the DTSC and other regulatory agencies. The second goal of the program is to conduct outreach for the binational border region.

The outreach activities are focused on the development of training and educational materials, the presentation of workshops, and the participation in meetings with the public and private sectors to address environmental concerns in the border region.

The HMD, in coordination with the DTSC, has worked in the development of educational programs that can be used in the border region. Existing training programs that have proven successful in the United States have been customized and are offered to the private and public sector on both sides of the United States-Mexico border. To maximize the number of people that can benefit from these training sessions, the educational materials and classes are offered in Spanish and English.

In the past eleven years, the HMD has provided trainings on numerous topics, as needs were identified. Training has included: hazardous waste hauler requirements, basic hazardous materials recognition, basic emergency chemical spill response procedures, import and export requirements, health risks for specific hazardous materials, and detection of illegal hazardous materials/waste loads.

During the fiscal year 2000-2001, the HMD offered three different workshops in the border region. One of the workshops, offered in two locations, was tailored to the needs of customs brokers and warehouses in the Otay Mesa Area and provided information about Hazardous Materials Disclosure Requirements. The second workshop covered U.S. import/export requirements for maquiladoras and Mexican industries. The third workshop in environmental sampling provided theory of sampling and hands-on training.

To meet the requests of participants in the workshops provided during the fiscal year 2000-2001, the training topics offered during the fiscal 2001-2002 included pollution prevention practices in the metal finishing businesses, universal waste and cathodic ray tube management requirements, import/export requirements, as well as awareness in hazardous emergency response. Training sessions were offered in the major Mexican cities bordering the Counties of Imperial and San Diego: Tijuana, Tecate, Mexicali and Ensenada.

In response to the September 11 terrorist attacks, and upon request from Baja California officials, the focus of the training activities was changed for the current fiscal year. Training conducted this year was focused on: operational level training for hazardous materials emergency response and personal protective equipment. These training sessions were presented in Baja California, in the cities of Ensenada, Tijuana, and Mexicali with great participation of Mexican First Responders. A total of 157 First Responders from different public agencies benefited from this training. Agencies represented were the local fire departments, the Red Cross, rescue teams, water treatment plants, police, and faculty from the Baja California University.

The teaching methodology used during these trainings varied with the subject matter presented. The sessions combined lectures and audiovisual elements with practical hands-on training, encouraging the exchange of field experience between participants and trainers.

Training sessions have been highly successful and attendees have great interest in bringing future workshops to their cities. Along with continuous education on topics already presented, there is a demand for training in other current topics such as bio-terrorism, weapons of mass destruction, illegal methamphetamine laboratories, decontamination of ambulatory and non-ambulatory patients, and emergency response to hazardous incidents at the technical level.

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New Requirement for testing UST "Spill Buckets" -How do I comply?

By Amanda Seigel,
Environmental Health Specialist II

By now most UST owners and operators have heard of Assembly Bill (AB) 2481, which became effective January 1, 2003.

One of the many changes included in AB 2481 was the addition of Health & Safety Code Section 25284.2, which requires annual testing of UST's spill containment, commonly known as spill buckets. AB 2481 does not require testing of the containment around a vapor riser.

With the testing deadline quickly approaching, here are two methods that can be used to test spill containment that is either surrounded by a sump or directly buried (no sump).

Method #1:

- Test must be conducted by a trained technician.
- Water must be placed approximately 1 inch below the top of the riser and visually monitor for a period of not less than 60 minutes.
- No observable leak or loss of water would indicate a passing test.

Method #2:

- Test must be performed by a technician trained in the use of the testing equipment in accordance with manufacturer's requirements.
- Water must be placed approximately 1 inch below the top of the fill riser in spill containment.
- Test must include two 15-minute hydrostatic tests using an approved measuring device.
- No measurable loss indicates a passing test.

Other testing options may be submitted to the HMD for review.

When testing is completed, liquid must be removed from spill containment and properly managed. Waste may be tested to determine if hazardous (and managed according to results), or managed as hazardous waste.

To report Spill Containment Testing use HMD's form HM-9169. The form can be found at www.sdcounty.ca.gov/deh/hmd/forms. Fill out page 1 and attach section 9 with spill containment test results. Submit results within 30 days of testing to the Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261, Attention: Spill Containment Testing.

If spill containment fails, it will need to be replaced, unless the failure is a result of a loose connection, a faulty drain valve or any other component that is replaceable. Spill containment must be replaced and retested as soon as possible, but no longer than 15 days from original test date.

For specific questions about spill containment testing please contact the UST Group Supervisor, Sylvia Mosse, at (619) 338-2309.

The deadline for hazardous waste generators subject to SB 14 is fast approaching!! September 1st of 2003

Businesses that generated more than 12,000 kg hazardous waste or more than 12 kg extremely hazardous waste in 2002 must prepare a Source Reduction Evaluation Review and Plan, a Hazardous Waste Management Performance, and a Summary Progress Report (SPR) by 09/01/03. All three documents must be maintained on site. Only the SPR must be submitted to DTSC by 09/01/03. For more information and forms, please visit: http://www.dtsc.ca.gov/PollutionPrevention/index.html .

HMD's Border & Outreach

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The DEH hopes to continue working with USEPA, DTSC, and other agencies in the United States and Mexico to provide outreach activities such as training, conferences and binational emergency response exercises.

These activities will promote the networking and communication needed between environmental professionals in the United States and Mexico to address current and future environmental concerns.

SECONDARY CONTAINMENT TESTING

Required by Senate Bill 989

By Anthony Torres, **Environmental Health Specialist II**

USTs installed prior to 01/01/0
☑Test of secondary containment required by 01/01/03

USTs installed after 1/1/01
☑ Test required at installation,
☑ 6 months after installation, and,
☑ 36 months thereafter

- Only companies who submit their prot ocols and procedures to the HMD are authorized to test secondary containment in San Diego County.
- HMD must be notified of testing at least 2 working days prior to testing
- Results must be reported to HMD using form HM-9169 within 30 days of test. Form HM-9169 can be found at: http://www.co.san-diego.ca.us/deh/hmd/forms_hmd.html
- Sites with failed secondary containment testing must apply for HMD permits to repair system within 30 days of failed test.
- HMD permits must be obtained prior to initiating repairs.
- Failed secondary containment must be tested after repairs are completed and results must be submitted to HMD.
- The areas of failure will determine the timeline to complete repairs (30, 60, 90 or 120 days).
- Obtain information about RUST low-interest loan program for UST repairs by calling (619) 232-7771.

CHIEF'S NOTES

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This evaluation will also demonstrate that such risk reduction is achievable from the effective administration of a regulatory program that consists of performance standards in addition to the traditional "enforcement" approach. The HMD has also been selected to participate in a pilot project for CalEPA's Environmental Protection Indicators for California (EPIC) program. It is exciting to be pioneers in this new way of measuring performance. The HMD will combine efforts with other CUPAs in Santa Clara County. I will provide you updates on this project in future issues of this newsletter.

We have moved!

The Radiological Health Program of the San Diego County Department of Environmental Health has moved to a new location. Please update immediately **ALL** of your posted **Notice to Employees** from the Department of Health Services (Form RH 2364) with the following contact information (located at the bottom right corner of the form):

Department of Environmental Health
Hazardous Materials Division
Radiological Health Program
1255 Imperial Ave, 4th floor
PO Box 129261
San Diego, CA 92112-9261

Phone: (619) 338-2969 or
(619) 338-2493
Fax: (619) 338-2592

Thank you!
Ron Yonemitsu
Senior Health Physicist

The Environmental Press is available online at : http://www.sdcounty.ca.gov/deh/hmd/newsletter.html

For comments about the newsletter or suggestions about upcoming articles, please contact the editor at: Gloria.Estolano@sdcounty.ca.gov

FINANCIAL ASSISTANCE FOR SMALL BUSINESS

Replacement of the Underground Storage Tank (RUST) Loan Program

By Sylvia Mosse,
Supervising Environmental Health Specialist

The State of California Technology, Trade and Commerce Agency Business Finance offers direct grants and loans for replacement of underground storage tanks (RUST). The program helps owners and operators of small independent underground storage tanks comply with the new requirements mandated by Senate Bill 989.

Eligible Applicants: Small business owners or operators of underground petroleum storage tanks, who are unable to find conventional financing. Applicants with multiple tanks on different locations must bring all sites into compliance in conjunction with the grant or loan application process.

Eligible Uses: Costs needed to get into compliance with the Senate Bill 989. Typically this includes plans, permits, drawings; excavation and removal of tanks, lines, and dispensers; installation of new tanks, lines, dispensers, under-dispenser containments, electronic monitoring system and enhanced vapor recovery system. Applicants must provide evidence that their site(s) is (are) in current compliance.

Loan Amount: Loans can range from $10,000 to $750,000.

Loan Terms and Collateral: The loan term is ten years when secured by Uniform Commercial Code Financing Statement on business assets. Or twenty years when the loan is secured by a Deed of Trust on real estate with adequate equity.

Interest Rate and Fees: Below conventional market rates. Loan fee of 2% paid at final loan closing.

Grant Amount: $3,000 to $50,000. Please call for Grant eligibility.

Contaminated UST sites: It is recommended the applicant contact the State Water Resources Control Board (SWRCB) at 1-800-813-3863. The SWRCB manages a grant program to help UST owners or operators pay for contamination cleanup costs. When the applicant's claim is approved, the SWRCB issues a letter of commitment, to reimburse eligible costs.

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Information taken from California Technology, Trade and Commerce Agency, http://commerce.ca.gov

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