

San Joaquin County

Environmental Health Division

CUPA NEWS



Volume 1 Issue 4

August 2001

Under-Dispenser Containment

All new underground storage tanks (USTs) installed in California after January 1, 2000 are required to have under-dispenser containment. It is also required for all systems installed after July 1, 1987 that are located within 1,000 feet of a public drinking water well. It is the responsibility of the owners or operators of these systems to determine if their facility is in this category. This can be accomplished by accessing Geotracker at: <http://geotracker2.arsenaultlegg.com/>.

The new dispenser containment must be continuously monitored with an audible and visual alarm or must stop the flow of product at the dispenser. USTs that do not have under dispenser containment now are required to have it installed by *December 31, 2003*. All dispenser pans used for secondary containment must be protected against corrosion as required by Title 23 of the California Code of Regulations, Section 2635(a)(2).

Effective immediately, all pressurized underground storage tank systems must have a 0.1 gallon per hour annual line tightness test unless they satisfy the requirements in Title 23, CCR, Section 2636(g)(1-4) (positive shut-down).

- All secondary containment systems must have a continuous monitoring system connected to the pumping system. (This will require a sensor that can shut down the pump). The monitoring system must shut down the pump and also activate an audible and visual alarm.
- The pump must shut down if any of the monitoring systems fail or are disconnected.

Shallow dispenser pans will need to have a sensor installed (under permit with the Environmental Health Division) to satisfy the above requirements. **If a site does not currently have sensors in the dispenser pans, a line tightness test is now required annually.**

FREE Compliance School!

The San Joaquin County Certified Unified Program Agency (CUPA) is offering *FREE* classes to help businesses learn to comply with regulations enforced by the CUPA. Trainers from *Network Environmental Systems (NES)* will teach the 4 hour classes. The training class covers:

- General categories of hazardous waste and management techniques
- Hazardous waste manifests and recordkeeping requirements
- Title 22 employee training requirements
- Hazardous waste storage and container requirements
- Hazardous Material Business Plan information
- Requirements and applicability of Spill Prevention Control and Countermeasure (SPCC), Emergency Response and Contingency Plans.

Classes will be held in Stockton. **You must pre-register to attend** Classes are scheduled on the following dates:

Wednesday, Sept. 19, 2001 8AM - NOON or 1PM - 5PM
Thursday, October 18, 2001 8AM - NOON
Monday, November 19, 2001 8AM - NOON
Thursday, December 6, 2001 8AM - NOON

**For more information or to register,
call Sylvia at 209-468-3427.
CALL SOON! Classes are filling up quickly!**

LOW COST DISPOSAL... Do you generate less than 100 kilograms (27 gallons) of hazardous waste per month? If you do, you may qualify for hazardous waste disposal and recycling that is *affordable, safe, and legal*, sponsored by the Cities and County of San Joaquin. For more information on the Conditionally Exempt Small Quantity Generator (CESQG) program, call (209) 468-3066.

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CUPA Q & A

Q: I have used paint booth filters that I would like to put in the regular trash. Is that okay?

A: It may be okay to dispose of your used paint booth filters in the municipal landfill. Prior to disposing of paint booth filters in this manner, you must make sure that they are not a hazardous waste. When dry paint booth filters are ready to be disposed of, many of the volatile organic chemicals (VOCs) are gone, as is the flammability risk of the waste. However, filters can accumulate toxic metals or other components that will lead to classification as a hazardous waste.

According to Title 22 of the California Code of Regulations (CCR), Section 66261.10, the generator of the waste may use knowledge of their waste to characterize it as hazardous, or may conduct laboratory testing as outlined in Chapter 11, Article 3.

If a generator always uses the same types of paint in the same quantities, an initial laboratory analysis should be sufficient. If there is a change in the paint or the process, new testing should be conducted. If many different paints are used in different quantities, the generator should test the filters before each disposal.

Remember, if you choose to dispose of a waste as non-hazardous based on "generator knowledge" or laboratory analysis, and your wastestream later tests at hazardous waste levels, you are in violation of the law and may be subject to enforcement action.

Do you have a question you would like answered in CUPA Q&A?

Write to **CUPA NEWS**, Attention Alison Youngblood:

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ANNUAL TESTING: Underground Storage Tanks

Every underground storage tank (UST) in San Joaquin County is required to have an annual monitoring certification. All pressurized piping systems must have a line leak detector test annually (regardless of whether mechanical or electronic leak detectors are installed). Most pressurized piping systems are required to have a piping tightness test conducted by a licensed tester as well. Only systems which the Environmental Health Division (EHD) has verified to be in compliance with the positive shutdown requirements of the California Code of Regulations (CCR), Section 2636(g), are exempt from the piping tightness test.

Here are some tips for getting this testing done in an efficient manner which will help you to stay in compliance:

- Choose a tester that is certified for the equipment you have installed. Effective January 1, 2002, only licensed contractors will be allowed to do monitoring certifications. These contractors must also be trained and recertified by the manufacturers of the equipment which they work on.
- Have the tester schedule the testing with the EHD. Effective January 1, 2000, all UST systems must be inspected annually. It will save the owner/operator money if they have the inspector out at the same time as the tester. The best way to do this is to have the tester contact your CUPA inspector for scheduling. Effective January 1, 2002, the owner or operator is required to notify the EHD 48 hours in advance of installing, repairing, replacing, calibrating or certifying monitoring equipment.
- Pick a date for this testing when business is slower. Many of the tests will require that the USTs be shut down for testing. Make sure your testing company knows which days are preferable.
- Verify that the testing company sends a report to the EHD within 30 days of any testing. A report must be sent even if an inspector was onsite. Beginning on January 1, 2002, a standardized reporting format will be required for all monitoring certifications. Testers are encouraged to begin using the standardized report now.
- It is a tank owner or operator's responsibility to make sure that this testing is done annually. It is not up to your inspector to remind you when you are due for testing, although many will. If you miss your annual testing you are in violation of the law. If you aren't sure what testing you need, ask your CUPA inspector.

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