

**SAN DIEGO POLICE DEPARTMENT
PROCEDURE**

DATE: AUGUST 14, 2020

NUMBER: 8.19 – CRITICAL INCIDENTS

SUBJECT: HAZARDOUS MATERIALS STORAGE AT POLICE FACILITIES

RELATED POLICY: N/A

ORIGINATING DIVISION: ADMINISTRATIVE SERVICES

NEW PROCEDURE:

PROCEDURAL CHANGE: **NO CHANGES**

SUPERSEDES: DP 8.19 – 12/19/2016

I. PURPOSE

This Department procedure establishes guidelines for hazardous materials/waste storage at police facilities and describes regulatory reporting guidelines for chemical release.

II. SCOPE

This procedure applies to all members of the Department.

III. BACKGROUND

Per Administrative Regulation 75.65, the Environmental Services Department is responsible for ensuring the City is in compliance with County, State, and Federal statutes regulating site storage of hazardous materials and wastes. The Facilities Management and Development (FM&D) Unit will ensure weekly inspections are completed and will maintain records of inspection in the FM&D office. The City's Environmental Services Department (ESD) Hazardous Materials Management Program staff will provide related training to the Police Department's Facility Coordinators. As part of this program, all police facilities that store quantities of hazardous materials greater than, or equal to, 55 gallons, 500 pounds, 200 cubic feet of a compressed gas, or generate a hazardous waste as part of their operation must have a Business Plan on file with the County of San Diego's Department of Environmental Health (DEH), Hazardous Materials Division. In addition, Federal Regulations and California Code of Regulations,

Title 19, provide City employees with basic directions on chemical release regulatory reporting guidelines. (See Section VI. for details on chemical release regulatory reporting guidelines.)

IV. DEFINITIONS

- A. Business Plan – a separate plan for each facility or site of a business that covers the management of hazardous materials and wastes found at the business. Each Business Plan must include an inventory of bulk chemicals (55 gallons, 500 pounds, 200 cubic feet compressed gas) stored on-site, an emergency response plan, a site map, and an employee training program. ESD will advise FM&D which police facilities require a Business Plan.
- B. Facility Coordinator – pre-designated Police Department supervisors who are responsible for ensuring proper handling, storage, and reporting of hazardous materials stored in their facilities. In addition, they are responsible for reviewing and coordinating their facility Business Plan with the ESD Hazardous Materials Inspector. The Facility Coordinator shall also conduct inspections of their site, in accordance with City policy.
- C. Hazardous Material – any material that, because of its quantity, concentration, physical, or chemical characteristics, poses a significant present or potential hazard to human health, safety, or to the environment, if released into the workplace or the environment.
- D. Hazardous Substance – a chemical or product for which a manufacturer or producer is required by law to prepare a Safety Data Sheet (SDS). It may also include materials requiring placard warnings during transportation.
- E. Hazardous Waste – a hazardous material that is no longer useable for its intended purpose or has expired (beyond its useable shelf life.)

V. PROCEDURES

- A. Facility Coordinator Responsibilities
 - 1. Each Facility Coordinator must complete a Business Plan with ESD anytime they store a hazardous material in the amounts listed above. The following hazardous materials must be included in the Business Plan:
 - a. All carcinogens or reproductive toxins of any quantity. The carcinogens list must be updated annually and submitted to the County’s Hazardous Materials Division.

- b. All hazardous materials and wastes stored in underground storage tanks.
 - c. All hazardous wastes stored at police facilities.
 2. Each Facility Coordinator must be present during a County Department of Environmental Health Regulatory inspection and complete any follow up actions identified during the inspection.
 3. Facility Coordinators are designated as follows:
 - a. Lab – Senior Lab Supervisor
 - b. Armory – SWAT Armory Supervisor
 - c. Property Room – Senior Property and Evidence Supervisor
 - d. FM&D Unit – Building Maintenance Supervisor
 - e. Firearms Training Unit (4008 Federal Boulevard) – Rangemaster
 - f. Air Support Unit (4141 Kearny Villa Road) – Air Support Supervisor
 - g. Canine Unit (4240 Federal Boulevard) – Safety Officer
 - h. All area station facilities will be inspected by FM&D Building Supervisors. (Related garage facilities will be inspected by General Services Supervisors.)
 4. The Facility Coordinators will provide updates to their Business Plan to ESD and the FM&D Building Maintenance Supervisor. ESD will submit the updated Business Plan to the County of San Diego Hazardous Materials Division.
 - a. Original Business Plans must be kept on file at each police facility.
 - b. Business Plans must be updated within thirty days when a chemical storage area has moved, chemicals have been added or deleted from the facility's inventory, or contact information or staging area has changed.
 5. Paperwork associated with the disposal of hazardous waste (e.g., Hazardous Waste Manifest, Bill of Lading, or Recyclable Waste Transfer Receipt) is required to be kept on site for a **minimum** of three years.

6. Facility Coordinators shall conduct a weekly inspection of their hazardous materials and waste storage areas, per regulatory requirements. Areas where hazardous materials, hazardous waste, or medical waste is stored must be inspected weekly. Use the Inspection Checklist to document each inspection. The Inspection Checklist is located at F:\Templates\Administrative\Hazardous Materials Wkly Inspection Checklist. All inspection reports shall be kept on-site for a **minimum** of three years from the date of inspection.

B. FM&D Unit Responsibilities

The FM&D Building Maintenance Supervisor is responsible for the following:

1. Maintaining a list of Facility Coordinators;
2. Ensuring Facility Coordinators develop, review, and update their Business Plans quarterly, or when hazardous materials and waste inventory or facility changes occur. Contact ESD for changes to the Business Plans;
3. Ensuring the original copy of the Business Plan is retained on site and a copy is provided to ESD and the FM&D Unit;
4. Ensuring all safety requirements are being adhered to as recommended by ESD during an inspection; and,
5. Ensuring the Chemical Release Assessment and Chemical Release Reporting Form (Form 304) is completed by Facility Coordinators, with the assistance of ESD if needed, if a release is required to be reported.

VI. CHEMICAL RELEASE REGULATORY REPORTING GUIDELINES

A. Chemical Release or Imminent Threatened Release

1. If a chemical is unexpectedly released from its container or is an imminent threat to release from its container (e.g., drum, tank, pipe):
 - a. All chemical releases must be cleaned up without delay;
 - b. All imminent threatened releases must be mitigated without delay;
 - c. A chemical release/spilled chemical or imminent threatened release requires regulatory reporting if any of the following circumstances exist:

- (1) Fire-Rescue Department assistance is needed due to an injury, or due to the amount, location, or type of chemical released;
- (2) Employee/volunteer was injured OR experienced a chemical exposure over the CAL/OSHA PEL (Permissible Exposure Limit);
- (3) Public was injured OR experienced a chemical exposure;
- (4) The chemical release caused damage to the facility or location where the release occurred;
- (5) The chemical was released to the environment (soil, surface water, storm drain, sewer, or air);
- (6) The chemical escaped secondary containment;
- (7) The release involved an unknown material;
- (8) The chemical was an imminent threat of release where a condition exists which creates a substantial probability of harm and requires immediate action to prevent damages to the environment, persons, or property;
- (9) The chemical was an imminent threat of release due to an increased potential for fire, explosion, line rupture, or equipment failure that may endanger the employees, public, or environment; or,
- (10) Federal reporting to the National Response Center (NRC) is REQUIRED. This is required when a reportable quantity of the chemical is released into the environment. Refer to the MSDS or 40 Code of Federal Regulations, Section 304 for a listing.

2. Facility Coordinators will also report the spill immediately to the FM&D Unit and immediately (within 15 minutes of the initial release) complete the required telephone report to the agencies listed in Section VI., C., 2. of this procedure.

B. Chemical Release Regulatory Report Requirements

If the chemical release meets any of the criteria listed on the Chemical Release Assessment Form, the Facility Coordinator is to complete a Chemical Release Reporting Form (Form 304). ESD may be contacted for assistance if needed.

C. Regulatory Agencies Requiring Reports

1. The Facility Coordinator shall contact Environmental Services, Hazardous Materials Management Program at (858) 492-5004 when chemical release requires regulatory reporting.
2. If regulatory reporting is required, the Facility Coordinator should report the chemical release within 15 minutes. ESD can be contacted for assistance; however, reporting should not be delayed for ESD assistance.
 - a. California Emergency Management Agency (formerly OES) – (800) 852-7550
 - b. County Dept. of Environmental Health (DEH) – (858) 505-6657, after hours at (858) 565-5255
 - c. City of San Diego Fire-Rescue Department HIRT (619) 533-4380
 - d. If a chemical is released into the sewer, surface water, or storm drain, also call the Federal National Response Center (NRC) – (800) 424-8802
3. The Facility Coordinator, supervisor, or other designee, shall provide basic incident information (name, location, chemical name, and, if known, amount released and potential hazards presented).
4. The Facility Coordinator shall update, via telephone, all applicable regulatory agencies with additional incident information, as it becomes available. Upon conclusion of the incident, the Facility Coordinator shall ensure the Chemical Release Reporting Form (Form 304) has been accurately completed and submitted to:
 - a. Any applicable regulatory agencies.
 - b. Environmental Services Department, Hazardous Materials Management Program via email at clester@sanidiego.gov.

VII. TRAINING

City policy and State law requires that hazardous material handlers, their supervisors, and facility managers attend annual training in handling hazardous materials/waste. The City's Environmental Services Department, Hazardous Materials Management Program, has identified the appropriate training. Facility managers are responsible for advising the Training Division of the names of handlers and supervisors. It is the responsibility of the

Training Division to schedule appropriate annual training for these persons through the Environmental Services Department and to maintain the required documentation of training.