

HAZMAT NOTIFICATION POLICY SUGGESTED REVISIONS

Matt Kaufmann, Director of Hazardous Materials Programs

matt.kaufmann@cchealth.org

(925) 655-3235

HISTORY

- The first Hazardous Materials Notification Policy was adopted by the Contra Costa County Board of Supervisors on November 5, 1991
- The Policy has gone through many revisions over the years – the most recent policy was adopted on January 22, 2016
- Provides guidance to Contra Costa County facilities on how to report a release or threatened release of a hazardous material.

PURPOSE OF THE POLICY

- Prompt and accurate reporting to Contra Costa Health Services (CCHS) of release or threatened release of hazardous materials.
 - Compliance with statutory require in California Health and Safety Code Section 25510(a)
 - Immediate report any release or threatened release of a hazardous material to the unified program agency (Contra Costa Health Services)
- Dispatching of CCHS resources to the incident
- Assessing the extent, or potential extent, of the release
- Determining if community protective actions (shelter in place, evacuation) are needed.
- Responding to inquiries from the public and media

THE PROCESS

Internal CCHS Revision Committee Formed

Identified Areas of Concern for Different Stakeholders

- CCHS, Other Agencies, Regulated Facilities, Community, Elected Officials

Suggested Revised Document

Presentation to and Receive Input from Regulated Facilities

- Community Awareness and Emergency Response Notification Committee
- Met with all three (3) operating petroleum refineries to discuss flaring operations

***** Presentation to Hazardous Materials Commission *****

Adoption by the Contra Costa County Board of Supervisors

Facility Outreach and Education

SUGGESTED REVISIONS

1. Remove Level 0
 - Primarily notification for unit start-up and shutdown that are not associated with flaring
2. Added descriptive language for each Level
 - Notification Only – Level 1
 - Public Health Advisory – Level 2
 - Public Protective Actions Required – Level 3
3. Ambiguities associated with “excessive” flaring
4. Added Response to Be Expected from CCHS

2019 CURRENT VS. PROPOSED

CURRENT POLICY

	2019 CWS Notifications
Level 0	81
Level 1	54
Level 2	0
Level 3	0
TOTAL NOTIFICATIONS	135

PROPOSED POLICY

	2019 CWS Notifications (Adjusted)
Notification Only – Level 1	97
Public Health Advisory – Level 2	0
Public Protective Actions – Level 3	0
TOTAL NOTIFICATIONS	97

28.1% DECREASE IN NOTIFICATIONS PROVIDED TO CCHS

2020 CURRENT VS. PROPOSED

CURRENT POLICY

	2020 CWS Notifications
Level 0	61
Level 1	36
Level 2	0
Level 3	0
TOTAL NOTIFICATIONS	97

PROPOSED POLICY

	2020 CWS Notifications (Adjusted)
Notification Only – Level 1	55
Public Health Advisory – Level 2	0
Public Protective Actions – Level 3	0
TOTAL NOTIFICATIONS	55

43.3% DECREASE IN NOTIFICATIONS PROVIDED TO CCHS

FLARING

- The current version requires notification for “excessive” flaring.
 - Inconsistent approach by industry in defining “excessive”
- The revised policy removes the adjective “excessive”.
- A definition of flaring is provided...

DEFINITION OF FLARING

Any smoke, fire or flame from a flare. For the purposes of this policy, flaring at petroleum/renewable fuel refineries excludes auxiliary flares not connected to a process unit. The flaring conditions that should be considered when determining applicability for reporting as required by this policy include, but are not limited to, the following:

1. Involves the release, or threatened release, of a hazardous material
2. Completeness of combustion
3. Duration of the incident
4. Presence of smoke
5. Adequacy of steam
6. Intensity of burn
7. Presence of an odor
8. Visibility and/or audible impact to the public

Typically, flaring is a CWS Level 1 incident. However, incident-specific circumstances may result in an off-site impact requiring the incident to be upgraded to a CWS Level 2 or CWS Level 3 incident.

NEXT STEPS

- Presentation to the Hazardous Materials Commission – Planning and Policy Development Committee
 - Wednesday, May 19, 2021
- Presentation to the Hazardous Materials Commission
 - Thursday, May 27, 2021
- Adoption at the Board of Supervisors Meeting
 - Likely on Consent Calendar
 - June/July 2021
- Facility Outreach and Education

QUESTIONS/COMMENTS?