Emergency Generators

Justin Martinez, EHS

Scenario – CUPA Inspector at your facility

After the CUPA Inspector has conducted a walk-through of your facility, if your facility is subject to the Aboveground Petroleum Storage Act (APSA) the inspector will request visual inspection records for your tanks.

Scenario – CUPA Inspector at your facility

You provide your compliance binder to the CUPA Inspector.

Scenario – CUPA Inspector at your facility

Our CUPA inspectors have found that facilities with back-up emergency generators like keep records related to the backup generator (including the tanks) in a binder that states something like “APCD Engine logs” or “APCD Compliance binder.” If you provide this binder to our inspectors, they may look through it…

Scenario – CUPA Inspector at your facility

…and find that these are not the records they are looking for. Why? Most facilities that provide CUPA inspectors with these binders have only provided the CUPA inspector with engine maintenance and start-up logs for back-up generator engines, which is regulated by an APCD permit. These logs are not compliant with the requirements detailed in APSA or the Spill Rule.

We understand you're inspected by *EVERYONE*

Noteworthy Takeaway: the CUPA is not the APCD

CUPA	APCD
Hazardous Waste Hazardous Materials APSA USTs CalARP Medical Waste (in SD)	Stationary Sources (of air pollutants) Volatile Organic Compounds (VOCs) Reactive Organic Compounds (ROCs) Oxides of Nitrogen (NOx) Oxides of Sulfur (SOx) Carbon Monoxide (CO) Particulate Matter (PMx)

So why do two agencies regulate one piece of equipment?

Well… It's not actually one piece of equipment. It's a "Genset"

APCD – Regulates generator engine and emissions

CUPA – Regulates hazardous materials storage tank, and tank appurtenances

Compartmentalize Your Programs

CUPA – Hazardous Materials Division

Air Pollution Control District

Imagine your “Genset” as two separate pieces of equipment, as depicted above.

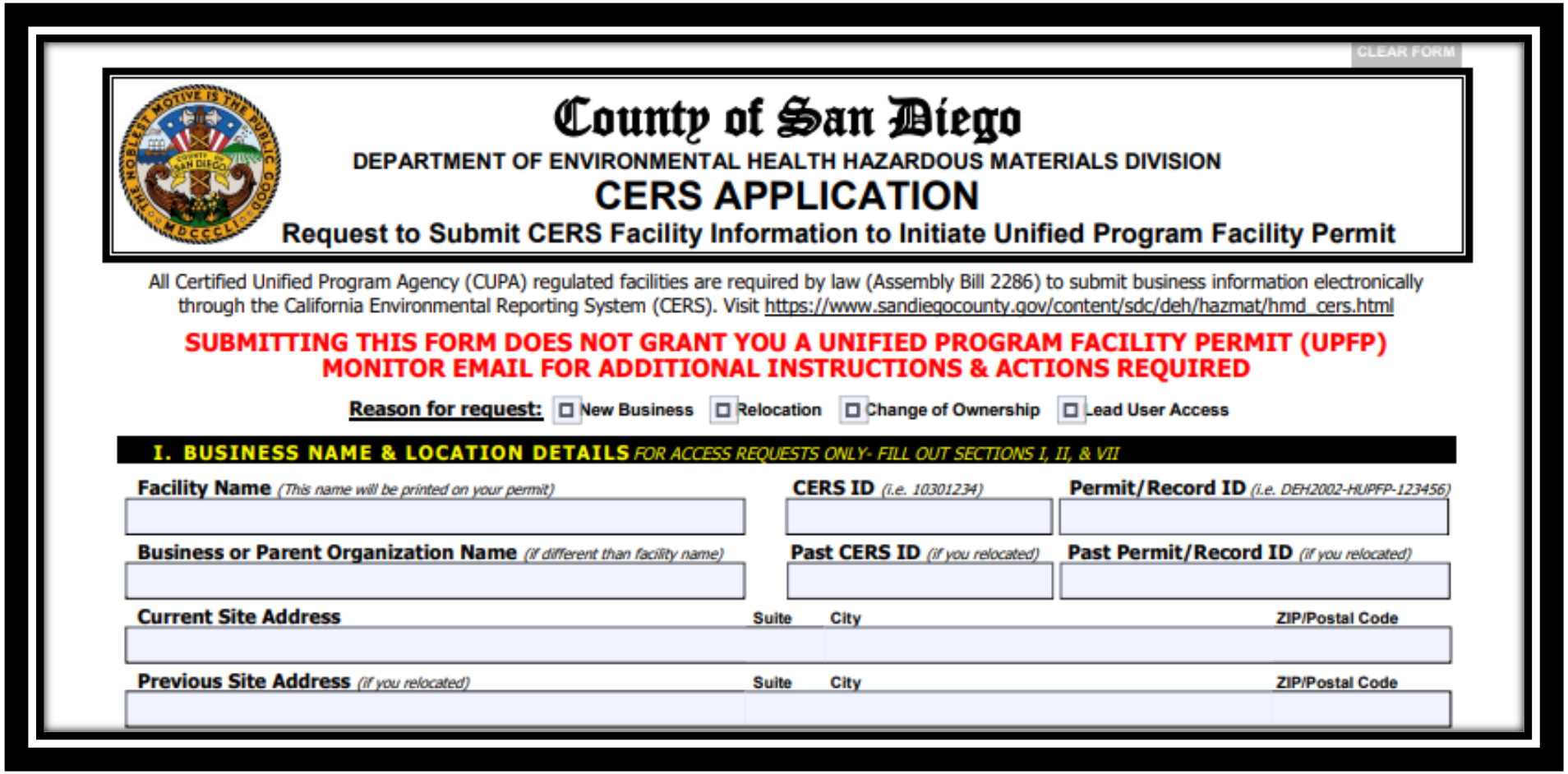
Let’s Discuss Requirements

- Permitting
  - HMBP and APSA Programs
  - CERS requirements
  - Permit Holder
- Inspection requirements
  - Industry Standards
  - Spill Rule and APSA

Requirements for HMD - Hazardous Materials Business Plan

Business Plan – CUPA Permit via CERS

For Business subject to ANY CUPA program, they must first apply for a Permit via CERS Application



CLEAR FORM

County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION

CERS APPLICATION

Request to Submit CERS Facility Information to Initiate Unified Program Facility Permit

All Certified Unified Program Agency (CUPA) regulated facilities are required by law (Assembly Bill 2286) to submit business information electronically through the California Environmental Reporting System (CERS). Visit https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html

SUBMITTING THIS FORM DOES NOT GRANT YOU A UNIFIED PROGRAM FACILITY PERMIT (UPFP)
MONITOR EMAIL FOR ADDITIONAL INSTRUCTIONS & ACTIONS REQUIRED

Reason for request: ☐ New Business ☐ Relocation ☐ Change of Ownership ☐ Lead User Access

I. BUSINESS NAME & LOCATION DETAILS *FOR ACCESS REQUESTS ONLY- FILL OUT SECTIONS I, II, & VII*

Facility Name *(This name will be printed on your permit)*

CERS ID *(i.e. 10301234)*

Permit/Record ID *(i.e. DEH2002-HUPFP-123456)*

Business or Parent Organization Name *(if different than facility name)*

Past CERS ID *(if you relocated)*

Past Permit/Record ID *(if you relocated)*

Current Site Address Suite City ZIP/Postal Code

Previous Site Address *(if you relocated)* Suite City ZIP/Postal Code

Requirements for HMD - Hazardous Materials Business Plan

Business Plan - Permit via CERS

Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive local inventory reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?

Unified Program Local Reporting Requirements for *San Diego County Department of Environmental Health and Quality*

- **Hazardous Waste Reporting:** Regulated facilities in this jurisdiction are required by local ordinance to report all hazardous waste(s), including wastes that are less than 55 gallons, 500 pounds, and for waste compressed gases less than 200 cubic feet. To comply with the law report all hazardous waste generated in the Hazardous Materials Inventory Submittal Element (San Diego County Code §68.904(a)(2) and §68.905).
- **Medical Waste Reporting:** Regulated facilities in this jurisdiction are required by local ordinance to report all medical waste(s), including wastes that are less than 55 gallons and 500 pounds. To comply with the law report all medical waste generated in the Hazardous Materials Inventory Submittal element (San Diego County Code §68.904(a)(2), §68.905, and §65.1202).
- **Toxic Gas Reporting:** Regulated facilities in this jurisdiction are required to report, as a hazardous material inventory any quantity of toxic gas with a TLV value of less than or equal to 10 ppm in the Hazardous Materials Inventory Submittal Element (San Diego County Code §68.1113).
- **Photographic Silver Waste:** Regulated facilities in this jurisdiction are required to report onsite photographic waste treatment/silver recovery annually (San Diego County Code §65.107(k)(14) and §68.909.5).

Yes

After an account has been made in CERS, the facility must indicate which CUPA programs are applicable to their facility operations in the “Business Activities” Questionnaire.

Requirements for HMD - Hazardous Materials Business Plan

Business Plan – chemical inventory and site map

Chemical Identification and Physical Properties

Chemical Name
Diesel Fuel No. 2

Common Name **CAS Number**
Diesel Fuel No. 2 68334-30-5

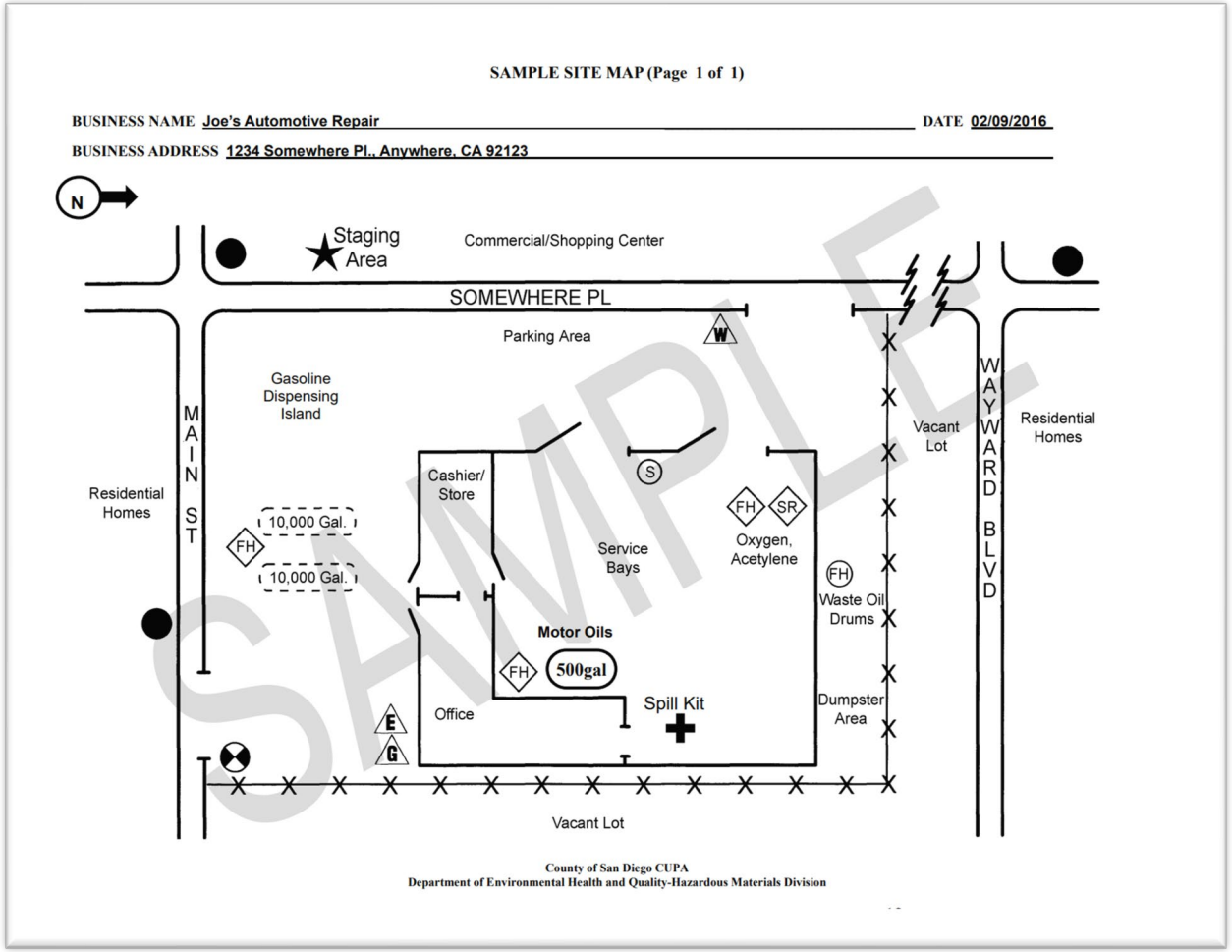
Physical State
Liquid

Hazardous Material Type
Pure

HMBP requirements:

- Facility Information in CERS
- Report hazardous materials in CERS,
- Site map to indicate where hazards are located.
- Emergency Response/Contingency Plan
- Training Plan implementation

Most back-up emergency generators are subject to HMBP because they are larger than 55 gallons.



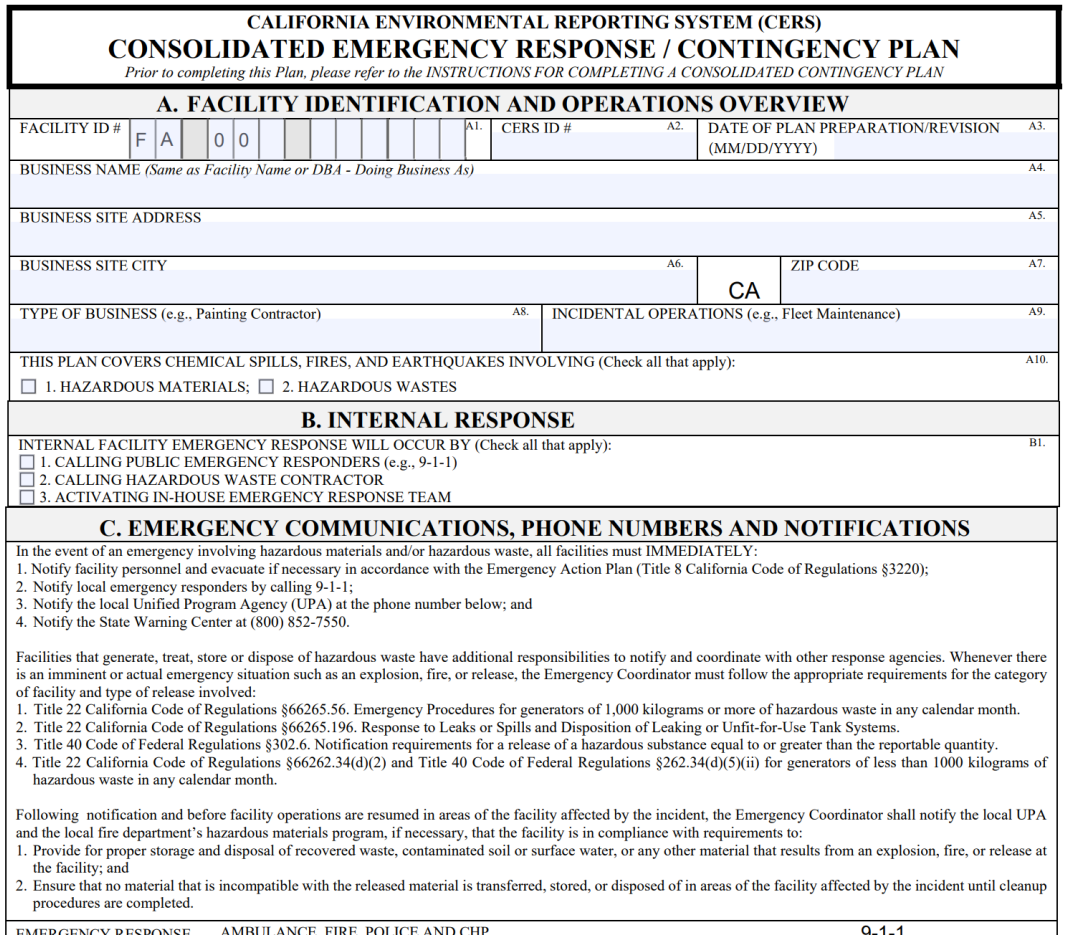
Requirements for HMD - Hazardous Materials Business Plan

Business Plan – Emergency Response plan

HMBP requirements:

- Facility Information in CERS
- Report hazardous materials in CERS,
- Site map to indicate where hazards are located.
- Emergency Response/Contingency Plan
- Training Plan implementation

Most back-up emergency generators are subject to HMBP because they are larger than 55 gallons.



CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS)

CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN

Prior to completing this Plan, please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN

A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW

FACILITY ID # F A 0 0 A1. | CERS ID # A2. | DATE OF PLAN PREPARATION/REVISION (MM/DD/YYYY) A3.

BUSINESS NAME *(Same as Facility Name or DBA - Doing Business As)* A4.

BUSINESS SITE ADDRESS A5.

BUSINESS SITE CITY A6. | CA | ZIP CODE A7.

TYPE OF BUSINESS (e.g., Painting Contractor) A8. | INCIDENTAL OPERATIONS (e.g., Fleet Maintenance) A9.

THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING (Check all that apply): A10.

☐ 1. HAZARDOUS MATERIALS; ☐ 2. HAZARDOUS WASTES

B. INTERNAL RESPONSE

INTERNAL FACILITY EMERGENCY RESPONSE WILL OCCUR BY (Check all that apply): B1.

☐ 1. CALLING PUBLIC EMERGENCY RESPONDERS (e.g., 9-1-1)
☐ 2. CALLING HAZARDOUS WASTE CONTRACTOR
☐ 3. ACTIVATING IN-HOUSE EMERGENCY RESPONSE TEAM

C. EMERGENCY COMMUNICATIONS, PHONE NUMBERS AND NOTIFICATIONS

In the event of an emergency involving hazardous materials and/or hazardous waste, all facilities must IMMEDIATELY:
1. Notify facility personnel and evacuate if necessary in accordance with the Emergency Action Plan (Title 8 California Code of Regulations §3220);
2. Notify local emergency responders by calling 9-1-1;
3. Notify the local Unified Program Agency (UPA) at the phone number below; and
4. Notify the State Warning Center at (800) 852-7550.

Facilities that generate, treat, store or dispose of hazardous waste have additional responsibilities to notify and coordinate with other response agencies. Whenever there is an imminent or actual emergency situation such as an explosion, fire, or release, the Emergency Coordinator must follow the appropriate requirements for the category of facility and type of release involved:
1. Title 22 California Code of Regulations §66265.56. Emergency Procedures for generators of 1,000 kilograms or more of hazardous waste in any calendar month.
2. Title 22 California Code of Regulations §66265.196. Response to Leaks or Spills and Disposition of Leaking or Unfit-for-Use Tank Systems.
3. Title 40 Code of Federal Regulations §302.6. Notification requirements for a release of a hazardous substance equal to or greater than the reportable quantity.
4. Title 22 California Code of Regulations §66262.34(d)(2) and Title 40 Code of Federal Regulations §262.34(d)(5)(ii) for generators of less than 1000 kilograms of hazardous waste in any calendar month.

Following notification and before facility operations are resumed in areas of the facility affected by the incident, the Emergency Coordinator shall notify the local UPA and the local fire department's hazardous materials program, if necessary, that the facility is in compliance with requirements to:
1. Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire, or release at the facility; and
2. Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.

EMERGENCY RESPONSE — AMBULANCE, FIRE, POLICE AND CHP — 9-1-1

Requirements for HMD - Aboveground Petroleum Storage Act

APSA – Permit via CERS and annual submittals

Facilities subject to APSA will need to follow requirements, in addition to HMBP…

Does the facility have an aggregate capacity of 1,320 gallons or more of petroleum in tanks/containers greater than or equal to 55 gallons?

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: • have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR • have one or more petroleum tanks in an underground area?	◉ Yes

Check “yes” in the Business Activities section

APSA CERS Element – Submit annually

- Indicate Total petroleum Shell capacity,
- The Number have Tanks In an Underground Area (If applicable), and
- the most recent date of your SPCC Plan 5-year review in the APSA CERS element

Facility Information

Conditionally Exempt
No

Total Aboveground Storage Capacity of Petroleum
8,500

Number of Tanks in Underground Area(s)
0

Date of SPCC Plan Certification or Date of 5-Year Review
6/26/2024

Requirements for HMD - Aboveground Petroleum Storage Act

Prepare a Spill Prevention Control and Countermeasures (SPCC) Plan

U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.[a] No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III: Required for all Tier I qualified facilities
Section A: Onshore facilities (excluding production)
Section B: Onshore oil production facilities (excluding drilling and workover facilities)
Section C: Onshore oil drilling and workover facilities
Attachments: 1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

[a] Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities		
This table includes a complete list of all oil storage containers (aboveground containers[a] and completely buried tanks[b]) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided. ☐		
Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))*	**Type of Oil**	**Shell Capacity (gallons)**
Total Aboveground Storage Capacity [c]		gallons
Total Completely Buried Storage Capacity		gallons
Facility Total Oil Storage Capacity		gallons

[a] Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

[b] Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

[c] Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment[a] is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	☐

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]*	☐
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]*	☐
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]**	☐
Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]*	☐
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. *[§112.7(f)]*	☐
A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]* Name/Title: _____	☐
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]* **[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]**	☐

Facilities with less than 10,000 gallons of oil may use an SPCC Plan Template, found on the EPA website

40 CFR 112.7(e) - ***Inspections, tests, and records.***

Conduct inspections and tests required by this part **in accordance with written procedures that you or the certifying engineer develop for the facility**. You must keep these written procedures and a **record of the inspections and tests**, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

40 CFR 112.7(e) is required for all APSA facilities, as APSA requires that facilities comply with Spill Rule requirements found in 40 CFR 112

40 CFR 112.8(c)(6) – ***Bulk Storage Containers***

"Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. **You must determine, in accordance with industry standards,** the appropriate qualifications for personnel performing tests and inspections, **the frequency and type of testing and inspections, which take into account container size, configuration, and design…"**

40 CFR 112.8(c)(6) is required for all APSA facilities, as APSA requires that facilities comply with Spill Rule requirements found in 40 CFR 112

Requirements for HMD - Aboveground Petroleum Storage Act

112.8(c)(6) outlined in Template SPCC Plans

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]*	☐
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:	

Tank requirements – Installation requirements and Standards

Manage Tanks Accordingly

- NFPA 30 – Safe storage/handling of flammable and combustible liquids
- UL 142 - Aboveground flammable liquid tanks
- SP001 – **Inspection standard** for most shop-fabricated aboveground storage tanks

Most “Genset” tanks are regulated per the SP001 tank inspection standard. Facilities must be able to provide adequate documentation detailing compliance with this standard, as is required by the APSA and the Spill Rule.

Requirements for HMD - Aboveground Petroleum Storage Act

- Monthly inspections are required Per SP001 industry standard
- Most “genset” tanks fall under SP001
- Monthly Checklist found on County website

Inspections – Monthly SP001 Checklist

STI SP001 Monthly Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are equivalent and meet all applicable inspection checklist items. Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that some non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- If the inspection finds the integrity of the spill control system and/or the CRDM, such as items 13 and 14, is compromised the tank category and inspection time table should be re-evaluated by someone knowledgeable about the SP001 standard.
- Retain the completed checklists for at least 36 months.
- **After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note**: *If "No", identify tank and describe leak and actions taken.*	☐ Yes ☐ No*	
2	Is the tank liquid level gauge legible and in good working condition?	☐ Yes ☐ No* ☐ N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	☐ Yes ☐ No*	

Requirements for HMD - Aboveground Petroleum Storage Act

- Annual inspections are required Per SP001 industry standard
- Most “genset” tanks fall under SP001
- Annual Checklist found on County website

Inspections – Annual SP001 Checklist

STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print): _____ Title: _____

Inspector’s Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent and meet all applicable inspection checklist items.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner’s inspector per paragraph 4.1.2 of the standard.
- Promptly remove standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- * designates an item in a non-conformance status. This indicates that action is required to address a problem. Note that non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	☐ Yes ☐ No*	
2	Concrete pad or ring wall free of cracking and spalling?	☐ Yes ☐ No* ☐ N/A	

Why the confusion regarding “Genset” Inspections?

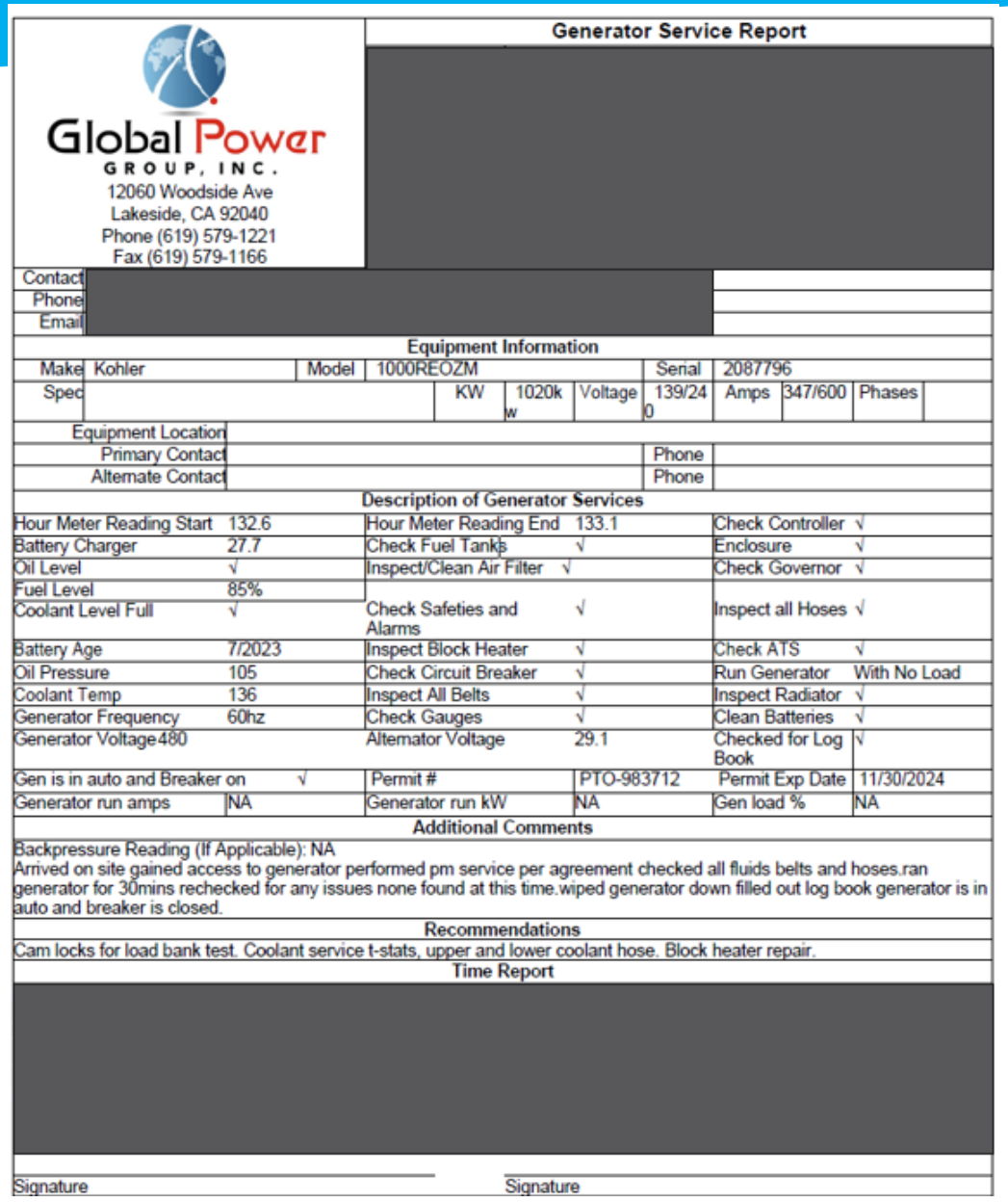
Facilities hire contractors to conduct inspections of the Genset,

However…

Contractors conduct limited inspections:

- Maintenance of the Engine
- Limited Tank inspections (not detailed)
  - “sensors”
  - “gauges”
  - “fuel tank”
  - “Alarms”
- Only conducted quarterly and annually

Remember, SP001 (therefore APSA and Spill Rule) requires monthly and annual inspections



Global Power GROUP, INC.
12060 Woodside Ave
Lakeside, CA 92040
Phone (619) 579-1221
Fax (619) 579-1166

Generator Service Report

[redacted]

Contact [redacted]
Phone
Email

Equipment Information

Make	Kohler	Model	1000REOZM	Serial	2087796
Spec		KW	1020kw	Voltage	139/240
Amps	347/600	Phases			

Equipment Location
Primary Contact — Phone
Alternate Contact — Phone

Description of Generator Services

Hour Meter Reading Start	132.6	Hour Meter Reading End	133.1	Check Controller	√
Battery Charger	27.7	Check Fuel Tanks	√	Enclosure	√
Oil Level	√	Inspect/Clean Air Filter	√	Check Governor	√
Fuel Level	85%				
Coolant Level Full	√	Check Safeties and Alarms	√	Inspect all Hoses	√
Battery Age	7/2023	Inspect Block Heater	√	Check ATS	√
Oil Pressure	105	Check Circuit Breaker	√	Run Generator	With No Load
Coolant Temp	136	Inspect All Belts	√	Inspect Radiator	√
Generator Frequency	60hz	Check Gauges	√	Clean Batteries	√
Generator Voltage	480	Alternator Voltage	29.1	Checked for Log Book	√
Gen is in auto and Breaker on	√	Permit #	PTO-983712	Permit Exp Date	11/30/2024
Generator run amps	NA	Generator run kW	NA	Gen load %	NA

Additional Comments

Backpressure Reading (If Applicable): NA
Arrived on site gained access to generator performed pm service per agreement checked all fluids belts and hoses.ran generator for 30mins rechecked for any issues none found at this time.wiped generator down filled out log book generator is in auto and breaker is closed.

Recommendations

Cam locks for load bank test. Coolant service t-stats, upper and lower coolant hose. Block heater repair.

Time Report

[redacted]

Signature — Signature

Who should apply for the CUPA permit?

<u>Discuss the following with your Property Management/Owner, or Landlord</u>

Who is maintains the “Genset”, and whose operations does it support?

- Back-up power to a business’s operations or suite? Tenant
- Back-up power to the entire property? Property Management/Owner, or Landlord
- Was there an agreement between the Property Management and Tenant as to who would maintain the “Genset”

Who should apply for the CUPA permit?

Permits are “non-transferrable”

- Applying for a permit is simple

  However…

- When a business moves out and closes their permit, the property owner or property management company must apply for and maintain a permit for the storage of diesel in a back-up emergency generator tank while the property remains vacant

The CUPA does not require property owners/mangers to apply for a permit for the “Genset” tank if the tenant/business has agreed to assume responsibility for the tank and permit…But the permitting process would be streamlined if the property manager/owner or landlord maintained a permit for the “Genset” tank, especially in industries with where tenants frequently change properties, such as Biotechs.

In summation…

- Back-up generators are *two* pieces of equipment, regulated by different agencies.
- Tanks storing 55 gallons or more of fuel must be permitted with HMD.
- APSA inspection requirements must meet SPCC Rule and AST industry standards.
- Decide who will hold the permit.

HMD RESOURCES

PROGRAM	CONTACT	EMAIL	MOBILE
Chief	**Zoraida Moreno**	Zoraida.Moreno@sdcounty.ca.gov	(619) 454-9682
Program Coordinator	**Sharon Preece**	Sharon.Preece@sdcounty.ca.gov	(619) 249-9024
Program Coordinator and Hazardous Waste	**Arleen Gurfield**	Arleen.Gurfield@sdcounty.ca.gov	(858) 229-1135
APSA and CalARP	**Erin Thomas**	ErinR.Thomas@sdcounty.ca.gov	(858) 952-9247
Enforcement	**Kelly Robertson**	Kelly.Robertson@sdcounty.ca.gov	(619) 778-2167
HMBP / CERS	**Richard LeClair**	Richard.LeClair@sdcounty.ca.gov	(619) 403-8669
Medical Waste	**Dana Barkil**	Dana.Barkil@sdcounty.ca.gov	(619) 249-8704
Response Services	**Leon Wirschem**	Leon.Wirschem@sdcounty.ca.gov	(858) 888-0610
UST	**Cecilia Lewallen**	Cecilia.Lewallen@sdcounty.ca.gov	(619) 454-9915