

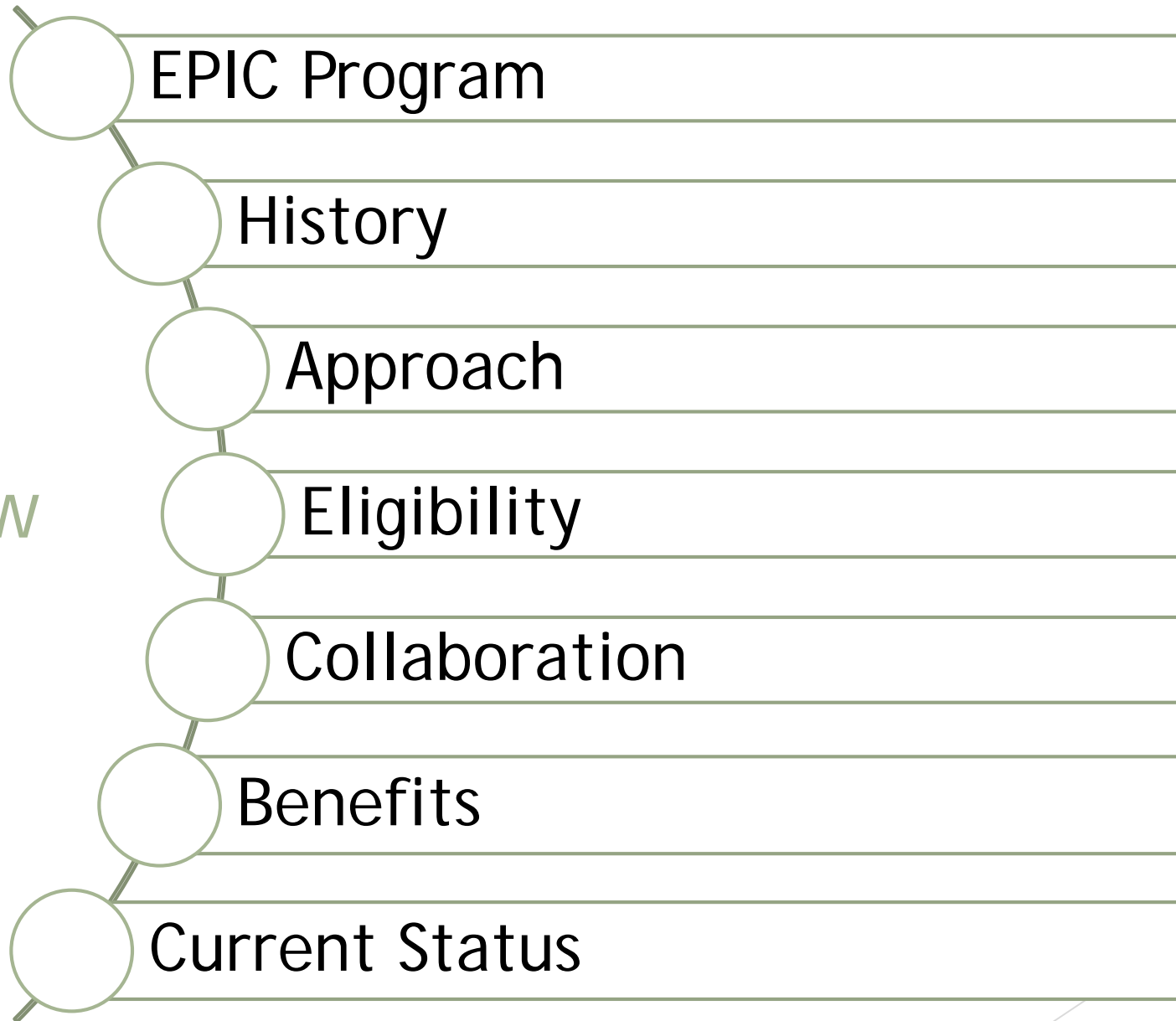
EPIC+ Program Updates

*Education, Process Improvements, and Compliance
for Environmental Risk Reduction*

Presented by:

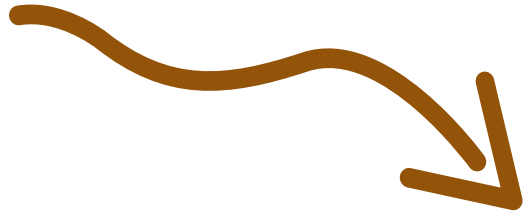
The County of San Diego
Department of Environmental Health
Hazardous Materials Division
Zoraida Herrera

Overview



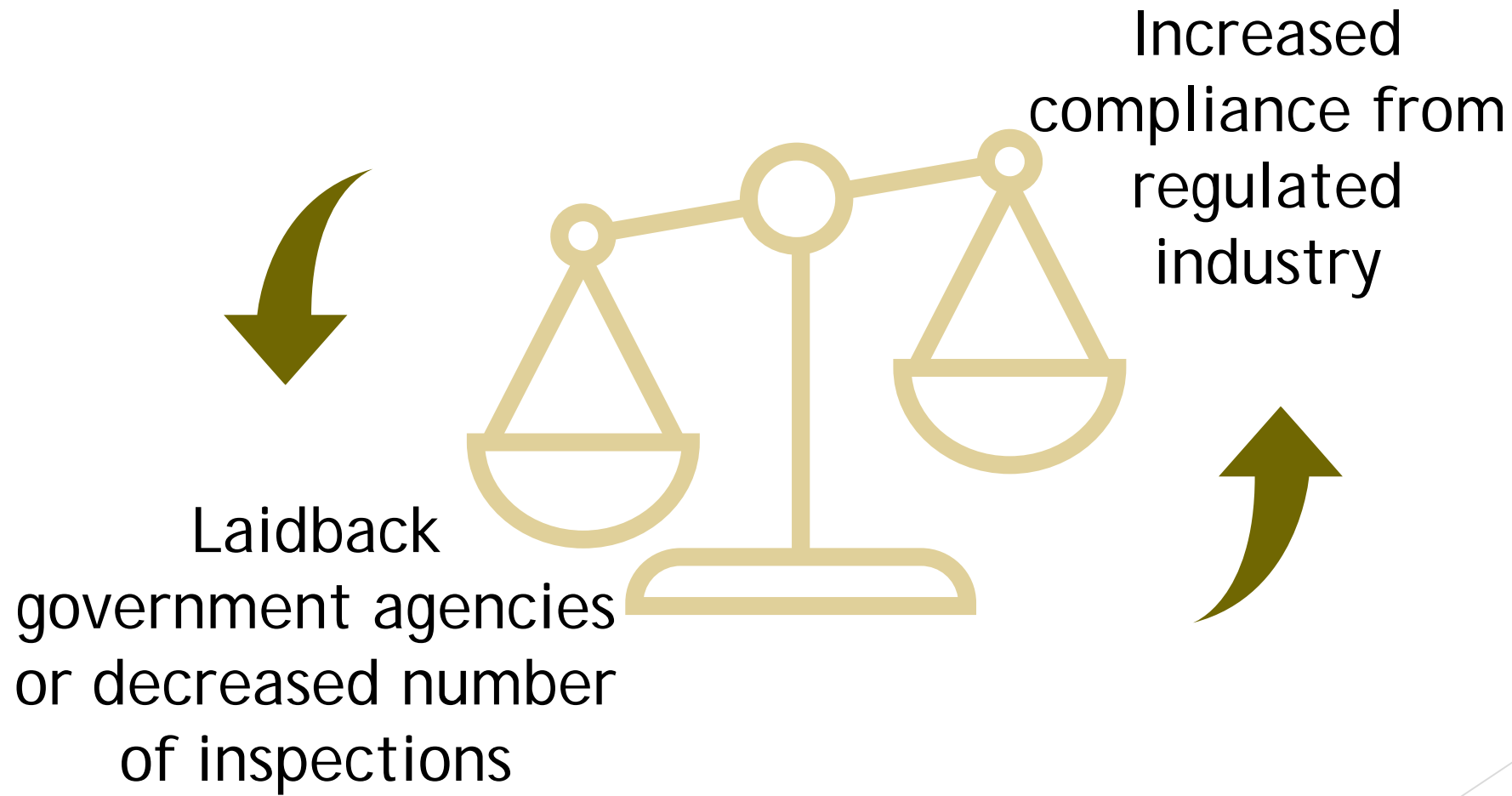
Declining Enforcement Levels

Environmental agencies are commonly criticized when the number of enforcement cases decline.



***A Sign Of Success
Or An Indicator Of Problems?***

Is it because of less enforcement?



Is it enough information...?

Enforcement levels alone
do not provide a complete performance picture.



More information and better outcome measures
are needed.



EPIC Origins

Assembly Bill No. 1360, Steinberg.

Environmental Quality: environmental indicators.



Requires the Office of Environmental Health Hazard Assessment (OEHHHA) to develop and maintain a system of environmental indicators that meet specified objective.



Requires the Secretary of CalEPA to assess the development and implementation.



What is EPIC?

EPIC → *Environmental Protection Indicators for California* [AB1360; OEHHA]



EPIC+ → *Education, Process Improvements, and Compliance for Environmental Risk Reduction*

Measuring Performance

Find and target environmental non-compliance problems



Motivate regulated parties to reduce their negative impacts on the environment



Assess and depict program effectiveness more accurately



Communicate program effectiveness to USEPA, CalEPA, federal and state legislatures, and the public



EPIC Origins in San Diego

Pilot Project

- Identify and measure environmental indicators on a select industry type

Workgroup

- Industry + CUPA

Objectives

- Demonstrate that education and outreach can be effective tools in obtaining compliance from the regulated community
- Establish a risk-based inspection process that can be used to assist in directing resources to areas of high risk and non-compliance

Approach

- ▶ Outreach and Education
- ▶ Focus on a narrow set of indicators (violations)
- ▶ Establish a baseline
- ▶ Calibrate inspectors for consistency
- ▶ Measure the impact of educational outreach



Compliance Through Education

Industry selected: Biotech and Research & Development

- ▶ Hazardous Waste
- ▶ Hazardous Materials Business Plan
- ▶ Medical Waste
- ▶ Aboveground Petroleum Storage
- ▶ Underground Storage Tanks





EPIC+ Eligibility

- ▶ Biotech and/or R&D Industry
- ▶ CUPA permit
- ▶ Inspection
- ▶ Application
- ▶ Attend seminar or complete online training
- ▶ Good Compliance history



Application

- Applicant
- Last EPIC+ training
- Compliance history (last 2 inspections)
- Date of last HMBP certification



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION

5500 OVERLAND AVE, SAN DIEGO, CA 92123

(858) 505-6657 <http://sdcdeh.org>

EPIC+ Application

EDUCATION, PROCESS IMPROVEMENTS, AND COMPLIANCE FOR ENVIRONMENTAL RISK REDUCTION

Biotech and Lab Research & Development Facilities

A. SITE INFORMATION			
Business Name: _____		UPFP Number: _____	
Site/Facility Address: _____		CA	
Street Number	Street Name	City	State Zip Code
B. APPLICANT INFORMATION			
Contact Person: _____		Title: _____	
Last Name	First Name	M.I.	
Telephone #: (____) _____		CONTACT PERSON MUST BE FACILITY EMPLOYEE AND CANNOT BE A CONSULTANT OR VENDOR FOR THE FACILITY	
E-Mail Address: _____			
C. NAME OF EMPLOYEES THAT ATTENDED SEMINAR OR COMPLETED ONLINE TRAINING			
Name: _____		Seminar/Online Training Date: ____ / ____ / ____	
Name: _____		Seminar/Online Training Date: ____ / ____ / ____	
TRAINED PERSONNEL MUST BE EMPLOYEE(S) AND CANNOT BE A CONSULTANT OR VENDOR FOR THE FACILITY			
D. COMPLIANCE HISTORY (INDICATE NUMBER OF VIOLATIONS RECEIVED)			
Inspection Date: ____ / ____ / ____	Class I: ____	Class II: ____	Minor: ____
Inspection Date: ____ / ____ / ____	Class I: ____	Class II: ____	Minor: ____
Date of last HMBP Certification (if applicable): ____ / ____ / ____			TO BE ELIGIBLE FOR EPIC+ EACH INSPECTION MUST SCORE FEWER THAN 15 POINTS (SEE REVERSE)
E. CERTIFICATION			
As the business representative I certify that this business meets and will continue to meet all the Performance Standards outlined on the reverse of this page. I understand that failure to comply with these standards will trigger a return to the 24-month inspection interval and a standard fee schedule.			
Print Name: _____		Job Title: _____	
Signature: _____		Date: ____ / ____ / ____	
Note: A new application must be submitted within 30 days whenever there is a significant change in information, facility location, ownership, and/or EPIC+ trained employee. Failure to resubmit may result in cancellation of the EPIC+ status.			

Violation Scoring System

- < 15 points at each of last two inspections
- Points are aligned with the CUPA's violation classification system

VIOLATION SCORING SYSTEM EXAMPLES*

Class I: 15 POINTS

Examples:

- Operating without valid UPFP
- Failed to notify CUPA of onsite hazardous waste treatment, per Tiered Permitting requirements
- Unauthorized disposal of hazardous waste
- Unlawful transportation of hazardous waste
- Did not report a release or threatened release

Class II: 10 POINTS

Examples:

- Failed to annually certify HMBP
- Failed to report material/waste in CERS
- Failed to provide or update emergency contact info in CERS
- Hazardous waste stored on site too long
- Employees not trained
- Repeat violations

Minor: 4 POINTS**

Examples:

- Annual carcinogen/reproductive toxin list not submitted
- Medical SOLID WASTE not secured against unauthorized persons
- Generating hazardous waste with inactivated EPA ID number

**** Includes minor violations corrected on site**

***Be advised that this is not a complete list of all possible violations. For more information review violation checklists or contact your area specialist.**



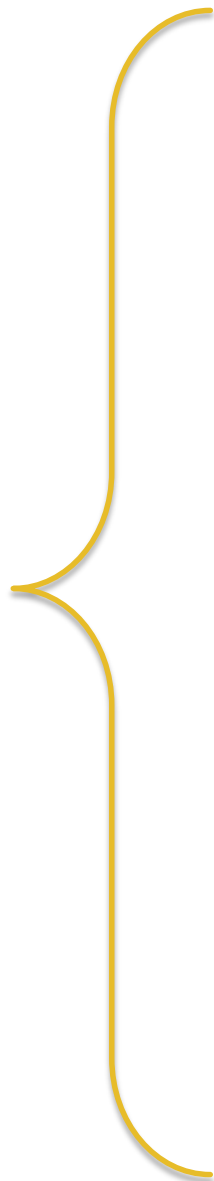
Benefits

- ▶ Decreased Inspection Frequency
 - With exception of USTs and MWLQG
- ▶ Reduced CUPA Base Fee
- ▶ Increased Communication
- ▶ Higher Compliance Rate
- ▶ Certificate
- ▶ 59 facilities as of July 2019





Challenges



Training



Updates to Laws and regulations



Tracking information



New staff



Cost recovery



Contact Info

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