



DEPARTMENT OF ENVIRONMENTAL RESOURCES

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RE: Inspections during the COVID-19 Pandemic

Stanislaus County Department of Environmental Resources, Hazardous Materials Division (SCHMD) have suspended all inspections until further notice during this COVID-19 crisis, While our on-site presence is not currently available, please know we are *still* here to address any questions or concerns. Below is guidance to keep your businesses in compliance during this time:

General

- Continue documenting inspections of storage tanks, employee trainings, hazardous material releases, hazardous waste accumulation start dates, etc.,
- Continue all safety procedures, industry standards, and best management practices,
- Document the reason(s) compliance could not be achieved. Documentation should include, but not limited to:
 - Cancellations and the reasons associated;
 - Records of public closures or restrictions, and
 - Any relevant information showing the efforts made to maintain compliance to the extent possible.
- Return to compliance as soon as possible.

For Underground Storage Tank (UST) Facilities:

- Provide immediate notification to SCHMD if your business closes to the public, temporarily or permanently. This may result in required updates to the Monitoring Plan in CERS.
- Provide immediate notification to SCHMD if your business experiences delay in performing required testing, maintenance, and inspections that prevent you from being in regulatory compliance.
- Maintain all documentation and identify the specific nature and dates of non-compliant anniversary testing or certifications.
- Keep in contact with your underground tank contractor(s) and ensure continuity of service. To avoid unnecessary delays, you may need to locate and utilize alternate installers, service technicians, etc. if your regular contractor is not readily available.
- Please keep in mind that while the SCDER is not required to be on-site to observe certification and testing, and your facility must still provide required notification of all related CUPA on-site activity to DER. If your UST monitoring system certification is performed without being witnessed by this Department, you will need to coordinate an on-site inspection at a later date to satisfy your annual permit requirements.

For Medical Waste Program Facilities:

- Due to the suspension of inspections, if your facility is currently and plans to undergo closure during this time, please contact our mainline at 209-0525-6700 to inform us of the closure. We will still work with your facility to assist in the closure process.
- If you need a copy of your Registration, please contact our mainline at 209-525-6700 and we will assist you with obtaining a copy.

For Monitoring Wells and Exploratory Borings Program:

- Please continue to submit applications and call for questions as usual.

For Site Mitigation Case Inquiries:

- Please continue to contact our office for assistance on these matters.

For Hazardous Waste Generator (HWG) Facilities

- Facilities who provide essential services may continue to generate hazardous waste and should maintain compliance with hazardous waste requirements for storage and disposal. These facilities shall arrange pickup of their hazardous waste to avoid over-accumulation.
- If your efforts to secure proper disposal of hazardous waste by the required time have not been successful, you can apply for an extension to accumulate your RCRA or Non-RCRA hazardous waste per 22 CCR § 66262.34(a) or (d).
 - If your facility is a RCRA Large Quantity Generator (LQG), as you generate more than 2,200 lbs. of RCRA hazardous waste, or more than 2.2 lbs. of RCRA Acutely hazardous waste in a month, you must apply for an extension, of up to 30 days, from the CA Department of Toxic Substances Control (DTSC). Please use the link below to access the DTSC 30-day Storage Exemption Application, which can be completed and submitted electronically.
 - https://dtsc.ca.gov/wp-content/uploads/sites/31/2020/04/90-day_storage3-2020_FormOnly-a.pdf
 - If your facility generates Non-RCRA or RCRA exempt hazardous waste, you must submit a hard copy letter, by certified mail with return receipt requested, to SCHMD notifying of the extension. This letter shall meet the requirement provided in 22 CCR § 66262.35. You can also utilize the template which SCHMD has provided for generators to complete and submit as notification.
- If your facility is unable to meet these requirements due to a shortage of hazardous waste disposal services or limited on site operations or personnel, please ensure the following:
 - The hazardous waste containers are labeled and closed minimizing the possibility of fire, explosion, or any unplanned release.
 - All efforts should be made to ensure that hazardous wastes are not accumulated past the permitted time.
- If your facility will not be operating, ensure that all hazardous waste storage containers are securely closed and labeled, and the facility has been secured from public access.
- If your transporter is unavailable for pickups, try contacting another registered transporter: [Registered Transporters](#)
- The Stanislaus County Household Hazardous Waste Collection (HHW) facility has closed to the public at this time. If your facility has been approved to utilize the HHW for waste drop offs, please make other arrangements for disposal. Once normal business operations resume, you will be able to schedule an appointment.
- Facilities, which store hazardous waste in tanks, shall continue to comply with hazardous waste tank system regulations, i.e. conducting daily inspections.

For Hazardous Materials Business Plan (HMBP)

- Businesses should continue using CERS as is necessary to maintain compliance unless extenuating circumstances prevent them from doing so. If you have questions, please contact SCHMD or your district inspector.

The SCHMD promotes public health and safety and acting responsibly under the circumstances in order to minimize the effects and duration of any non-compliance cause by COVID-19. SCHMD Staff is available Mondays through Fridays from 7:30 a.m. to 5:00 p.m. to answer any questions you may have. Please call: (209) 525-6700. Thank you for your time.