

HAZARDOUS MATERIALS STORAGE AND COMPLIANCE EXECUTIVE SUMMARY

1/11/24

Stanford University is authorized to store and use hazardous materials through a storage permit from Santa Clara County's (SCC) Hazardous Materials Compliance Division. The County has authority under the Hazardous Materials Storage Ordinance (HMSO), which applies to any facility that stores hazardous materials.

EH&S handles the permit's administration, but it is the responsibility of every chemical owner and/or chemical user to properly store hazardous materials in their lab or facility. Non-compliance with the ordinance may result in fines, enforcement, suspension, or permit revocation.

The lifecycle of a hazardous materials permit begins with the plans review of anticipated chemical storage volumes in a new or renovated building. The chemical inventory is submitted with the building plans and approved by the County. The chemical owner must update Chemtracker with the chemical inventory immediately upon moving hazardous materials into a new facility. EH&S is required to submit the chemical inventory for the building to the county using a software program named CERS within 30 days. This information is important for emergency responders such as the Palo Alto Fire Department. Federal, state, and local laws require a hazardous materials business plan (HMBP) to be submitted annually to CERS. HMBP elements include chemical inventory, facility maps, contingency plans, and employee training plans. The submitted HMBP for each building is uploaded into FIMS under EH&S Safety Documents and includes hazardous materials at or above reportable threshold quantities.

ChemTracker data is used to print out Life Safety Boxes located at each entrance to an area that stores hazardous materials. Permitted facilities are required to submit updated inventory annually or when there is a 100 percent or more increase in the quantity of material. The County then sends hazardous materials storage permits and the associated fees to EH&S. Permit fees are paid centrally by EH&S followed by journal transfers to charge back to departments for their individual storage fees at the end of the fiscal year.

To ensure Stanford is complying with the HMSO, the Regulatory Agency (either Santa Clara County or the City of Palo Alto Fire Department) conducts onsite inspections of permitted facilities once every three years. Typically, the inspector will visit 1-3 facilities during a weekly visit to campus and document storage violations. EH&S relays these findings to the responsible parties (responsible faculty member or chemical owner) and they are required to correct the findings within 21 days. EH&S submits the corrective actions to the regulatory agency within 30 days, outlining how the findings were corrected. Violations and fines can range from \$5,000 per day

per occurrence for HMSO to \$70,000 per day per occurrence for hazardous waste violations and may be assessed against the school, department, and/or responsible faculty member.

As a chemical owner and user, it is your responsibility to know how to comply with the HMSO. Permit conditions include the proper storage, identification, inventory and self-inspection of chemicals.

[Hazardous materials storage requirements:](#)

- Storage - chemicals are properly [segregated](#), all chemicals are stored in clean secondary containment, container lids are closed
- Identification - all containers are labeled with the full chemical name
- Inventory - [chemical inventory](#) is updated in [ChemTracker](#)
- Inspections - the facility is completing self-inspections in [BioRaft](#)
 - Quarterly for labs and shops
 - Monthly for hazmat storage areas (gas storage rooms, cold rooms)
- Hazardous Waste - [handling and storage requirements](#)

Federal - Emergency Planning and Community Right-To-Know Act (EPCRA) [40 CFR 350-372](#) and [42 USC Chapter 116](#)

State - California Health and Safety Code (H&SC) [25500-25519](#) and [Title 19 CCR 4](#).

County and Municipal Code - Santa Clara County Hazardous Materials Storage Ordinance [Title B11 Chapter XIII](#) and Palo Alto Municipal Code [Title 17](#).