



Power Outage Impacts on CUPA Programs

Introduction

The Certified Unified program agency (CUPA) regulates facilities that are equipped with components for monitoring and safe guarding the hazardous material and/or waste generated and store on site. These components may not work in case of a power outage. Some of the facilities may have a secondary source of power. Alternate methods could be used in case of power outage to safe guard these chemicals for facilities that do not have a secondary source of power. Being prepared to overcome the constraints of power outages is a smart thing to do. Safety of employees and the public is foremost.

❖ Underground Storage Tank (UST) program

UST systems are monitored using sensors for leak detection and operate with electricity. Facilities that have a secondary source of power may use it in case of power outages. Facilities that do not have a secondary source of power should design and maintain a plan to use in case of power outages. One of the ways the facility can provide monitoring is by keeping records of daily visual inspections until power is back on. This would require physically looking into sumps, under dispenser containments and checking the level of product/waste in the USTs. Records of these inspections must be kept on site to be reviewed during CUPA inspections. Electronic gates and electronic doors that secure some UST sites may not be functional, have a plan to access and secure them.

❖ Aboveground Petroleum Storage Act (APSA) program

Aboveground tanks are installed with sensors and leak detectors that will not operate in the event of a power outage. A facility should have a plan in place to make sure that the aboveground tanks are inspected daily during a power outage. Records of these inspections must be kept on site to be reviewed during CUPA inspections. Electronic gates and electronic doors that secure some APSA sites may not be functional, have a plan to access and secure them.

❖ California Accidental Release (CalARP) Program

CalARP facilities have complex systems that should have standard operating procedures in place to safely shut down their systems (Title 19 Section 2755.3(a) and (b)) in the event of an emergency. The chemical detection systems may not be operational without a backup source of power requiring a method of daily inspection be included in emergency procedures. Records must be kept to be reviewed during routine CUPA inspections.

Security is critical for these sites. If electronic gates or electronic doors are used to secure the CalARP sites they may no longer be functional. Be sure to include a way to access the doors and secure the gates in your emergency procedures.

❖ Hazardous Material/ Hazardous Waste Programs

Hazardous Materials/Wastes are normally kept in 55-gallon drums or small totes. Although, these containers may not have any sensors or leak detection equipment, monitoring them in the event of a prolonged power outage should be addressed in the facility's best management practices. If hazardous waste treatment is performed at the facility, plans must be in place to safely close the treatment processes to avoid unauthorized discharge to the environment. Records of these inspections must be kept on site to be reviewed during CUPA inspections. If electronic gates and electronic doors are used to secure the materials/wastes, they may not be functional, have a plan to access the doors and secure the gates.