

**Office of the State Fire Marshal**  
- Evaluation of Programs -

**Agency Name:** \_\_\_\_\_

**Agency Contact:** \_\_\_\_\_

**Agency Phone:** \_\_\_\_\_

**Evaluation Date:** \_\_\_\_\_

**Evaluator's name:** \_\_\_\_\_

**Evaluator's Phone:** \_\_\_\_\_

**Introduction**

Because the HMMP/HMIS and Business Plan requirements are similar, the two program elements have been merged, to the extent possible, to meet the intent of coordinating, consolidating, and making the programs consistent, while reducing the regulatory burden on business, and duplication of effort by regulatory agencies. The purpose of the fire code element is to enhance coordination and communication between CUPA, fire agency, and business stakeholders. To accomplish this, the statutes and regulations provide for:

- **Communication** – between the CUPA, businesses, and fire agencies for sharing hazardous materials information;
- **Coordination** – of activities, such as inspection, enforcement, and emergency response to avoid overlap and duplication of effort, and;
- **Consistency and Consolidation** – of laws, regulations, ordinances, policies, and procedures to prevent unnecessary burden on business.

Please review this questionnaire to prepare for the evaluation, and help make improvements in your program. A Compendium of Laws and Regulations for the HMMP/HMIS Program Element in the Unified Program is attached for your reference.

If you have any questions, please contact:

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**Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)**

<p><b>Program Goal:</b> To ensure the CUPA is implementing the Hazardous Materials Management Plan / Hazardous Materials Inventory Statements (HMMP/HMIS) program element of the California Fire Code (CFC) for all regulated businesses as specified in CFC § 8001.3.2a and 8001.3.3a, Health and Safety Code (HSC) § 25500 et seq., HSC § 13143.9(b) and 13143.9(c), HSC § 25404 et seq., California Code of Regulations (CCR) Title 27 § 15100 et seq., and CCR Title 19 § 2729 et seq., and to enhance coordination and communication between CUPA, fire agency, and business stakeholders.</p>		
Statute or Regulation	General Program Standards	Program Improvement (Y/N)
HSC § 25404.2(a)(1)(E)(2)	<p>1. Has the CUPA, to the maximum extent feasible within statutory constraints, and in conjunction with participating agencies, consolidated, coordinated, and made consistent any local or regional regulations, ordinances, requirements, or guidance documents related to the implementation of the provisions specified in subdivision (c) of section 25404 or pursuant to any regional or local ordinance or regulation pertaining to hazardous waste or hazardous materials?</p> <p>Please explain:</p>	
HSC § 25503.5(c)(1)	<p>2. Is the CUPA aware that, although exempt under the Unified Program Business Plan requirements, hazardous consumer products may be regulated by the local fire chief?</p>	
HSC 13143.9 and HSC 25503.5	<p>3a. Is the CUPA aware of the fire service's authority to require a HMMP/HMIS below the business plan threshold quantity amounts of 55 gallons, 200 cubic feet, and 500 pounds?</p> <p>3b. Are any of the local fire agencies regulating quantities below business plan threshold quantities?</p> <p>3c. Does the CUPA collect chemical inventory data on chemicals below the business plan threshold quantities?</p> <p>3d. What sort of coordination and communication is there to prevent duplication of effort by businesses and agencies?</p> <p>Please explain:</p>	

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<p>HSC § 25503(c) (6) (C) &amp; (F)</p>	<p>4. If the CUPA has exempted unstaffed remote facilities located in sparsely populated areas from the business plan requirements, are both of the following requirements met: (C) Warning signs are posted and maintained for hazardous materials pursuant to the CFC, and (F) The CUPA shall forward a copy of the notification and inventory to those agencies that share responsibility for emergency response?</p>	
<p>HSC § 25506(a)</p>	<p>5. Can/will the CUPA transmit copies of the entire business plan or any information contained in the business plan to any requesting state or local agency?  Explain method/process:</p>	
<p>HSC 25509.2(a)(3)</p>	<p>6. Does the CUPA forward the business plan data collected, within 15 days of receipt and confirmation, to other local agencies in a format easily interpreted by those agencies with shared responsibilities for protection of the public health and safety and the environment?  Describe process/method:</p>	
<p>HSC § 25509(b), T27 § 15400.4(a)</p>	<p>7. If the local fire chief requires businesses to comply with the requirements of UFC 8001.3.3a (HMIS), as adopted by the SFM pursuant to § 13143.9, have the businesses also filed the Addendum required by § 25503.9 with the CUPA?  Please explain:</p>	
<p>HSC § 13143.9(b), T27 § 15400.4(a)</p>	<p>8. Is the CUPA aware that a business, which files a Business Plan inventory form in compliance with Chapter 6.95 (commencing with section 25500) <u>including</u> the Addendum adopted pursuant to HSC § 25503.9, shall be deemed to have met the requirements of subdivision (c) of § 80.103 (now 8001.3.3a (HMIS)) of the UFC, as adopted by the SFM pursuant to this section?</p>	

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<p>HSC § 13143.9(c), T27 § 15400.4(a)</p>	<p>9. Is the CUPA aware that a business, which is not required to file a hazardous materials inventory form (per HSC § 25509), but which is required by the local fire chief to comply with subdivision (c) of UFC § 80.103 (now 8001.3.3a (HMIS)), as adopted by the SFM pursuant to this section, shall, notwithstanding Chapter 6.95 (commencing with § 25500) of Division 20, file the inventory form adopted pursuant to section 25503.3 and the Addendum adopted pursuant to section 25503.9 with the local fire chief for purposes of complying with this requirement, if determined to be necessary by the fire chief?</p>	
<p>UFC/CFC § 8001.3.2a and 8001.3.3a</p>	<p>10a. Does the local fire chief require an HMMP with each fire permit application? If not, why not?</p> <p>10b. Does the local fire chief require an HMIS with each fire permit application? If not, why not?</p>	

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<b>Statute or Regulation</b>	<b>Inspection and Enforcement Standards</b>	<b>Program Improvement (Y/N)</b>
HSC § 25404.2(a)(1) (E)(4)	<p>1. Has the CUPA, in conjunction with participating agencies, to the maximum extent feasible, coordinated the single, unified inspection and enforcement program of other federal, state, regional, and local agencies, which affect facilities regulated by the unified program? Please address and explain specifically with respect to local fire agency/environmental health coordination and communication.</p> <p>Please describe:</p>	
T27 § 15100 (b)(5)	<p>2. Has the CUPA consolidated permits, coordinated enforcement of regulations and ordinances, and developed and coordinated a single inspection and enforcement program? Please address and explain specifically with respect to local fire agency/environmental health coordination and communication.</p> <p>Please describe:</p>	
HSC § 25509.2(a)(4)	<p>3. Is enforcement of this chapter and the UFC/CFC coordinated?</p> <p>Please explain:</p>	
T27 § 15200(f)	<p>4. Has the CUPA's inspection and enforcement program plan been implemented in cooperation with all proposed participating agencies of the jurisdiction? And, does the enforcement component include coordination and timely notification between responsible agencies and the appropriate prosecuting attorney?</p> <p>Please explain:</p>	
T27 § 15200 (f)(2)(E) and (F)	<p>5. Have provisions been made for county and/or regional meetings of the CUPA with its participating agencies and between the CUPAs in a countywide or regional area involving multiple CUPAs at least every quarter? What efforts have been made to eliminate duplication,</p>	

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	<p>inconsistencies, and lack of coordination with inspection and enforcement programs?</p> <p>Please explain:</p>	
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<b>Statute or Regulation</b>	<b>Reporting Standards</b>	<b>Program Improvement (Y/N)</b>
HSC § 25503.3(b)(1) and T27 § 15400.4(a)	<p>1a. Have any forms, designated by the CUPA pursuant to this paragraph, ensured that all information required by HSC § 25509 is reported?</p> <p>1b. Have the forms been developed in consultation with the other agencies within the jurisdiction that are responsible for fire protection, emergency response, and environmental health?</p> <p>1c. If the CUPA permits inventory information to be submitted by electronic means, has the format and mode of submittal been developed in consultation with those other agencies?</p>	
T19, § 2729.3(b)(1), T27 § 15400.4(a)	<p>2. Has the CUPA developed any alternative hazardous materials inventory reporting requirements in consultation with all agencies within the CUPA's jurisdiction that are responsible for fire protection, emergency response, and environmental health?</p> <p>Please explain:</p>	
T19, § 2729.7(a), T27 § 15400.4(a)	<p>3. Is the CUPA aware that the requirements of § 25503.9 obligate the CUPA to require businesses to submit an Addendum with the inventory of hazardous materials when complying with § 13143.9(b) and (c) and § 25509(b)?</p> <p>Please explain, specifically with respect to coordination and communication between fire protection and environmental health:</p>	
T19 § 2729.7(a)(1)	<p>4. Are the Fire Code Hazard Classes identified on the chemical description page of the hazardous materials inventory statement, if required by the local fire chief? If not, why not?</p> <p>Please explain:</p>	

**Compendium of Laws and Regulations for the HMMP/HMIS Program Element in the  
Unified Program  
By  
Office of the State Fire Marshal  
CUPA Program**

**INTRODUCTION**

The Hazardous Materials Management Plan (HMMP) and Hazardous Materials Inventory Statement (HMIS) requirements in Article 80 of the Uniform Fire Code (UFC), have been incorporated by adoption into the California Fire Code (CFC), as Part 9 of Title 24, California Code of Regulations (hereinafter, referred to as UFC Article 80, sections (§) 8001.3.2a and 8001.3.3a).

The HMMP/HMIS was developed during the 1980s around the same time as the Business Plan requirements in Chapter 6.95 of the Health and Safety Code (HSC). Because the requirements of the HMMP/HMIS and the Business Plan are similar, the two program elements have been merged, to the extent possible, to meet the intent of coordinating, consolidating, and making the programs consistent, while reducing regulatory burden on business and duplication of effort by regulatory agencies.

Below are the sections of Health and Safety Code (HSC), California Code of Regulations (CCR), and Uniform Fire Code/California Fire Code (UFC/CFC) that specifically reference the HMMP/HMIS, the Addendum, and the State Fire Marshals' and fire agency's role in the Unified Program. A summary of the Cal Chief's position paper (March, 2000) on the role of the fire agencies in the Unified Program is also included at the end.

**California Health and Safety Code (HSC), [Chapter 6.11, Sections 25404-25404.8](#) Unified Program.**

- HSC § 25404(b) ...The Unified Program shall be developed in close consultation with the director, the Office of Emergency Services, the State Fire Marshal, the State Water Resources Control Board, and the California Regional Water Quality Control Boards, the local health officers, local fire service agencies, and other appropriate officers of interested local agencies, and affected businesses and interested members of the public, including environmental organizations.
- HSC § 25404(c) the unified program shall consolidate the administration of the following, and shall, to the maximum extent feasible within statutory constraints, ensure the coordination and consistency of any regulations adopted pursuant to those requirements:
  - (6) The requirements of subdivisions (b) and (c) of Section 80.103 of the UFC (now 8001.3.2a and 8001.3.3a), as adopted by the State Fire Marshal pursuant to Section 13143.9 (b) and (c) of the HSC, concerning hazardous material management plans and inventories.

## Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)

- HSC § 25404.1(a)(1) All aspects of the unified program related to the adoption and interpretation of statewide standards and requirements shall be the responsibility of the state agency that is charged with that responsibility under existing law (SFM is charged with HMMP/HMIS).
- HSC § 25404.2(a)(1)(A) The CUPA shall develop and implement a procedure for issuing, to a unified program facility, a unified program facility permit, which would replace any permit or authorization required under any local ordinance or regulation relating to the generation or handling of hazardous waste or hazardous materials, but which would not replace a permit issued pursuant to a local ordinance which incorporates provisions of the UFC and UBC.
- HSC § 25404.2(a)(1)(E)(2) To the maximum extent feasible within statutory constraints, the CUPA, in conjunction with participating agencies, shall consolidate, coordinate, and make consistent any local or regional regulations, ordinances, requirements, or guidance documents related to the implementation of the provisions specified in subdivision (c) of section 25404 or pursuant to any regional or local ordinance or regulation pertaining to hazardous waste or hazardous materials.
- HSC § 25404.2(a)(1)(E)(4) The CUPA, in conjunction with participating agencies, shall coordinate, to the maximum extent feasible, the single, unified inspection and enforcement program of other federal, state, regional, and local agencies which affect facilities regulated by the unified program.
- HSC § 25404.3(b) In determining whether an applicant agency should be certified, or designated as certified, the Secretary, after receiving comments from the director, OES, SFM, SWRCB, and RWQCB, shall consider at least...

## California Health and Safety Code, [Chapter 6.95, Article 1, Sections 25500-25520](#)

- HSC § 25503(a) ...OES shall adopt, after consultation with the SFM and other appropriate entities, regulations for minimum standards for business plans and area plans.
- HSC § 25503.3(a) OES shall, in consultation with the AAs<sup>1</sup>, in accordance with § 25503.1, adopt by regulation a single comprehensive hazardous material reporting form<sup>2</sup> for businesses to submit to AAs for the purposes of § 25509 (*Addendum*<sup>3</sup>). The form shall include a section for additional information (*line 246, OES Form 2731*) that may be

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<sup>1</sup> AA = Administering Agency and is synonymous with CUPA.

<sup>2</sup> OES Form 2731, Hazardous Materials Inventory – Chemical Description serves as the single comprehensive hazardous material reporting form. If required by the local fire chief, OES Form 2731 shall include the Fire Code Hazard Classes for each chemical (Line 210, OES Form 2731), and any additional locally required information (Line 246). Supplemental pages may be attached to OES Form 2731, if needed. Additional information includes data needed by the fire chief for emergency response and/or building occupancy determination (the *Addendum*). Check with your local fire chief for additional locally required information.

<sup>3</sup> The Addendum is not defined except to say that it must be a single comprehensive reporting form (HSC § 25503.3) in compliance with HSC § 13143.9 (b) and (c) and HSC § 25509(b), required by HSC § 25503.9.

**Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)**

requested by the AA. The regulations shall also specify criteria for sharing data electronically. Except as provided in subdivisions (b) and (c), after January 1, 1997, each AA shall require businesses to use this form annually when complying with § 25509.

- HSC § 25503.3(b)(1) Any form designated by an AA pursuant to this paragraph shall ensure that all of the information required by section 25509 is reported. The form shall be developed in consultation with the other agencies within the jurisdiction that are responsible for fire protection, emergency response, and environmental health. If the AA permits inventory information to be submitted by electronic means, the format and mode of submittal shall be developed in consultation with those other agencies and, following the adoption of standards for the sharing of electronic data...
- HSC § 25503.5(c)(1) Hazardous materials contained solely in a consumer product for direct distribution to, and use by, the general public is exempt from the business plan requirements of this chapter unless the AA has found, and has provided notice to the business handling the product, that the handling of certain quantities of the product requires the submission of a business plan, or any portion thereof, in response to public health, safety, or environmental concerns. [Note: Although exempt under the Unified Program Business Plan requirements, consumer products are not exempt from the fire code HMMP/HMIS, and are regulated by the local fire chief.]
- HSC § 25503.5(c)(6) The AA shall exempt a business operating an unstaffed remote facility located in an isolated sparsely populated area from the hazardous materials business plan and inventory requirements of this article if the facility is not otherwise subject to the requirements of applicable federal law, and all of the following requirements are met:
  - (C) Warning signs are posted and maintained for hazardous materials pursuant to the California Fire Code.
  - (F) The AA shall forward a copy of the notification and inventory to those agencies that share responsibility for emergency response.
- HSC § 25506(a) ...The AA shall transmit copies of the entire business plan or any information contained in the business plan to any requesting state or local agency.
- HSC § 25509(b) If the local fire chief requires the business to comply with the requirements of UFC 8001.3.3a (HMIS), as adopted by the SFM pursuant to § 13143.9, the business shall also file the *Addendum*<sup>4</sup> required by § 25503.9 with the AA.
- HSC § 25509.2(a)(2) To streamline and ease the regulatory burdens of doing business in this state, compliance with (*all of*) the Business Plan requirements of this chapter shall also

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<sup>4</sup> The legislative intent of the “Addendum” is to collect and provide additional locally collected information, which may be required by the fire chief to meet the fire code HMMP/HMIS requirements. Additional requirements may include information on all hazardous materials, regardless of amount. This information may be necessary for emergency response and/or building occupancy determination. Check with your local fire chief for additionally required information.

## Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)

suffice to meet the requirements of the Uniform Fire Code with regard to the requirement for a HMMP/HMIS, as set forth in Article 80 of the UFC and its appendices<sup>5</sup>.

- HSC § 25509.2(a)(3) Businesses which are required to comply with this chapter do so on one form, with one fee and one inspection. The AA shall forward the data collected, within 15 days of receipt and confirmation, to other local agencies in a format easily interpreted by those agencies with shared responsibilities for protection of the public health and safety and the environment.
- HSC § 25509.2(a)(4) Enforcement of this chapter and the UFC shall be coordinated.
- HSC § 25509.2(b) Notwithstanding § 13143.9, and any standards and regulations adopted pursuant to that section, any business which files the annual inventory form in compliance with this article, including the Addendum adopted pursuant to § 25503.9, as required by the local fire chief to comply with subdivision (c) of § 80.103 (now § 8001.3.3a) of the UFC, as adopted by the SFM pursuant to § 13143.9, shall be deemed to have met the requirements of UFC § 8001.3.3a, as adopted by the SFM pursuant to § 13143.9.<sup>6</sup>
- HSC § 25509.2 (c) Notwithstanding § 13143.9, and any standards and regulations adopted pursuant to that section, any business which establishes and maintains a business plan for emergency response to a release or a threatened release of a hazardous material in accordance with § 25503.5, shall be deemed to have met the requirements of subdivision (b) of § 80.103 (now 8001.3.2a (HMMP)) of the UFC, as adopted by the SFM pursuant to § 13143.9(b) and (c).
- HSC § 25509.2(d) Except for the Addendum required by the local fire chief, the administering agency shall be the sole enforcement agency for purposes of determining compliance pursuant to subdivisions (b) and (c).
- HSC § 25509.2(e) Except as otherwise expressly provided in this section, this section does not affect or otherwise limit the authority of the local fire chief to enforce the UFC.
- HSC § 13143.9(b) A business which files a Business Plan inventory form in compliance with Chapter 6.95 (commencing with section 25500) including the *Addendum* adopted pursuant to HSC § 25503.9, shall be deemed to have met the requirements of subdivision (c) of § 80.103 (now 8001.3.3a (HMIS)) of the UFC, as adopted by the SFM pursuant to this section.
- HSC § 13143.9(c) A business which is not required to file a hazardous materials inventory form (per HSC § 25509), but which is required by the local fire chief to comply with subdivision (c) of UFC § 80.103 (now 8001.3.3a (HMIS)), as adopted by the SFM pursuant

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<sup>5</sup> Compliance with (*all of*) the Business Plan requirements of Chapter 6.95 is sufficient to meet the requirements of the UFC HMMP/HMIS. To meet the fire code requirements of the HMMP/HMIS, using the Business Plan format, it is critical to determine additional information that may be required by the local fire chief pursuant to HSC section 13143.9(b) and (c). HSC § 25509.2(b) states that any business that files the annual inventory in compliance with Business Plan requirements including the *Addendum*, complies with UFC 8001.3.3a.

<sup>6</sup> Any business that files the annual inventory in compliance with Business Plan requirements including the *Addendum*, complies with UFC 8001.3.3a (HMIS).

## **Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)**

to this section, shall, notwithstanding Chapter 6.95 (commencing with § 25500) of Division 20, file the inventory form adopted pursuant to section 25503.3 and the Addendum adopted pursuant to section 25503.9 with the local fire chief for purposes of complying with this requirement, if determined to be necessary by the fire chief.

### **California Code of Regulations, Title 19, Division 2, Chapter 4, Sections 2620-2734**

- T19, Article 4 (general). The provisions of this subchapter are intended to be implemented in coordination with existing local hazardous materials planning efforts.
- T19, § 2729.2 Hazardous Materials Inventory Reporting Requirements.
- T19, § 2729.3(b)(1), Alternative Hazardous Materials Inventory Requirements shall be developed in consultation with all agencies within the CUPA's or AA's jurisdiction that are responsible for fire protection, emergency response, and environmental health.
- T19 § 2729.4(a) Hazardous Materials Inventory Submittal. A business shall submit a hazardous materials inventory to the appropriate CUPA or AA and local fire agency.
- T19 § 2729.7(a) UFC Compliance Requirements. The requirements of § 25503.9 of the HSC to obligate administering agencies to require businesses to submit an Addendum with the inventory of hazardous materials when complying with § 13143.9(b) and (c) and § 25509(b) of HSC shall be met by complying with the requirements of § 2729.2.
- T19 § 2729.7(a)(1) If the local fire chief requires submittal of a Hazardous Materials Inventory Statement (HMIS) as stated in the UFC § 80.103 subdivision (c) (now § 8001.3.3a), then the Fire Code Hazard Classes shall be identified on the chemical description page.

### **California Code of Regulations, Title 27, Division 1, Subdivision 4, Chapter 1, Sections 15100-15620**

- T27, § 15100(g). To avoid overlap in responsibilities, CUPA and State Agency responsibilities for the HMMP/HMIS (HSC § 25404(c)(6)) is clarified as follows:
  - (1) The State Fire Marshal (SFM) will coordinate program responsibilities concerning the HMMP/HMIS.
  - (2) The HMMP/HMIS, when required, will comply with HSC § 25500 through 25545 and CCR, T19, § 2620 et. seq.
  - (3) Each CUPA will ensure full access to and availability of information submitted under § 8001.3.2a and § 8001.3.3a, Part 9 of the CCR T24 (UFC/CFC), to any Chief of any county or city fire department or district with shared responsibility for protection of the public health and safety of the environment. The CUPA will forward the data collected, within 15 days of receipt and confirmation, to the county or city fire department or district.

**Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)**

- T27, § 15100(b)(2) ... The State Fire Marshal has responsibility for § 8001.3.2a and 8001.3.3a of the UFC, as adopted pursuant to § 13143.9 of the HSC, concerning the HMMP/HMIS...
- T27 § 15100 (a)(6). The Secretary administers the Unified Program pursuant to Chapter 6.11 of the HSC and regulations of this Division. This Division integrates but does not duplicate requirements established pursuant to: The HMMP/HMIS requirements - § 8001.3.2a and 8001.3.3a, Part 9 of T24, CCR (UFC/CFC).
- T27 § 15100 (b)(5). The Unified Program requires the CUPA in a jurisdiction to consolidate permits, coordinate enforcement of regulations and ordinances, and develop and coordinate a single inspection and enforcement program.
- T27 § 15160(b)(1). Application Certification Process. State agency review and recommendation. Applications, which are found to be complete, shall be reviewed pursuant to HSC § 25404.3(b). In determining whether an applicant agency should be certified, the Secretary shall consider comments from the following or their designee:
  - DTSC
  - OES
  - SFM
  - SWRCB
  - RWQCB
- T27 § 15200(f). ... the CUPA shall implement an Inspection and Enforcement Program Plan in cooperation with all proposed participating agencies of the jurisdiction and shall contain provisions for administering all program elements.
  - (2) The plan shall include an enforcement component. The enforcement component shall include the following:
    - (i) appropriate confidentiality
    - (ii) coordination and timely notification between responsible agencies and the appropriate prosecuting agency.
- T27 § 15200(f)(2)(E). Provisions for county and/or regional meetings of the CUPA with its participating agencies and between the CUPAs in a countywide or regional area involving multiple CUPAs at least every quarter.
  - (F) A description of the efforts made to eliminate duplication, inconsistencies, and lack of coordination within inspection and enforcement programs.
- T27 § 15400.4(a) Collecting Additional Information from Businesses on the UPCF. CUPAs shall collect additional local information on either supplemental pages or within the UPCF in the boxes provided on the Business Owner/Operator Identification page (OES form 2730) and the Hazardous materials Inventory – Chemical Description page (OES form 2731).

**Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)**

Title 27, Appendix C. UP Information Collection and Reporting Standards, Unified Program Data Dictionary – Business Section.

Hazardous Materials: Hazardous Materials Inventory – Chemical Description (OES form 2731)					
ID	ELEMENT	Edit Criteria	Length	Type	Information
210	Fire Code Hazard Classes	Narrative	60	AN	May be required by the CUPA <sup>7</sup> . Fire Code Hazard Classes describe to first responders the type and level of hazardous materials which a business handles. A list of the various hazard classes and instructions on how to determine which class a material falls under are included in the appendices of the UFC Article 80. If a material has more than one hazard class, include all. Contact CUPA for guidance.

- UFC § 8001.3.2a Hazardous Materials Management Plan (HMMP). When required by the chief, each application for a permit shall include a HMMP. The location of the HMMP shall be posted adjacent to permits when an HMMP is provided. The HMMP shall include a facility site plan designating the following:
  1. Storage and use areas,
  2. Maximum amount of each material stored or used in each area,
  3. Range of container sizes,
  4. Locations of emergency isolation and mitigation valves and devices,
  5. Product conveying piping containing liquids or gases, other than utility-owned fuel gas lines and low-pressure fuel gas lines, and
  6. On and off positions of valves for valves which are of the self-indicating type.
  7. Storage plan showing the intended storage arrangement, including the location and dimensions of aisles.

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<sup>7</sup> The statutes and regulations use several different phrases with respect to the “requirement” for the fire code hazard class on the hazardous materials inventory. Language such as: “if required by the fire chief,” “if required by the CUPA,” “when required by the chief,” and “if the local fire chief requires submittal of a HMIS, then the fire code hazard classes shall be identified on the chemical description page.” Because using the fire code hazard class is a requirement in § 8001.1.2 of Article 80 UFC/CFC, and to encourage coordination and communication between the CUPA and the fire agencies, as well as providing vital information to first responders, the SFM recommends that this information be included on line 210 of OES form 2731.

## Hazardous Materials Management Plans and Hazardous Materials Inventory Statements (HMMP / HMIS)

The plans shall be legible and approximately to scale. Separate distribution systems are allowed to be shown on separate pages. See also Appendix II-E of the 1998 California Fire Code.

[For SFM] The HMMP shall comply with Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.

- UFC § 8001.3.3a Hazardous Materials Inventory Statement. When required by the chief, each application for a permit shall include a Hazardous Materials Inventory Statement (HMIS).

[For SFM] The HMIS shall comply with Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.

### **A Summary of the Official Position of the California Fire Chiefs' Association (March, 2000)<sup>8</sup>**

Briefly, the *Addendum*, in its complete form, should include additional chemical information to determine fire code requirements such as Fire Code Hazard Class. In addition, information on all materials in any amounts, not just above the state thresholds of 55 gallons, 500 pounds, and 200 cubic feet, must be available (if required by the chief) for use by the fire chief because building occupancy type and fire code permits, although not specifically included in the UP, are based on the total quantity of chemicals in each hazard category. The *Addendum* is a requirement separate and apart from the Business Plan requirements, although the two documents should be coordinated and complimentary.

For more information, please contact:

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<sup>8</sup> This is a paraphrased summary of "Role of Fire Service Agencies in the Unified Program for Hazardous Materials and Waste An Official Position of the California Fire Chiefs' Association. March 200. Copyright © 2001 – California CUPA Forum.