

# Case Scenario

## Seasonal Concerns



Daphny Pan  
Environmental Inspector II  
Watershed Enforcement  
June 16, 2025

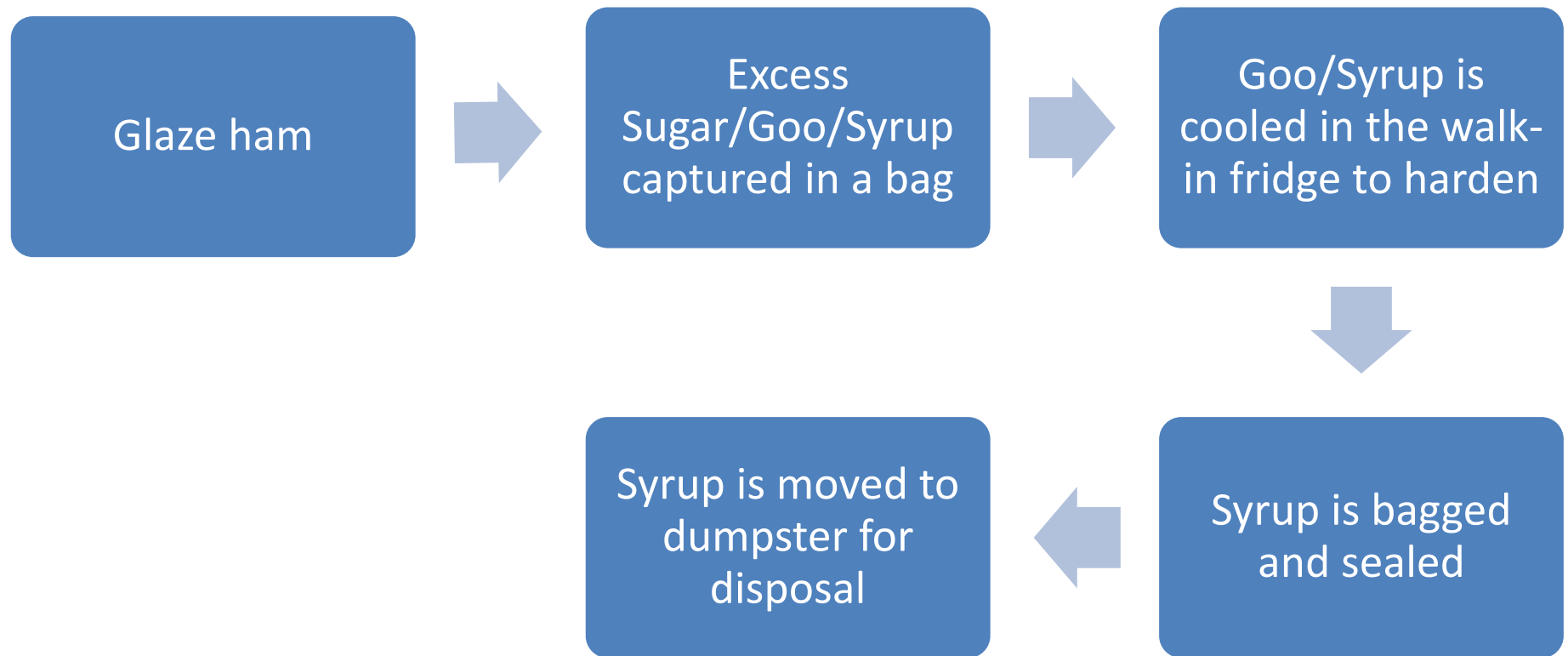


*Environmental Services*



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# Sugar/Goo Disposal Process





# Violation History

- 5-year site history
  - 3 inspections
- Nov. 2022:
  - Alternative compliance
- March 2022 and Dec 2018:
  - Minor violations

# Violation History (2022)



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# IDDE Report & Inspection

## Illicit Discharge Detection and Elimination



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# IDDE Report & Inspection



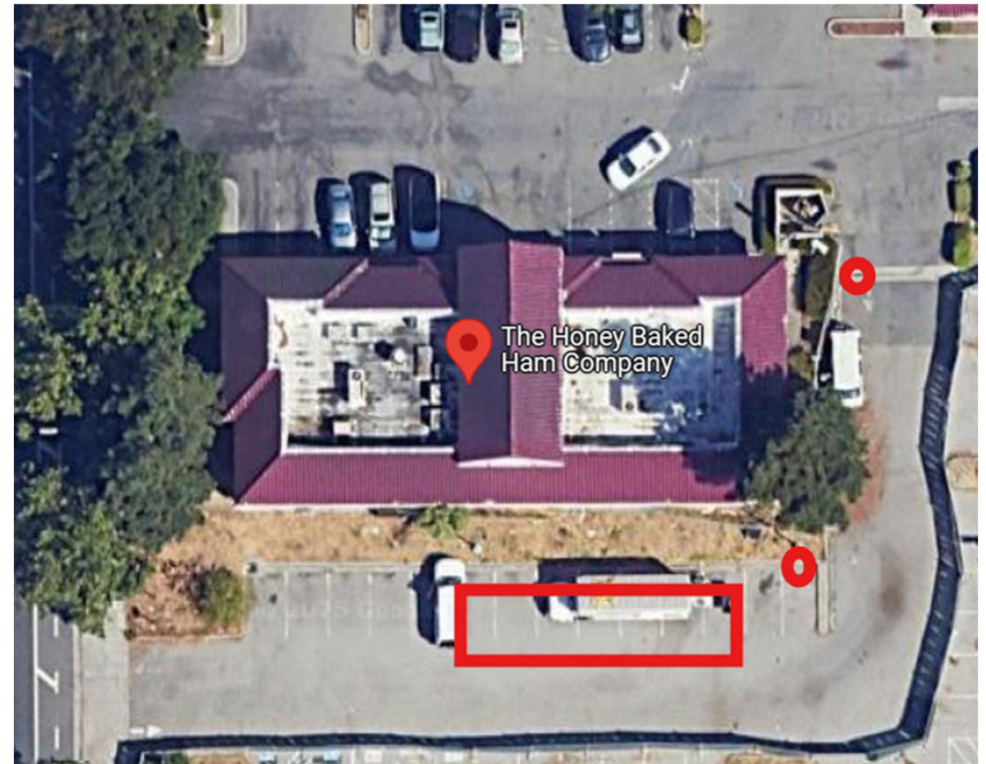
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# In December 2024...

- Food Service Establishment: Selling Pre-made products



- SIC Code: 5812
  - Standard Industrial Classification\*
- Pollutant: Syrup/Glaze



# Areas of Concern

December 17, 2024

- Initial Inspection



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# Areas of Concern

December 17, 2024

- Signage Placed in 2022 due to previous ACR issued (highest form of enforcement in the field)



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# Facility Map

NE Waste  
Corner



Initial  
Location

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# Areas of Concern

December 18, 2024



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# Areas of Concern

December 18, 2024



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# Areas of Concern

December 19, 2024



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# Areas of Concern

December 19, 2025



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# Areas of Concern

December 23, 2025



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# Facility Map



NE Waste  
Corner

Moved  
Location

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# Areas of Concern

December 23, 2025



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# Resolution

January 6, 2025



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# Challenges



- Allowing syrup in the waste stream
- Legal issues with neighboring property owner

# Challenges

- Untrained seasonal staff
- Heavy Syrup bags
- Busy Season



# Challenges



- Holiday Furlough
- Lack of space in plaza
- Unhoused in the area/encampment bordering the site

# City's Response & Citations

- Three Administrative Citations issued Referrals for the days we have evidence of potential and actual discharge.

- \$625

- \$750

- \$750

■ \$2,125 Total

ADMINISTRATIVE CITATION				
Violation Information		Administrative Information		
Citation issued to	Relationship to Violation	Citation Number	Issue Date	
The Honey Baked Ham Company, LLC	Agent for Service of Process	SD230509	01/27/2025	
c/o Amanda Garcia		Facility Number	16271	
330 N. Brand Blvd				
Glendale, CA 91203				
Violation Address				

# Business Response

- Encouraged for clarifications
  - \*TM: Team Member

## > BOH SUGAR BAG ROTATION

**SUGAR BAGS COOLING**

COOLING TIME BRIDGE				COMPLETED 4 HOURS				TRANSITION TO FREEZER				COMPLETED 4 HOURS			
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**SUGAR BAGS MOVED TO TRASH BY YEAR AROUND TM ONLY**

QUANTITY	DOUBLE BAGGED	STACKED NEATLY	TIME	QUANTITY	DOUBLE BAGGED	STACKED NEATLY	TIME	QUANTITY	DOUBLE BAGGED	STACKED NEATLY	TIME	QUANTITY	DOUBLE BAGGED	STACKED NEATLY	TIME
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**TRASH CHECKS BY YEAR AROUND TM ONLY**

OPENER	MID-DAY	CLOSER
<input type="checkbox"/> Double bags method	<input type="checkbox"/> Double bags method	<input type="checkbox"/> Double bags method
<input type="checkbox"/> NO Leaks	<input type="checkbox"/> NO Leaks	<input type="checkbox"/> NO Leaks
<input type="checkbox"/> Neatly Stacked	<input type="checkbox"/> Neatly Stacked	<input type="checkbox"/> Neatly Stacked
<input type="checkbox"/> TIME	<input type="checkbox"/> TIME	<input type="checkbox"/> TIME

**SPILL REPORTING AND CLEAN UP NOTES BY YEAR AROUND TM ONLY**

SPILL TIME	WHO CLEANED	MANAGER SIGN OFF AND NOTES
LOCATION		

**SPILL REPORTING AND CLEAN UP NOTES BY YEAR AROUND TM ONLY**

SPILL TIME	WHO CLEANED	MANAGER SIGN OFF AND NOTES
LOCATION		



Zip Ties

920719/10  
1/13/2025

**January Cleaning Log**  
Store: 8911

Date:	Associate:	Signature:	Who Follow Up:
1/10/2025	Paula Olney	[Signature]	Yvonne [Signature]
1/13/2025	Paula Olney	[Signature]	
1/15/2025			
1/17/2025			
1/20/2025			
1/22/2025			
1/24/2025			
1/27/2025			
1/29/2025			
1/31/2025			

# Business Response

## SUGAR REMOVAL PROCESS

TO BE DONE BY YEAR AROUND ASSOCIATE ONLY

### ITEMS NEEDED:

- ABSORBENT (KITTY LITTER)
- HAMMER, SHOVEL OR PICK
- BROOM
- SHOP VACCUUM
- TRASH BAGS
- SANDBAGS

### STEP BY STEP:

- 1) Identify area of sugar spill/residue
- 2) Apply absorbent directly on spill and around
- 3) Ensure nearby drains are blocked off with sandbags with a protective bridge of absorbent in front of drains
- 4) Allow absorbent to sit for 20 mins, validate area has absorbed before using shop vacuum—apply more if needed
- 5) Vacuum up absorbent
- 6) Apply more absorbent if needed and repeat steps 2-5 until all had been removed
- 7) If hardened sugar residue is present begin to break down with tools(hammer/shovel/pick)
- 8) Once all sugar is removed sweep and vacuum any debris
- 9) Go back and leave notes in the Sugar rotation form and ensure trash is in good standing and root cause of issue has been discussed and solved to prevent further spills/ residue

## KEY ACTIONS TO PREPARE FOR UPCOMING SEASON

1. Contact new Trash Services (Republic not allowed) to schedule for additional pick-ups a month in advance

2. Follow up with Property Manager

████████████████████ on approved trash placement

3. Any new employees will be fully trained and given a step-by-step handout on the proper way to dispose of sugar goo bags. **\*\*Save sign off certification to file\*\***

4. Stock up on extra Goo bags from **Tapia** a month in advance

# Business Response (continue)

## STEP-BY-STEP PROCESS OF SUGAR PREP TO DISPOSAL

\*\*\*\*\*GOO BAGS TO BE over stocked by one case in ordinance with San Jose city.

### 1) Sugar Caddy Prep:

- Always have a ham box prelined with vacuum plastic bag
- Add empty sugar bag to protect from hot sugar melting through
- Place box in metal push tray and put in place under machine

### 2) Sugar Caddy Cooling:

- Pull sugar caddy delicately and allow to cool to the side
- Once cooled outside, throw in fridge for 4 hours
- After cold to touch, throw in freezer for additional 4 hours

### 3) Sugar Caddy-Prep for Disposal

- Remove frozen sugar from freezer
- Place additional vacuum seal bag over the top of box and tape closed
- Place in black trash bag

### 4) Throwing Sugar: ONLY TO BE DONE BY YEAR AROUND ASSOCIATE

1. When throwing out sugar steps 1-3 must be completed.
2. Validate with designated lead/manager sugar can be disposed
3. Carefully bring to trash can
4. Stage sugar as you would ham boxes and carefully stack ensuring no leak is present or can occur

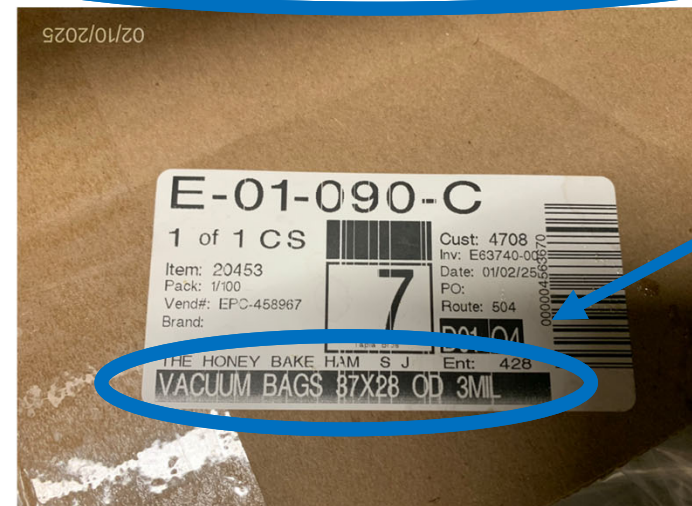
### 5) Trash Upkeep:

- Ensure secured tarp under trash entrance
- Always stack sugar back to front
- Always ensure exit door is lined with water saturator: IE Kitty Litter, to prevent potential leak if spill occurs

### 6) Trash Checks:

- Beginning of each shift validate trash and clean, well maintained and protected from environmental issues-add additional litter if needed
- Every 4 hours check in on trash to ensure safe disposal and no leaker bags or damage to any bags for leaks
- Add extra litter to prevent potential leaks and validate tarp is secure under and around trash
- In closing, validate trash is locked for the day preventing any one from getting into bin

TRASH SHOULD BE LOCKED AND COVERED AT ALL TIMES



Bag thickness

# Business Response (continue)



Do it Right <b>WASTE STORAGE AREA</b> <small>Compactors / Dumpsters / Tallow Bins</small>	Hágalo bien <b>ÁREA DE CONFINAMIENTO DE RESIDUOS</b> <small>Compactadores / Contenedores / Recipientes de sales</small>	Làm Cho Đúng <b>Khu Vực Cất Giữ Rác</b> <small>Máy Mùn Rác / Thùng Lớn Dựng Rác / Thùng Dựng Dầu Mỡ</small>
<p><b>Maintain and clean waste enclosure area on a regular basis.</b> Mantenga limpia las áreas de confinamiento de residuos regularmente. Thường xuyên giữ gìn và vệ sinh quanh bãi đổ rác.</p> <p><b>Do not hose down dumpsters, compactors, tallow bins, or the enclosure area to the storm drain.</b> No hose con mangueras los contenedores, los compactadores, recipientes de sales o el área de confinamiento de residuos pluvial. Không dùng vòi nước để rửa vào thùng đựng rác, các máy mùn rác, các thùng đựng dầu mỡ, hoặc khu vực bao quanh bãi đổ chất thải nước thải.</p> <p><b>When you clean the enclosure, collect all wash water and dispose of it in the sanitary sewer.</b> Cuando limpie el área de confinamiento de residuos recolecte todo el agua sucia y dirígala al alcantarillado sanitario. Khi dọn sạch khu vực bãi rác, thu tất nước rửa và đổ vào cống chảy vệ sinh.</p> <p><b>Do not put liquid waste in dumpster or compactor.</b> No ponga residuos líquidos en el contenedor o el compactador. Không đổ chất lỏng vào thùng đựng rác hoặc máy mùn rác.</p> <p><b>Train employees to keep waste enclosure area clean and prevent all wash water from going to the storm drain.</b> Entrene a los empleados para mantener limpia el área de confinamiento y evitar que el agua sucia vaya a los alcantarillados pluviales. Huấn luyện nhân viên về việc giữ gìn khu vực bao quanh bãi đổ rác sạch sẽ, và giữ cho nước rửa không chảy vào cống thoát nước thải.</p>	<p><b>Prevent spills and leaks, and have spill kit readily available for clean up.</b> Previene los derrames y fugas y tenga listo un kit de limpieza de derrames. Phòng ngừa chất泼 và rò rỉ để có, và luôn có sẵn dụng cụ để lau dọn.</p> <p><b>Clean up all spills and leaks immediately using spill kit. Sweep up absorbent right away; do not let it sit out overnight or in the rain.</b> Limpie todos los derrames y fugas inmediatamente usando el kit para derrames. Barrer absorbente pronto; no lo deje de estar fuera toda la noche o en la lluvia. Lau dọn ngay lập tức và lau sạch ngay khi có thể. Không để chất泼 ngoài trời qua đêm hoặc dưới mưa.</p> <p><b>Close lids on all containers after use.</b> Cierre los tapas de todos los contenedores después de su uso. Đóng nắp kỹ sau khi sử dụng xong tất cả thùng.</p> <p><b>Double-bag wet waste. Mix dry absorbent in with wet waste. Then tie off bags. Use buckets to transfer bagged wet waste to the dumpster.</b> Ponga los residuos húmedos en doble bolsa. Mezcle con absorbente desecante, luego asegure las bolsas. Utilice baldes para pasar la bolsa de residuos húmedo al contenedor. Đóng hai túi rác ướt vào nhau để dính vào với nhau. Thêm chất thấm nước với rác ướt, và cột kín túi. Dùng xô hoặc thùng để chuyển rác ướt đã đóng gói vào thùng đựng rác.</p> <p><b>Call your hauler to replace leaky bins immediately.</b> Lláme a su transportista para reemplazar los contenedores con fugas inmediatamente. Đòi thay bin rác rỉ để thay ngay cho thùng đựng rác để sử dụng.</p>	

*Keep your waste storage area clean to protect the Bay*  
*Mantenga limpia el área de confinamiento de residuos para proteger la bahía*  
*Giữ cho khu vực đổ rác được sạch sẽ để bảo vệ cho Vịnh Vịnh*

**NO DUMPING!  
FLOWS TO BAY**



Santa Clara Valley Urban Runoff Pollution Prevention Program

**Preventing Storm Drain Pollution**  
Outdoor Storage and Spill Response at Your Business

**Storm Drains and the San Francisco Bay**  
When wash waters, leaked waste, and spills enter the street and storm drain inlets, they flow untreated through the storm drain system to our local waterways, the San Francisco Bay (Bay), and eventually the ocean. These pollutants can be toxic to fish, wildlife, and people. Federal, state, and local regulations prohibit discharge of anything but rain water into the storm drain.

Help protect the Bay and local creeks by following the guidelines below.

**Good Housekeeping**

- Train employees on Best Management Practices (BMPs) for material storage, spill prevention and response.
- Never dump oils, chemicals, mop water or other fluids into a storm drain, gutter, street, drainage ditch, creek, or any surface leading to a storm drain.
- Regularly inspect containers/equipment for wear/leaks. Replace as needed.
- Regularly inspect outdoor areas for leaks, chemical/oil spills and loose litter.

Clean up spills and leaks immediately. Sweep regularly to prevent debris and other materials from entering storm drain inlets.

- Store all materials inside, if possible.

**Outdoor Materials Management**

- If materials must be stored outdoors, then keep storage areas tidy.
- Enclose items to prevent contact with rainfall/runoff. Do all the following:
  - Cover (e.g. by a tarp, roof or in a fully enclosed container).
  - Elevate (e.g. on a shelf or on pallets).
  - Use secondary containment (e.g. lined on pallets and covered).

**SI • NÊN LÀM • YES**

**NO • ĐỪNG LÀM**

from street and cleanout.

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# Update: Inspection of the Plaza/PO Easter

April 16, 2025



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# Update: Easter 2025



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# Facility Map

NE Waste  
Corner



Current  
Location

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# Update: Easter 2025



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# Key Takeaways



- Site will be monitored during the holiday season; inspected on a yearly basis
  - Under the radar for multiple teams
- Note has been placed for hauler to obtain covered roll-off
- Inspections during the holidays can be a good thing

# Questions

## Contact:

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- Phone: 
  - 408-332-8039

