



# Welcome to the October 2009 EPIC+ Workshop



**EPIC+ is a joint project of**

**BIOCOM,**

**The County of San Diego CUPA**

**Department of Environmental Health  
Hazardous Materials Division (HMD)**

**and**

**The San Diego Industrial Environmental Association**

# Questions to Ponder

1. Your HMBP and carcinogen/reproductive toxin list must be certified every \_\_\_\_\_ months.
2. In late 2009 California will be adopting a electronic submittal format for hazardous materials handlers to submit chemical inventory information to the CUPAs. (T/F).
3. Open hazardous waste containers are allowed as long as they are inside a lab fume hood (T/F)
4. You must file an exception report with DTSC if you do not receive a TSDf signed manifest within \_\_\_\_\_ days of a waste pick-up.

So, you think it is just another day  
at the office...



Until an inspector from the San Diego County, Hazardous Materials Division (HMD) shows up,....



*clipboard in hand,*  
and says they are here to do an inspection!

# It's ROUTINE INSPECTION time

You're probably already familiar with the game plan. Most HMD inspections start with a walk through and end with paperwork. Are you also familiar with what the inspector checked before he/she arrived?

## A Note on Inspection Frequencies (it's nice to have a rough idea):

**12 months:** LQGs of medical waste, facilities with regulated USTs

**18 months:** Hazardous waste generators, reportable hazardous materials

**24 months:** One permitted item, SQGs of medical waste that treat waste onsite

**36 months:** SQG medical waste generators with no onsite treatment, *EPIC+ approved site*.

\*Multiple applicable categories? You will be inspected in line with the shortest.



## Inspector: Items checked before an inspection may include:

- Site's EPA ID number (DTSC tracking system)?
- Hazardous Waste generator status per tracking system/data collected during previous inspections, SQG or LQG?
- Previous violations observed?
- Hazardous Materials Business Plan (HMBP), annual Carcinogen List, last HMBP certification date, site maps on file?
- Medical Waste Management Plan (MWMP) on file, if required?

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# Department of Toxic Substances Control



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## DTSC: HWTS Reports

This site uses POP-UP technology to provide reports in a printable format. It is recommended that you add this site to your allowed pop-up list or temporarily disable any pop-up suppression.

- Report
- General Public Reports
  - 1. [Search For A Company](#)
  - 2. [Search For A Hazardous Waste Transporter](#)
  - 3. [EPA ID Profile Report For A Specific Company](#)
  - 4. [Transporter Profile Report For A Specific Transporter](#)
  - 5. [Hazardous Waste Handler Summary Report For A Specific Company](#)
  - 6. [Find Specific Manifests](#)
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  - 8. [Total Yearly Tonnage By Waste Code By EPA ID Report](#)
  - 9. [Total Yearly Tonnage By Disposal Method Code Report](#)
  - 10. [Total Yearly Tonnage By Entity Type Report](#)

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# This background information plays directly into report findings/violations

## EPA ID numbers:

- Active or inactive?
- Correct type (federal or state, permanent or temporary)?
- Are generator copies of manifests being submitted to State DTSC?

## Past violations:

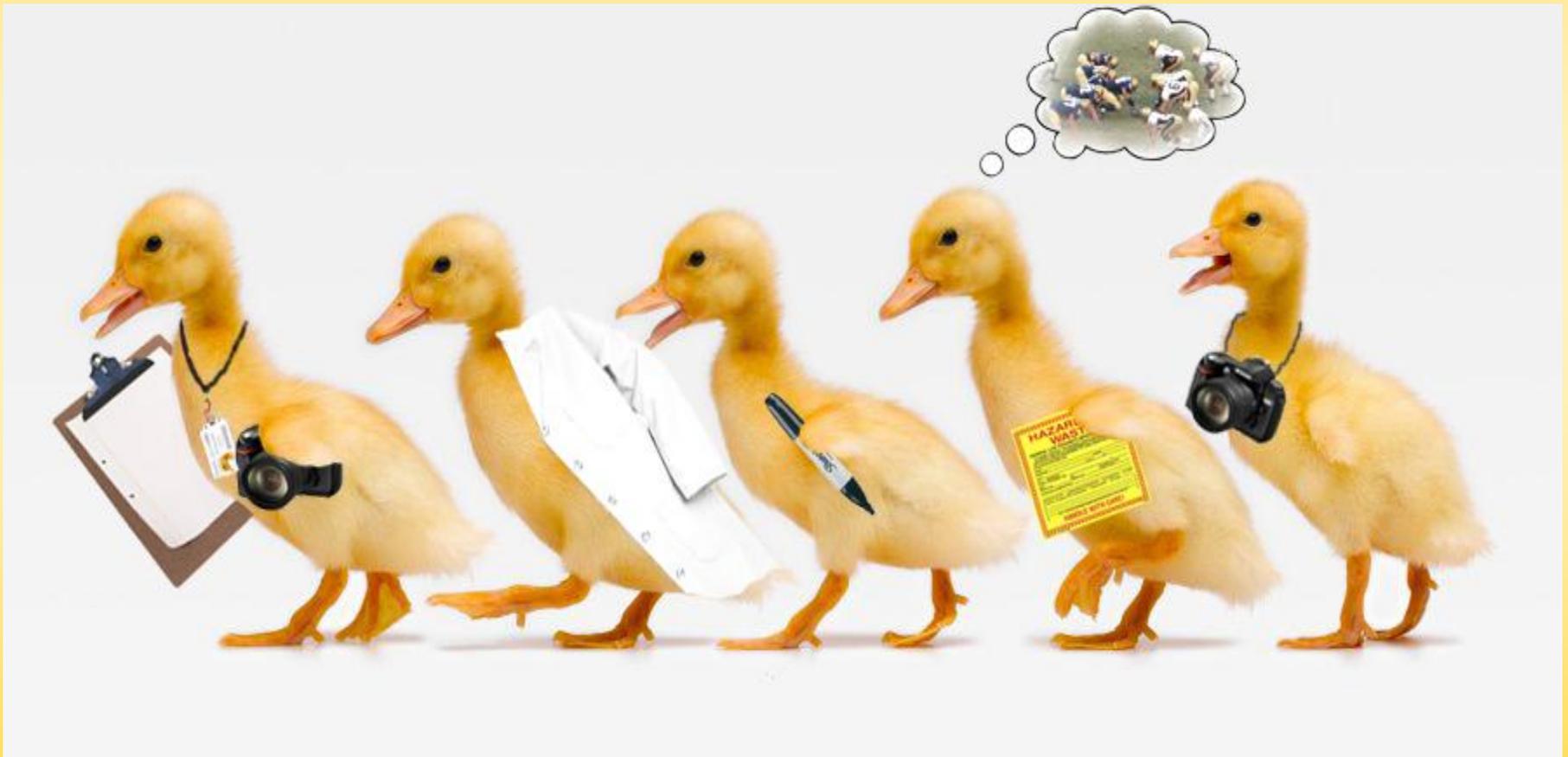
- Corrected or outstanding?
- What were they (repeat violations are not minor)?

## Scanned file records retained by HMD: (HMBP/MWMP/carcinogen list):

- What's been submitted to the HMD?
- Submittal dates?
- Accuracy?

# The Walk Through

The physical inspection will cover areas relevant to the accurate reporting, storage, labeling, and general management/handling of medical waste, hazardous waste and hazardous materials. You'll most likely lead the walkthrough as you know the facility best.



(Inspections at bigger facilities often become a procession)

# Specific photos may be taken by HMD Inspector per State law

- *Why?* To document violations observed.
- *Legal.* **Yes, established in State Law:** Cal. Health and Safety Code §25185(a)... In order to carry out the purposes of this chapter, any authorized representative of the department or the local officer or agency authorized to enforce this chapter pursuant to subdivision (a) of Section 25180, may, at any reasonable hour of the day,... **(5) Photograph any waste, waste container, waste container label, vehicle, waste treatment process, waste disposal site, or condition constituting a violation of law found during an inspection.**
- If a trade secret, inform the County inspector to follow the established guidelines to avoid a photo of secret or proprietary information.
- **A complete set of all Inspector's photos taken must be given to the business for their file per State law.**

# Trade Secret issue per State law

- **Cal. HSC §25173 and §25185(d).**  
...shall notify the person whose facility was inspected prior to public disclosure of the information, and, upon request of that person, shall submit a copy of any information to that person for the purpose of determining whether trade secret information, as defined in Section 25173, or facility security would be revealed by the information.



# Areas of interest during an inspection include:

- Facility perimeter (waste dumpsters, power generators, water treatment system, waste accumulation/storage areas)
- Custodial areas (cleaning chemicals, paints, oils)
- Labs, hazmat storage, facility maintenance areas, manufacturing/mixing areas
- Points of waste generation for medical and hazardous wastes, sinks, chemical storage & satellite waste accumulation areas
- Universal wastes accumulation areas

# TOP 10 VIOLATIONS IN 2008 AT local BIOTECHS

- HAZWASTE CONTAINERS/TANK W/O LABELS/DATE
- HAZARDOUS WASTE CONTAINER NOT CLOSED
- NO GENERATOR'S INFO. ON RED BAGS/SHARPS
- HMBP (i.e., Business Plan) INCOMPLETE/NOT AMENDED
- NO ANNUAL CARC./REPRO. TOXIN LIST TO HMD
- HMBP: INADEQUATE SITE MAP
- HMBP INVENTORY INCOMPLETE/NOT AMENDED
- HMBP NOT AVAILABLE FOR REVIEW ONSITE
- MWMP (i.e., Medical Waste Mgmt. Plan) NOT SUBMITTED TO HMD *[HMD form is required; form last updated March 2009]*
- TSDF-SIGNED MANIFEST NOT AVAILABLE FOR REVIEW

# HAZARDOUS WASTE

STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

GENERATOR NAME: [REDACTED]

ADDRESS: [REDACTED]

CITY: [REDACTED] STATE: [REDACTED] ZIP: [REDACTED]

EPA / MANIFEST ID NO. / DOCUMENT NO.: [REDACTED]

EPA WASTE NO.: [REDACTED] CA WASTE NO.: [REDACTED] ACCUMULATION START DATE: 5/14/82

CONTENTS, COMPOSITION: 12 plastic waste

PHYSICAL STATE:  SOLID  LIQUID

HAZARDOUS PROPERTIES:  FLAMMABLE  TOXIC  CORROSIVE  REACTIVITY  OTHER

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

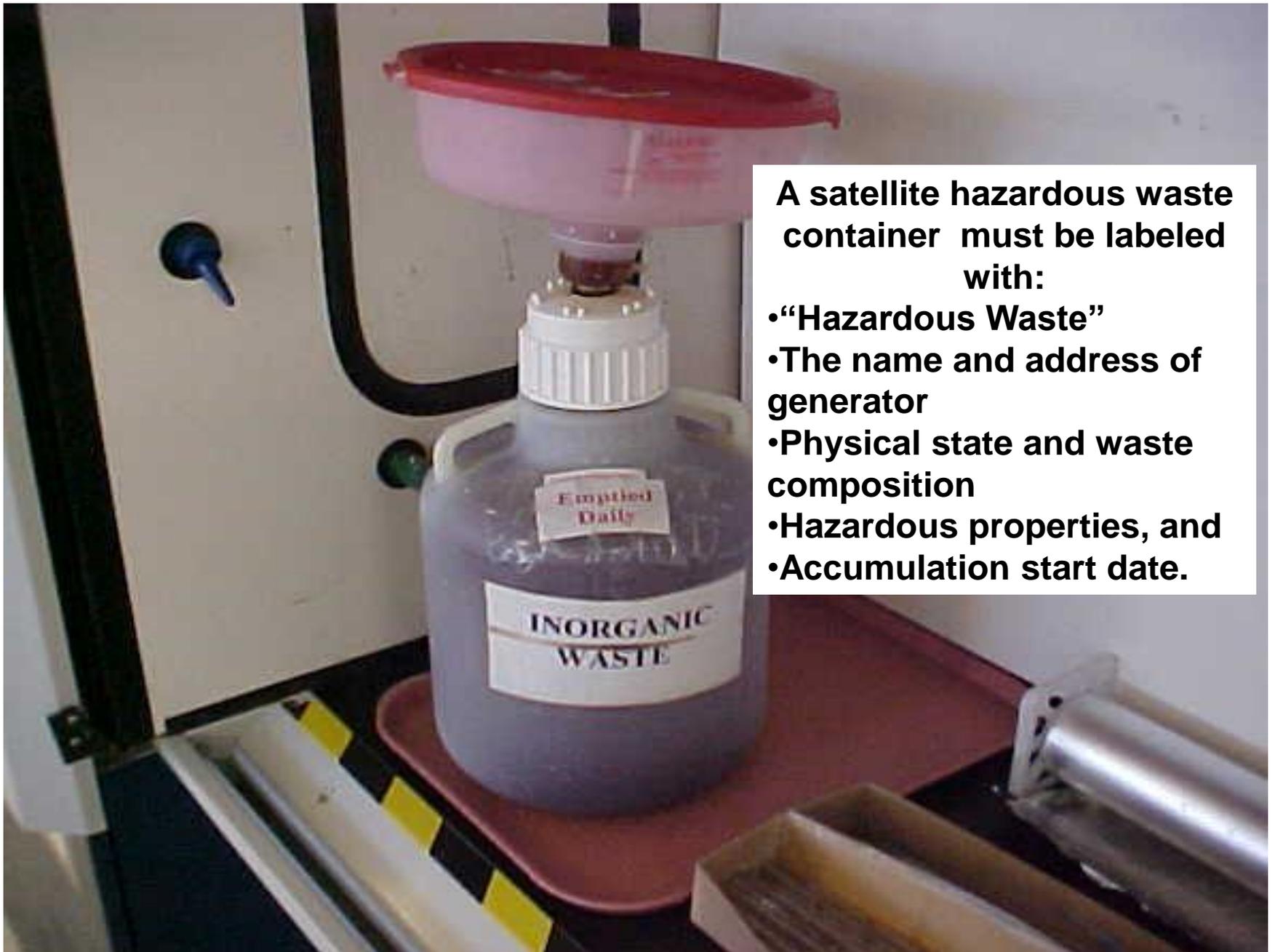
PRINTED BY: WEGA LABEL EXPRESS, INC. P.O. BOX 1000, PUNAH, CA 94648

Missing physical state

Missing hazardous property; waste composition not clear

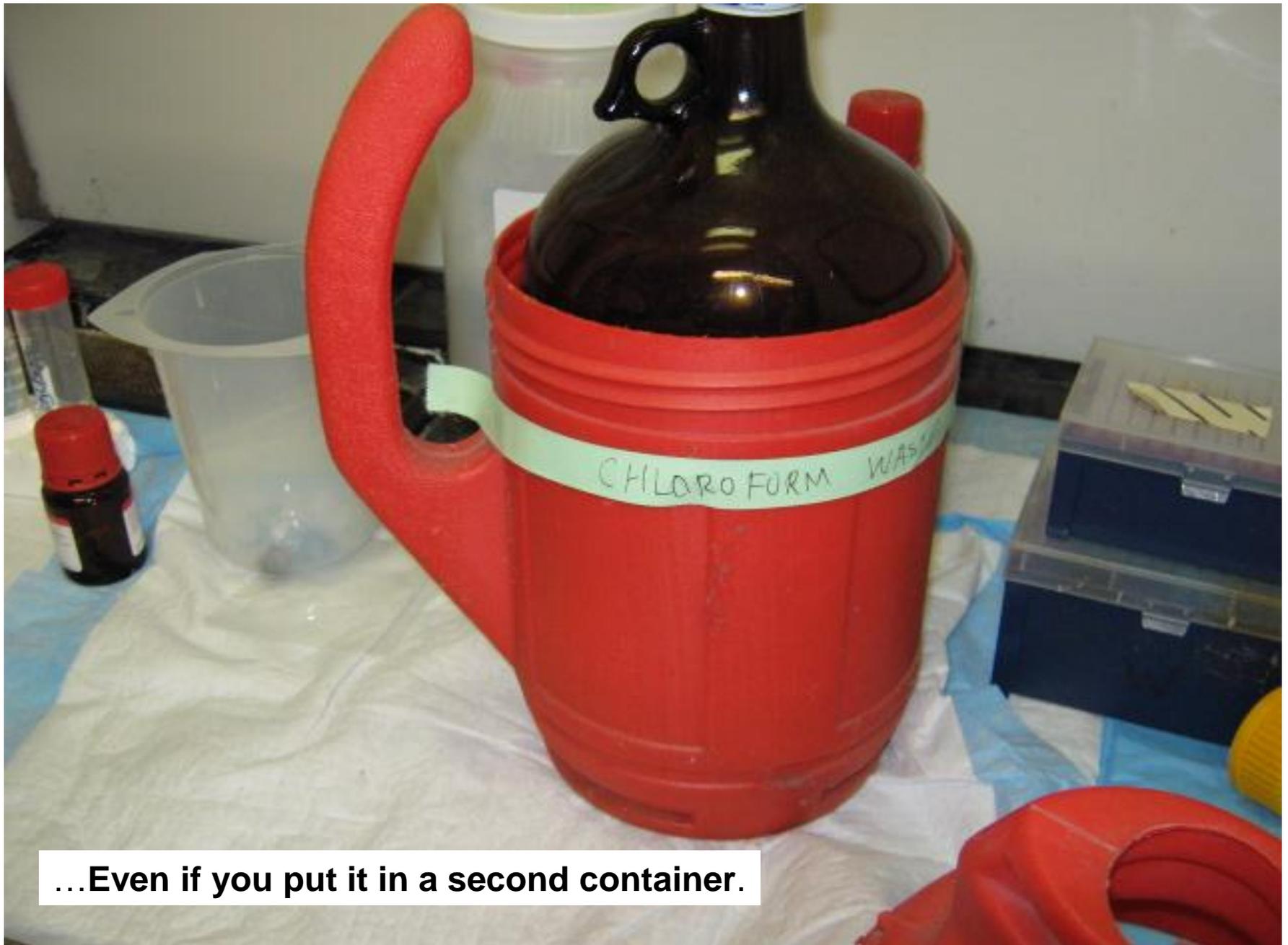
# **Container Labeling Requirements for Hazardous Waste Accumulation**

- **Labeled or marked clearly with the words "Hazardous Waste" and,**
  - Name and address of the person producing the waste
  - Physical state and composition of the waste
  - Hazardous properties of the waste (e.g., toxic, ignitable, reactive, corrosive).
- **The waste accumulation start date**
  - Clearly marked and visible for inspection
  - On both containers and tanks.



**A satellite hazardous waste container must be labeled with:**

- **“Hazardous Waste”**
- **The name and address of generator**
- **Physical state and waste composition**
- **Hazardous properties, and**
- **Accumulation start date.**



...Even if you put it in a second container.

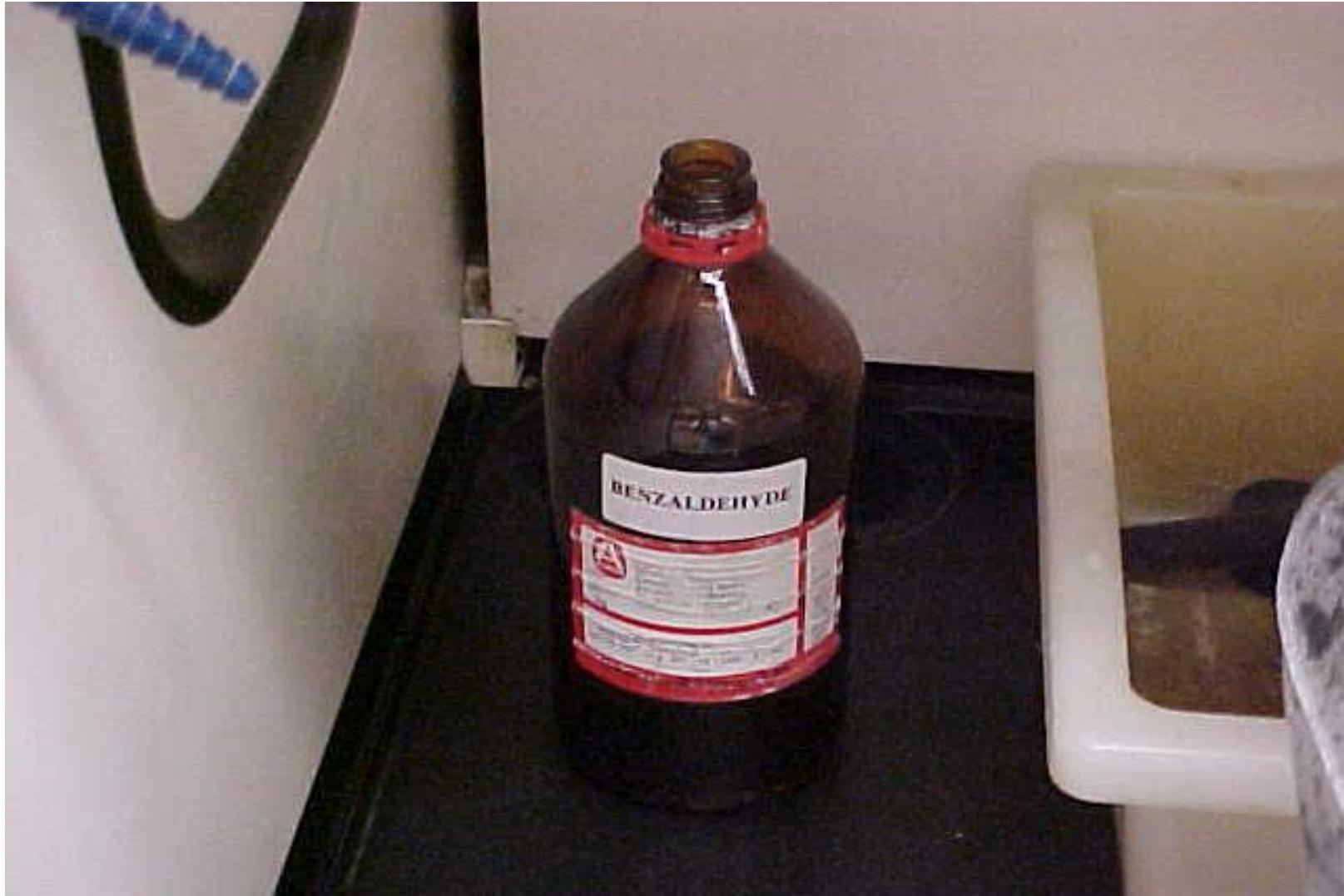


This picture shows a waste collection cart at a storage room, but there is no obvious waste labeling for the different wastes. 18

Don't concentrate on labeling laboratory waste and ignore less obvious waste streams



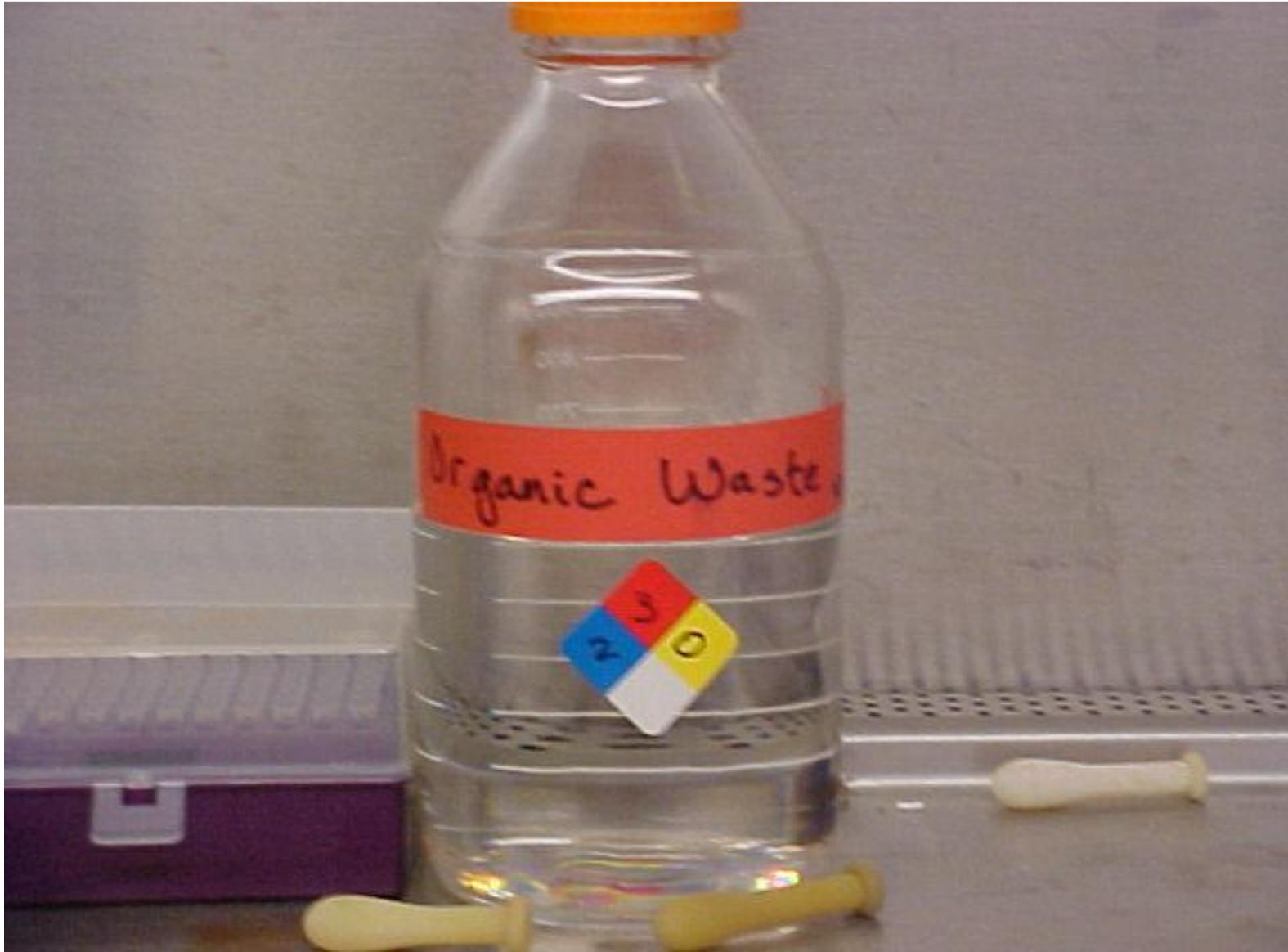
How about this? Are we looking at an open container violation? Is it empty? Is it waste?



In the fume hood a container holding a waste solvent mixture (TFA, Acetonitrile, Methanol, Ethanol, Isopropyl



# A bottle holding organic waste missing a hazardous waste label



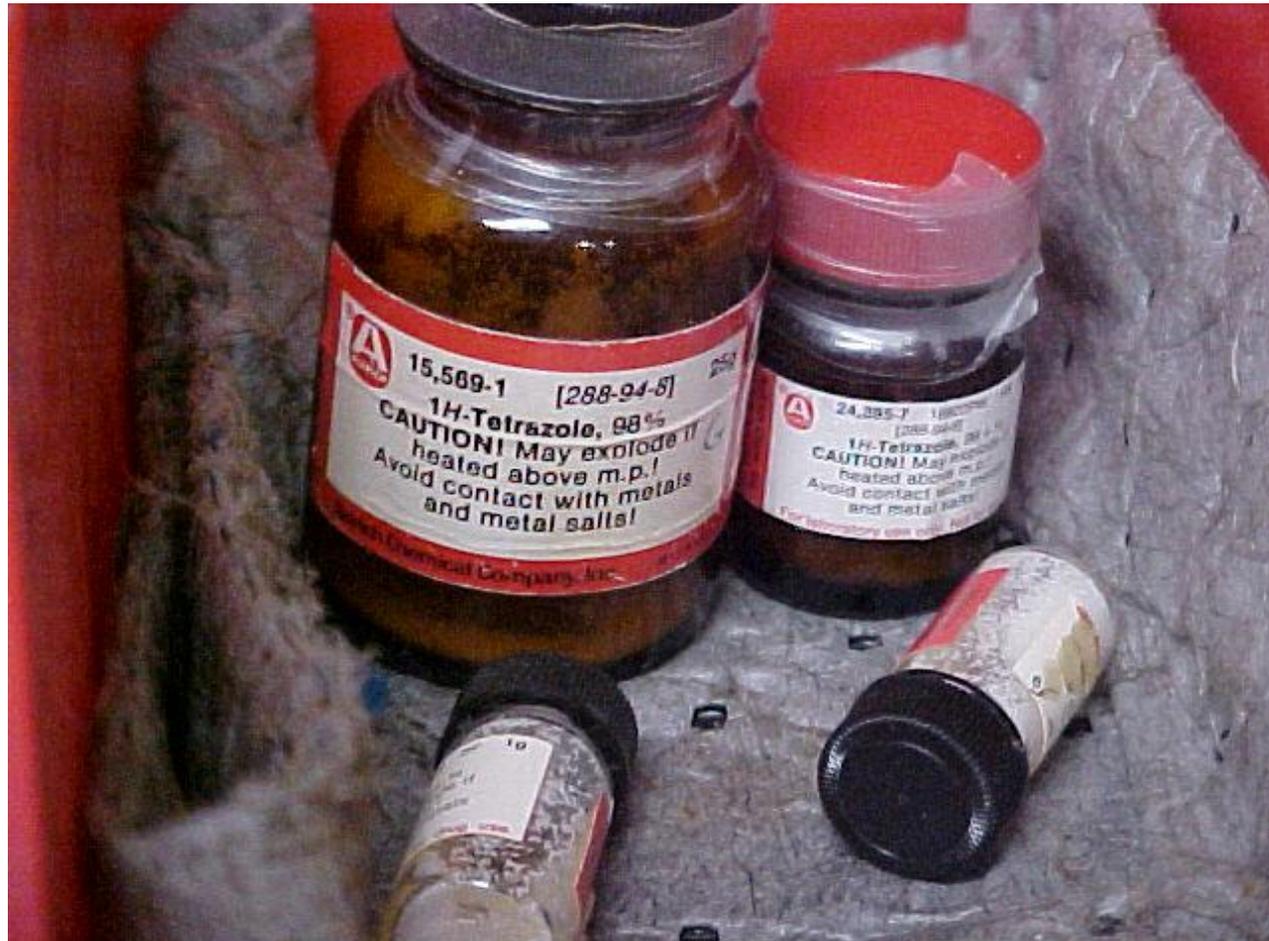
70% nitric acid bottle observed in poor condition removed from corrosive cabinet. Cap on bottle was damaged and deteriorated. This was identified as hazardous waste and transferred into a labeled hazardous waste container during the inspection.



**Close-up of waste Osmium Tetroxide not labeled as hazardous waste located in the 1 of 3 flammable cabinet waiting for waste transporter to lab pack.**



**Tetrazole containers were observed in a tray in the hazardous waste storage room with a hazardous waste label placed on top of them. Accumulation start date of 4/18/08. These hazardous waste were onsite greater than the allowable 90 days.**



**Hazardous wastes in the tray were identified as toxic solids. These wastes were not labeled with a waste label.**



**Rusted container was in the hazardous waste storage room was identified as 2-methyl 2-butane.  
Waste container in poor condition an not labeled as hazardous waste.**



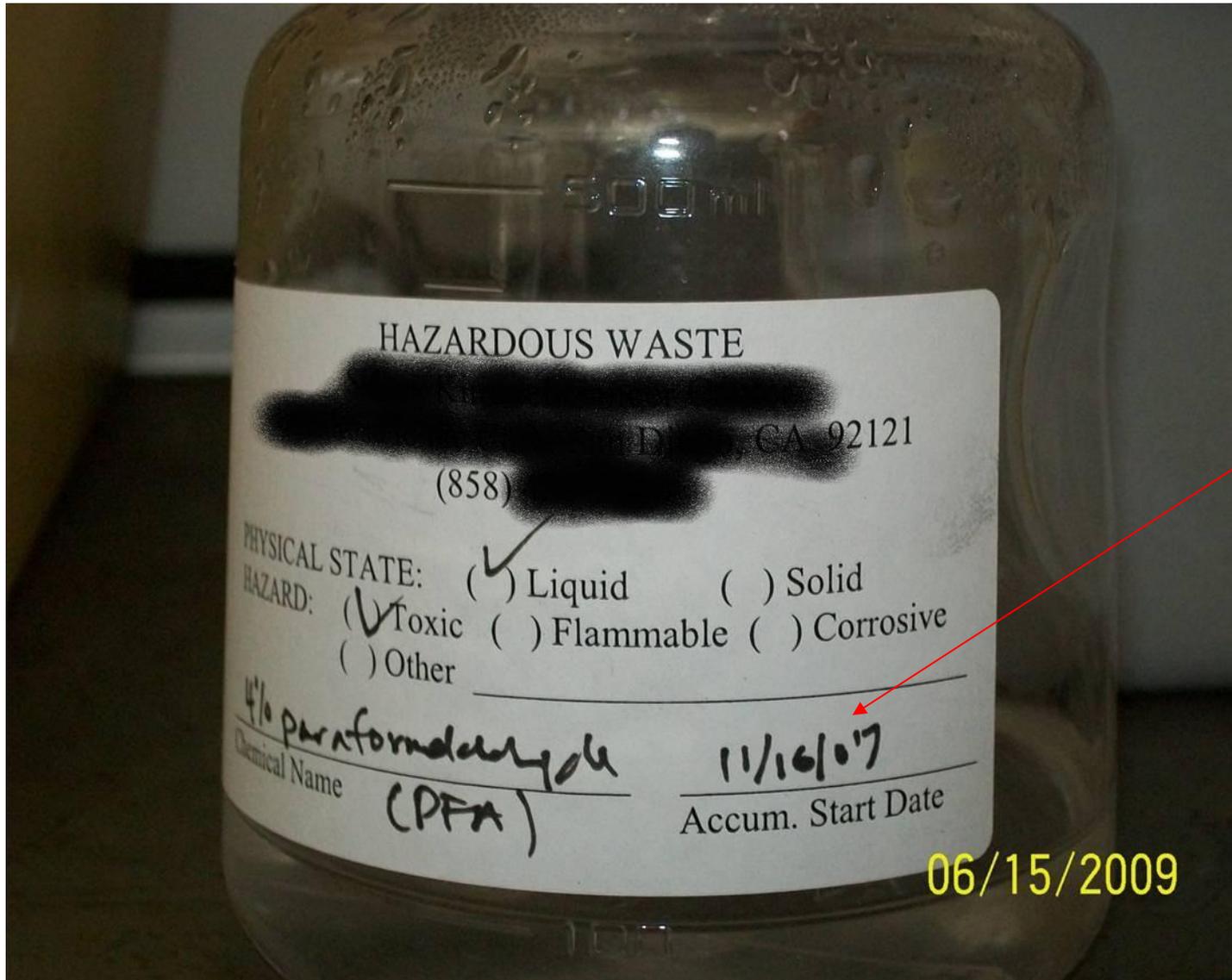
**The hazardous waste container (in a sink), shown with the funnel, was observed not properly labeled.**



**Various containers holding waste are stored in the outside hazardous waste storage room. The containers/tray are missing a hazardous waste label.**



**A hazardous waste has been stored onsite for more than the time allowed for SQG hazardous waste generators. Label shows an accumulation start date of 11-16-07.**



**A 5-gallon container holding an unknown liquid was observed in the hazardous waste storage area.**



**Inadequate aisle space inside the 90-day hazardous waste outdoors storage shed.**



**Close-up of universal waste fluorescent light bulbs.  
Broken one noted by Inspector during inspection.**



# What's the potential *problem(s)* here?



FYI: If this doesn't look great in an indoor corrosive chemical cabinet...

**...it's not going to look any better in  
a custodial cabinet**



# A 99% ether waste not labeled with hazardous waste labeling in the waste storage locker.



**Many bottles of acid waste stored in the waste chemicals cabinet. Not labeled with hazardous waste labels. (H<sub>2</sub>S<sub>0</sub>4 and HCl)**



**Fume hoods were observed with spilled chemical substances, most likely hazardous waste, which is an indication that employee hazwaste training is an issue.**



# Laboratory hazardous waste drums stored in hazardous waste storage area at a local college



A bulging HW drum observed, see next slide.  
Generator was combining incompatible waste in drum.

The HMD's Response Team responded to the hazard (**bulging drum**) and opened the pressurized container of this inorganic waste. The brownish red gas shown was captured in the plastic bag and was field tested with a test strip. The test strip indicated the gas contained chromic acid.



What about those pesky empty or contaminated containers?



# Contaminated Container Regulation, CCR §66261.7

DTSC's publication, "Managing Empty Containers" is a good resource to start with. That and many other topics are available at:

[http://dtsc.ca.gov/PublicationsForms/type\\_pubs\\_2008.cfm](http://dtsc.ca.gov/PublicationsForms/type_pubs_2008.cfm)

Containers must be CAL. empty (**e.g., no flow of waste liquids when container turned upside down, CCR §66261.7(a) & (b)**) before they are non-regulated (*but P-listed acutely/extremely hazardous waste containers must be scrutinized further; e.g., properly triple-rinsed to clean the container*).

[http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/Article-1\\_Ch11\\_ready-to-post.pdf](http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/Article-1_Ch11_ready-to-post.pdf)

# P - LISTED RCRA Acutely Hazardous Waste

*some examples.....*

- P064 Methyl isocyanate
- P087 Osmium tetroxide
- P048 Phenol, 2,4-dinitro-
- P098 Potassium cyanide
- P105 Sodium azide
- P106 Sodium cyanide
- P016 Dichloromethyl ether
- P028 Benzene, (chloromethyl)-

[http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/OEARA\\_REG\\_Title22\\_Ch11\\_Art4.pdf](http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/OEARA_REG_Title22_Ch11_Art4.pdf)

Lastly, pay attention to all trash receptacles, including dumpsters.



To avoid this scene, please keep your dumpster free of all regulated waste ...



Remember, you are required to inspect hazardous waste **storage** areas **each week**

Check for completed labels during weekly storage area inspections

No identifying waste generator information (e.g., **name, address, & phone number**), the State-mandated labeling is visible



# Medical waste red bags and sharps additional labeling requirement

- County Ordinance requires the waste generator's name, address and phone number be on the container when first placed into use.
- San Diego County Code §68.1205 & 68.1206.



Another problem. Sharps waste protruding out of the waste container, the container is likely too full.

**A container holding medical waste (sharps waste) is missing the generator's name, address, and phone number. The waste does not fit inside the container (overfilled).**



**Two red biohazard waste bags are not containerized in rigid, leak resistant, and covered containers or bins. The bags were observed on the floor next to a refrigerator in a hallway. The bag on the right side is not tied off to prevent leakage/expulsion of contents during the handling and storage.**



# The Paperwork Component



A walk-through only shows an inspector what you are doing at one specific point in time.

Records are what have the ability to demonstrate a **history** of hazardous waste & materials management, and compliance with applicable laws and regulations

...given you can find them, of course.

**Remember: The following six violations, from the top ten violations found at local biotech facilities during 2008, are related to the records review component of the inspection:**

1. No TSDF signed waste manifest available for review
2. Hazardous Materials Business Plan (HMBP) incomplete/not amended
3. HMBP not available onsite for review
4. HMBP Site Map not sufficient/inadequate
5. No annual carcinogen/reproductive toxin list submitted to HMD
6. Medical Waste Management Plan (MWMP) not submitted to HMD

# Tracking log for hazardous waste manifests may be useful

## TSDF SIGNED MANIFEST TRACKING LOG

MANIFEST NUMBER	TSDF TO WHICH WASTE WAS SHIPPED	DATE SHIPPED	DATE DUE (35 DAYS)	DATE RECEIVED

# General information regarding recordkeeping

- The majority of waste records must be kept for three years (exception: SQG medical waste generators keep 2 years for all medical waste shipped offsite)
- All manifest copies must be submitted to DTSC and a TSDF-signed copy of each must be received by the waste generator within 35 days of initial pickup or an exception report must be filed. A generator files an 'exception report' with DTSC after:
  - 45 days for LQG Generators  $\geq 1000$  kg/month
  - 60 days for SQG Generators  $< 1000$  kg/month
- Ensure all plans are accurate and up to date, and that applicable documents (new and revised) have been submitted to the HMD. **Keep copies onsite!**

- Periodically tour your facility and review the hazardous materials inventory and Hazardous Materials Business Plan (HMBP) site map to ensure accuracy.
- Submit changes to the HMD for the HMBP within 30 days, and certify annually (w/in 12 months) that there are no changes in the plan information.
- Annually submit changes to carcinogens / reproductive toxins list or certify that there are no changes.
- Ensure that personnel are aware of the HMBP and that it is accessible at all times.

So, your facility generates hazardous waste and medical waste, and you handle/store reportable quantities of hazardous materials onsite ( **$\geq 55$  gallons, 500 pounds, or 200 cu.ft.**) . What should you have ready for review?



# At a minimum you'll need:

- A HMBP that has been certified with the HMD within the last year
- A carcinogen and reproductive toxin list that has been certified with the HMD within the last year
- Three years of hazardous waste and medical waste manifest/disposal records, including Land Disposal Restriction (LDR) notifications.
- A copy of your current HMD permit
- Three years of employee training records
- A copy of your most recent RCRA LQG biennial report (due every even numbered year; **p.s..next due to DTSC by March 1, 2010**).

[http://www.dtsc.ca.gov/HazardousWaste/AnnualReports/Biennial\\_Reports.cfm](http://www.dtsc.ca.gov/HazardousWaste/AnnualReports/Biennial_Reports.cfm)

# Hazardous Materials Business Plans (HMBP): reportable inventory

(H&SC Chapter 6.95 §25509, 25510 & 25505)

Also you must report to the County HMD...

- Extremely hazardous substances must be reported at their federal EPCRA threshold planning quantities (TPQs) (*356 on list*) see <http://yosemite.epa.gov/oswer/lol.nsf/homepage>
- Hazardous (TLV < 10 ppm) compressed gases in any amount per the San Diego County Code 68.1113(b).

Nitrous oxide, acetylene, and carbon dioxide, which are all handled above 200 cubic foot quantities. The inspector points out that only acetylene and carbon dioxide are on your facility's HMBP chemical inventory.

**What's does that mean?** *Reportable quantity of nitrous oxide was not reported to the Hazardous Materials Division as required by State law.*



If you think your inventory forms were lost in the mail and you did not keep a copy, State CERS chemical inventory online reporting will help with that.





HX 3347  
DO NOT REMOVE THIS TAG

HYDROGEN FLUORIDE  
COLUMBIA, GA.  
SUN GAS



MAR

**A 30-gallon drum holding corrosive material, Phosphoric acid solution, was observed in the basement. Another 30-gallon drum containing the same material was observed inside the glassware cleaning room. These two items (60-gallons total) make this material discloseable for the hazardous material chemical inventory. This material was not reported to the HMD.**



Changes to chemical inventory happens, inventory disclosure law (H&SC Chapter 6.95 §25510 & 25505)

Submit an amendment to the County HMD within 30 days of any one of the following:

- (1) A 100 percent or more increase in the quantity of a previously disclosed material.
  - (2) Handling/storage of a previously undisclosed hazardous material.
  - (3) Change of business address, change of business ownership, change of business name.
- ◆ Be sure the chemical inventory reporting form is completely filled out.

# Since you're subject to the HSC Chapter 6.95, you must have a Hazardous Materials Business Plan (HMBP) onsite consisting of:

1. An employee training description
2. An emergency response plan
3. Chemical inventory handled onsite
4. Site map(s)
5. Business owner/operator information form.

**AND...if required, because you are a LQG...**

A LQG hazwaste 'Emergency Contingency Plan' (ECP) includes:  
whom is the site emergency coordinator, evacuation routes?

1. A list of spill/emergency equipment and locations.
2. Emergency notification numbers.
3. Review *CCR §66265.52, .51 and .56* for the specific content reqs. for a ECP.

[http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/OEARA\\_REG\\_Title22\\_Ch15\\_Art4.pdf](http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/upload/OEARA_REG_Title22_Ch15_Art4.pdf)

# So you pull out your site map and you correctly...

- Used 8½ x 11” paper to do the site map
- Depicted your facility with multiple pages, starting with a map of the entire site and then detailing buildings where hazmats are stored (usually excludes office/admin. areas)
- Left out **colors** and shading
- Included the business name, address, zip code, HMD permit number and Thomas Brothers map page and coordinates at the top of each page.
- Used the correct symbols (see slide # 68).

# Only use the standardized map symbols in the handout

**The symbols were agreed upon by all of the Emergency Responders in the County of San Diego**

**Please, do not invent your own site map symbols!**

**County of San Diego Hazardous Materials  
Business Plan forms at: [http://www.co.san-diego.ca.us/deh/hazmat/hmd\\_hmbp\\_sections.html](http://www.co.san-diego.ca.us/deh/hazmat/hmd_hmbp_sections.html)**

# Using these site map symbols is required

## II. HMBP STANDARDIZED SITE MAP SYMBOLS\*

SITE MAP SYMBOLS		
<b>ENTRANCE/EXIT</b> 	<b>FENCE</b> 	<b>SAFE REFUGE</b> (Evacuation Area, Staging Area)
<b>SEWER DRAIN</b> 	<b>FIRE HYDRANT</b> 	<b>STORM DRAIN OR CULVERT</b> 
<b>FIRE DEPT. SPRINKLER SYSTEM CONNECTION</b> 	<b>F.D. STANDPIPE OUTLET</b> 	<b>KNOX BOX (FIRE DEPT. KEY BOX)</b> 
<b>STORAGE TANKS AND CAPACITY</b>		
<b>UNDERGROUND</b> 	<b>ABOVE GROUND</b> 	<b>OR</b>
	<b>OR</b>	
<b>MAIN UTILITY SHUT OFFS</b>		
<b>ELECTRICAL</b> 	<b>GAS</b> 	<b>WATER</b> 
<b>ANNUNCIATOR PANEL</b> 	<b>STAIRWELL</b> (i.e. 1 thru 3) 	<b>ELEVATOR</b> Range of Floors 1  3

HAZARDOUS MATERIALS STORAGE/USE AREA SYMBOLS	
<b>IMMEDIATE (ACUTE) HEALTH HAZARD</b> An adverse effect resulting from a short-term exposure to a chemical. Includes highly toxic, toxic, irritant, sensitizers, corrosive chemicals. Examples: cyanide, hydrochloric acid, sodium hydroxide, chlorine gas.	<b>MATERIALS</b> <b>WASTE</b>
<b>DELAYED (CHRONIC) HEALTH</b> An adverse health effect resulting from long-term exposure to a substance. The effects could be a skin rash, bronchitis, cancer or any other medical condition. Examples include carcinogens such as benzene, formaldehyde, and methylene chloride.	<b>MATERIALS</b> <b>WASTE</b>
<b>FIRE HAZARD</b> Includes flammable liquids and solids, combustible liquids, pyrophorics and oxidizers. Examples include solvents like acetone and alcohol, solvent based paints, gasoline, naphtha solvent, acetylene gas cylinders, propane gas.	<b>MATERIALS</b> <b>WASTE</b>
<b>SUDDEN RELEASE OF PRESSURE</b> This category includes explosives, blasting agents and compressed gases. Examples: nitrogen, oxygen, acetylene, helium, carbon dioxide, etc.	<b>MATERIALS</b> <b>WASTE</b>
<b>REACTIVE</b> This category includes unstable air reactive, water reactive or shock materials. Examples: organic peroxides, fine metal dusts like magnesium, aluminum, phosphorous, cyanides, sulfides and picric acid.	<b>MATERIALS</b> <b>WASTE</b>
<b>MEDICAL (INFECTIOUS) WASTE</b> Medical (Infectious) wastes generated in medical, dental and lab settings. Typically needles and syringes in sharps containers, infectious materials in biohazard bags, clinical and microbiological lab specimens and some pharmaceutical waste.	<b>MATERIALS</b> N/A <b>WASTE</b>
<b>RADIOACTIVES</b> Includes mixed waste and radioactive sources used in labs and industrial settings. Examples include: Scintillation materials, nuclear medicine waste and R & D materials and waste.	<b>MATERIALS</b> <b>WASTE</b>
<b>EXTREMELY HAZARDOUS</b> Includes materials listed in Appendix A of Part 355 of Subchapter J of Chapter 1 of Title 40 of the Code of Federal Regulations. Examples include: Fluorine gases, Silane, Fumigation gases.	<b>MATERIALS</b> <b>WASTE</b>

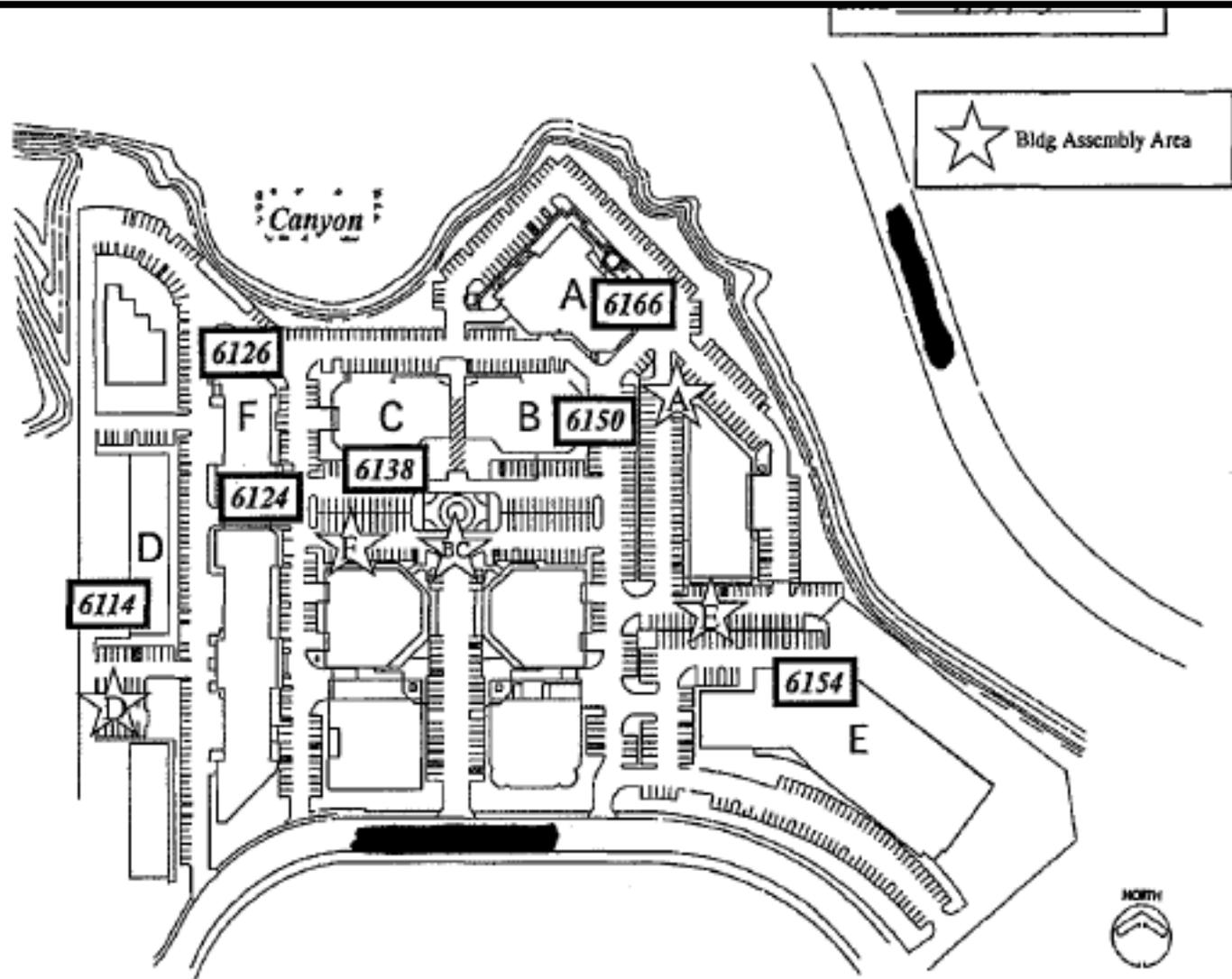
**NOTE: Only use the above listed symbols on the site map.** These symbols have been standardized throughout San Diego County and are meaningful to the local Fire Departments and Public Health Officials that will be responding in the case of an emergency.

# Some Sample Site Maps

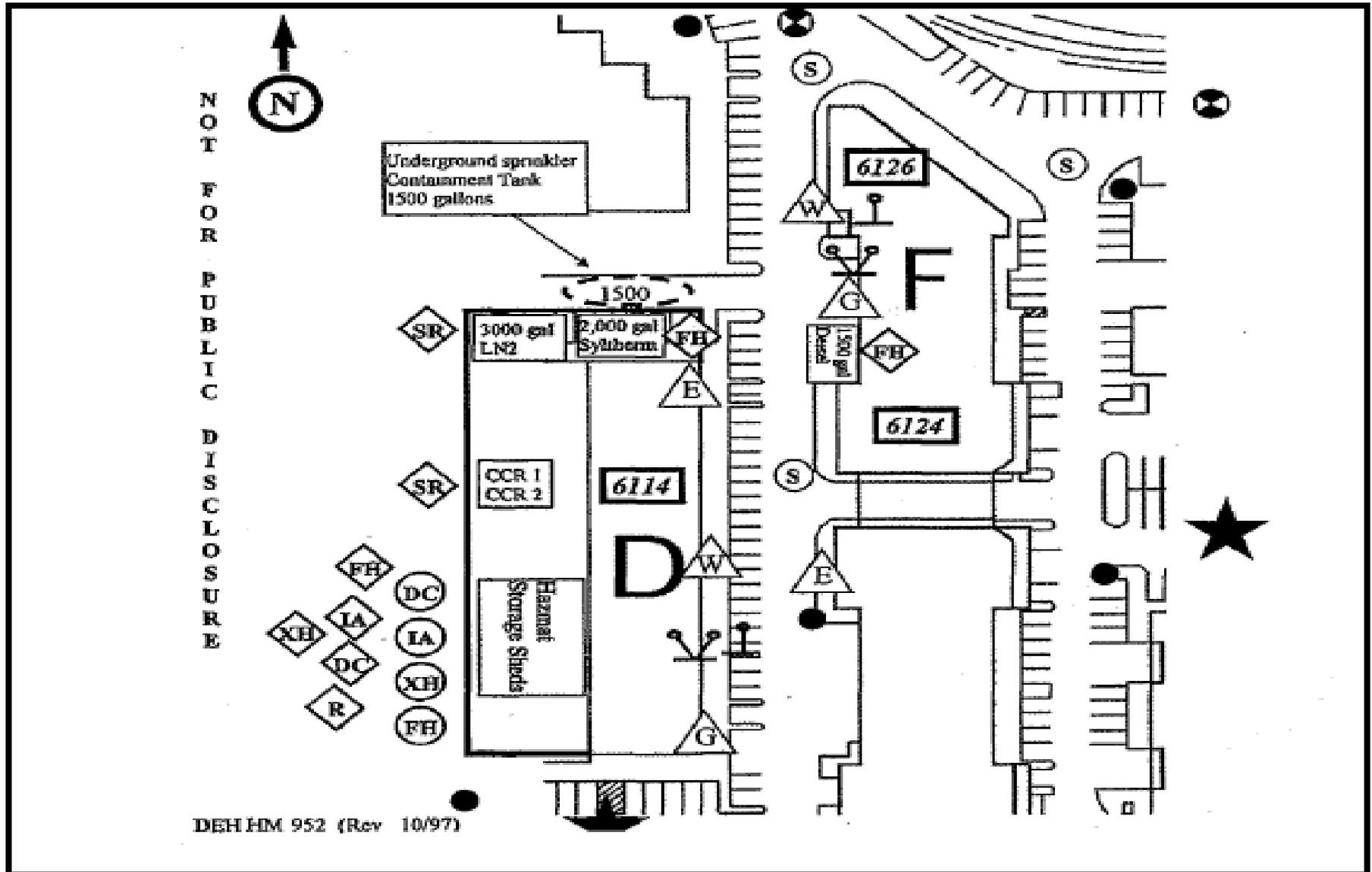


# Complex Site, page 1 of 14

NOT FOR PUBLIC DISCLOSURE

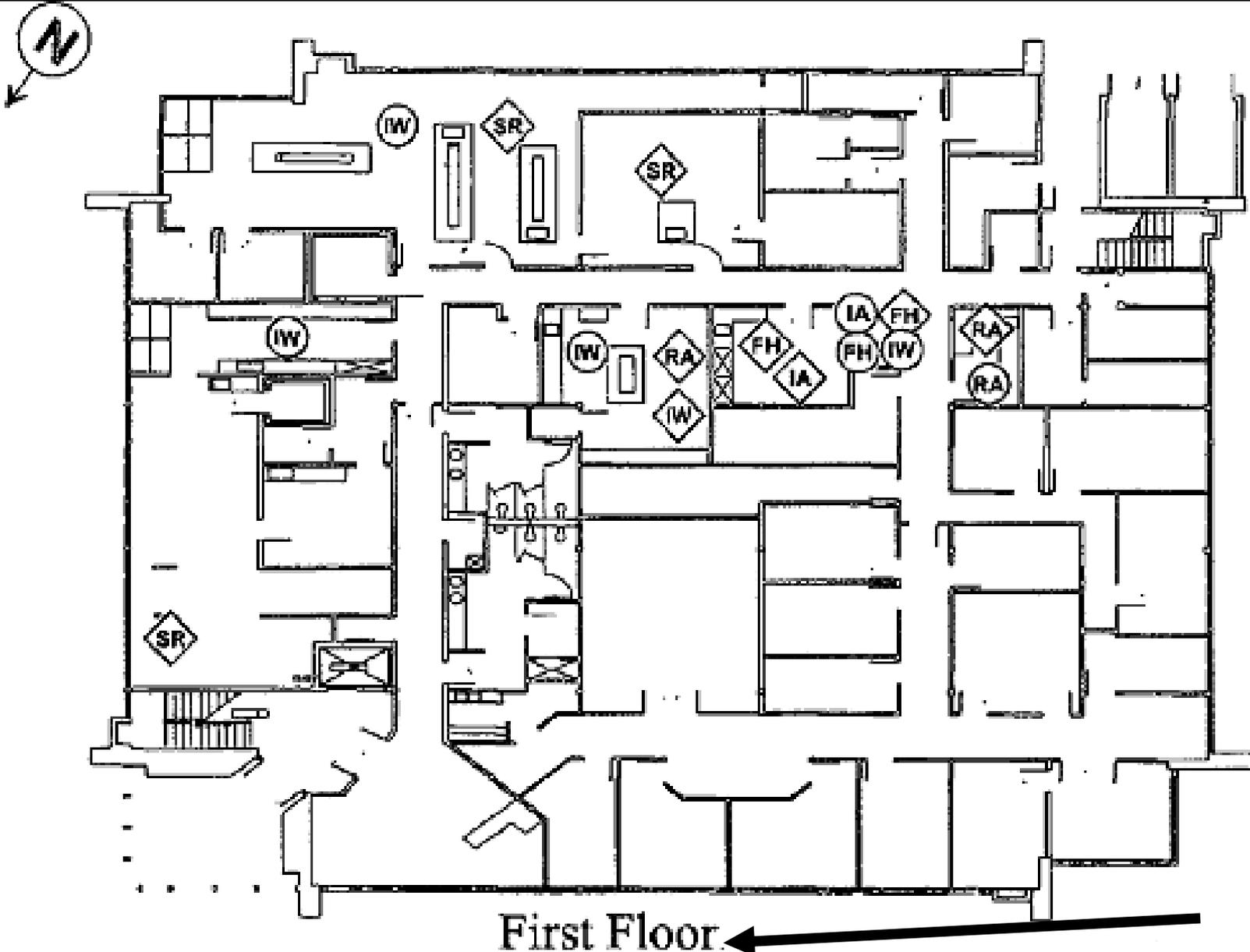


# Complex Site, page 3 of 14



# Multiple Floors Page x of y

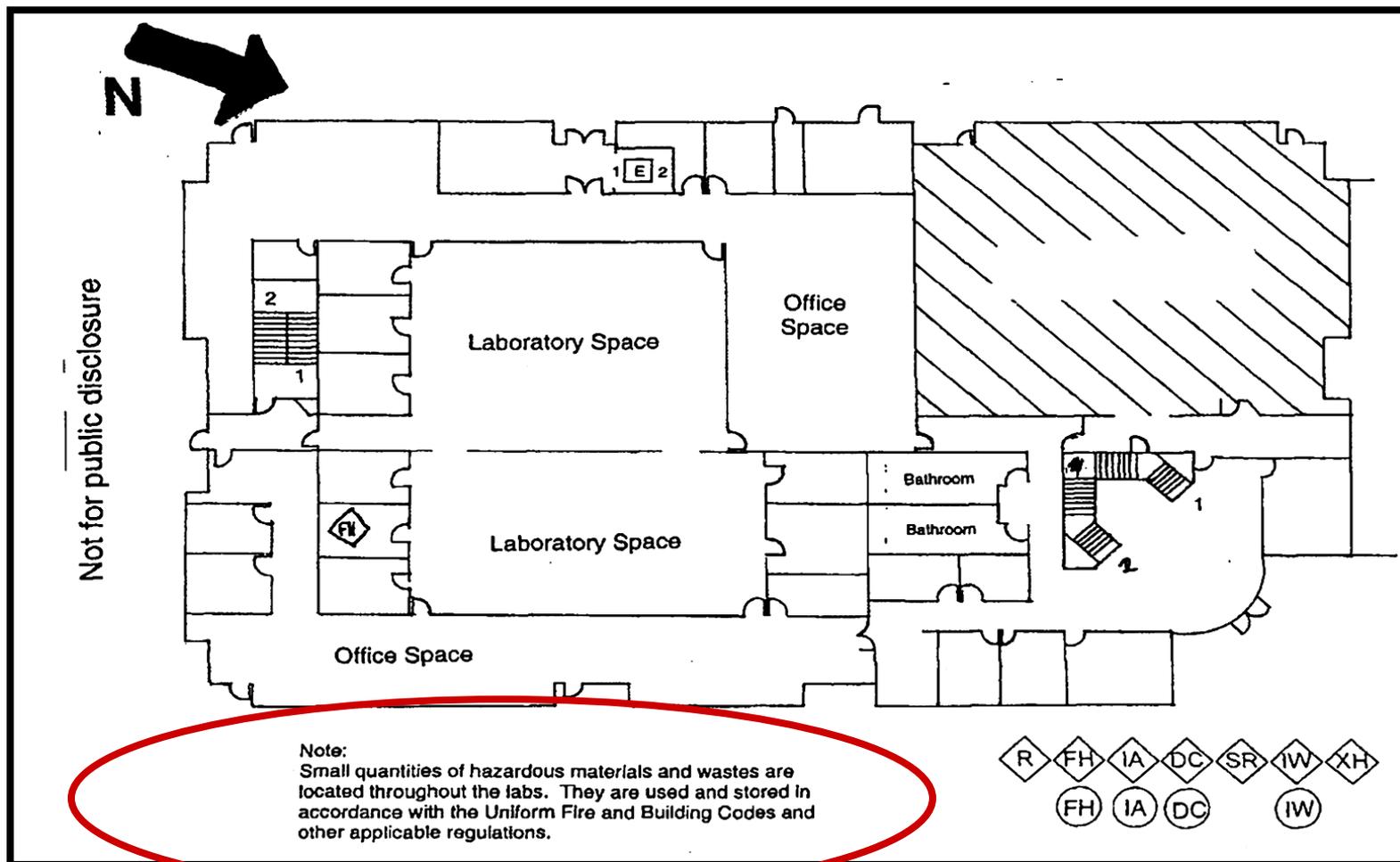
NOT FOR PUBLIC DISCLOSURE



# Multiple Laboratories Small Quantities

What if no one laboratory in a building contains reportable quantities of hazardous materials, but the sum of the hazardous materials in the building exceeds reportable amounts?

You receive this answer:  
To eliminate clutter, it is acceptable to use  
*“laboratories may have one or more of these hazards  
in small quantities”*



**Alright, your HMBP looks good, but it was last certified by the hazardous materials handler 18-months ago.**

Even though no changes have occurred, you still must certify your HMBP and your carcinogen/reproductive toxin list on an **annual basis (12 months)**.

*How? Do you resubmit the whole HMBP again?*

No, submit a completed form HM-#953 (*next slide shows the HMD form*) to the HMD along with the changed/updated sections of the HMBP, if you have any changes/updates.





# Some Prop. 65 reportable Carcinogens & Reproductive Toxins

- Acetaldehyde
- Acrylamide
- Benzene
- Benzyl chloride
- Carbon tetrachloride
- Dichloromethane
- Ethylene monoethyl ether
- Ethylene monomethyl ether
- Hydrazine
- Lead & lead compounds
- Mercury & mercury compounds
- Nickel sulfate
- Nitromethane
- Toluene
- Many pesticides

# Office of Environmental Health Hazard Assessment (OEHHA)

## Useful Website

### **Proposition 65 chemicals:**

[www.oehha.ca.gov/prop65.html](http://www.oehha.ca.gov/prop65.html)

Proposition 65 requires the Governor to publish, at least annually, a list of chemicals known to the State to cause cancer or reproductive toxicity. Last updated September 2009 by the State.

# Report carcinogens/reproductive toxics in these ranges

Chemical Name	Amount of material handled						
	< 1 Gallon	< 1 Pound	< 10 Gallon	< 10 Pound	< 55 Gallon	< 500 Pound	Trade Secret
Acrylamide				<b>X</b>			
Dichloromethane (methylene chloride)			<b>X</b>				
Chloroform	<b>X</b>						
Toluene	<b>X</b>						
Ethylene Glycol monomethyl ether	<b>X</b>						
Carbon tetrachloride	<b>X</b>						
Rosin Flux Core Solder (lead)		<b>X</b>					

Remember to submit annually the  
carcinogen & reproductive toxins  
list,

or your annual **certification**, if  
nothing changes.

# Now the inspector asks for your Medical Waste Management Plan (MWMP)

You locate your MWMP quickly, but it is from 2006.

*Hmm, should you have redone this annually?*

*Everything is still accurate.*

You can always read the California Medical Waste Management Act if you have these types of questions, or call your inspector, or HMD main office at **619-338-2231** for general answers.

*Cal. Health and Safety Code: online at....*

<http://www.cdph.ca.gov/certlic/medicalwaste/Documents/MedicalWaste/MedicalWasteManagementAct.pdf>

# Do I need to submit my MWMP annually?

**No.**

After an initial MWMP submittal, SQG's of medical waste that treat their medical waste onsite and all LQG's, need to resubmit their MWMP to the HMD only when changes are made (within 30 days of a change).

Must keep a copy onsite.

# The County's MWMP reporting form may be obtained on the HMD website, last updated in early 2009.



**County of San Diego**  
 DEPARTMENT OF ENVIRONMENTAL HEALTH  
 HAZARDOUS MATERIALS DIVISION  
 P. O. BOX 129261, SAN DIEGO, CA 92112-9261  
 (619) 338-2222 T-800-253-9933 FAX (619) 338-2377  
<http://www.sdcdeh.org>



### Medical Waste Management Plan

Facility Information

Business Name: \_\_\_\_\_ Unified Program Facility Permit #: \_\_\_\_\_  
 Type of Business: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Address: \_\_\_\_\_ CA \_\_\_\_\_  
Street No. Street Name City State Zip Code

Person Responsible for implementing the Medical Waste Management Plan

Name: \_\_\_\_\_ Phone: (\_\_\_\_) \_\_\_\_\_ x \_\_\_\_\_  
 Title: \_\_\_\_\_

Types of wastes generated

<input type="checkbox"/> <b>Sharps</b> - e.g., needles, blades, scalpels, or broken glass or syringes contaminated with biohazardous waste. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Home-Generated Sharps</b> Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Laboratory wastes</b> - specimens or microbiological cultures, stocks of infectious agents, live and attenuated vaccines, biologicals, and culture media. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Liquid or semi-liquid biohazardous laboratory waste</b> - treated on site by chemical disinfection* and discharged to sewer. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Waste contaminated with fixatives or chemotherapeutic agents.</b> Estimated monthly amount _____ lbs <input type="checkbox"/> <b>California-regulated pharmaceutical waste</b> Estimated monthly amount _____ lbs	<input type="checkbox"/> <b>Blood or body fluids</b> - liquid blood or blood products, or other regulated body fluids, or articles contaminated with liquid blood or body fluids. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Pathology waste</b> - recognizable human anatomical parts. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Surgical specimens</b> - human or animal parts or tissues removed surgically or by autopsy and are suspected to be contaminated by agents which are contagious to humans. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Isolation waste</b> - waste contaminated with excretion, exudates or secretions from humans or animals who are isolated due to highly communicable diseases. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Contaminated animals</b> - animal carcasses, body parts, tissues or fluids suspected to be contaminated by agents which are contagious to humans. Estimated monthly amount _____ lbs <input type="checkbox"/> <b>Other (specify):</b> _____ Estimated monthly amount _____ lbs
---	---

Estimate of **TOTAL** monthly medical waste generated: \_\_\_\_\_ lbs

---

**ONSITE MEDICAL WASTE TREATMENT ONLY:** Method of medical waste treatment *if performed onsite:*

Steam Autoclaving       Other state approved alternative technology (specify below): \_\_\_\_\_

Onsite medical waste treatment records must be maintained for three years. HSC §117975

\*Per HSC §118215(c), for liquid or semi-liquid biohazardous laboratory waste (§117635(a)), the treatment method must be recognized by the NIH, the CDC, or the American Biological Safety Association. If the chemical disinfection of the medical waste causes the waste to become a hazardous waste, the waste shall be managed in accordance with the requirements of HSC Chapter 6.5 (commencing with §25100) of Division 20.

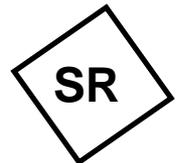
HM-9213 (03/09)      Department of Environmental Health-Hazardous Materials Division      3

Most HMD forms are online and available anytime.

# San Diego County Code requires reporting/disclosure of “TLV” toxic gases

**A business with a compressed gas with a Threshold Limit Value (TLV) of 10 parts per million or less, shall:**

- Report any quantity of these gases as part of their HMBP chemical inventory reporting and
- Submit with your Hazardous Materials Business Plan to the San Diego County HMD.
- And be sure to show the location on your site map, use the standardized map symbol and other appropriate hazard symbols. Most likely XH.



# Some “TLV” Toxic Compressed Gases

- Hydrogen Chloride
- Dimethylamine
- Hydrogen Cyanide
- Fluorine
- Hydrogen fluoride
- Methylamine
- Sulfur dioxide

With your records reviewed,  
and the physical inspection  
completed, you just wait for the  
inspector to give you an  
inspection report.

(Note: if the report is going to be a long  
one you'll most likely get an initial report  
on the day of the inspection and a final  
report soon thereafter).

Read your inspection report. Definitely ask your inspector any questions you have in regards to the report/inspection findings, then respond to each violation (if any were received) or remarks requesting follow-up within the time period prescribed. If photos are taken, the HMD inspector will give you a complete set of all photos.



Note: Even if you disagree with a violation, you must respond to it within 30 days or less depending on the violations.

All of your regulated materials and wastes are properly labeled and stored & everything went well!

**GOLD  
STAR**

You might qualify for EPIC+ when you meet all the eligibility requirements.

# Answers to the four questions on slide 1

1. Your HMBP and carcinogen/reproductive toxin list must be certified every 12 months.
2. In late 2009 California will be adopting a electronic submittal format for hazardous materials handlers to submit chemical inventory information to the CUPAs. (T/F).
3. Open hazardous waste containers are allowed as long as they are contained in a lab fume hood (T/F)
4. You must file an exception report with DTSC if you do not receive a TSDf signed manifest within 45 or 60 days of a waste pick-up.

# Thank you for attending the October 2009 EPIC+ workshop

It is now time for the voluntary written post-test. Feel free to stay and take the test now, or go ahead and register and take the HMD's online EPIC+ training course at your convenience.

[http://www.co.san-diego.ca.us/deh/hazmat/hmd\\_epic\\_training.html](http://www.co.san-diego.ca.us/deh/hazmat/hmd_epic_training.html)