

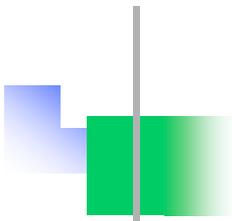
Hazardous Materials & Hazardous Waste Compliance for Schools



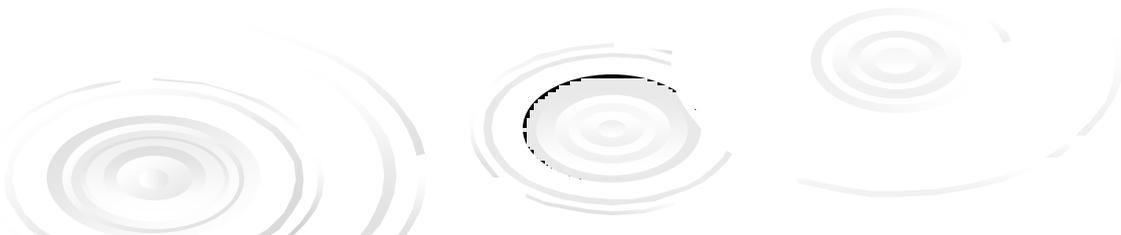
presented by:

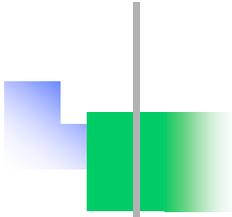
Manon Maschue & Sonja Ingmanson
Environmental Health Specialists
County of San Diego
Department of Environmental Health
Hazardous Materials Division





Overview

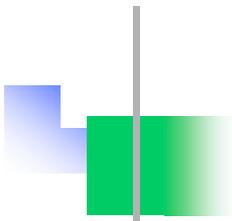
- Authority to regulate / inspect
 - 2008 School Inspections
 - General Inspections
 - Guidelines for staying in compliance
- 



Hazardous Materials Division (HMD)

- Department of Environmental Health within the County of San Diego
- Cal EPA certified HMD to implement the Unified Program
- Certified Unified Program Agency (CUPA) for San Diego County

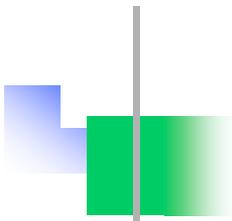




CUPA Authority

H&SC 25185... any authorized representative of the department ... may, at any reasonable hour of the day, ... do any of the following:

- ✓ Enter and inspect ...
 - ✓ Carry out any sampling activities...
 - ✓ Inspect and copy any records...
 - ✓ Photograph any... condition constituting a violation of law found during an inspection...
- 

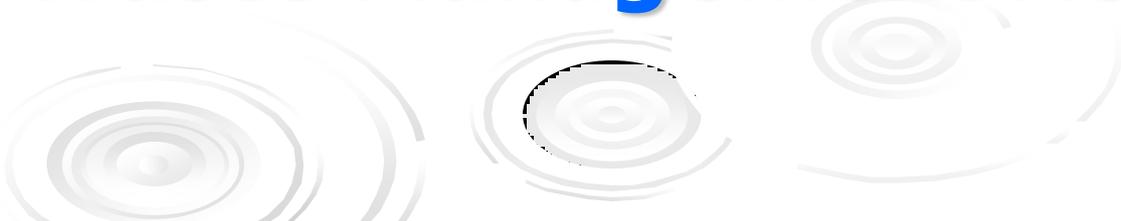


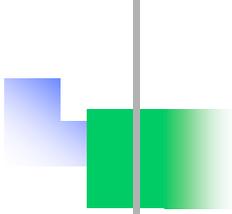
CUPA Authority

SDCC Title 6, Division 8, Chapter 9
Section 68.902

Designates

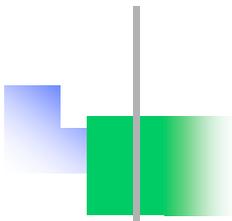
Director of the Department of Environmental Health
to **implement and enforce:**

- **The Unified Program**
 - **The Medical Waste Management Act**
- 

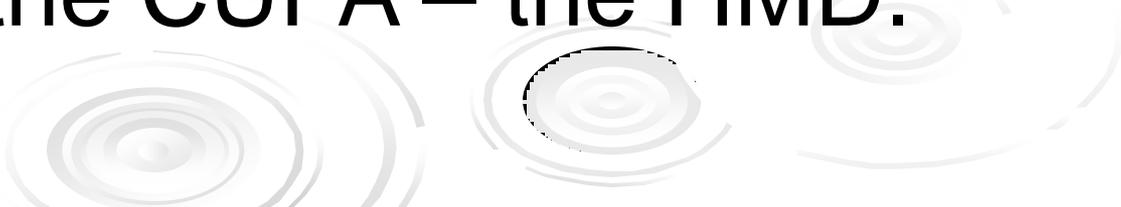


Unified Program Elements

- Hazardous Waste Generators
 - Hazardous Materials Release Response Plans & Inventories (*Business Plans*)
 - Underground Storage Tanks Program (USTs)
 - Aboveground Petroleum Storage Act
 - California Accidental Release Prevention Program (CalARP)
 - Onsite Hazardous Waste Treatment (tiered permitting) Programs
 - The Medical Waste Management Act
- 



In San Diego County Schools that...

- Generate hazardous waste
 - Store hazardous materials
 - Store a hazardous substance in an underground storage tank (UST)
 - Generate medical waste...
 - ...need a Unified Program Facility Permit with the CUPA – the HMD.
- 



What is a Hazardous Waste?

Solids, liquids and gases:

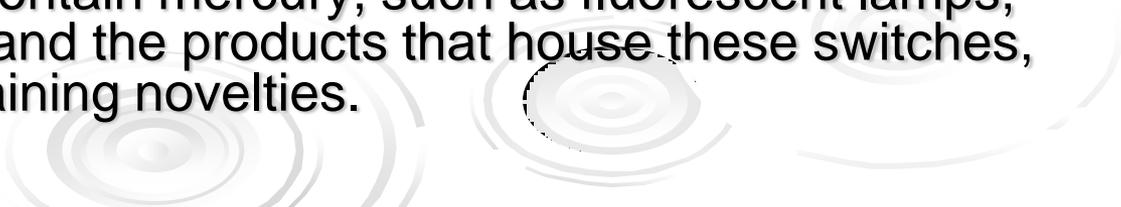
- Ignitable
 - flashpoint $<140^{\circ}\text{F}$, such as used oil, solvents,
- Corrosive
 - pH <2 or a pH >12.5
- Reactive
 - Wastes that are unstable under normal circumstances
- Toxic
 - Harmful or fatal when absorbed, inhaled or ingested

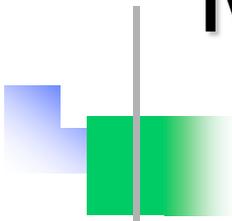




What is a Hazardous Waste?

Listed Wastes

- F-listed (non-specific source wastes):
 - solvents that have been used for cleaning or degreasing
 - K-listed (source-specific wastes):
 - certain wastes from specific industries, such as petroleum refining or pesticide manufacturing.
 - P-listed and U-listed (discarded commercial chemical products):
 - specific commercial chemical products that have not been used
 - M-listed Wastes (discarded mercury-containing products):
 - wastes known to contain mercury, such as fluorescent lamps, mercury switches and the products that house these switches, and mercury-containing novelties.
- 



More info on Hazardous Waste Determination

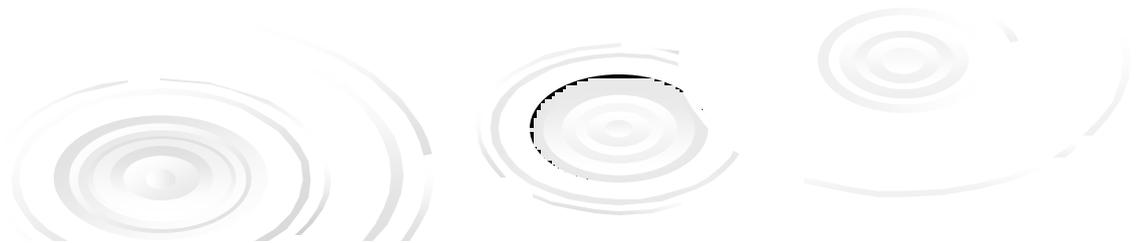
- Department of Toxic Substances Control website

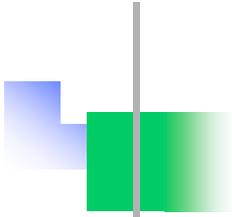
www.dtsc.ca.gov

- Hazardous waste and regulations

- More detailed explanation and examples

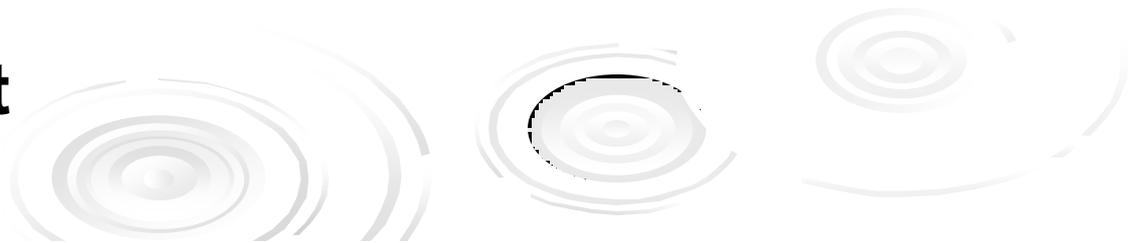
www.dtsc.ca.gov/HazardousWaste/upload/HWMP_DefiningHW1.pdf

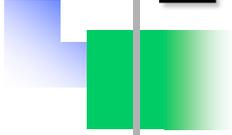




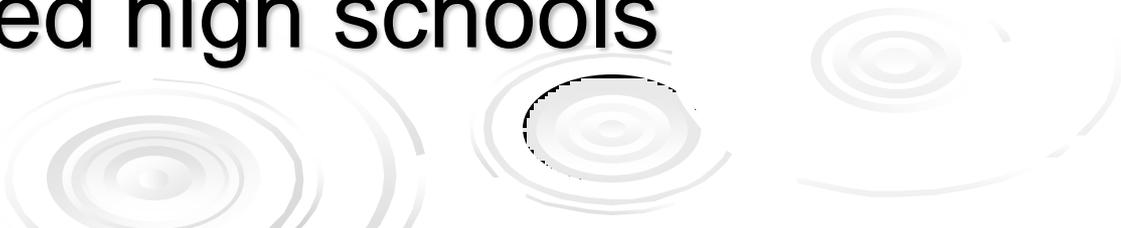
Inspections

- **Unannounced**
- **Comprehensive**
 - **All CUPA Programs**
 - **Fence-to-fence & wall-to-wall**
- **Types**
 - **Routine – typically 18 month intervals**
 - **Follow-up**
 - **Complaint**

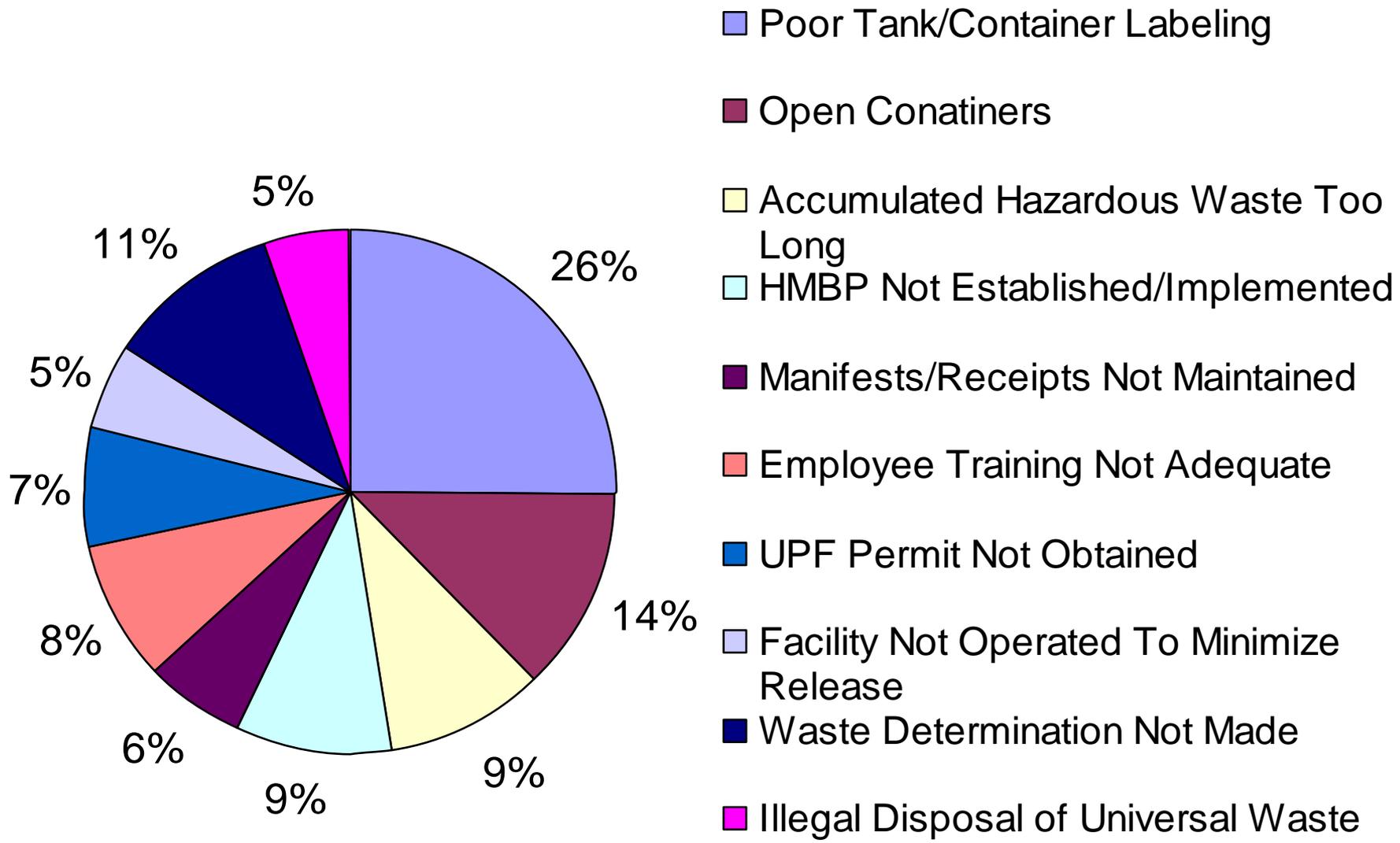


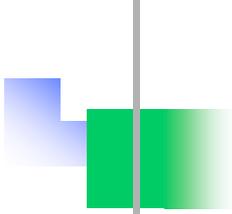


2008 High School Inspections

- Goal: Inspect 100% in 2008
 - 131 area high schools
 - public & private
 - Outcome:
 - 49 didn't require a UPF permit
 - 20 new permits
 - 82 permitted high schools
- 

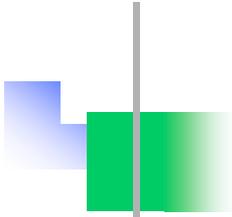
Schools Top 10 Violations During 2008 (N=95)





Common Violations

- Containers not properly labeled
 - Hazardous waste accumulated / stored onsite longer than allowable time
 - Waste disposal receipts not available or not maintained for last 3 years
 - Waste container not kept closed
 - Hazardous Materials Business Plan not implemented/submitted/updated
- 



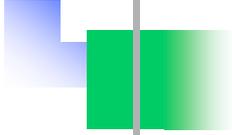
Hazardous Waste Violation

**Container missing label or not
properly labeled**

Article 3 –

Hazardous Waste Accumulation
22 CCR §66262.34(f)





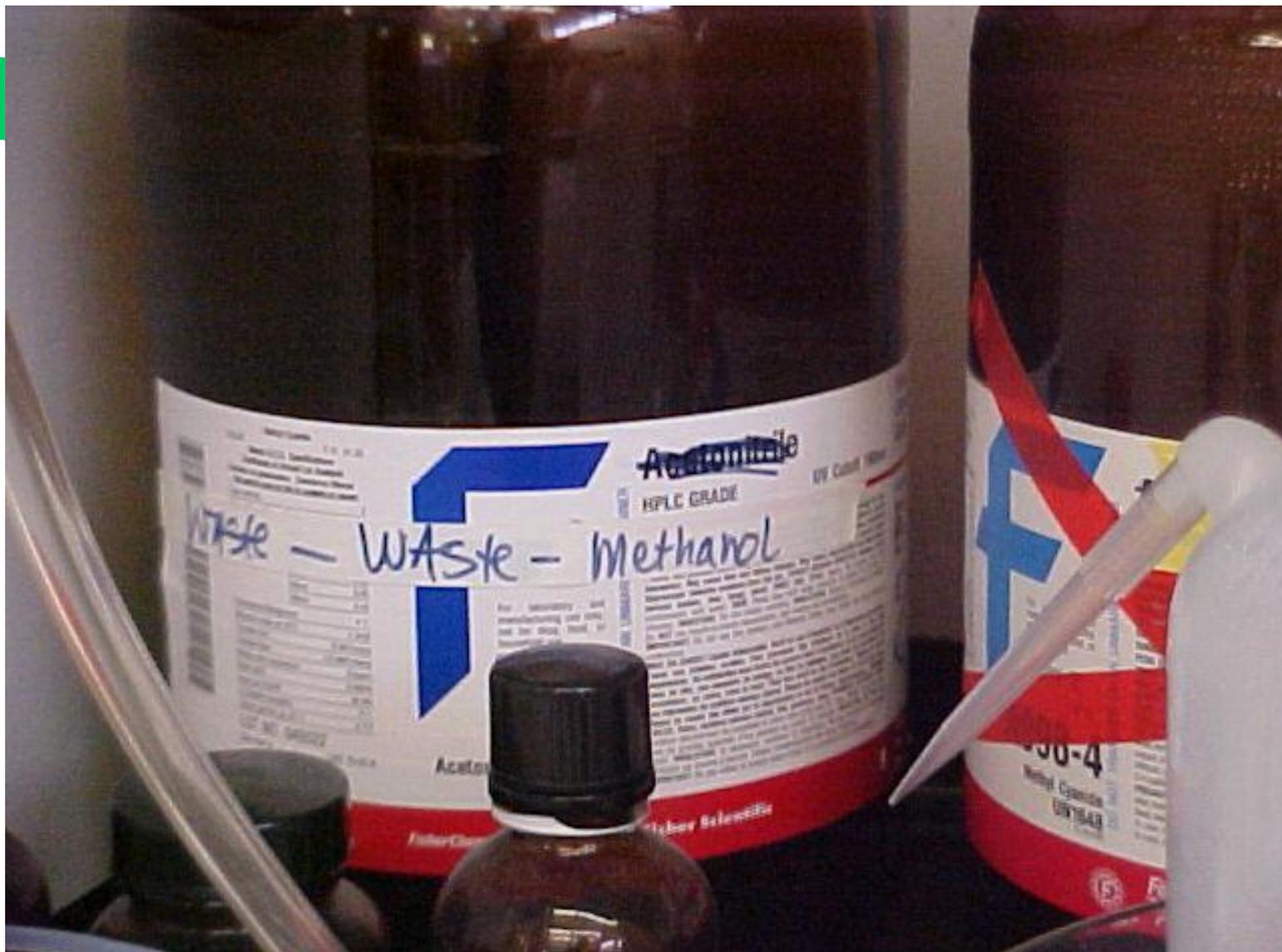
Container Labeling Requirements for Hazardous Waste Accumulation

(22 CCR §66262.34(f))

- **The words "Hazardous Waste" and,**
 - Name and address
 - Physical state and composition
 - Hazardous properties

 - **The accumulation start date**
 - Clearly marked and visible for inspection
 - On containers and portable tanks.
- 

Chemistry



Improperly labeled

HAZARDOUS WASTE

STATE & FEDERAL LAW PROHIBIT IMPROPER DISPOSAL

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

PROPER D.O.T. SHIPPING NAME: _____ UN OR NA #: _____

GENERATOR'S NAME AND ADDRESS:

NAME: _____

ADDRESS: _____

CITY: _____ STATE: CA ZIP: _____

GENERATOR'S EPA ID NUMBER: _____

MANIFEST TRACKING
NUMBER: _____

ACCUMULATION START DATE:

____ / ____ / ____

CA WASTE NUMBER: _____

EPA WASTE NUMBER: _____

CONTENTS, COMPOSITION: _____

PHYSICAL STATE:
 SOLID LIQUID

HAZARDOUS PROPERTIES: FLAMMABLE TOXIC
 CORROSIVE REACTIVE OTHER

COMPLETE
FOR
STORAGE

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

COMPLETE
FOR
TRANSPORT

Missing Accumulation Start date

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

PROPER D.O.T. SHIPPING NAME _____

GENERATOR INFORMATION

NAME John Deere TELEPHONE 916-486-1000

ADDRESS 1000 N. Deere Blvd

CITY Deerfield STATE CA ZIP 94515

EPA I.D. NO. _____ MANIFEST DOCUMENT NO. _____

ACCUMULATION START DATE _____ CA WASTE NO. _____ EPA WASTE NO. _____

CONTENTS, COMPOSITION: USED MOTOR OIL

PHYSICAL STATE: LIQUID SOLID

HAZARDOUS PROPERTIES: FLAMMABLE TOXIC CORROSIVE REACTIVITY OTHER _____

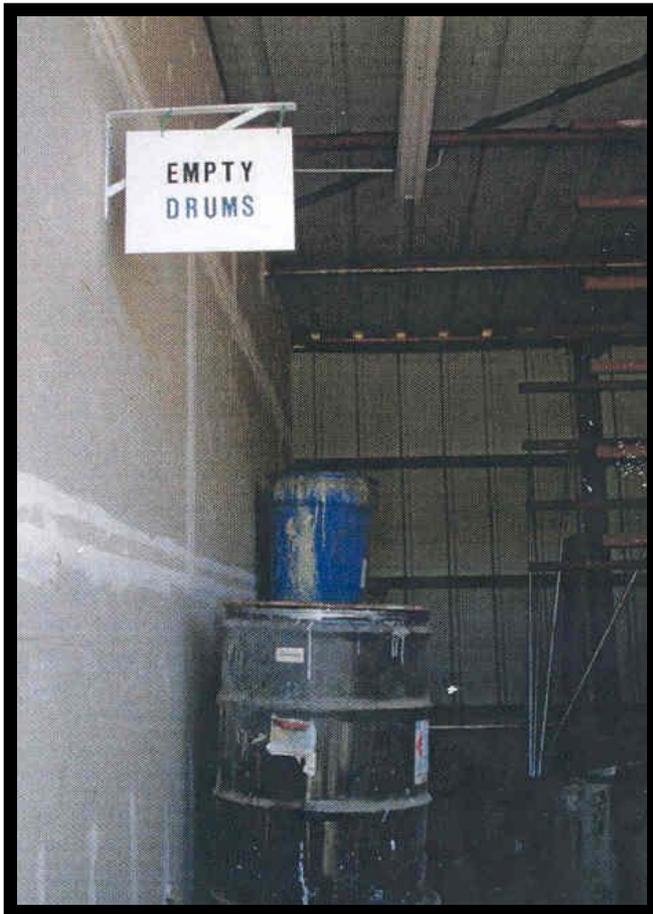
COMPLETE FOR STORAGE

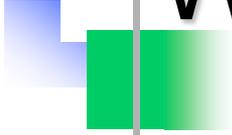
HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTE

PRINTED BY: MESA LABEL EXPRESS, INC. (858) 568-2828 FAX: (858) 568-2828

Label Empty Containers

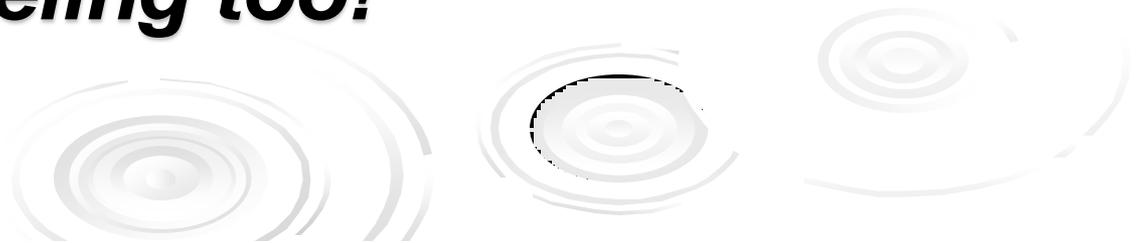
>5 gallons must be labeled with the date emptied. 66261.7(e)

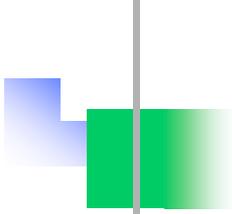




Weekly Container Inspections

- Required for storage areas
- Teach students to conduct weekly inspections
- Look for & Correct:
 - Leaking & deteriorating containers
 - Any failure of the containment system caused by corrosion or other factors.
 - ***Check labeling too!***





Hazardous Waste Violation

**Hazardous waste stored / accumulated
greater than allowable time**

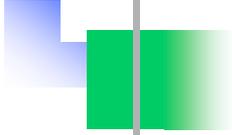
Article 3 –

Pre-Transportation Requirements

22 CCR §66262.34 (a), (b), (c) & (d)



California Hazardous Waste Generator Categories

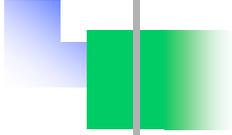


Regulations vary by generator category:

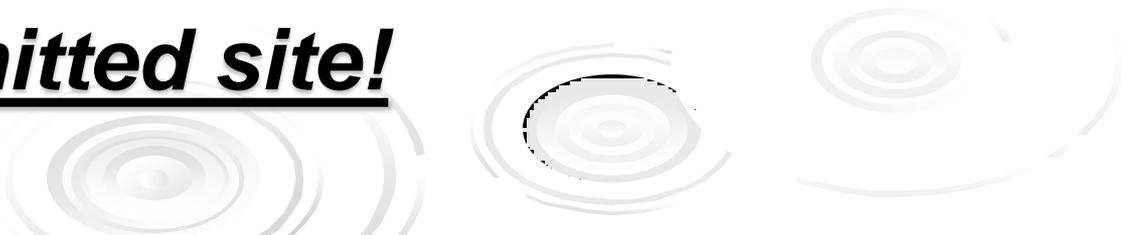
Large Quantity Generators (LQGs)

Small Quantity Generators (SQGs)



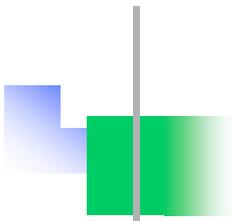


Large Quantity Generator (LQG)

- Generate **1,000 kilograms or more** of hazardous waste during any calendar month, or
 - **One kilogram** of acutely hazardous waste (P list) during any calendar month (e.g., sodium azide, epinephrine), or
 - **One kilogram of extremely** hazardous waste during any calendar month (strychnine).
 - **For entire permitted site!**
- 

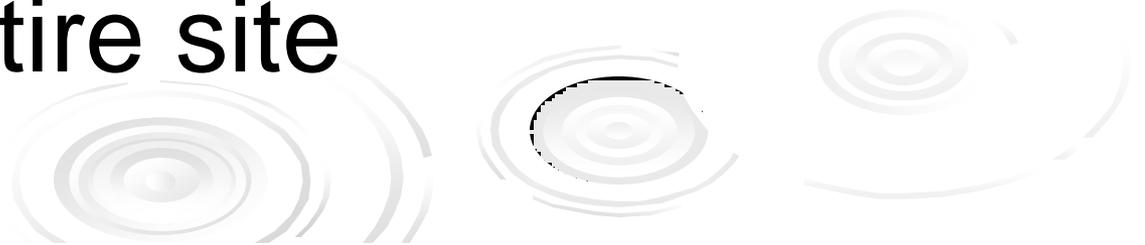
Small Quantity Generator (SQG)

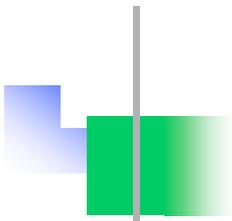
- **Generate less than 1,000 kilograms** of hazardous waste in any month, and
(1,000 kg \approx 5½ 55-gallon drums of used oil)
- **Do not accumulate more than 6,000 kilograms** of hazardous waste onsite, and
(6,000 kg \approx 33 55-gallon drums)
- **Do not hold acutely hazardous waste or extremely hazardous waste in an amounts >one kg for >90 days.**
- **For entire permitted site**



Small Quantity Generators ($<1,000$ kg waste/month)

- Most individual schools are SQG
- Very Small Generators (<100 kg/mo)
 - A subset of SQGs
 - Very small generators have special “relaxed” rules for accumulation.
- Consider entire site



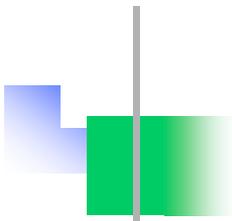


Accumulation Time

- LQG - 90 days
- SQG - 180 days*
- Very Small - 180 days *after* 100kg is accumulated.
- Satellite Accumulation

***SQGs can accumulate hazardous waste for 270 days if the destination facility is greater than 200 miles away.**



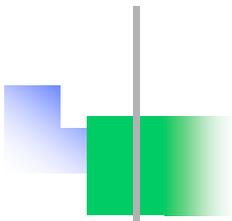


Satellite Accumulation

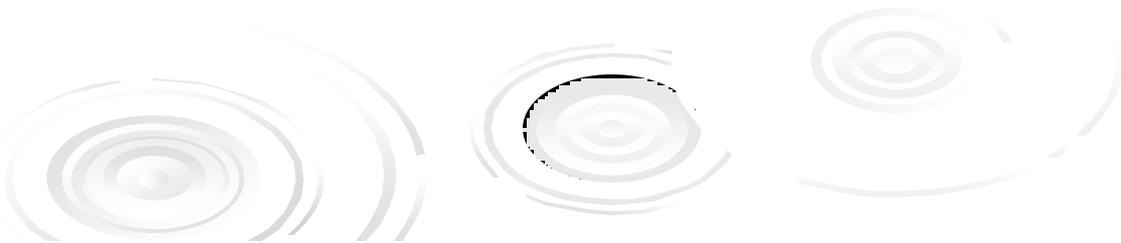
- ✓ 55 gallons per waste stream maximum in satellite area.
- ✓ Accumulated at or near the point of generation.
- ✓ In control of the generator all the time (in line of site or locked).

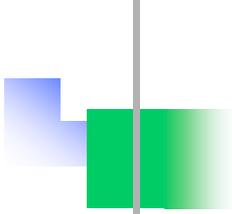
Can accumulate the waste for a year.





“Full Permit”

- Storing hazardous waste longer than the allowed time requires a *full permit* from the California Department of Toxic Substances Control (DTSC).
 - Full Permits are not regulated by the CUPA.
 - Permitting process is expensive and time consuming.
- 



Hazardous Waste Violation

Manifest Violations

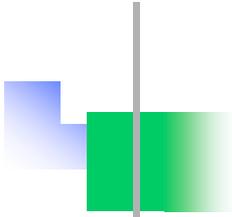
**Waste disposal receipts /
documents not available**

Article 2 –

Recordkeeping

22 CCR §66262.40 & 22 CCR §66262.42





Uniform Hazardous Waste Manifest

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

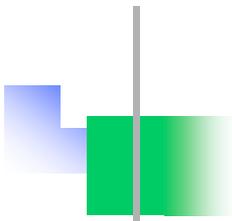
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number					
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)								
Generator's Phone:										
6. Transporter 1 Company Name				U.S. EPA ID Number						
7. Transporter 2 Company Name				U.S. EPA ID Number						
8. Designated Facility Name and Site Address				U.S. EPA ID Number						
Facility's Phone:										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1.									
	2.									
	3.									
	4.									
14. Special Handling Instructions and Additional Information										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offeror's Printed/Typed Name				Signature		Month		Day		Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
17. Transporter Acknowledgment of Receipt of Materials Transporter signature (for exports only): _____ Transporter 1 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____ Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____										
18. Discrepancy										
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
18b. Alternate Facility (or Generator) _____ Manifest Reference Number: _____ U.S. EPA ID Number _____										
Facility's Phone: _____										
18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1.		2.		3.		4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a				Signature		Month		Day		Year
Printed/Typed Name										

Recordkeeping

22 CCR§66262.40

A generator...

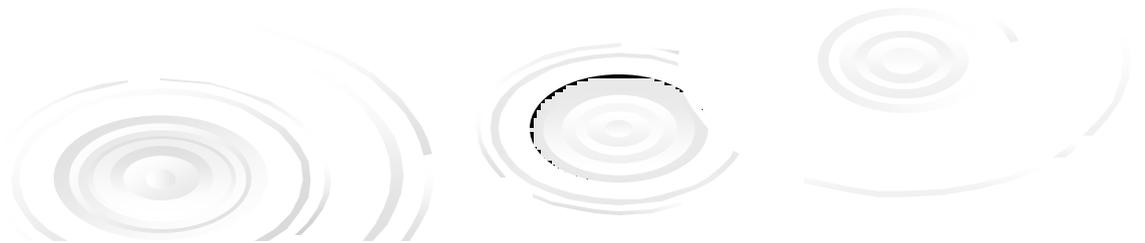
- Must receive a signed copy from the designated facility within 35 days.
- Shall retain the TSDF-signed manifest as a record for at least three years.
- Shall keep a copy of all records regarding waste, analysis or manifest tracking for at least three years.

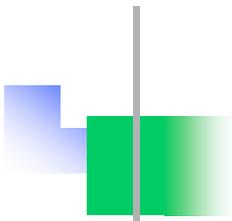


Manifest Regulations

22 CCR 66262.23

Within 30 days of each shipment of hazardous waste the generator must submit **a legible photocopy** of each manifest used to the California Department of Toxic Substances Control.





Six-Page Manifests

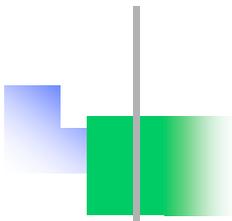
First page: “Designated facility to destination State (if required)”.

Last page: “Generator’s initial copy”.

Getting a *legible* copy from the 6th page is nearly impossible.

Copy the *first page* before the transporter drives away!





Generator sends legible photocopy to DTSC

DTSC Generator Manifests
Department of Toxic Substances Control
P.O. Box 400
Sacramento, CA 95812-0400



Retain copy signed by TSDf

DESIGNATED FACILITY	18. Discrepancy												
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection												
	Manifest Reference Number:												
	18b. Alternate Facility (or Generator)										U.S. EPA ID Number		
	Facility's Phone:												
	18c. Signature of Alternate Facility (or Generator)										Month	Day	Year
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
	1.			2.			3.			4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
	Printed/Typed Name					Signature					Month	Day	Year
NAME OF TSDf REPRESENTATIVE					<i>Signature of TSDf Representative</i>					11	21	07	

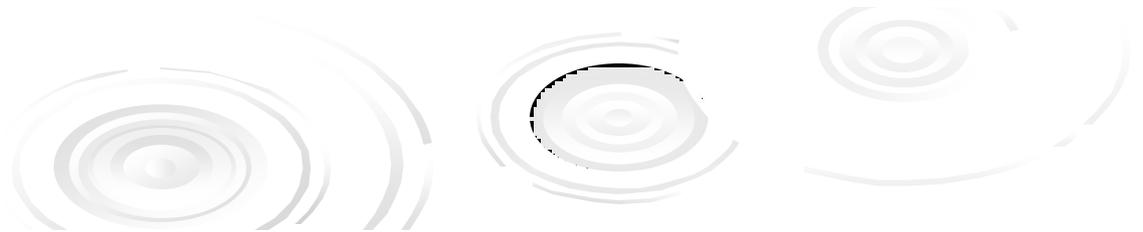
Keep this copy for at least 3 years

Exception Reporting §66262.42(a)

Contact the transporter and/or the designated facility if you do not receive a copy of the manifest with the handwritten signature of the designated facility within **35 days** of the date the waste was shipped.

DESI ↓	19. Hazardous waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
	1.	2.	3.	4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature		Month	Day	Year
TSDF Operator		<i>TSDF Operator</i>		11	21	07

EPA Form 8700-02 (Rev. 9-05) Revisions effective 10/1/07



DTSC's Manifest Information

<http://www.dtsc.ca.gov/IDManifest/Manifests.cfm>



Skip to: [Content](#) | [Foot](#)

[Home](#) | [Emerging Issues](#) | [Green Chemistry](#) | [Pollution Prevention](#) | [Site Cleanup](#) | [Managing Waste](#) | [Enforcement & Response](#) | [Lab](#) | [DTSC](#)

[Hazardous Waste](#) | [Household Waste](#) | [Universal Waste](#) | [Electronic Waste](#)

QUICK LINKS

- [DTSC Data](#)
- [EnviroStor](#)
- [Permit Appeals](#)
- [Fact Sheets, Publications and Forms](#)
- [Laws, Regs & Policies](#)
- [News Room](#)

RESOURCES

- [Regulatory Assistance](#)
- [Employment](#)
- [Decisions Pending and Opportunities for Public Participation](#)

Hazardous Waste Manifest Information

A hazardous waste manifest must accompany most hazardous waste that is shipped off site. The Uniform Hazardous waste from the point of generation, through transportation, to the final treatment, storage, and disposal facility the generator, signs and keeps one of the manifest copies, creating a "cradle-to-grave" tracking of the hazardous waste manifest. [Hazardous waste transporters](#) in California must be registered with the Department of Toxic Substances Control.

In 2005, U.S. EPA published regulations that significantly change the manifest form and procedures. They mandate a new form that goes into effect on September 5, 2006.

This page contains information to help businesses understand and comply with these changes.

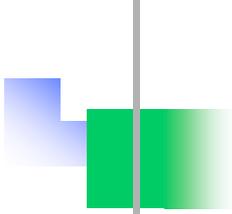
Click on one of the links below to go directly to a specific topic:

- [State Manifest Regulations and Statutory Changes](#)
- [Buying Manifest Forms](#)
- [Manifest Forms and Federal and State Instructions](#)
- [Manifest Submission to DTSC](#)
- [Manifest Report Repository](#)
- [Manifest Exception Reports](#)
- [Significant Discrepancy Reports](#)
- [Unmanifested Waste Reports](#)
- [Exception Reports for Exporters](#)
- [Manifest Correction Letters](#)

mislabeled waste...
incorrect manifest...

steel etchant waste inside
a steel truck... closed I-15





Hazardous Waste Violation

**Hazardous waste containers
not kept closed**

Article 9 –

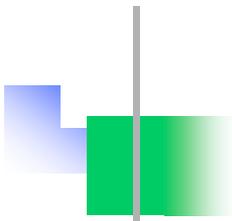
Management of Containers

22 CCR§66265.173 & 40 CFR§265.173



Open Wastes

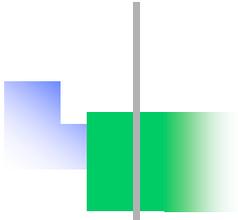




Hazardous Waste Containers

- Must be closed at all times, except when adding or removing waste
- Teach students to close containers, except when adding or removing waste

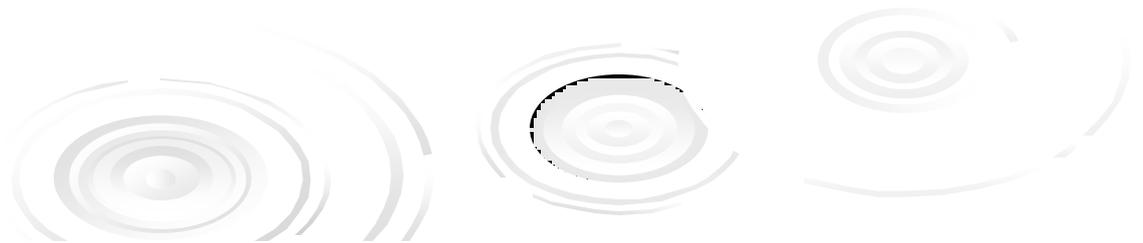


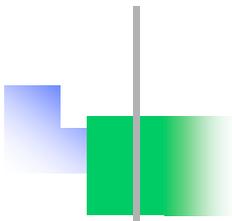


Train staff and students to keep
waste containers closed.

Missed one?

Close it during the inspection

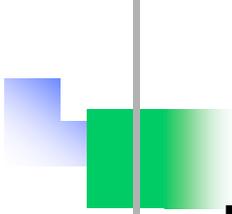




Hazardous Waste Violation Summary

Tour the facility weekly. Inspect all hazardous waste areas and containers for:

- Labeling
 - Accumulation storage times
 - Closed containers with tight fitting lids
 - Proper waste management
 - File and maintain all waste disposal records for inspection review
- 



Hazardous Materials Violation

**Hazardous Materials Business
Plan not submitted, not updated
or inadequate**

Chapter 6.95 – Article 1

Business and Area Plans

H&SC 25505(a) & H&SC 25503.5(a)



55 gallons liquid
or greater

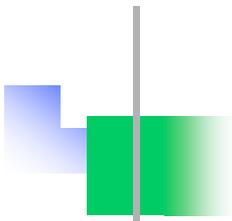


200 cubic feet
compressed gas (at STP)
or greater



500 lbs solid
or greater





Do you need a HMBP?

- Store only small quantities
 - 30 gallon used oil drum
 - 100 cubic feet of oxygen
 - Hazardous Materials Business Plan may not be required.
 - If you do not need a HMBP, post “Emergency Procedures” near a telephone.
- 

EMERGENCY PROCEDURES

POST NEAR TELEPHONE

In case of a fire, spill, or other emergency involving hazardous chemicals or waste, do the following:

Major Emergency

- ⇒ Evacuate the affected areas per the facility Evacuation Plan
- ⇒ Call 911 and report the emergency
- ⇒ Report the emergency to the facility Emergency Coordinator

Minor Emergency

- ⇒ Try to control the emergency if you are trained to do so and can do it safely
- ⇒ Report the emergency to the facility Emergency Coordinator

Facility Emergency Coordinators (EC)

	NAME	WORK PHONE	CELLULAR PHONE/PAGER	HOME PHONE
Primary EC		()	()	()
Alternate EC		()	()	()
Alternate EC		()	()	()

Emergency Contacts

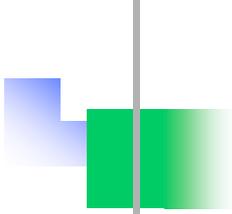
AGENCY	TELEPHONE NUMBER
Fire Department, Ambulance, Police	911
California Office of Emergency Services	(800) 852-7550
San Diego County Hazardous Materials Division	(619) 338-2222
Hazardous Waste Clean-Up Contractor (Optional)	()
Medical Facility (Optional)	()

Emergency Equipment

Locations of fire extinguishers, fire alarms (if any), and equipment for controlling chemical spills are shown on the facility site plan posted with this notice. Locations (optional) of electrical gas and water shut-offs, are also shown on the posted facility plan.

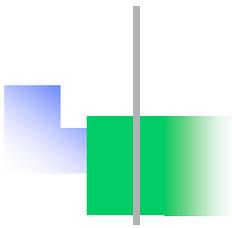
Ensure that employees are familiar with these emergency and evacuation procedures.
An emergency coordinator must be available 24-hours to assist emergency response personnel.

Post
Near
Phone



A Hazardous Materials Business Plan Includes:

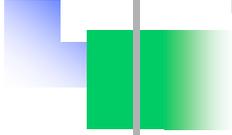
- Employee Training Description
 - Emergency Response Plan
 - Site Map
 - Reportable Inventory
 - 55 gallons
 - 500 lbs
 - 200 c.f. at STP
 - Toxic gases with TLV \leq 10ppm in any amount
- 



Employee Training Description

- Describes training for employees (and students)
- How to respond in case of emergency
- Location & use of emergency response equipment – eye wash, fire extinguishers, etc.
- Where to gather in case of evacuation – staging area





Emergency Response Plan

- Who is responsible for contacting authorities
- Authorities to contact
- How to respond in case of small spill, large spill, etc
- More requirements for LQG's



Site Map

H&SC §25509(a)(5)

- Use 8½ x 11” paper.
- Complex facilities are best depicted with multiple pages. Start with a map of the complex and then detail the buildings.
- Detail not required for administrative buildings.



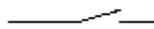
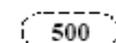
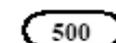
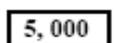
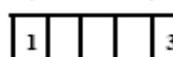
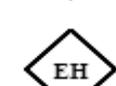
Site Map

H&SC §25509(a)(5)

- These maps will be scanned in black & white.
- Color and shading detracts from map quality.
- The business name, address, zip code, permit number and Thomas Brothers map page with coordinates must be at the top of the page.

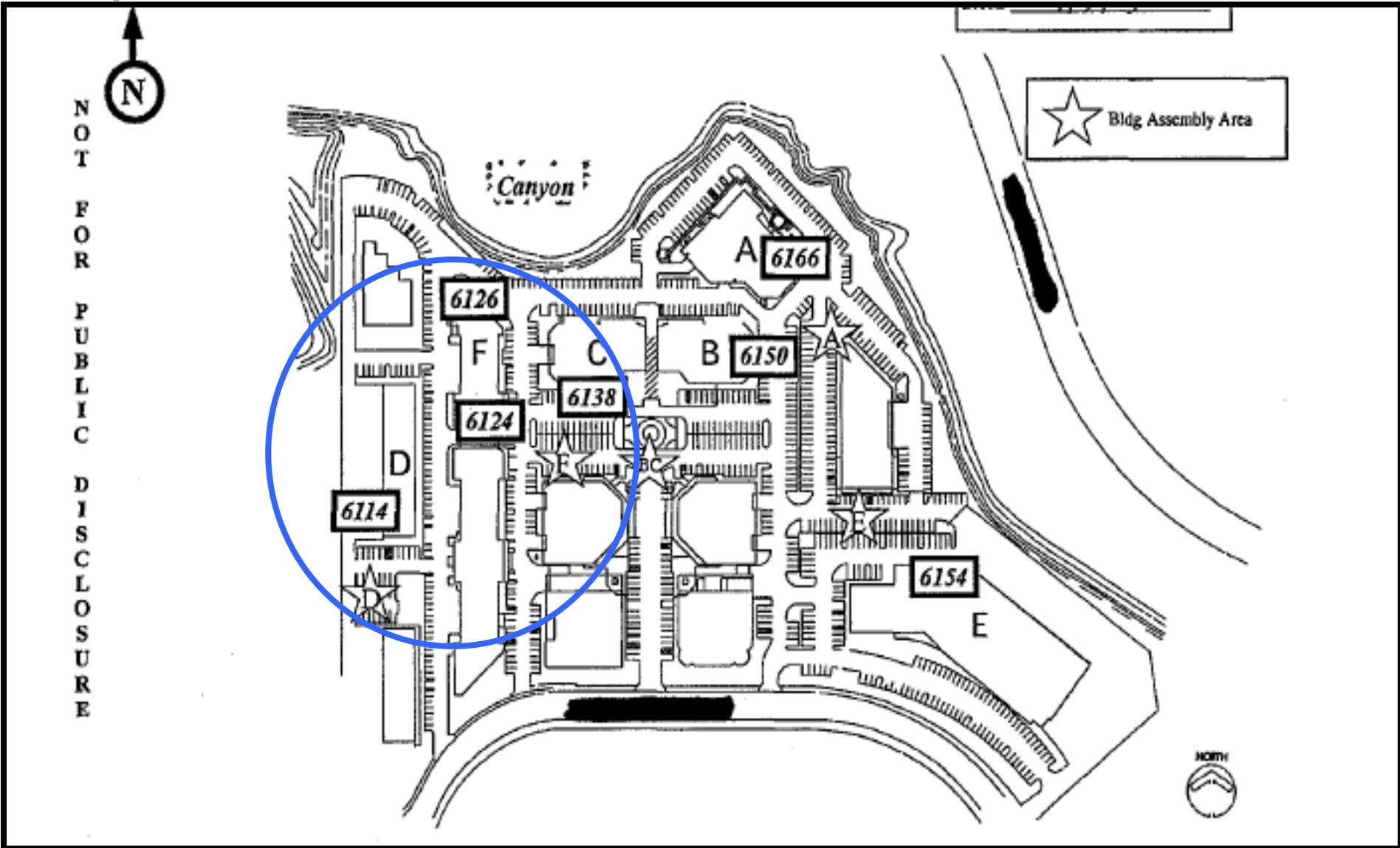
Standardized Site Map Symbols

II. HMBP STANDARDIZED SITE MAP SYMBOLS*

SITE MAP SYMBOLS			HAZARDOUS MATERIALS STORAGE/USE AREA SYMBOLS	
ENTRANCE/EXIT 	FENCE 	SAFE REFUGE (Evacuation Area, Staging Area) 	IMMEDIATE (ACUTE) HEALTH HAZARD 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.	
SEWER DRAIN 	FIRE HYDRANT 	STORM DRAIN OR CULVERT 	DELAYED (CHRONIC) HEALTH 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.	
FIRE DEPT. SPRINKLER SYSTEM CONNECTION 	F.D. STANDPIPE OUTLET 	KNOX BOX (FIRE DEPT. KEY BOX) 	FIRE HAZARD 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.	
STORAGE TANKS AND CAPACITY			SUDDEN RELEASE OF PRESSURE This category includes explosives, blasting agents and compressed gases. Examples: nitrogen, oxygen, acetylene, helium, carbon dioxide, etc.	
UNDERGROUND 	ABOVE GROUND  OR  OR 		REACTIVE 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.	
MAIN UTILITY SHUT OFFS			MEDICAL (INFECTIOUS) WASTE 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.	
ELECTRICAL 	GAS 	WATER 	RADIOACTIVES 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.	
ANNUNCIATOR PANEL 	STAIRWELL (i.e. 1 thru 3) 	ELEVATOR Range of Floors 1  3	EXTREMELY HAZARDOUS 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.	
			MATERIALS  	
			WASTE 	
			 	
			 	
			 	
			N/A 	
			 	
			 	

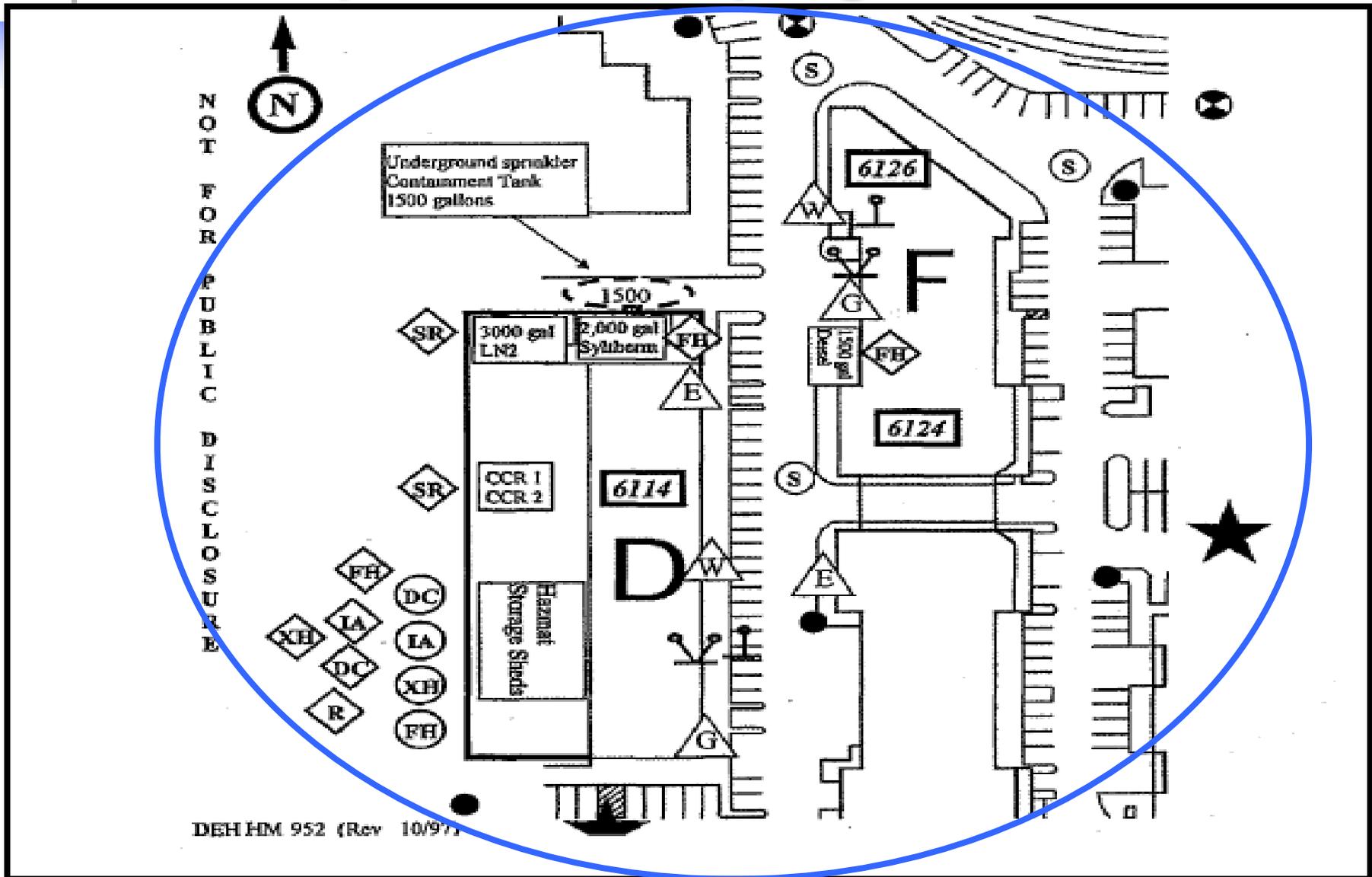
NOTE: Only use the above listed symbols on the site map. These symbols have been standardized throughout San Diego County and are meaningful to the local Fire Departments and Public Health Officials that will be responding in the case of an emergency.

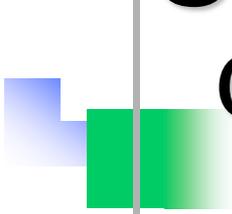
Complex Site, page 1 of 14



NOT FOR PUBLIC DISCLOSURE

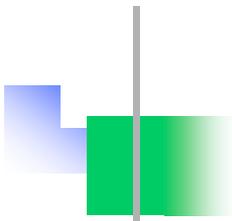
Complex Site, page 3 of 14





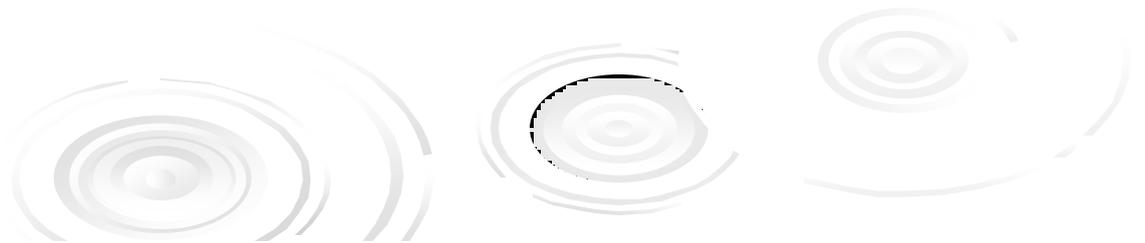
Submit amendments within 30 days of any of the following:

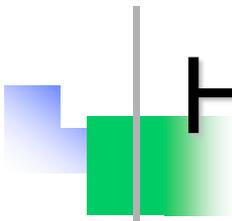
- A 100% or more increase in a material
 - Any handling of a previously undisclosed hazardous material.
 - Changes to emergency contacts or to maps.
 - Change of facility...
 - address
 - ownership
 - name
- 



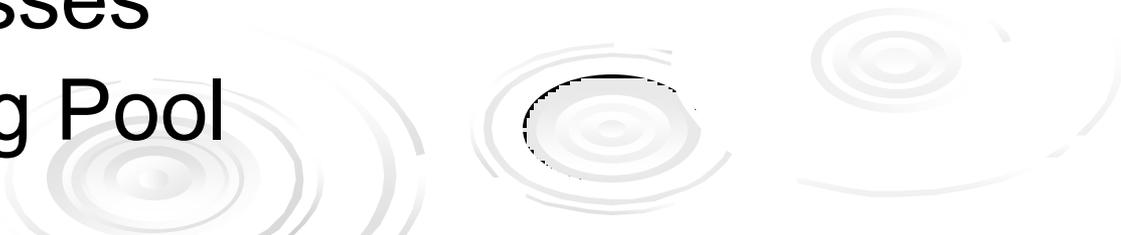
Hazardous Materials Violation Summary

- Periodically tour the facility and review the hazardous materials inventory and site map
- Annually certify that there are no changes or submit changes
- If possible, correct violations during the inspection

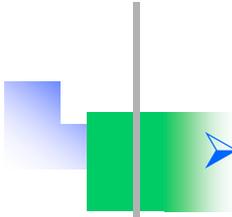
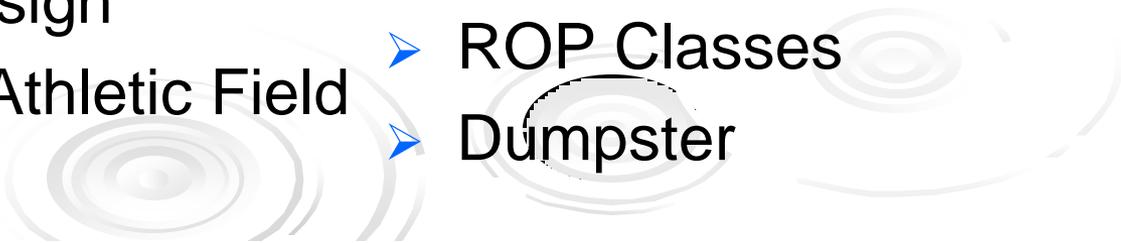




Places at Schools Where Hazardous Materials are Stored

- Grounds & Maintenance
 - District or Contractor's Trailers
 - Emergency Generator
 - Cooling/Boiler Room
 - Custodial Services
 - Drama/Set Design
 - Associated Student Center
 - ROP Classes
 - Swimming Pool
- 

The Inspection

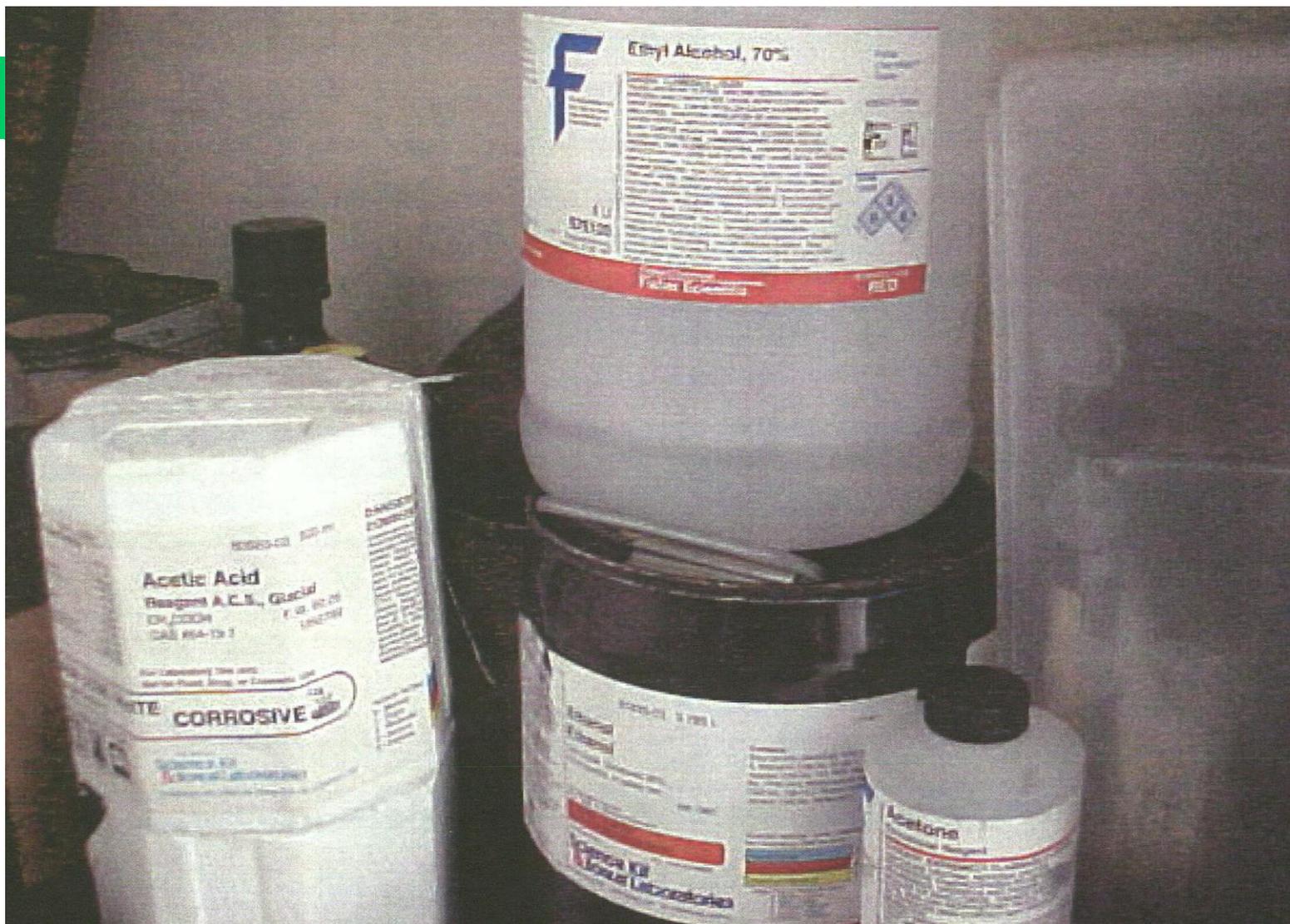
- 
- Biology Lab
 - Physical Sciences
 - Chemistry
 - Auto Repair
 - Auto Body
 - Woodworking/Furniture
 - Welding – gases storage
 - Machining – fluids/metals
 - Art/Photography Class
 - Graphic Arts
 - Drama/Set Design
 - Gardening or Athletic Field Maintenance
 - Custodial
 - Universal wastes management area
 - Swimming Pool
 - Associated Student Center
 - Nurse's Office
 - District or Contractor's Trailers
 - Emergency generator
 - Cooling/boiler room
 - ROP Classes
 - Dumpster
- 

Biological & Physical Science



Mercury Droplets = Mercury Vapors

Chemistry



Dangerous Incompatibles

Chemistry



Dangerous Incompatibles

Chemistry



Dangerous Incompatibles

Auto Shop



Dangerous, banned solvent

Repackage Deteriorated Containers



Auto Body - Sanding



Collect Sanded Paints & Metals

Woodworking



Use safety cans

Generates Hazardous Waste

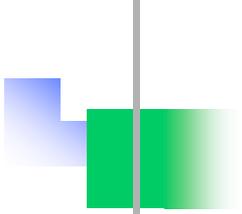


Machine Shop



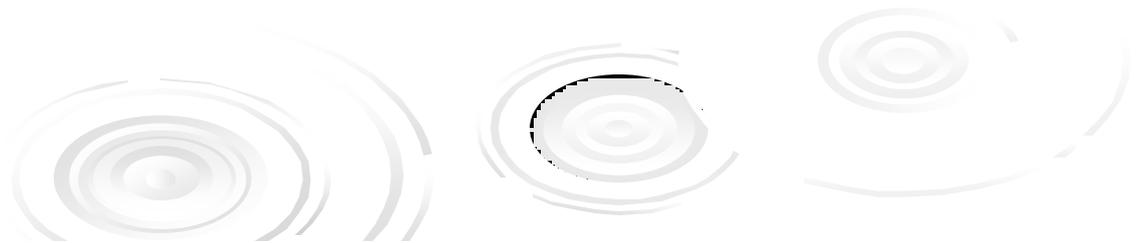
Welding - Safety

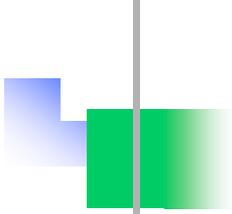




Universal Waste

- Universal
- Relatively lower risk
- Management requirements less restrictive than hazardous waste

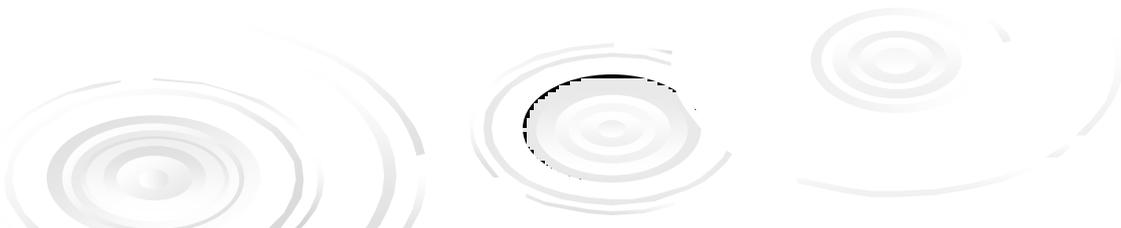




Universal Waste

- Hazardous wastes that are generated by a wide variety of people that contain mercury, lead, cadmium, copper and other substances hazardous to human and environmental health.
- Universal waste may not be discarded in solid waste landfills
- Examples of these wastes are batteries, fluorescent tubes, and some electronic devices.

www.dtsc.ca.gov/HazardousWaste/UniversalWaste/upload/UniversalWfactsheetfinal.pdf



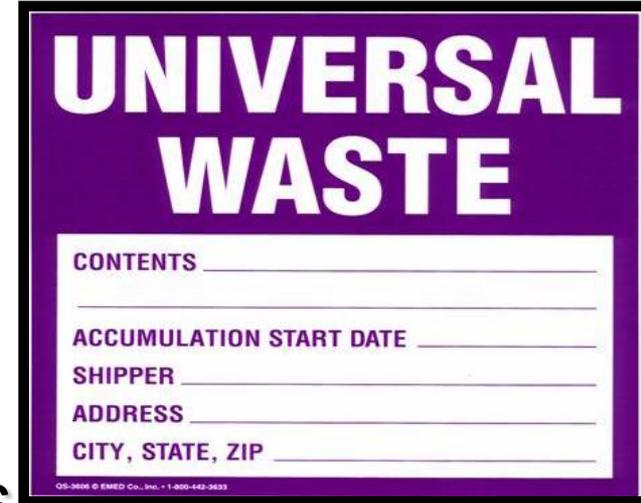
Examples of Universal Waste



Electronic Devices (ED)

“Electronic Device” means any electronic device including, but not limited to:

- Computers
- Telephones
- Answering machines
- Radios / Stereo equipment
- Tape players/recorders
- Video cassette players/recorders
- Compact disc players/recorders
- Calculators
- and some appliances



A purple rectangular label with a black border. The text "UNIVERSAL WASTE" is written in large, bold, white capital letters at the top. Below this, there are five white rectangular boxes with purple text and lines for information: "CONTENTS", "ACCUMULATION START DATE", "SHIPPER", "ADDRESS", and "CITY, STATE, ZIP". At the bottom left of the label, there is small white text: "OS-3006 © EMED Co., Inc. - 1-800-443-3633".

**UNIVERSAL
WASTE**

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

OS-3006 © EMED Co., Inc. - 1-800-443-3633

Universal Waste



Universal Waste Storage?



Medical Waste Management



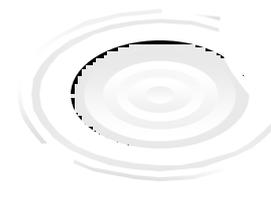
- Medical waste containers (sharps and bags)
 - labeled when first put into use
 - generator's name, address and phone number
- Sharps containers
 - must have either the words “sharps waste”, or
 - the international biohazard symbol and the word “BIOHAZARD”.
- Sharps containers that are “ready for disposal” must be properly disposed within 30 days.

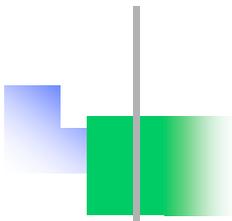


Medical Waste Records



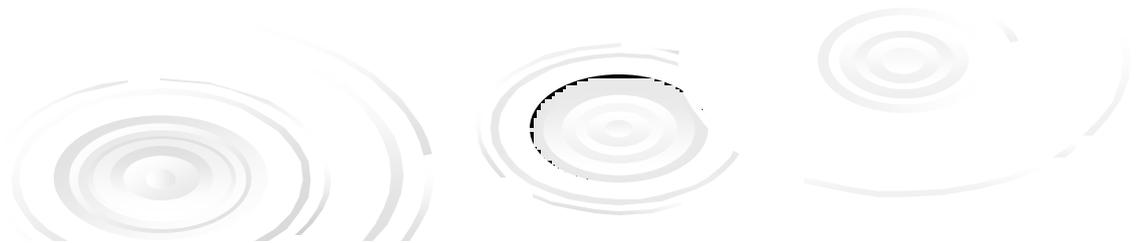
- A document describing how the generator contains, stores, treats, and disposes of medical wastes must be maintained at the accumulation site.
- Maintain all tracking documents for 2-3 years.





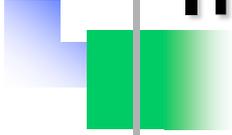
During the Inspection

- Bring keys, a map and a sharpie
- Correct violations as you come upon them
- Ask questions
- Inspectors will ask questions
- The inspector may take photographs and/or samples



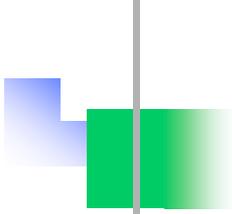
After the Inspection

- Inspector will write a report
- Prefer to debrief with an administrator (chemical hygiene officer?).
- Copy of report, samples splits, and photographs will be offered.
- Correct any remaining violations within prescribed time frames.
- Submit corrective action documentation not later than 35 days post inspection.



Implementation & Enforcement

- The CUPA inspects facilities for compliance with the Unified & Medical Waste programs.
 - The CUPA inspector issues an inspection report at the end of the inspection.
 - If evidence of a violation is observed the report contains a **Notice to Comply**.
 - An **Official Notice** or **Notice of Violation** is issued for serious violations.
- 



Enforcement

- All violations must be corrected.
 - Most violations are enforced by requiring corrective action.
 - Typically, evidence that the violation has been corrected is sufficient to satisfy the requirements of the law.
 - Failure to correct violations (or serious (Class I) violations) could lead to administrative, civil or criminal enforcement.
- 



COUNTY OF SAN DIEGO

CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

PERMIT # _____

SPECIALIST _____

INSPECTION DATE: ___/___/___

CONTACT _____

BUSINESS NAME _____

ADDRESS _____ CITY _____ ZIP _____

VIOL #	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (ATTACH ANY SUPPORTING DOCUMENTATION TO THIS FORM)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

I certify under penalty of law that this business/site has corrected all violations marked on the Compliance Inspection Report /Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the business/site, and am aware that there are significant penalties for submitting false information.

Responsible Party (Print Name): _____ Job Title _____

Signature of Responsible Party: _____ Date: ___/___/___

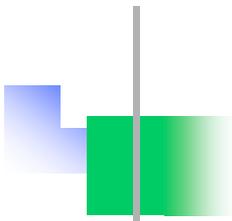
< Mail completed form and supporting documentation to the address listed below >

COUNTY OF SAN DIEGO USE ONLY: Reviewed by: _____ Date: _____

Specialist's comments: _____

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261; (619) 338-2222; 1-800-253-9933

Certificate of Correction



Contact Information

Hazardous Materials Division
San Diego County Dept. of Env. Health
PO Box 129261
San Diego, CA 92112-9261

(619) 338-2231 – Duty Desk

HMDUTYEH@sdcounty.ca.gov

www.sdcdeh.org

