## **Top 5 Compliance Tips**

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### **AS HMD INSPECTORS, WE:**

- Conduct inspections of facilities subject to the following requirements:
  - Hazardous Materials Business Plan (HMBP)
  - Medical Waste (MW)
  - Hazardous Waste (HW)
  - Aboveground Petroleum Storage Act (APSA)
  - Underground Storage Tanks (UST)
  - California Accidental Release Prevention (CalARP)
- Ensure that facilities subject to our permit are in compliance with all the laws and regulations that our division enforces
- Promote environmental health
- **☑** Prepare court cases and other formal enforcement actions



### #1: Proper labeling of Medical Waste (MW) Containers

Label containers properly at the point of accumulation.

Each primary container accumulating MW must have:



- Manual label that includes:
  - Generator's name
  - Generator's address
  - Generator's phone number
    - SDCC 68.1205

#### Generator's Label (example)

Name: Medical Waste Generator

Address: 123 Generator Dr.

San Diego, CA

92123

Phone #: (858) 123-4567

### #2: Keep Hazardous Waste Inventories Up-to-Date in CERS

#### You must:

- Report all hazardous wastes generated
- Update the inventory whenever waste types or quantities change
- Review and certify your data annually\*\*

# #3: Containerize biohazardous bags for storage, handling or transport.

Use containers that are:

- Rigid (e.g., hard-sided bins or tubs)
- Leak-resistant (to prevent spills or contamination)
- Covered (to reduce exposure and contain odors)

### **Containment and storage**

- Medical Waste Management Act (2024)
  - 118280 (c)
    - Biohazardous waste, except as provided in subdivision (b), shall be bagged in accordance with subdivision (b) of Section 118275 and placed for storage, handling, or transport in a rigid container that may be disposable, reusable, or recyclable. Containers shall be leak resistant, have tight-fitting covers, and be kept clean and in good repair......

### **Examples of Compliant Containers**







### **Examples of Non-Compliant Containers**





### **Exemptions to containerization of Biohazardous Waste**

### When are red bags NOT required to be containerized?



**Surgical Suite** 





**Patient Rooms** 

Generator's label still required!!

\*\*\*NOTE: Biohazard bags must be transferred to a proper container after completing the procedure.

### #4: Properly label hazardous waste containers.

Proper hazardous waste label contains the following information in clear and visible writing:

- ▼ The words: "HAZARDOUS WASTE"
- Name of the facility generating the waste
- Address of the facility generating the waste
- ✓ Waste accumulation START DATE (when was the waste first added?)
- Physical State (solid or liquid?)
- **Composition** (what is it?)
- Hazard Classification (e.g. flammable, toxic, corrosive, etc.)

### **Examples of Compliant Hazardous Waste Labels**





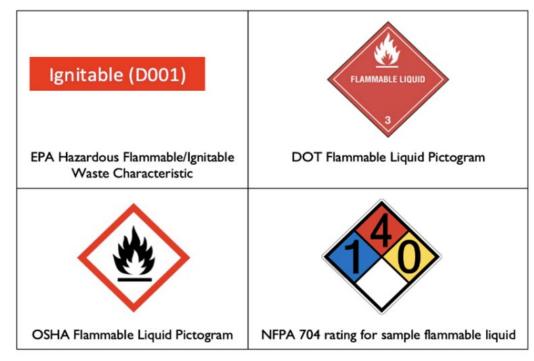
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ADDRESS							
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CONTENTS							
ACCUMULATION START DATE							

# Additional Labeling Requirement for HW Containers and Tanks

## An indication (symbols) of the hazards of the contents of the tank or container

examples include, but are not limited to:

- applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic)
- hazard communication consistent with Department of Transportation requirements at 49 Code of Federal Regulations part 172 subpart E (labeling) or subpart F (placarding)
- hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 Code of Federal Regulations 1910.1200; or
- chemical hazard label consistent with the National Fire Protection Association code 704]

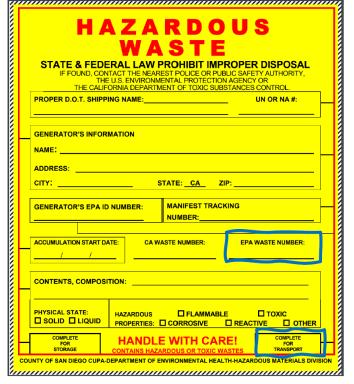


22 CCR 66262.15(a)(5) 22 CCR 66262.16 (b)(4) - for SQGs 22 CCR 66262.17(a) - for LQGs

### **Pre-transportation Marking Requirements**

Ensure the following are on the hazardous waste label BEFORE THE SHIPMENT:

- The words: "HAZARDOUS WASTE"
- Name of the facility generating the waste
- Address of the facility generating the waste
- **☑** Generator's **EPA Identification Number**
- Manifest Tracking Number
- US EPA Hazardous Waste Number(s)
  - aka hazardous waste code (EX: D008 for lead)
  - new requirement



# #5: Maintain your Facility's Uniform Hazardous Waste (HW) Manifest

Keep your facility's TSDF Signed Uniform HW Manifest, Consolidated Manifest, and/or Bill of Lading for <u>3 years</u>.

#### Remember:

- HW pick-ups must be accompanied by a Uniform HW manifest form at all times
- ☑ Uniform HW manifest must be accurate and complete
- Generator and transporter must sign and date the Uniform HW Manifest
- Make a photocopy of your (initial) manifest and mail it to DTSC within 30 days of shipping the HW
- TSDF will mail a <u>signed copy</u> back to the generator when they receive the waste from the transporter

### Why is Uniform Hazardous Waste Manifest important?

- Cradle-to-grave tracking
  - allows the generators to verify that their hazardous waste has reached its intended destination
- Ensures proper waste handling and disposal
- Supports transparency and promotes environmental protection

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# What happens when the generator does not receive the signed TSDF copy of HW manifest within 35 days – what must the generator do?

- Contact TSDF and the transporter
- File EXCEPTION REPORT with DTSC if:
  - LQG (>1000 kg of hazardous waste/month OR >1 kg of acute waste/month): 45th day from the hw pick-up date and still no HW manifest
  - SQG (>100 kg<1,000 kg of hazardous waste/month): 60th day from the hw pick-up date and still no HW manifest
- ☑ The Exception Report must include the following information:
  - A legible copy of the manifest for which the generator does not have confirmation of delivery; and
  - A cover letter signed by the generator or his/her authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts
- Send Exception Reports to:

DTSC Report Repository
Generator Information Services Section
P.O. Box 806
Sacramento, CA 95812-0806

# Uniform Hazardous Waste Manifest vs. Medical Waste Disposal Records

	UNIFORM HAZARDOUS WASTE MANIFEST	MEDICAL WASTE DISPOSAL RECORDS
Purpose	Track <i>Hazardous Waste</i> from the generator to the final treatment, storage, and disposal facility	Track <i>Infectious Waste</i> disposal from the generator to the final treatment facility
Form	EPA Form 8700-22	Varies per medical waste transporter company, usually manifest-like forms
Content	Generator's information, <i>EPA ID</i> , <i>manifest tracking number</i> , type of waste, quantity, waste codes, transporter's information, designated facility's information	Generator's information, type of medical waste/waste description, quantity, transporter's information, designated facility's information, words "Non-hazardous waste manifest"

# BONUS TIPS!

# #6: Re-certify your HMBP every year and re-submit every 3 years in CERS.

A complete Hazardous Materials Business Plan (HMBP) is composed of the following three sections:

Facility Information

- Business Activities
- Business Operator/Owner Identification

Hazardous Materials Inventory

- Inventory
- Site Map
- Medical Waste Management Plan (MWMP)\*\*

Emergency Response & Training Plans

- Consolidated Emergency Response / Contingency Plan
- Employee Training Plan

# Hazardous Materials Inventory: Determining Reportable Quantities for Your Compressed and Liquefied Gases

Compressed gases which are not classified as inert gases or with the designation of "simple asphyxiant"

- Reportable at 200 cubic feet
- Examples: Hydrogen, Oxygen (not used in medical setting)
- California Health & Safety Code 25507(a)(1)(A)

#### **Inert Gases/Simple Asphyxiant**

- Reportable at 1000 cubic feet or its liquefied equivalent converted in gallons
- Example: Liquid Nitrogen is reportable at 10.7 gallons
- Other examples: Argon, Helium, Neon, Xenon, Carbon Dioxide
- California Health & Safety Code 25507(a)(5)(A), HSC 25507(a)(5)(C)

Gases in different physical states should be reported as separate items (e.g., liquid nitrogen and gaseous nitrogen should be reported on separate forms)

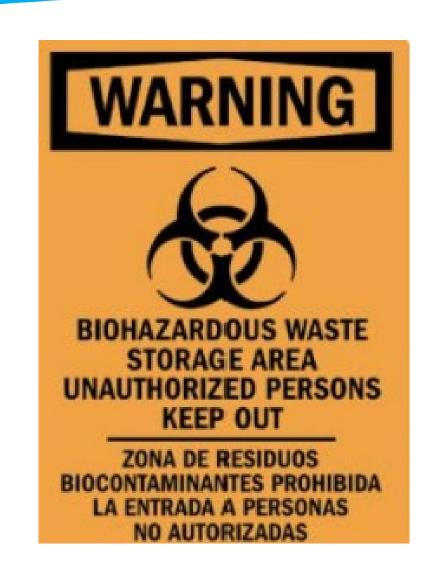
### **#7: Post Biohazardous Waste Signs**



#### Requirement:

# Post a **legible "Biohazard" warning sign** in:

- English **and** Spanish (or common workplace language)
- Visible from at least 25 feet



### #8: Conduct & Document Employee Training

(for facilities that are subject to **HMBP** requirements)

### Requirement:

- Train employees in emergency response and safe handling
- Conduct training at hire and annually
- Keep training records for 3 years

# #9: Submit and Maintain your Medical Waste Management Plan



#### Requirement:

- Submit your **Medical Waste Management Plan (MWMP)** to
  HMD if your facility is a *Large*Quantity Generator of Medical
  Waste with or without Treatment
  and Small Quantity Generator
  that treats MW:
  - Within 30 days of generating medical waste
  - Any time there are major changes



#### County of San Diego



DEPARTMENT OF ENVIRONMENTAL HEAL HAZARDOUS MATERIALS DIVISION P.O. BOX 129261, SAN DIEGO, CA 92112-9261 (858) 505-6880 FAX (858) 505-6848 http://www.sdcdeh.org

#### **Medical Waste Management Plan**

The San Diego County Department of Environmental Health, <u>Hazardous Materials Division (HMD)</u> is the local agency designated by the California Department of Public Health (CDPH) <u>Medical Waste Management Program</u> to implement the <u>Medical Waste Management Act</u>. This law governs the generation, handling, storage, transportation, treatment and disposal of medical waste to protect the public and the environment from potential infectious exposure to disease-causing agents.

The Medical Waste Management Plan (MWMP) is a document that describes the types and amount of medical waste generated at a specific location and indicates how wastes are managed to ensure proper treatment and disposal. All Large Quantity Generators (LQGs) generating ≥200 pounds of medical waste per month and Small Quantity Generators (SQGs) generating <200 pounds of medical waste per month that also treat their medical waste onsite, are required to submit their MWMP to the local enforcement agency. [Authority cited: California Health and Safety Code § 117960 (LQG); § 117935 (SQG with treatment)]

Attached is a blank MWMP form for your use. Please **complete**, **sign**, **and upload** your MWMP to the "Locally-Required Documentation" of the "Hazardous Materials Inventory" section of your California Environmental Reporting System (CERS) facility. Retain a copy for your records and inspection review. If there are changes in any of the information on your MWMP, submit a revised form in CERS within 30 days of changes. Annual submittal of the MWMP is not required. Additional information about CERS can be found at the following website: <a href="http://www.sdcounty.ca.gov/deh/hazmat/hmd-cers-info.html">http://www.sdcounty.ca.gov/deh/hazmat/hmd-cers-info.html</a>

SQGs of medical waste that do not treat their medical waste onsite are not required to submit this form in CERS. However, SQGs are required to maintain a document stating how they contain, store, treat, and dispose of any medical waste generated at their office. Completing a MWMP and keeping it at their office can satisfy this requirement. More information for SQG requirements can be found on the <a href="https://example.com/HMD Medical Waste website">HMD Medical Waste website</a>.

If you have any questions, please contact your area inspector or the Hazardous Materials Division Duty Desk at (858) 505-6880.

Attachment



# Questions?

### **Resources:**

#### MEDICAL WASTE MANAGEMENT ACT 2024:

https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/EMB/MedicalWaste/MedicalWasteManagementAct01292025.pdf

#### HAZARDOUS WASTE MANIFEST INFORMATION:

https://dtsc.ca.gov/hazardous-waste-manifest-information/

#### HAZARDOUS WASTE GENERATOR REQUIREMENTS:

https://dtsc.ca.gov/hazardous-waste-generator-requirements-fact-sheet/