

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:

✓ **Electronic tracking system label OR**

✓ **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****

****for facilities that are *also* subject to HMBP requirements**

#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

USED OIL
CALIFORNIA HAZARDOUS WASTE

California Code of Regulations, Title 22, Section 66262.34 subsection (a)(1) requires that containers must be kept in good condition. No severe rusting, no structural defects or deterioration, no leaking, and kept tightly closed except when used oil is added or removed. Regular inspection and routine maintenance of all containers is required.

Generator's Name _____
Address _____
City _____
State & Zip Code _____
EPA ID # _____

CA Waste Number 221

Accumulation Start Date: ____/____/____

HCL www.hclco.com SHL-0006

HAZARDOUS WASTE

STATE AND 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 INFORMATION:
NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. / MANIFEST DOCUMENT NO. _____ / _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____

CONTENTS COMPOSITION: _____

PHYSICAL STATE: ☐ SOLID ☐ LIQUID HAZARDOUS PROPERTIES: ☐ FLAMMABLE ☐ TOXIC
☐ CORROSIVE ☐ REACTIVITY ☐ OTHER _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

UNIVERSAL WASTE

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

ACCUMULATION START DATE _____





**** or a printed/written copy on any paper that indicates all required hw label information**

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]

 <p>Ignitable (D001)</p> <p>EPA Hazardous Flammable/Ignitable Waste Characteristic</p>	 <p>DOT Flammable Liquid Pictogram</p>
 <p>OSHA Flammable Liquid Pictogram</p>	 <p>NFPA 704 rating for sample flammable liquid</p>

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

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 INFORMATION

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: ☐ CORROSIVE ☐ FLAMMABLE ☐ REACTIVE ☐ TOXIC ☐ OTHER

COMPLETE FOR STORAGE

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

COMPLETE FOR TRANSPORT

COUNTY OF SAN DIEGO CUPA-DEPARTMENT OF ENVIRONMENTAL HEALTH-HAZARDOUS MATERIALS DIVISION

#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 3 years.

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 signed copy 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

Please print or type.

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

9a. 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 Volumes

13. Waste Codes

14. Special Handling Instructions and Additional Information

15. GENERATOR'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, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I export shipment and I am the Primary Exporter. I certify that the contents of this consignment conform to the terms of the applicable U.S. Environmental Protection Agency's (EPA) Hazardous Waste Manifest System. I certify that the waste information statement identified in 40 CFR 261.23(a) (1) is a large quantity generator or (b) (1) is a small quantity generator (is true).

Generator's Signature Printed Name Signature Month Day Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry (if export): Date leaving U.S.

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed Name Signature Month Day Year

Transporter 2 Printed Name Signature Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

18b. Alternate Facility (or Generator)

Manifest Reference Number U.S. EPA ID Number

Facility's Phone

19. Signature of Alternate Facility (or Generator) Month Day Year

20. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

21. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.

Printed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete.


DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

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, 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 <i>"Non-hazardous waste manifest"</i>

The background consists of a solid blue area at the top, which transitions into a white area below a wavy, horizontal line.

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

**** Required for all LQG MW facilities and SQG MW facilities that treat**

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 HEALTH
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, [Hazardous Materials Division \(HMD\)](#) is the local agency designated by the California Department of Public Health (CDPH) [Medical Waste Management Program](#) to implement the [Medical Waste Management Act](#). 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: <http://www.sdcounty.ca.gov/deh/hazmat/hmd-cers-info.html>

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 [HMD Medical Waste website](#).

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/>