



TOP 10 COMPLIANCE TIPS

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TOP 10 COMPLIANCE TIPS

1. Hazmat (HM) Inventory Incomplete
2. Medical Waste (MW) Containers Labeling
3. HM Employee Training
4. HMBP Not Certified
5. Hazardous Waste (HW) Inventory Incomplete
6. Labeling of Hazardous Waste (HW) Containers and Tanks
7. Identification Number, EPA ID Number
8. Medical Waste (MW) Inventory Incomplete
9. Biohazardous Bags Not Containerized
10. Medical Waste Management Plan (MWMP) Not Submitted

An abstract geometric design on the left side of the slide. It features a diagonal line running from the top-left to the bottom-right. The area to the left of this line is divided into several colored sections: a green triangle at the top, a blue square with concentric circles, a white semi-circle, a blue square with diagonal lines, a green square with concentric lines, a light blue triangle, and a blue square at the bottom. A white dot is located in the top-left green triangle, with a line extending from it towards the center.

1. HAZMAT (HM) INVENTORY INCOMPLETE

REPORTING HM IN CERS INVENTORY

- ☐ Report any hazardous material (pure & mixture) that has a quantity at any one time during the reporting year that is
 - ☐ ≥ 55 gallons for liquids,
 - ☐ ≥ 500 pounds for solids, or
 - ☐ ≥ 200 cubic feet for gases
 - ☐ Other higher or lower thresholds may apply
- ☐ Report within **30 days**:
 - ☐ Any new HM at reportable quantity
 - ☐ 100% or more increase in the quantity of previously disclosed HM





2. MEDICAL WASTE (MW) CONTAINERS LABELING

MW CONTAINER LABELING REQUIREMENTS

Each primary MW container accumulating MW must have the **Generator Label** including the following information:

- ☐ Business Name
- ☐ Address
- ☐ Business Phone Number

Generator's Label *(example)*

Name: Medical Waste Generator
Address: 123 Generator Dr.
San Diego, CA
92123
Phone #: (858) 123-4567

Facility could **either** use the following type of labels:

- ☐ Manual Label
- ☐ Electronic tracking system label (QR code)
- ☐ Business card

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3. HM EMPLOYEE TRAINING

HAZARDOUS MATERIALS BUSINESS PLAN (HMBP) TRAINING REQUIREMENTS

- ☐ Train employees in emergency response and safe handling of hazardous materials
- ☐ Conduct training **at hire** and **annually**
- ☐ Keep training documentation for the last 3 years
 - ☐ Training Plan
 - ☐ Training Title
 - ☐ Date conducted
 - ☐ Employee name and job title
 - ☐ Duration of the training
 - ☐ Facilitator (person or online portal)

HMBP TRAINING DOCUMENTATION

SAMPLE TEMPLATE ([HM-354](#))

EMPLOYEE TRAINING DOCUMENTATION*

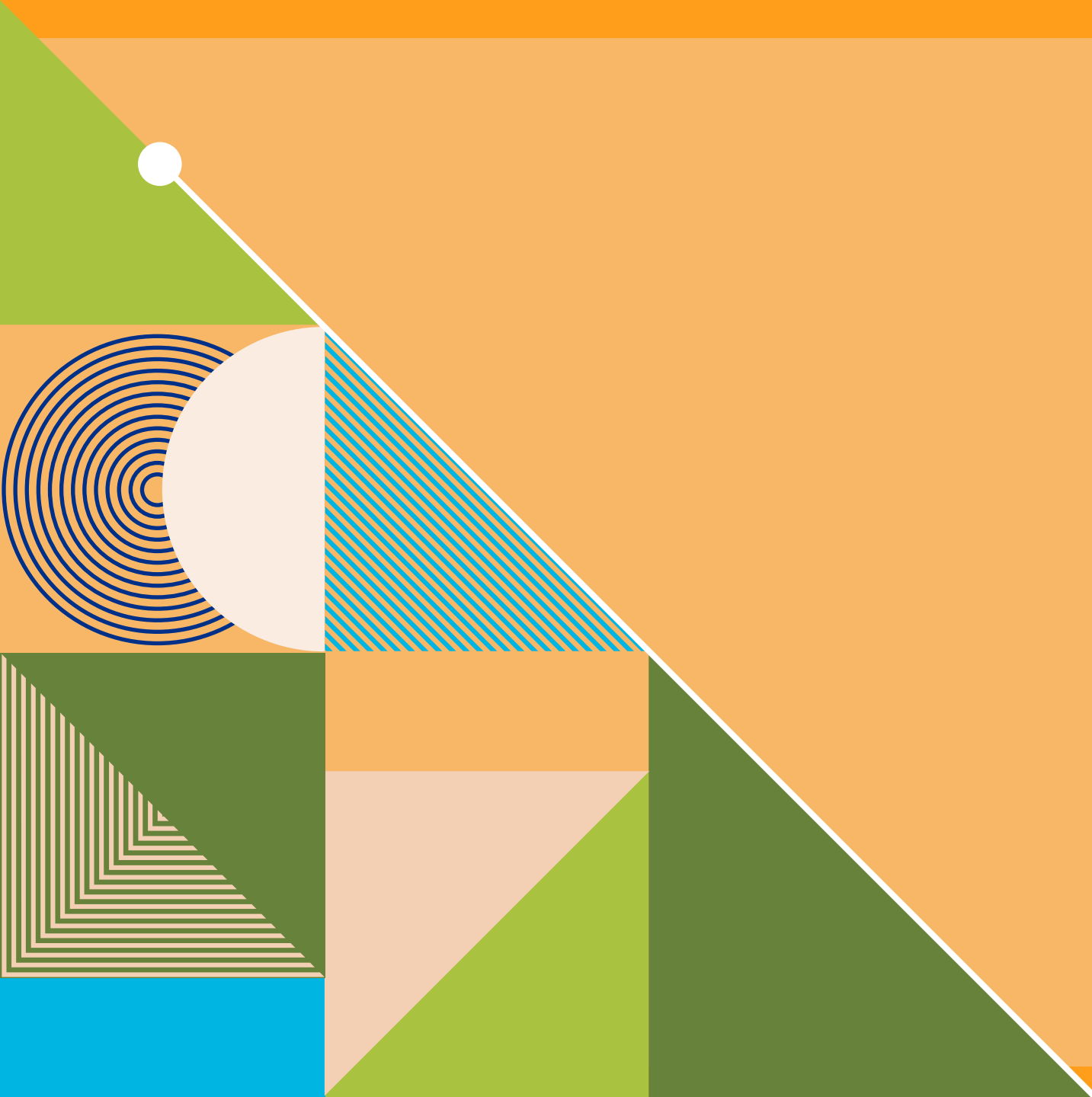
ON ___ / ___ / ___, TRAINING PROVIDED BY: _____
WAS CONDUCTED ON THE FOLLOWING TOPICS:

	TRAINING TOPIC	TRAINING TIME
☐	Procedures for handling hazardous materials, including hazardous wastes.	
☐	Procedures for coordinating with emergency response agencies.	
☐	Use of emergency response equipment and materials under the business control.	
☐	Emergency Response Plan implementation.	

THE FOLLOWING PERSONS ATTENDED THE TRAINING SESSION:

NAME	TITLE	SIGNATURE

OR YOU MAY CREATE YOUR OWN TRAINING LOG

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4. HMBP NOT CERTIFIED

HMBP ANNUAL CERTIFICATION REQUIREMENTS

An HMBP must include this 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

****** Although not part of the HMBP, this is where you would upload your MWMP if you are an LQG MW facility or an SQG MW facility that treats MW on site.

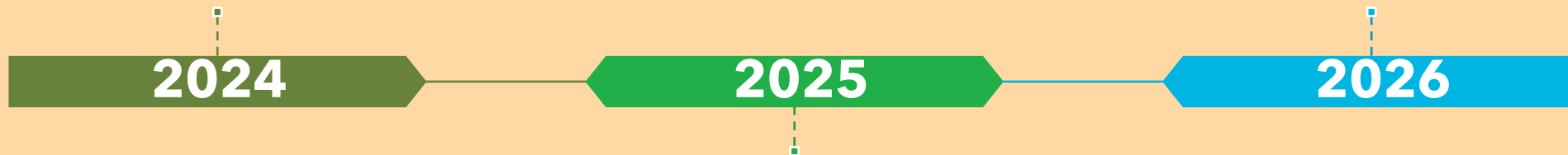
HMBP ANNUAL CERTIFICATION SCHEDULE

- ❑ Certify your HMBP annually to confirm all information is still accurate.
- ❑ Re-submit a full HMBP every 3 years, unless significant changes occur (those must be submitted within 30 days).

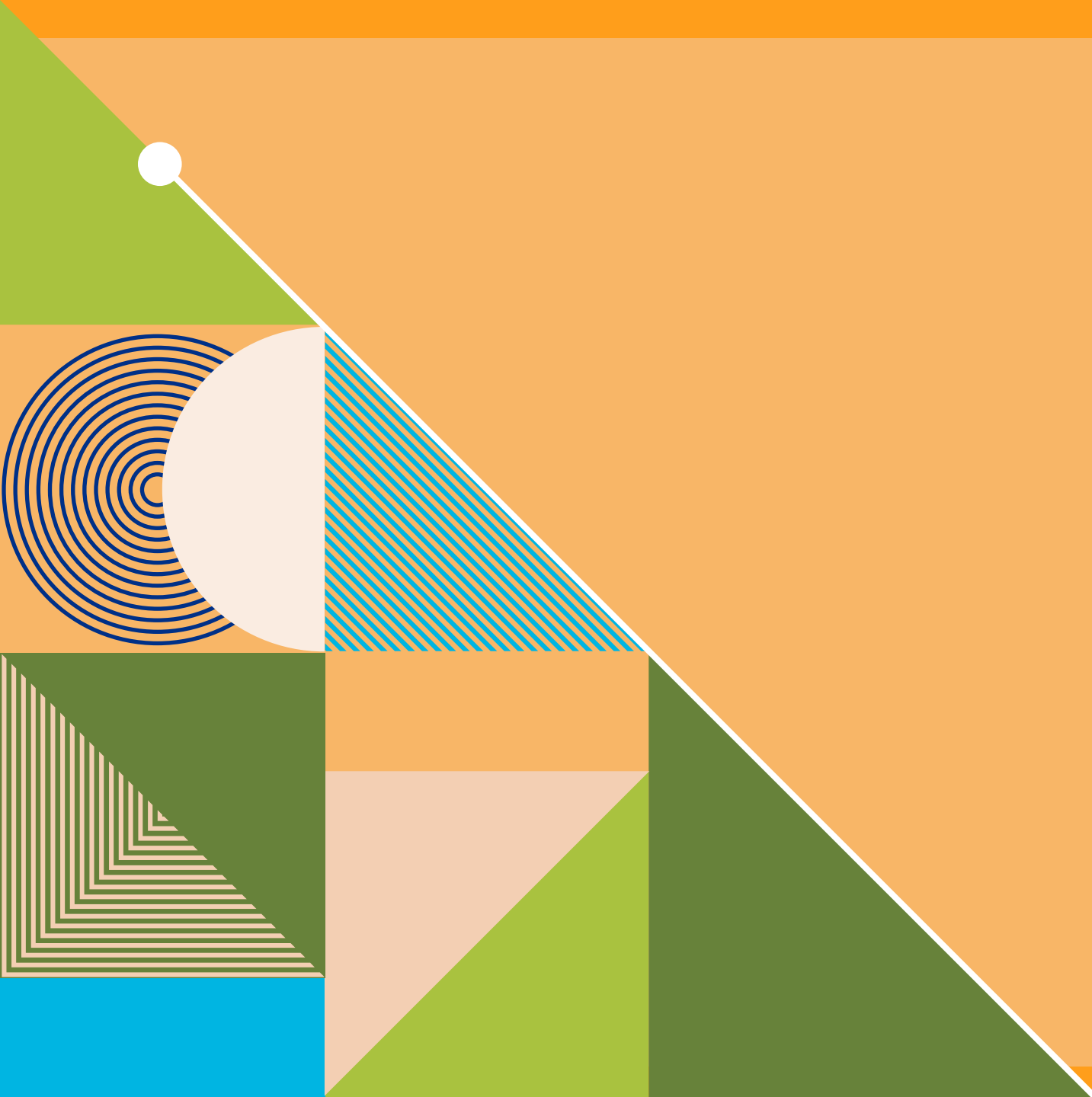
Example pattern, if you **submitted** a complete HMBP in 2023:

Review and **Certify** **

Review and **Submit**



** If no updates are required

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5. HAZARDOUS WASTE (HW) INVENTORY INCOMPLETE

REPORTING HW IN CERS

Keep HW inventory up to date in CERS

- ☐ HW is reportable at **any** amount
- ☐ Update HW inventory whenever the following occurs:
 - ☐ Generate a new HW
 - ☐ Change in quantities
- ☐ Review and certify your data annually**

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

HW CHEMICAL INVENTORY REPORTING REQUIREMENTS IN CERS

The following information shall be included when reporting any HW type in CERS:

[Return to Submittal Inventory](#)

Chemical Identification and Physical Properties

Chemical Name	CERS Chemical Library ID
Organic Solvent Waste with water	-
Common Name	US EPA SRS ID
Organic Solvent Waste with water	-
Physical State	Trade Secret
Liquid	-
Hazardous Material Type	-
Waste	-

Chemical Hazard Classification

EHS ☒ Fire Code Hazard Classes (by priority) DOT Hazard Class ☒
No - 3 - Flammable and Combustible Liquids
Radioactive -
No - State Waste Code ☒
Series - Oxygenated solvents (acetone, butanol, ethyl acetate, etc.)
- [Lookup Code](#)

Federal Hazard Categories Yes PHYSICAL: Flammable
No Fire (Obsolete) No PHYSICAL: Gas Under Pressure
No Reactive (Obsolete) No PHYSICAL: Explosive
No Pressure Release (Obsolete) No PHYSICAL: Self-heating
No Acute Health (Obsolete) No PHYSICAL: Pyrophoric
No Chronic Health (Obsolete) No PHYSICAL: Oxidizer
No PHYSICAL: Organic Peroxide
No PHYSICAL: Self-reactive
No PHYSICAL: Pyrophoric Gas
No PHYSICAL: Corrosive to Metal
No PHYSICAL: In Contact with Water Emits Flammable Gas
No PHYSICAL: Combustible Dust
No PHYSICAL: Hazard Not Otherwise Classified (HNOC)
No HEALTH: Carcinogenicity
No HEALTH: Acute Toxicity
No HEALTH: Reproductive Toxicity
No HEALTH: Skin Corrosion or Irritation
No HEALTH: Respiratory or Skin Sensitization
No HEALTH: Serious Eye Damage or Eye Irritation
No HEALTH: Specific Target Organ Toxicity
No HEALTH: Aspiration Hazard
No HEALTH: Germ Cell Mutagenicity
No HEALTH: Simple Asphyxiant
No HEALTH: Hazard Not Otherwise Classified (HNOC)

Inventory Location and Quantity

Chemical Location	Average Daily Amount ☒ Maximum Daily Amount ☒	Units ☒
205 Suite Laboratories / Shipping/Receiving	30 60	gallons
Chemical Location Confidential EPCRA	Largest Container Annual Waste Amount ☒	
No	30 120	
Map # (Optional) Grid # (Optional)	Days on Site	
-	365	

Inventory Storage Information

No Aboveground Tank	Yes Can	No Box	No Tank Truck, Tank Wagon
No Underground Tank	No Carboy	No Cylinder	No Tank Car, Rail Car
No Tank Inside Building	No Silo	No Glass Bottle	No Other
Yes Steel Drum	No Fiber Drum	No Plastic Bottle	
No Plastic/Non-Metallic Drum	No Bag	No Tote Bin	

Storage Pressure Ambient Storage Temperature Ambient

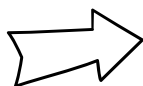
Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS
Ethanol	64-17-5	10.00	-
Isopropanol	67-63-0	15.00	-
Acetone	67-64-1	5.00	-
Formic Acid	64-18-6	0.75	No
Typan Blue	72-57-1	0.10	No

Additional Mixture Components ☒
Xylenes 1-5% Water 70-90%

Additional Chemical/Material Description

Additional Chemical Description Information ☒
-



[Return to Submittal Inventory](#)

Chemical Identification and Physical Properties

Chemical Name	CERS Chemical Library ID
Organic Solvent Waste with water	-
Common Name	US EPA SRS ID
Organic Solvent Waste with water	-
Physical State	Trade Secret
Liquid	-
Hazardous Material Type ☒	-
Waste	-

Chemical Hazard Classification

EHS ☒ Fire Code Hazard Classes (by priority) DOT Hazard Class ☒
No - 3 - Flammable and Combustible Liquids
Radioactive -
No - State Waste Code ☒
Curies - Oxygenated solvents (acetone, butanol, ethyl acetate, etc.)
- [Lookup Code](#)

Federal Hazard Categories Yes PHYSICAL: Flammable
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The following information shall be included when reporting any HW type in CERS:

Chemical Identification and Physical Properties

Chemical Name
Organic Solvent Waste with water

CAS Number
Organic Solvent Waste with water

Physical State
Liquid

CERS Chemical Library ID
-

US EPA SRS ID
-

Hazardous Material Type
Waste

Trade Secret
-

Chemical Hazard Classification

EHS
No

Fire Code Hazard Classes (by priority)
-

Radioactive
No

Curies
-

DOT Hazard Class
3 - Flammable and Combustible Liquids

State Waste Code
Oxygenated solvents (acetone, butanol, ethyl acetate, etc.)

Lookup Code

Federal Hazard Categories
No Fire (Obsolete)
No Reactive (Obsolete)
No Pressure Release (Obsolete)
No Acute Health (Obsolete)
No Chronic Health (Obsolete)

Yes PHYSICAL: Flammable
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No HEALTH: Specific Target Organ Toxicity
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No HEALTH: Germ Cell Mutagenicity
No HEALTH: Simple Asphyxiant
No HEALTH: Hazard Not Otherwise Classified (HNOC)

Inventory Location and Quantity

Chemical Location
205 Suite Laboratories / Shipping/Receiving

Average Daily Amount
30

Maximum Daily Amount
60

Units
gallons

Chemical Location Confidential EPCRA
No

Largest Container
30

Annual Waste Amount
120

Map # (Optional)
-

Grid # (Optional)
-

Days on Site
365

Inventory Storage Information

No Aboveground Tank
No Underground Tank
No Tank Inside Building
Yes Steel Drum
No Plastic/Non-Metallic Drum

Yes Can
No Carboy
No Silo
No Fiber Drum
No Bag

No Box
No Cylinder
No Glass Bottle
No Plastic Bottle
No Tote Bin

No Tank Truck, Tank Wagon
No Tank Car, Rail Car
No Other
-

Storage Pressure
Ambient

Storage Temperature
Ambient

Mixture Components

Hazardous Component Name
Ethanol
Isopropanol
Acetone
Formic Acid
Typan Blue

CAS Number
64-17-5
67-63-0
67-64-1
64-18-6
72-57-1

% by Weight
10.00
15.00
5.00
0.75
0.10

EHS
-
-
-
No
No

Additional Mixture Components
Xylenes 1-5% Water 70-90%

Additional Chemical/Material Description

Additional Chemical Description Information

Inventory Location and Quantity

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Annual Waste Amount
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Map # (Optional)
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% by Weight
10.00
15.00
5.00
0.75
0.10

EHS
-
-
-
No
No

Additional Mixture Components
Xylenes 1-5% Water 70-90%

Additional Chemical/Material Description

Additional Chemical Description Information

** Use the "Mixture Components" section to report components of "mixtures" >1% and to list "wastes" reported as lab packs or retail wastes

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6. LABELING OF HAZARDOUS WASTE (HW) CONTAINERS AND TANKS

HAZARDOUS WASTE LABEL CONTAINS THE FOLLOWING INFORMATION IN CLEAR AND VISIBLE WRITING UPON ACCUMULATION:

1. The words: "HAZARDOUS WASTE"
2. Name and address of the generator
3. Physical characteristics of the waste
4. Chemical characteristics of the waste
5. Starting date of waste accumulation
6. Composition of waste



EXAMPLES OF COMPLIANT HAZARDOUS WASTE LABELS

1 HAZARDOUS WASTE

STATE AND FEDERAL LAWS 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

2 GENERATOR INFORMATION:

NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____

EPA ID NO. / MANIFEST DOCUMENT NO. _____
EPA WASTE NO. _____ CA WASTE NO. _____ **3** ACCUMULATION START DATE _____

4 CONTENTS, COMPOSITION: _____

5 PHYSICAL STATE: **6** HAZARDOUS PROPERTIES: ☐ FLAMMABLE ☐ TOXIC
☐ SOLID ☐ LIQUID ☐ 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 _____



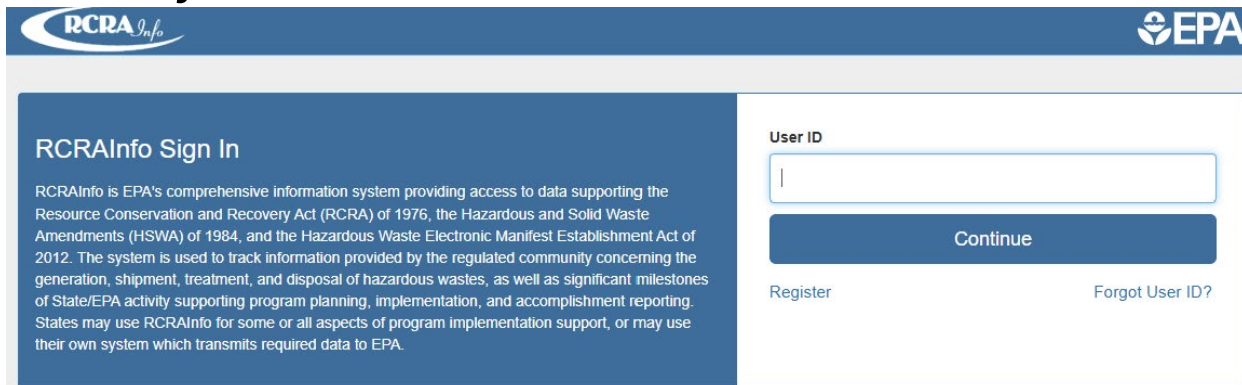
7. IDENTIFICATION NUMBER, EPA ID NUMBER

FEDERAL EPA IDENTIFICATION (EPA ID) NUMBER

- ❑ Issued to handlers of RCRA (federal) hazardous waste. If you or your business generates more than 100 kilograms of RCRA hazardous waste and/or more than 1 kilogram of RCRA acutely hazardous waste per month, you will need to obtain a federal EPA ID number.
- ❑ Obtain an EPA Identification (EPA ID) number using the Subtitle C Site ID Form (EPA Form 8700-12).
- ❑ Site-specific EPA ID number.

FEDERAL EPA IDENTIFICATION (EPA ID) NUMBER

- ❑ U.S. EPA now has an online tool called myRCRAid, a module of the RCRAInfo Industry Application, to help you get and update your site's **permanent federal EPA ID number**. For more information go to [Using myRCRAid](#).
- ❑ Reactivate your EPA ID number annually by completing and submitting the [U.S. EPA Form 8700-12 - RCRA Subtitle C Site Identification Form](#). You may submit the form electronically in RCRAInfo or by mail.

The image is a screenshot of the RCRAInfo Sign In page. At the top, there is a blue header bar with the 'RCRA Info' logo on the left and the 'EPA' logo on the right. Below the header, the page is divided into two main sections. The left section has a dark blue background with the text 'RCRAInfo Sign In' in white. Below this, in smaller white text, it reads: 'RCRAInfo is EPA's comprehensive information system providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976, the Hazardous and Solid Waste Amendments (HSWA) of 1984, and the Hazardous Waste Electronic Manifest Establishment Act of 2012. The system is used to track information provided by the regulated community concerning the generation, shipment, treatment, and disposal of hazardous wastes, as well as significant milestones of State/EPA activity supporting program planning, implementation, and accomplishment reporting. States may use RCRAInfo for some or all aspects of program implementation support, or may use their own system which transmits required data to EPA.' The right section has a white background and contains a 'User ID' label above a text input field. Below the input field is a blue 'Continue' button. At the bottom of this section, there are two links: 'Register' and 'Forgot User ID?'.

CALIFORNIA IDENTIFICATION (STATE ID) NUMBER

- ❑ Permanent State ID numbers are owner and site-specific, and issued to individuals and businesses that generate one of the following:
 - 1. Any amount of non-RCRA hazardous waste per month
 - 2. Less than 220 pounds (100 kg) of RCRA hazardous waste per month
 - 3. Less than 2.2 pounds (1 kg) of RCRA *acutely* hazardous waste per month

- ❑ To apply for a permanent State ID number, complete and submit the DTSC Form 1358 - Permanent State ID Number Application

CALIFORNIA IDENTIFICATION NUMBER

If your ID number doesn't meet the 2026 eVQ reporting requirements, you cannot use eVQ to reactivate your ID number.

❑ To reactivate your ID number, submit one of the following:

1. Permanent State ID Number - [DTSC Form 1358](#), or
2. RCRAInfo 's [myRCRAid](#)

LATE REPORTING PENALTIES STARTING IN THE 2026 EVQ REPORTING CYCLE

- ❑ Verification Questionnaires not submitted by the March 31st deadline will be subject to late reporting penalties. For more information, visit <https://dtsc.ca.gov/evq-penalties/>
- ❑ The chart to the left will be used to determine the initial penalty based on the annual tonnage generated in the prior calendar year.

Tonnage Tier	1-15 days after reporting deadline	16-30 days after reporting deadline	31-45 days after reporting deadline	46-60 days after reporting deadline	61+ days after reporting deadline
Less than 5 tons	\$25	\$50	\$75	\$125	\$250
5 tons but less than 10 tons	\$100	\$200	\$350	\$550	\$1,100
10 tons but less than 25 tons	\$200	\$300	\$450	\$650	\$1,300
25 tons but less than 500 tons	\$300	\$400	\$550	\$750	\$1,500
500 tons but less than 1,000 tons	\$400	\$500	\$650	\$850	\$1,700
1,000 or more tons	\$500	\$600	\$750	\$950	\$1,900

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8. MEDICAL WASTE (MW) INVENTORY INCOMPLETE

MW INVENTORY

Any business, person, owner or operator that has a unified program facility permit (UPFP) and is a medical waste generator shall submit and shall keep up to date, through CERS, all of the following (at a minimum):

1. The common name of the waste,
2. Maximum amount in storage at any one time,
3. Annual waste amount,
4. Physical state of the waste,
5. Unit of measure.





9. BIOHAZARDOUS BAGS NOT CONTAINERIZED

BIOHAZARDOUS WASTE BAGS

Medical Waste Management Act (2024) -118280 (c)

(c) Containers shall be leak resistant, have tight-fitting covers, and be kept clean and in good repair. Containers may be of any color and shall be labeled with the words "Biohazardous Waste" or with the international biohazard symbol and the word "BIOHAZARD" on the lid and sides so as to be visible from any lateral direction.



EXAMPLES OF COMPLIANT CONTAINERS



EXAMPLES OF NON-COMPLIANT CONTAINERS





County of San Diego
DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY, HAZARDOUS MATERIALS DIVISION
PHONE (858) 505 - 6880 | FAX (858) 505 - 6848 | WEBSITE <http://www.sdcdeh.org>
MANAGEMENT OF REGULATED MEDICAL WASTES



The following requirements, as indicated in the Medical Waste Management Act (MWMA-2024 version), must be adhered to by all generators of medical waste.
For more information see the [Medical Waste Management Act](#).

CONTAINMENT & LABELING

	BIOHAZARDOUS WASTE	SHARPS WASTE	PHARMACEUTICAL WASTE	PATHOLOGY WASTE	TRACE CHEMOTHERAPY WASTE
CONTAINER TYPES	Red biohazard bag inside a closed, clean, leak resistant, rigid container in good repair. Red bag must meet ASTM D1709 and ASTM D1922 requirements when prepared for offsite shipment.	Rigid, puncture-resistant container that, when sealed, is leak resistant and cannot be opened without great difficulty.	Clean, leak resistant, rigid container in good repair with tight fitting cover.	Red or white biohazard bag inside a closed, clean, leak resistant, rigid container in good repair.	Sharps Trace Chemo: Same as Sharps container. Non-sharps Trace Chemo: Red or yellow biohazard bag inside a closed, clean, leak resistant, rigid container in good repair.
WASTE and CONTAINER MANAGEMENT	Secondary container must be closed when red bag is not in active use. The red bags shall be tied to prevent leakage or expulsion of contents when ready for shipment.	Sharp containers must not have any internal lining. May place sharps containers ready for disposal in red biohazard bags OR in containers with the biohazard bags.	Only non-RCRA pharmaceutical waste can be managed as medical waste. RCRA pharmaceutical waste must be managed as hazardous waste.	Recognizable human or animal anatomical parts & fixed tissues must be managed as pathology waste if suspected to be contaminated with infectious agent.	Only trace chemotherapy (<3% by weight) can be managed as medical waste. Bulk chemo (> or equal to 3%) must be managed as hazardous waste.
CONTAINER LABELING	1. Generator's label** and International Biohazard symbol for the bag and either: 2. "Biohazardous Waste" OR International Biohazard symbol and word "BIOHAZARD" on lid and sides of secondary container.	Generator's label** and either: "Sharps Waste" or International Biohazard symbol and word "BIOHAZARD."	Generator's label** and the words "HIGH HEAT" or "INCINERATION ONLY" on lid and sides of container.	Generator's label** and International Biohazard symbol on bag & either: "Pathology Waste" or "PATH" on lid and sides of secondary container.	Sharps Trace Chemo: Generator's label** and either: "Chemotherapy Waste" or "CHEMO." Non sharps Trace Chemo: Generator's label** and International Biohazard symbol on bag and either: "Chemotherapy Waste" or "CHEMO" on lid and sides.
SEGREGATION	Contain each medical waste separately from other waste at the point of origin, unless otherwise allowed as described in this document.				
CONSOLIDATION	Sharps waste & non-RCRA pharmaceutical waste may be consolidated in a common container (container may be reusable if properly treated) and labeled with the biohazardous waste symbol and the words "HIGH HEAT" or "INCINERATION ONLY" on the lid and sides. 118280 (g) The containment and storage time for wastes consolidated in a common container pursuant to paragraph (7) of subdivision (a) of Section 118275 shall not exceed the storage time for any category of waste set forth in this section.				

****ADDITIONAL LABELING REQUIREMENTS FOR FACILITIES IN SAN DIEGO COUNTY****

As required by San Diego County Code (SDCC) section 68.1205, all primary containers storing regulated medical waste must be labeled with the following, once the container begins accumulating waste in any amount:
GENERATOR NAME, ADDRESS, and PHONE NUMBER. See example below:

Generator's Label (example)

Name: Medical Waste Generator
Address: 123 Generator Dr.
San Diego, CA
92123
Phone #: (858) 123-4567



EXEMPTIONS TO CONTAINERIZATION OF BIOHAZARDOUS WASTE

When are red bags NOT required to be containerized?



Surgical Suite



Patient Rooms

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10. MEDICAL WASTE MANAGEMENT PLAN (MWMP) NOT SUBMITTED

REQUIRED:

Medical Waste Management Plan

Facility Information	
Business Name	Permit or Registration #
Type of Business	Date
Street Address	City/ZIP
Person Responsible for implementing the Medical Waste Management Plan (MWMP)	
Name	
Title	Phone
Types of Medical Wastes (MW) Generated	
Please check the box for all types of medical waste that will be generated by your facility. Also estimate the number of pounds (lbs.) that will be generated each month. Definitions are in Chapter 2 of the Medical Waste Management Act in the California Health and Safety Code (HSC) §117625-117780.	

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 or when any of the information in the plan changes.
- ☐ Shall have the MWMP on file for review during an inspection or upon request.



QUESTIONS?

