Section 1: Introduction

EPIC+ Webpage Education https://www.sandiegocounty. gov/content/sdc/deh/hazmat /hmd epic.html Process What does **EPIC+ stand** Improvements and for? Compliance ... for environmental risk reduction

Purpose of the EPIC+ Program

To reduce the most common hazardous materials, hazardous waste, and medical waste violations found at biotech facilities.









Demonstrate that education and outreach can be effective tools in obtaining compliance from the regulated community



Establish a risk-based inspection process to assist in directing resources to areas of higher risk and importance

EPIC+ PROGRAM PARTICIPATION

Maintain a standard of compliance during routine HMD inspections

- Facilities must have 2 full HMD inspections, or parent company must be eligible
- · Scoring guidelines are on the page two of the application

Facility employee must complete annual EPIC+ training

A consultant may NOT undergo this training on your facility's behalf

IMPORTANT REMINDER!

The <u>facility</u> is responsible for maintaining eligibility and demonstrating compliance during inspections.

Outside consultants will not be the only point of contact during emergencies at your facility.

Purpose of this Online Training

Increasing compliance with hazardous materials, hazardous waste, and medical waste requirements

To supplement the site-specific training programs already in place at your facility

Awareness of common violations found at biotech facilities



If your facility is new to the program,

you must meet all the requirements and submit an application.

This application can be found on our webpage, along with additional EPIC+ program information



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION 5500 OVERLAND AVE, SAN DIEGO, CA 92123 (888) 505-6857 http://sdcdeh.org

EPIC+ Application

EDUCATION, PROCESS IMPROVEMENTS, AND COMPLIANCE FOR ENVIRONMENTAL RISK REDUCTION

Biotech and Lab Research & Development Facilities

A. SITE INFORMATION						
Business Name:	UPFP Number:					
Site/Facility Address: Street Number Street Name	City	CA State Zip Code				
B. APPLICANT INFORMATION						
Contact Person: Last Name First Name	Title:					
Telephone #: () E-Mail Address:		SON MUST BE FACILITY CANNOT BE A CONSULTANT THE FACILITY				
C. NAME OF EMPLOYEES THAT ATTENDED SEMINAR OF	COMPLETED ONLINE	FRAINING				
Name: Seminar/Online Training Date: 1 1						
Name:	Seminar/Online Training D	ate: / /				
TRAINED PERSONNEL MUST BE EMPLOYEE(S) AND CANNOT BE A CONSULTANT OR VENDOR FOR THE FACILITY						
D. COMPLIANCE HISTORY (INDICATE NUMBER OF VIOL	ATIONS RECEIVED)					
Inspection Date: / / Class I: Class	s II: Minor:	TO BE ELIGIBLE FOR EPIC+ EACH				
Inspection Date: / / Class I: Class	s II: Minor:	INSPECTION MUST SCORE FEWER THAN				
Date of last HMBP Certification (if applicable): / /		15 POINTS				
	_	(SEE REVERSE)				
E. CERTIFICATION						
As the business representative I certify that this business meets and will continue to me understand that failure to comply with these standards will trigger a return to the 24-ms						
Print Name:		a ice sescure,				
•		, ,				
Signature: Note: A new application must be submitted within 30 days whenever there						
ownership, and/or EPIC+ trained employee. Failure to resubmit may resu						
OFFICE USE ONLY						
Received by Specialist: Date:Date:	Reviewed by Supervisor: Approved Not Approved	Date://				

HM-9155 (8-17)

https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd epic.html

END OF SECTION

Section 2: Program Implementation and Compliance

SECTION 2 OVERVIEW:

1. Violation Classification

2. Return to Compliance

3. Enforcement

VIOLATION CLASSIFICATION:



Not every violation poses the same threat, but all require follow-up and correction.

Key Components of Classifying a Violation:



VIOLATION CLASSIFICATION

- Class I Violation
- Class II Violation
- Minor Violation

HSC 25404, 25110.8.5, 25117.6 & Title 22 66260.10



Class I Violations:

Class I Violations are cited on a "Notice of Violation"



Components of a Class I Violation (one or more of the following)

Willful

Intentional

Negligent

Knowingly (or should have known)

Chronic Violations

Recalcitrant Violator

Class I Violation: Significant Threat

Represents a significant threat to human health or safety or the environment due to the:

1) Volume of the waste

2) Relative hazard of the waste

3) Proximity of population at risk



Class 1
Violation:
Economic
Benefit

A violation that enables the violator to benefit economically from noncompliance, either by reducing costs or competitive advantage.

Violations can Escalate in Classification

"Chronic"

Defined as a pattern of behavior.
 Violations of the same
 requirement identified in two
 consecutive inspections may be
 considered chronic

"Recalcitrant"

 Defined as person/business who actively refuses to comply with the regulatory requirements or who has engaged in a pattern of neglect or disregard for statutory or regulatory requirements.

Disclaimer!

Violations discussed throughout this training do not encompass ALL violations that may be cited during an inspection.

Refer to relevant codes of law or violation checklists included in your inspection reports for more information.

Class I Violation Examples

Class I Violation: Failed to notify CUPA of onsite hazardous waste treatment per Tiered Permitting requirements

Class I Violation: Unauthorized disposal of hazardous waste (illegal disposal)





Class I Violation Examples

Class I Violation: Unlawful transportation of hazardous waste (shipping hazardous waste without a hazardous waste manifest or not using a Cal. registered hazardous waste hauler

Class I Violation: Did not immediately report release or threatened release







Does not pose a significant threat to human health, safety, or the environment.

Components of a Minor Violation

Not Willful

Not Negligent

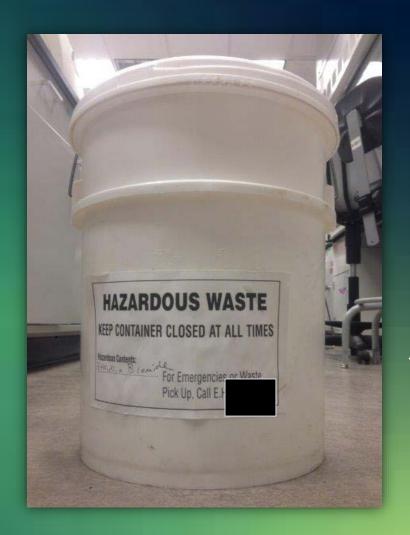
Not Knowing

Not Chronic

Not from a Recalcitrant Violator

NOT A CLASS II VIOLATION

Minor Violation Example



MINOR VIOLATION:
One low-risk hazardous
waste container with
incomplete hazardous
waste label

Hazardous waste label is attached but missing some required components

Minor Violation Example

Pf	8858	print or type. (Form designed for use on elile (12-pitch) hypewriter.)					Fon	m Approved. Of	/B No. 2050-0	-0039		
Ė	u	NIFORM HAZARDOUS 1. Generator ID Number	2. Page 1 of	Energency Respons	e Phone	4. Manifest	Tracking N	umber		-		
	Ш	WASTE MANIFEST										
	5.	Generator's Name and Mailing Address	6	enerator's Site Address	(F different fi	nan mailing addre	(55)					
П	Ш											
Ш	1											
П	E E	nerator's Phone. Transporter 1 Company Name				U.S. EPAID	Number			-		
Ш	1					1				- 1		
Н	7.1	Transporter 2 Company Name				U.S. EPAID	U.S. EPAID Number					
П	L					1	U.S. EPA ID Number					
П	16.1	Designated Facility Name and Site Address				U.S. EPA ID	Number			- 1		
П	1											
Ш	Fac	cilt/s Phone:				1						
П	93.	St. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,		10. Contail	rers	11. Total	12. Unit	19 (800)	13. Waste Codes			
Ш	HM	and Packing Group (# any/)		No.	Тура	Quantity	WL/Vol.	10.1100	* 0.000	_		
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ZAT												
GENERATOR	H	2.										
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П	15.	GENERATOR'S OFFEROR'S CERTIFICATION: I hereby declare that the contents of this or marked and labeled/placarded, and are in all respects in proper condition for transport access	ding to applicable	international and ratio	oribed above i nai governme	by the proper ship ratel regulations.	pping name, If export ship	and are classifier orent and I am to	f, peckaged, Primary			
П		Experier, I certify that the contents of this consignment conform to the terms of the attached I certify that the waste minimization statement identified in 40 CPR 262.27(a) (if I am a large	EPA Acknowledg	nent of Consent.								
Ш	Gen	evator's Differor's Printed Typed Name	Signati	e e	closured Sec.	200713100.		North	Day hear	-		
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LL	15, li	Nemational Shipments Import to U.S.	Export from U.S.	Port of entr						_		
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		azardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatme	ent, disposat, and	recycling systems)						_		
8	1.	2.	3.			4.						
H		ssignated Facility Owner or Operator: Certification of receipt of Nazardous materials covered in		rount as noted in Year.	ika .					-{		
		esignated Facility Owner or Operator, Certification of receipt of Necessaus Instantials Covered L of Typed Name	Bignatus	kucya an richino es sinti E	-			Month	Day Year	1		
	LUMBE											
	rana							1 1				

MINOR VIOLATION: One TSDF signed manifest not available for review during inspection

Completely filled out manifest should be available for review during inspection including TSDF signature located here "cradle to grave"

Minor Violation Example

Permit #: Date:

SAN DIEGO COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION

Annual Carcinogen and Reproductive Toxin Reporting List

Business Name:

Business Address:

Business Owner or Operator:

Please complete the following by entering the chemical name in the chemical name column and then place a check ✓ in the quantity column that most closely estimates the amount on hand. If measured by volume, check the appropriate gallon column(s). If measured by weight, check the appropriate pound column(s). If the chemical is a trade secret, you should check the trade secret box. For example, if you have one pint of benzene you would write benzene in the chemical name column and place a check ✓ in the <1-gallon column.

(PLEASE NOTE: the symbol < means less than).

Chemical Name	<1 gal.	√1 lb.		<55 gal.	Trade Secret

MINOR VIOLATION:
Annual
carcinogen/reproductive
toxin list not submitted
through CERS

Submitted in the "locally required documentation section" in CERS

Minor Violation Corrected on-site

A <u>minor</u> violation discovered during an inspection may be corrected by the facility during the inspection.

The minor violation will be documented in the inspection report, but no further follow-up action will be required.

BE ADVISED: If similar violations are discovered during future inspections, the violation is now repeated and may be escalated to Class II or above.

A Class II Violation is defined by what it is NOT:

Not a Minor Violation

CLASS II VIOLATION

Not a Class I Violation

Generally a Class II Violation can be:

Repeat Minor Violation from previous inspections

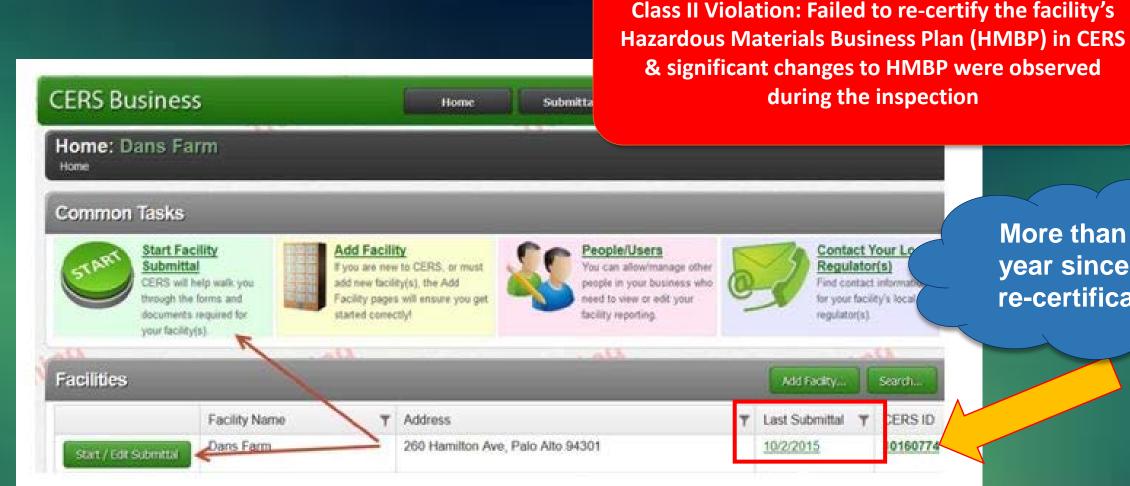
A serious violation that is not severe enough to be defined as a Class I

A Minor violation that failed to be corrected within specified time frames

Violations that are cited repeatedly throughout a facility's inspection history

Violations demonstrating a pattern of negligence

Class II Violation Example



More than one year since last re-certification

Class II Violation Example



Class II Violation Example

Class II Violation: Medical Waste Management Plan not established and not submitted to the CUPA (if Large Quantity Medical Waste Generator)



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.sdcdeb.org



Medical Waste Management Plan

Facility Information						
Business Name	Unified Program Facility Permit #					
Type of Business	Date					
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						
Street Address	City/ZIP					
Person Responsible for implementing the I	Medical Waste Management Plan (MWMP)					
Name						
Title	Phone					
Types of medical was	stes (MW) generated					
MW Chame	Bland or bland and dusts. Fold bland or bland					
MW Sharps - e.g., needles, blades, scalpels, or broken glass or syringes contaminated with biohazardous waste. (human or animal)	Blood or blood products - liquid blood or blood products, or other regulated body fluids, or articles contaminated with liquid blood or body fluids.					
Estimated monthly amount lbs	Estimated monthly amount lbs					
Laboratory wastes – infectious specimens or microbiological cultures, stocks of infectious agents, live and attenuated vaccines, biologicals, and culture media.	Pathology waste – human or animal tissues suspected to be infectious to humans					
Estimated monthly amount lbs	Estimated monthly amount lbs					
Liquid or semi-liquid biohazardous laboratory waste - treated on site by chemical disinfection* and discharged to sewer. Estimated monthly amount lbs	Isolation waste - waste contaminated with excretion, exudates or secretions from humans or animals who are isolated due to highly communicable diseases. Estimated monthly amount Ibs					
Trace chemotherapeutic waste	Contaminated animals w/Highly communicable animal carcasses, body parts, tissues or fluids suspected to be contaminated by agents which are contagious.					
Estimated monthly amount lbs	Estimated monthly amount lbs					
California-regulated pharmaceutical waste	Other (specify):					

Class II Violation: Failed to provide or update primary emergency contact's information in CERS within 30 days of a significant change





After your facility has been cited violation(s) what is the next step?

RETURN

TO COMPLIANCE



Return to Compliance (RTC) Process:

Step 1:

Review the corrective actions prescribed in the report

Step 2:

Correct the violations within the timeframes on the report

Step 3:

Complete/submit the "Corrective Action Form to Document Return to Compliance" & include supporting documentation requested

If corrective actions are not received within specified time frames...



Re-inspection and Reinspection fees may be apply to determine compliance ...



Violations may be escalated



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME:	Biotech	
ADDRESS:	123 Biotech Way	
CITY/ZIP:	SAN DIEGO	/92037

INSPECTION DATE: 05/09/2018 PAGE 1 OF 2	2					
RECORD ID #: DEH2013-HUPFP-000307						
TIME START: END:						
SPECIALIST:						
INSPECTION CONTACT: Darth Vader						
TITLE: Sith						
PHONE:						
E-MAIL:	_					

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

		•		•	·
Yes	N/A		Yes	N/A	
		Unified Program Facility Permit Current			Contingency Plan Available LQG SQG
		Hazardous Materials Business Plan Available			Employee Training Records Available
		Employee Training is Adequate			Universal Waste Managed Properly
		Waste Disposal Records Available for Review			Waste Containers Closed Labeled
		Emergency Contacts Current Updated today			Waste Containers in Good Condition
		Chemical Inventory/Map Current Updated today			Permit Expires On 09/30/2014

Re-Inspection Fees May Apply When:



A second visit is needed because the facility denied consent to inspect



Two types of inspection reports:



Notice to Comply



Notice of Violation

Notice to Comply

A "Compliance
Inspection Report"
with Minor or Class
II Violations cited
serves as a Notice
to Comply



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME: BIOTECH BIOTECH

ADDRESS: 5555 CUPA WAY

CITY/ZIP: SAN DIEGO /92101

INSPECTION DATE: 01/11/2018

RECORD ID #: **DEH2013-HUPFP-0**TIME START:

SPECIALIST: The Inspector
INSPECTION CONTACT:Mr. EHS

TITLE: Site Manager

PHONE: ____

Documentation of corrective actions are due within the timeframes prescribed (usually 30 days)

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions

of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do

chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

Yes	N/A		Yes N	I/A	
		Unified Program Facility Permit Current		_ C	Contingency Plan Available 🗌 LQG 🔲 SQG
		Hazardous Materials Business Plan Available		_ E	Employee Training Records Available
		Employee Training is Adequate		J	Jniversal Waste Managed Properly
		Waste Disposal Records Available for Review		_ V	Waste Containers 🔲 Closed 🔲 Labeled
		Emergency Contacts Current Updated today		_ V	Waste Containers in Good Condition
		Chemical Inventory/Map Current Updated today		Р	Permit Expires On 09/30/2014
CON	SENT	TO CONDUCT INSPECTION GRANTED BY:			TITLE:

Notice of Violation

63	COUNTY OF SAN I	DIEGO		DATE: 01/17/2018 : DEH2013-HUPFP-	_	1 OF 8
48	NOTICE OF VIOLATIO		TIME START: SPECIALIST:		END:	
FACILITY NAME:	BIOTECH BIOTECH BIOTECH		TITLE: Site	Manager		
ADDRESS:	5555 CUPA WAY		PHONE:			
CITY/ZIP:	SAN DIEGO	/92101	E-MAIL:			
OWNER'S NAME	COSD HAZARDOUS MATERIALS		CITY/ZIP	SAN DIEGO	/9	2101
ADDRESS	5555 CUPA WAY		PHONE			
of the H&SC, the Ca	the County inspected your facility under the authority of the lifornia Code of Regulations (CCR), and the San Diego County a formal written response and corrective action within the ti	Code of Regulatory Ord				
NOTE: Reinspe	ection fees will be charged if additional insp	ections are requi	red to detern	nine compliance.		
CONSENT TO	CONDUCT INSPECTION GRANTED BY:			TITLE:		
INTRODUCTIO	N:					

If Class I Violations are cited, they will be documented on a Notice of Violation. This signals the initiation of potential formal enforcement

Enforcement proceedings may commence, or the enforcement case will be referred to another agency.

Penalties can be imposed for each day in violation. Reinspection fees will be charged if additional inspections are required to determine compliance

END OF SECTION

Section 3: Hazardous Materials and the Hazardous Materials Business Plan (HMBP)

Section 3: Hazardous Materials Overview

- Purpose of Hazardous Materials Regulations
 - Hazardous Materials Reportable Thresholds
 - Hazardous Materials Exemptions
 - Common Violations for Hazardous Materials
 - Record Keeping Requirements

Purpose of Hazardous Materials Regulations

Your Hazardous Materials
Business Plan (HMBP) serves to
provide critical information to
emergency responders and ...

Ensure that facility personnel are familiar with emergency response procedures, including evacuation and coordination with emergency responders in case of spills or releases of hazardous materials



HMBP

- It is the facility's responsibility to ensure that employees are familiar with the contents of the HMBP.
- Be prepared to demonstrate to your inspector that you have access to your HMBP, either digitally or hard copy.

Hazardous Materials
Business Plan



>55 gallons of a liquid

>200 cubic feet of a gas (some exemptions apply)

≥500 pounds of a solid

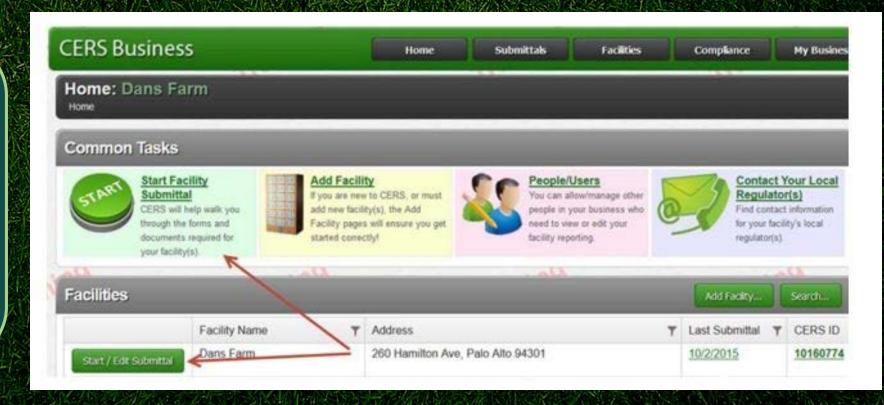
Highly toxic compressed gases with TLV less than 10ppm are reportable

Remember
Hazardous Waste
and Medical
Waste are
reportable in any
amount

Hazardous Materials Business Plans (HMBPs) are reported in CERS

HMBPs must be submitted at least annually. Submit the following at a minimum:

- Facility information
- Hazardous Materials Inventory
- Emergency Response & Employee training plan



Refer to HMD's CERS guidance page for more CERS related information: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html

DEFINITON OF A HAZARDOUS MATERIAL

"Hazardous Material" means a material... that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety, or to the environment if released into the workplace or the environment.

A "Hazardous Material" includes the following:

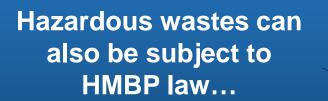
A substance or product for which the manufacturer or producer is required to prepare a material safety data sheet pursuant to the Hazardous Substances Information and Training Act or pursuant to any applicable federal law or regulation

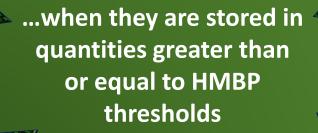
A substance listed as a radioactive material in Appendix B of Part 30 of Title 10 of the Code of Federal Regulations, as maintained and updated by the Nuclear Regulatory Commission.

A substance listed pursuant to Title 49 of the Code of Federal Regulations.

A substance listed in Section 339 of Title 8 of the California Code of Regulations.

A material that is a hazardous waste, as defined by Sections 25115, 25117, and 25316







For example... a 55-gallon drum of corrosive waste is subject to HMBP



HMBP Exemption Examples



Nitrogen

Argon

Helium

Air

Freon

Xenon















Convert cryogenic gases to cubic feet to determine if the item is subject to HMBP

In CERS ... Report the item as a liquid with report units gallons



Refrigerant gases in a closed loop system are exempt from reporting up to 1,000 cubic feet





HMBP Exemption Examples

Hydraulic oils in elevator systems are exempt from reporting if the facility does not store greater than 1,320 gallons of petroleum products





HMBP Exemption Examples

Materials classified as hazardous <u>solely</u> as an irritant or sensitizer are exempt from reporting up to 550 gallons or 5,000 pounds

Agar

Non-Toxic Buffer Solution



HMBP Updates

The facility is responsible for updating their HMBP within 30 days of a significant change. These include but are not limited to....

100% or more increase/decrease in capacity for a hazardous material or waste

New hazardous material handled onsite in reportable quantities

Change in emergency contact information

Change in location of hazardous material which triggers change in site map

Does my HMBP need to be updated?



Inventory Updates

- Periodically check the facility's hazardous materials inventory and compare to reported quantities in CERS
- Check with purchasing and receiving for new chemicals stored on-site



Site Map Changes

• Tour the facility to ensure that all hazardous materials and hazardous wastes in reportable quantities are represented accurately on the HMBP site map



Emergency Information Changes

• Ensure your listed emergency contacts in CERS are current

What if there are NO CHANGES to your facility's HMBP???



What if your facility's HMBP is NOT ACCEPTED in CERS???

A "NOT ACCEPTED" CERS submittal may result in a violation during inspection if not addressed in a timely matter.

Read and pay careful attention to the comments provided in CERS. Follow directions provided in comments ...



Contact your inspector if you have additional questions or concerns ...



Make sure you resubmit changes that are made until your submittal is "ACCEPTED"

Always base your latest CERS submittal on your previously accepted submittal (not from scratch) or everything will be erased.

What hazardous material type do I mark in CERS???

If the item is a waste...

Check off "Waste" if the item is being shipped offsite as a waste

You may add the mixture components of the waste stream if necessary (i.e. waste flammable liquid mixture)

If the item is a material...

Check off "Pure" if material is a pure item (i.e. isopropyl alcohol)

Check off "Mixture" if material is a mixture (i.e. gas/liquid mixtures) and ensure that mixture components are included





Ensure that your HMBP is updated annually and your facility is reporting all hazardous waste and medical waste in any amount

You are not required to report hazardous *materials* (non-waste) below reportable thresholds.

Ensure that your submittal is fully submitted (you will see a confirmation page).

If your HMBP is "NOT ACCEPTED" don't panic!

Log in to CERS & review the comments provided



Start new submittal and make the requested changes



SUBMIT the edits

You may contact your inspector if you need more assistance or the HMD CERS help desk staff at (858) 505-6990

Permit Relocations

If your facility is relocating, you are required to notify HMD within 30 days of beginning operations at your new location

Step 1: Submit CERS Access/I.D. request form

Step 2: Once access has been granted, submit information through CERS for new location

Step 3: Submit closure notification in CERS for previous location



REMINDER!

HMD Permits are nontransferable from one owner to the next, or from one location to another

Permit Closures

If your facility changes owners or locations (including suite numbers) you are required to obtain a new UPFP

Procedures

Step 1:

Log into CERS and select "NO" to all facility information "Business Activities" section questions

Step 2:

Leave a comment to regulator stating the move out date and, if applicable, your new location and starting date

Step 3:

Submit the Facility Information section of CERS with your changes and comments. An inspector will conduct a closure inspection at a future date



HMBP RECORDKEEPING REQUIREMENTS

Electronic copies
are acceptable as
long as they are
readily available to
employees and
during inspections

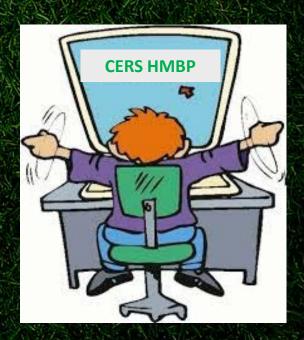
HMBP ON-SITE?

Ensure that your HMBP is readily accessible to facility personnel at all times through one of the following:

Access to CERS

A hardcopy of the HMBP on-site

Access to an electronic copy of the HMBP



Annual Employee Training Documentation

Employees are required to be trained annually for:



Facilities subject to HMBP



Large quantity hazardous waste generators



Medical waste treatment facilities

Training Records shall be documented electronically or by hard copy and made available:



If subject to HMBP, records maintained for at least 3 years [HSC 25505 (a)(4)]



If your facility is a large quantity HW generator, until closure of the facility and for 3 years after termination of employment for former employees [CCR 66265.16 (e)]



If your facility is a medical waste treatment, records maintained for at least two years [HSC 117938 (b) (1-3)]

What kind of training?

"Training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the even of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the plans and procedures specified in paragraph (3)*. These training programs may take into consideration the position of each employee. This training shall be documented electronically or by hard copy and shall be made available for a minimum of three years." HSC 25505 (a)(4)

	ON / / , TRAINING PROVIDED BY:	
,	WAS CONDUCTED ON THE FOLLOWING TOPICS:	
	TRAINING TOPIC	TRAINING
	TRAINING TOTIC	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.	

* Paragraph (3) refers to the facility's Emergency Response Plan

Training Frequency?

Employee training requirements are indicated in the consolidated emergency response and training plan template posted in CERS

EMPLOYEE TRAINING FREQUENCY AND RECORDKEEPING TRAINING MUST BE:

- Provided initially for new employees as soon as possible following the date of hire. New employees should not work in an unsupervised position that involves hazardous materials handling and/or hazardous waste management without proper training;
- Provided within six months from the date of hire for new employees at a large quantity generator;
- Ongoing and provided at least annually;
- Amended prior to a change in process or work assignment;
- Given upon modification to the Emergency Response/Contingency Plan.

Large Quantity Generator Training: Large quantity generators (1,000 kg or more) must retain written plan and documentation of employee training which includes:

- A written description of the type and amount of both initial and ongoing training that will be given to persons filling each job position having responsibility for hazardous waste management and/or emergency response.
- The name, job title and job description for each position at the facility related to hazardous waste management.
- Current employee training records must be retained until closure of the facility and former employee training records must be retained for at least three years after termination of employment.

Small Quantity Generator Training: Small quantity generators (less than 1,000 kg) must include basic hazardous waste management and emergency response procedures but a written employee training plan and training records are not required. In order to show that the facility has met the small quantity generator employee training requirement, an employee training plan and training records may be made available.

Hazardous Materials Business Plan Training: Businesses must provide initial and annual employee training that includes the content referenced above. The training may be based on the job position and training records must be made available for a period of at least three years.

CONSOLIDATED EMERGENCY RESPONSE/CONTINGENCY PLAN TEMPLATE

https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/consolidated%20ER%20plan%202017.pdf



A form developed by CalEPA to combine the:

- Emergency Response Plan (for hazardous materials) and
- Contingency Plan (for hazardous waste generators)



This template can also be used to satisfy:

- HMBP employee training description [HSC 25505 (a)(4)]
- HW employee training description [22 CCR 66262.34 (d)(4), 22 CCR 66265.16]



Template and instructions available on HMD's website, or through CERS

• You are not required to use this template. However, if you choose to use your own form, ensure that all required elements are included.

Common HMBP Violations

VIOLATION: HMBP not re-certified annually

VIOLATION: Initial/annual training not conducted or no records







Common HMBP Violations

VIOLATION: Inventory not complete or not updated to reflect 100% or more increase

VIOLATION: Primary emergency contact listed is not current (change occurred more than 30 days ago)

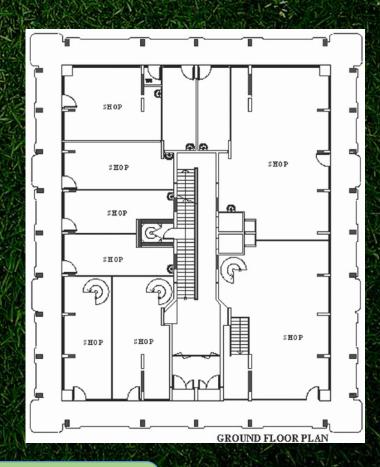




Common HMBP Violations

VIOLATION: Site Map Inadequate

For each HMBP site map, certain information is required. Failure to submit a correct site map with all required information will result in a "not accepted" CERS inventory and may be a violation during inspection.



For site map guidance please refer to the following document:

https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hmbp/HM-952%20(10-16).pdf

END OF SECTION

Section 4: Hazardous Waste



Outline

Section 1: Purpose

Section 2: Definition of a Hazardous Waste

Section 3: Characteristics of a Hazardous Waste

Section 4: Common Hazardous Waste Violations

Section 5: Hazardous Waste Recordkeeping Requirements

Section 6: Labeling

PURPOSE OF HAZARDOUS WASTE REGULATIONS

To ensure safe storage, proper waste disposal, and prevent releases of hazardous waste to the environment







DEFINITION OF A HAZARDOUS WASTE

"A solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible serious, illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed."

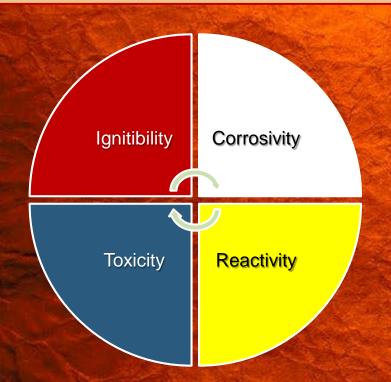
(40 CFR Part 261, Subpart B)

CALIFORNIA DEFINITION OF HAZARDOUS WASTE

22 CCR 66260.10 "Hazardous waste" means a hazardous waste as defined in section 66261.3 of this division. "Hazardous waste" includes acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste and universal waste.

What is a Hazardous Waste?

Any waste that has any of the following characteristics:





Or any waste listed in Title 22, California Code of Regulations or is under 40 CFR (e.g. F, K, U, P, are the U.S. EPA lists)

IGNITABILITY

Flash point < 140°F

Oxidizer,
Flammable Solid,
or Ignitable
Compressed Gas

EXAMPLES:

Acetonitrile, alcohols, acetone, toluene, xylene, ether, organic peroxide, acetylene, other flammable solvents





CORROSIVITY

- pH \leq 2.0 or pH \geq 12.5
- Corrodes steel at a rate greater than 6.35 mm/year at a test temperature of 130°F
- Non-aqeous solution mixed with an equal weight of water has pH ≤ 2.0 or pH ≥ 12.5

Examples:

Acids, glass cleaner, hydroxides, bases, drain cleaners

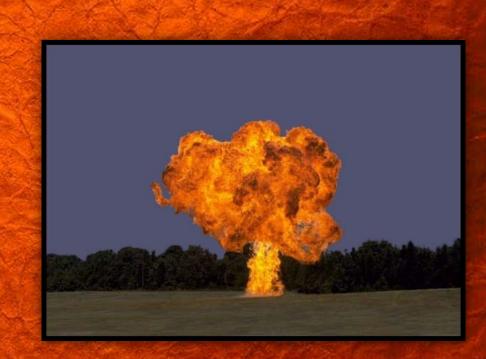


REACTIVITY

- Unstable and may explode under certain conditions such as heat, friction, or pressure
- Reacts with water
- It is a cyanide or sulfide bearing waste

Examples:

Picric acid, peroxide forming chemicals, ethyl ethers, dinitro compounds, azides



TOXICITY

 Toxicity encompasses both federal (RCRA) and California (non-RCRA) hazardous waste criteria

Examples:

Arsenic, mercury, lead (RCRA)

Zinc, nickel, cobalt (California)



CALIFORNIA TOXICITY

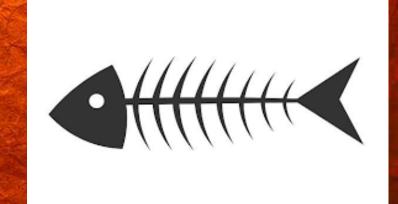
Fails WET- Waste Extraction Test

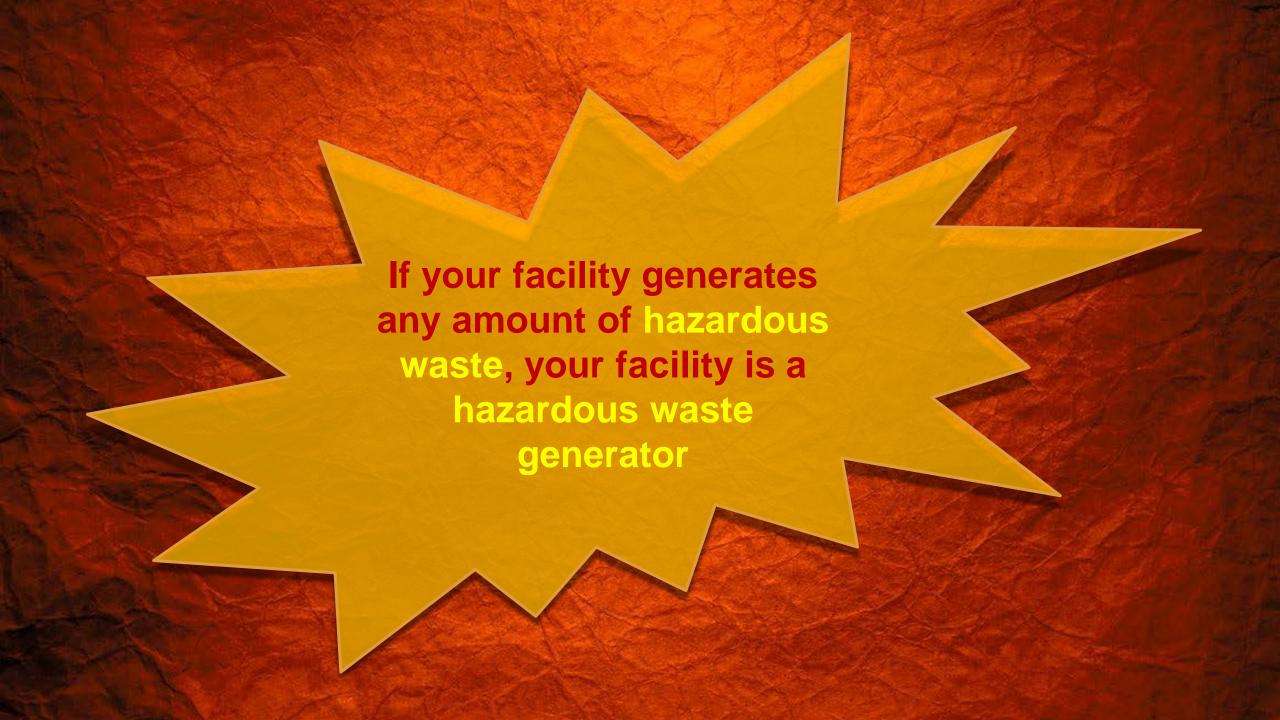
- TTLC and STLC
 (Total Threshold Limit Concentration and Soluble Threshold Limit Concentration)
- Fails Acute Aquatic 96-hour Fish Bioassay
- Fails Toxic Characteristic Leaching Procedure (TCLP) Test
- LD 50/LC 50 (oral, dermal, or inhalation toxicity)
- Carcinogenic Substances- California reg. 22 CCR 66261.24(a)(7)

Examples:

Heavy metals: mercury, lead, silver, chromic acid

http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/index.cfm





HAZARDOUS WASTE GENERATOR CATEGORIES

LARGE QUANTITY GENERATOR (LQG)

- ≥ 2,200 lbs/month of hazardous waste (1,000 kgs.)
- ≥ 2.2 lbs/month of acutely or extremely hazardous waste (1 kg.)

SMALL QUANTITY GENERATOR (SQG)

- Between 220-2,200 lbs/month of hazardous waste
- < 2.2 lbs/month of acutely or extremely hazardous waste

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)*

- < 220 lbs/month of hazardous waste
- < 2.2 lbs/month of acutely or extremely hazardous waste

*Federal regulations also refer to this as Very Small Quantity Generator (VSQG)

Waste Reporting in San Diego County

Per San Diego County Code SDCC 68.904(a)(2), hazardous AND medical wastes must be reported through CERS if generated in ANY AMOUNT.







Hazardous Waste Generator Requirements Checklist

Waste determination	Training
Accumulation time limits	Shipping Requirements/Recordkeeping
Labeling/marking	Biennial Report (if applicable)
Satellite Accumulation	Empty container management
EPA Identification Number	ERM/Tiered Permitting (if applicable)
Emergency response/contingency plan	Waste reporting (CERS)

WASTE DETERMINATION IS THE GENERATOR'S RESPONSIBILITY

Conduct a proper waste determination waste determination on all waste streams on at the point of at the paration.

Point of generation:

The point at which the generator determines that the material is no longer usable/is a waste

The waste determination must be conducted at each point of generation prior to being combined.

HOW TO DO A WASTE DETERMINATION?

This is accomplished by either:

- Sending a representative sample of the waste to a State certified laboratory to conduct quantitative testing using EPA qualified testing methods
- Claiming and documenting "Generator Knowledge" of the waste stream

Maintain documentation of waste determination for inspector review

See guidance document at:

https://www.dtsc.ca.gov/HazardousWaste/upload/HWMP_DefiningHW111.pdf

ILLEGAL DISPOSAL

HAZARDOUS WASTES MUST NOT BE DISPOSED OF TO SEWER, STORMWATER, AIR, OR MUNICIPAL TRASH.

GENERATORS MUST USE A CALIFORNIA REGISTERED

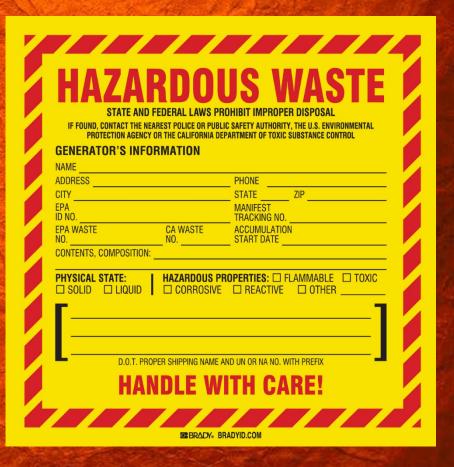
TRANSPORTER

Please refer to DTSC's list of registered hazardous waste transporters: http://hwts.dtsc.ca.gov/transporters

LABELING REQUIREMENTS

22 CCR 66262.34(f)

- -The words "Hazardous Waste"
- -Accumulation start date
- -Physical state
- -Composition
- -Hazardous properties
- -Name and address of generator



EMPTY CONTAINER DISPOSAL

Containers or bottles

Containers or bottles

previously containing

Empty containers greater than 5 gallons in capacity must be marked with the date on which they were emptied, and managed within 1 year of that date.

Exception: Containers
previously storing p-listed
chemicals or an extremely
hazardous waste must be
must be managed as a
hazardous waste.





EPA ID NUMBERS

EPA ID numbers are required for all hazardous waste generators

The type and quantity of hazardous waste generated determines whether the facility requires a Federal or California EPA ID number



If a business generates <u>more than 1 kilogram</u> of RCRA acutely hazardous waste per month or <u>more than 100 kilograms</u> of other RCRA waste per month, then the facility must obtain a US EPA ID number (CAR, CA, CAD, etc.)

If a business generates RCRA hazardous waste in amounts below federal EPA ID number requirements or generates non-RCRA hazardous waste (California only), then the facility is required to obtain a California EPA ID number (CAL, etc.)

EPA ID NUMBERS

Generators with RCRA EPA or California ID numbers must complete an annual information verification submittal <u>online</u> to keep their number active with the State DTSC.

https://dtsc-web01.dtsc.ca.gov/eVQ/Home.aspx



Annual ID number Verification Questionnaire – Generators, transporters, and facilities that are authorized to generate, store, transport, treat, and dispose of hazardous waste are required to annual verify their ID number information per Health and Safety Code section 25205.16(b)

DTSC FAQ page at:

http://www.dtsc.ca.gov/IDManifest/upload/eVQ_FAQs.pdf

CONTINGENCY PLAN

- All hazardous waste generators are required to have a contingency plan
- Please refer to 22 CCR 66265.52 for a list of required elements

□ 1. HAZARDOUS MATERIALS: 2. HAZARDOUS WASTES

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS) CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN Prior to completing this Plan, please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW DATE OF PLAN PREPARATION/REVISION FACILITY ID# CERS ID BUSINESS NAME (Same as Facility Name or DBA - Doing Business As) CUPA AUTO SHOP BUSINESS SITE ADDRESS 8888 EHS WAY BUSINESS SITE CITY 104. ZIP CODE 105. 92121 San Diego CA TYPE OF BUSINESS (e.g., Painting Contractor) INCIDENTAL OPERATIONS (e.g., Fleet Maintenance) **AUTO REPAIR** THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING: (Check all that apply)

WASTE ACCUMULATION TIME LIMITS DEPEND ON:

Amount of hazardous waste generated

LQG vs SQG vs CESQG

Where the hazardous waste is headed for disposal

Can be stored longer if a SQG and transported more than 200 miles away

Type of hazardous waste accumulation

Satellite vs 90/180 day storage area

SATELLITE ACCUMULATION

- A hazardous waste container (not a tank) may be stored at or near the point of generation and under the control of the generator.
- Full hazardous waste labeling requirements apply, though "Emptied Weekly" or "Emptied
 Daily" may be marked for Accumulation Start Date if the container is emptied as described.
 - Emptied Monthly is not acceptable!



SATELLITE ACCUMULATION TIME LIMITS:

No more than 55 gallons (1 quart for acutely or extremely hazardous waste) of satellite accumulation per process

Must be moved to the 90/180 day storage area within 1 year of initial accumulation, or within 3 days of accumulating 55 gallons

The TOTAL time limit (whether or not the 55 gallon or 1 quart limit has been reached) is one year from initial accumulation

IS IT ACCUMULATION OR IS IT STORAGE?

Improper treatment, storage, or disposal may qualify your facility as a treatment, storage and disposal facility (TSDF) which requires an additional permit by the Department of Toxic Substances Control (DTSC)

**Reminder: Weekly inspections of hazardous waste storage areas are required for all hazardous waste generators [22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.174]

ACCUMULATION TIME LIMITS

Accumulation time limits for hazardous wastes vary according to how much hazardous waste a facility generates each month:

11 1000	If your facility generates	then wastes must be disposed of within	and your facility's generator status is
	Less than 100 kg/month hazardous waste or less than 1 kg/month acutely hazardous waste	180 days of accumulating an aggregate 100 kg hazardous waste on site	Conditionally Exempt Small Quantity Generator (CESQG)
	More than 100 kg/month hazardous waste but less than 1,000 kg/month, or more than 1 kg/month acutely hazardous waste	180 days of initial accumulation	Small Quantity Generator (SQG)
	More than 1,000 kg/month hazardous waste	90 days of initial accumulation	Large Quantity Generator (LQG)

WHAT IF MY GENERATOR STATUS CHANGES THROUGHT THE YEAR?

MEDICAL WASTE: If your facility generates more than 200 pounds of medical waste in a month, your facility is a large quantity generator of medical waste for that 12 month period.

HAZARDOUS WASTE: Your facility must abide by LQG requirements during the months that your facility generates wastes above LQG thresholds. Ensure that additional documents (i.e. training plans) are updated accordingly.

TRAINING

Training is required for all hazardous waste generators

However, documentation of training is only required if the facility is:

- Subject to HMBP
- Large quantity generator of hazardous waste
- Conducting medical waste treatment (medical waste training)

(Note: OSHA more stringent and requires documentation of employee training by employers)



SHIPPING REQUIREMENTS

It is the generator's responsibility to:





Use a currently registered hazardous waste hauler [HSC 25163(a); 22 CCR 66263.41]

Use a hazardous waste manifest for shipping all hazardous wastes [22 CCR 66262.23(a)]

A list of currently registered transporters is on DTSC's website: http://hwts.dtsc.ca.gov/transporters/

MANIFESTS

Send copy of generator manifest to DTSC within 30 days [22 CCR 66262.23(a)(4)]



[22 CCR 66262.40(a)]

BIENNIAL REPORT

If your facility is a RCRA large quantity generator, you are required to complete the Biennial Report by March 1st on every even numbered year. [22 CCR 66262.41(b)]

Maintain copies onsite for 3 years [22 CCR 66262.40(b)]

RCRA Info webpage:

RCRA Info is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984.

https://rcrainfopreprod.epa.gov/rcrainfo-help/application/industryHelp/index.htm#t=Introduction.htm





Benchtop neutralization



Clean in Place (CIP)



Disinfection by bleaching & sewering (medical waste)

EXCLUDED RECYCLABLE MATERIALS & ONSITE HAZARDOUS WASTE TREATMENT HAVE ADDITONALY REQUIREMENTS

Additional regulatory requirements may apply if your facility claims exemption under Excluded Recyclable Materials, or is engaged in onsite hazardous waste treatment.

Please contact your area inspector or the Hazardous Materials Division if this applies to your facility and you have questions about the requirements.

HAZARDOUS WASTE RECORDKEEPING REQUIREMENTS



Generator copies of manifests sent to DTSC within 30 days of generation

22 CCR 66262.23(a)(4)



TSDF-signed copies of manifests maintained on site for 3 years 22 CCR

66262.40(a)



Documentation of waste determination results maintained on site [22 CCR

66262.40(c)]

Additional recordkeeping and notification requirements will apply if your facility treats hazardous waste or claims exemptions under Excluded Recyclable Material

E - MANIFEST

Hazardous Waste Electronic Manifest System (e-Manifest)

• On June 30, 2018, the U.S. Environmental Protection Agency (EPA) launched the Hazardous Waste Electronic Manifest System (e-Manifest). The system will improve access to higher quality and more timely hazardous waste shipment data and save industry and states valuable time and resources.

Go to: https://www.epa.gov/e-manifest for detailed information. To use e-Manifest, generators will need an EPA Identification (ID) Number and register with e-Manifest.

GENERATOR IMPROVEMENT RULE ADOPTED BY U.S. EPA IN 2017

- On May 30, 2017, the United States Environmental Protection Agency's (US EPA's)
 Hazardous Waste Generator Improvement Rule (GIR) went into effect. However, because
 California is an authorized state the GIR does <u>not</u> take effect in California until DTSC adopts
 the rule, or parts thereof, via their rulemaking process.
- Anticipate the State DTSC adopting parts of the revised federal regulations in late 2018 or 2019.

- See: https://www.dtsc.ca.gov/HazardousWaste/Generator_Improvement_Rule.cfm for more information.
- Sign up for E mail subscriber list: https://www.dtsc.ca.gov/ContactDTSC/ELists.cfm

COMMON VIOLATIONS FOR HAZARDOUS WASTE

VIOLATION: Failed to properly label/update hazardous waste container and/or tank 22 CCR 66262.34(f)

VIOLATION: Hazardous waste accumulated beyond allowed accumulation time limits HSC 25201(a); 22 CCR 66262.34(d); 40 CFR 262.34(e) and (f)





COMMON VIOLATIONS FOR HAZARDOUS WASTE

VIOLATION: Failed to comply with hazardous waste satellite container regulations 22 CCR 66262.34(e)

VIOLATION: Failed to mark date on empty container larger than 5 gallons and/or manage it within one year 22 CCR 66261.7(b-e) &/or (r); 22 CCR 66261.7(f)





COMMON VIOLATIONS FOR HAZARDOUS WASTE



VIOLATION: Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)

VIOLATION: Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)

VIOLATION: Failed to properly close hazardous waste container 22 CCR 66262.34(d)(2); 40 CFR 262.34 (d)(2), 265.173

VIOLATION: Failed to properly label/update hazardous waste container and/or tank 22 CCR 66262.34(f)



Section 5: Medical Waste







Medical Waste Outline

- Medical Waste Management Act
- Labeling and Storage Guidelines
- Small Quantity Generators vs Large Quantity Generators
- Medical Waste Treatment
 - Common Violations for Medical Waste

MEDICAL WASTE MANAGEMENT ACT HAS BEEN UPDATED

Ensure that your facility is using the most recent version for reference:

JANUARY 2017

CALIFORNIA HEALTH AND SAFETY CODE SECTIONS 117600 - 118360

DEFINITION OF MEDICAL WASTE

Generally, medical waste is defined in the Medical Waste Management Act as waste that has been determined to be infectious or potentially infectious to human beings.

Please refer to the Medical Waste Management Act for a more detailed definition of medical waste.



Be advised that other regulatory agencies and/or professional organizations may have more stringent definitions of medical waste.

MEDICAL WASTE LABELING

All medical waste containers/bags are required to have a generator label on the outside of the container immediately upon use (NOT when ready for disposal or after the bag is tied off)

A generator label includes:

- Facility name
- Address
- Phone number

A business card works!



*Refer to the guidance document in the notes section for a helpful chart

MEDICAL WASTE BAGS AND CONTAINERS

Biohazardous red bags must be:

- Puncture-resistant
- Contained in a rigid, leak-proof container in good repair
- Tied off after being filled to prevent expulsion of contents
- Labeled with a generator label on the outside of the bag at the point of generation

Sharps containers must be:

- Rigid, puncture-resistant, leak-resistant
- Resistant to opening after being sealed
- Labeled with a generator label at the point of generation

BENCHTOP STORAGE

Small biohazardous "benchtop" red bags used to collect non-breakable pipette tips do not need to have a generator information label.



PROPER USE OF RED BAGS

Waste stored in biohazardous red bags will be presumed biohazardous waste

Do NOT use red bags as municipal trash bags. If a biohazardous red bag is found at the landfill (without heat treatment tape), the source of the red bag will be investigated.



MEDICAL WASTE TIME LIMITS

Waste Storage Time Limits					
Amount of medical waste stored at room temperature unless otherwise specified	BIOHAZARDOUS	SHARPS WASTE READY FOR DISPOSAL	NON-RCRA PHARMACEUTICAL WASTE READY FOR DISPOSAL	PATHOLOGY WASTE	TRACE CHEMOTHERAPY WASTE
<20 lbs/month	30 days	30 days	-	30 days	Manage as sharps or biohazardous waste according to the type of container used for storage and the type of waste.
≥20 lbs/month	7 days	30 days	-	7 days	
≥200 lbs/month	7 days	30 days	-	7 days	
Stored below 0° C (32°F)	90 days	90 days	-	90 days	
Any amount of Non-RCRA pharmaceutical waste	-	-	90 days when ready for disposal, or at least once per year	-	-

MEDICAL WASTE GENERATOR STATUS

Small Quantity Generator (<200 pounds/month)

Required only if treating medical waste on site

Medical Waste

Management Plan

Record Retention

Medical Waste Tracking

3 years

Large Quantity Generator (>200 pounds/month)

Required

2 years

Training records are required if your facility treats medical waste on site.

PHARMACEUTICAL WASTE

Non-RCRA pharmaceutical waste can be managed as medical waste

Examples of non-RCRA pharmaceutical waste:

- Ibuprofen
- Propofol

RCRA pharmaceutical waste must be managed according to hazardous waste standards

Examples of RCRA pharmaceutical waste:

- Nicotine
- Arsenic Trioxide
- Warfarin
- Coumadin



TRACE CHEMO WASTE

Trace chemotherapy waste <u>(<3% by weight)</u> must be managed as medical waste

Use sharps containers or yellow bags, depending on waste material

Bulk chemotherapy waste (>3% by weight) must be managed according to hazardous waste standards

Use hazarodus waste standards for labeling and storage







MEDICAL WASTE TREATMENT

If your facility treats medical waste through an autoclave, the following information will be verified during inspection:



Annual thermometer calibration records (for autoclave in use)



Monthly biological indicator testing records



Standard operating procedures (for autoclave)



Heat sensitive tape observed in use



Medical Waste Management Plan on-site available for review



Records of treatment: logs of dates/times/temperatures



Training records (if large quantity generator of medical waste)

If your facility is a Large
Quantity Generator of
medical waste and you
treat your medical
waste, you are
required to obtain,
before treating the
waste, a medical
waste treatment
permit with the
Hazardous Materials
Division

MEDICAL SOLID WASTE **SECURITY**

Per 1000 is 1211, medical 1000 WASTE must be secured against unauthorized access.

"Medical solid waste shall include, but not be limited to, waste such as empty specimen containers, bandages, dressings containing non-liquid blood, surgical gloves, decontaminated biohazardous waste, and other materials which are not biohazardous."

> Medical SOLID WASTE may be secured by having a securely locked dumpster, by implementing a policy wherein trash is only taken out on trash pick up day, or by otherwise demonstrating that your medical SOLID WASTE is secured.

COMMON MEDICAL WASTE VIOLATIONS

VIOLATION: Primary containers accumulating MW not labeled with generator's name, address, and phone number (SDCC 68.1205)

VIOLATION: Biohazardous red bag waste stored >7 days at >0C (for generators of >20 lbs/month). HSC 118280(e)(1)(A)

Generator's Label

(Must include this information):

Name: <u>I. M. Sharp, DDS</u>

Address: 123 Needle Stick Drive

San Diego, CA 92101

Phone #: (619) 123-4567



COMMON MEDICAL WASTE VIOLATIONS

VIOLATION: MW designated accumulation area not posted with an approved, legible biohazardous waste "warning sign" in English and Spanish which can be read from 25 ft (HSC 118310)

VIOLATION: Medical SOLID WASTE not secured to deny unauthorized persons (SDCC 68.1211)

CAUTION BIOHAZARDOUS WASTE STORAGE AREA UNAUTHORIZED PERSONS KEEP OUT CUIDADO ZONA DE RESIDUOS BIOLOGICOS PELIGROSOS PROHIBIDA LA ENTRADA A PERSONAS NO AUTORIZADAS



COMMON MEDICAL WASTE VIOLATIONS

VIOLATION: MWMP not submitted to HMD (initial/updates) (LQG or treatment only) (HSC 117935, 118032, 117960, 117970)



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



Section 6: Conclusion

Thank you for completing the EPIC+ online training!

The goal of the EPIC+ training is to improve compliance through education. This training is one of the tools we use towards gaining compliance.

For any suggestions, comments, or concerns please contact your area inspector or the HMD Duty Desk: (858) 505- 6880

Please feel free to contact your area inspector if you have any specific questions about your facility's process or practices.

FINAL STEPS

Please complete and submit the EPIC+ Application to participate in the EPIC+ program if you have not already done so.

The application does not need to be renewed annually, but you must re-enroll and complete the online training at least every 12 months OR attend our in-person seminar. HMD posts a new online program each July. Your training is good for one year, starting from the date you completed and passed your post test.

PLEASE REMEMBER TO TAKE THE POST TEST!







THE END!