



COUNTY OF SAN DIEGO

DEPARTMENT OF ENVIRONMENTAL HEALTH

HAZARDOUS MATERIALS DIVISION



Reporting Lab Packs of Hazardous Waste through CERS

This document is to provide guidance on reporting lab packs of hazardous waste (HW) through the California Environmental Reporting System (CERS) for inventory purposes in San Diego County. Keep in mind there are State and Federal laws that regulate lab pack management and this document shall only be used for CERS reporting.

Laboratories commonly generate small volumes of many different hazardous wastes. Rather than manage all these wastes separately, labs often consolidate these small containers into **lab packs**. "Lab pack", as defined in Title 22 California Code of Regulations (22 CCR), Section [67450.41](#), means small containers of hazardous waste placed in a sorbent-filled outer drum or container in accordance with the requirements of 22 CCR [66264.316](#).

Per San Diego County Code section [68.904](#), businesses, persons, owners or operators that operate a facility subject to a Certified Unified Program Agency (CUPA) permit shall report hazardous waste generated in any amount through CERS. At the minimum the following information shall be included: the common name of the waste, maximum amount in storage at any one time, annual waste amount, physical state of the waste, unit of measure, the State waste code, and the hazard categories.

When preparing a CERS submittal to include a "lab pack", it is recommended that you start by adding it manually by selecting "**Add Material**", then "**Unable to Find Material/Add New Material**", and provide a descriptive Common Name suitable to your reporting; you may use the same nomenclature for the Chemical Name. Two options are suggested:

1. To simplify the process, you may combine the reporting and create at least two entries: one for solids and one for liquids. Then indicate all the different hazard categories applicable to the wastes in your lab pack. You may then provide specific information in the Additional Chemical Description Information box at the bottom of the page.
2. If you prefer more detailed reporting, here are some examples of the different lab packs inventory items you could report:
 - Inorganic acids: Hydrochloric, Sulfuric
 - Inorganic bases: Sodium hydroxide, Potassium hydroxide
 - Strong oxidizing agents: Ammonium nitrate, Barium nitrate, Sodium chlorate, Sodium peroxide
 - Strong reducing agents: Sodium thiosulfate, Oxalic acid, Sodium sulphite
 - Anhydrous organics and organometallics: Tetraethyl lead, Phenylmercuric chloride
 - Anhydrous inorganics and metal hydrides: Potassium hydride, Sodium hydride, Sodium metal, Potassium
 - Toxic organics: PCBs, Insecticides
 - Flammable organics: Hexane, Toluene, Acetone
 - Inorganics: Sodium carbonate, Potassium chloride
 - Inorganic cyanides: Potassium cyanide, Sodium cyanide, Copper cyanide
 - Organic cyanides: Cyanoacetamide
 - Toxic metals: Arsenic, Cadmium, Lead, Mercury

In either instance, it is critical that a) all hazard characteristics are reported, and b) that wastes that require special handling (i.e. explosives, acute HW, etc.) are clearly indicated.

For each lab pack entry created, complete the fields indicated in the Sample CERS Submittal in the following page.

Note: This guidance is intended for County of San Diego CUPA facilities and may differ from requirements in other jurisdictions.

Sample CERS Submittal

Chemical Identification and Physical Properties

A.1 Chemical Name

Common Name CAS Number

CERS Chemical Library ID

US EPA SRS ID

A.2 Physical State Solid Liquid Gas

A.3 Hazardous Material Type Pure Mixture Waste

Trade Secret Yes No

Chemical Hazard Classification

B.1 EHS Yes No

Radioactive Yes No

Curies

Fire Code Hazard Classes (by priority)

[View/Edit Additional Firecodes](#)

DOT Hazard Class

State Waste Code [Lookup Code](#) **B.2**

B.3 Federal Hazard Categories

- PHYSICAL: Flammable
- PHYSICAL: Gas Under Pressure
- PHYSICAL: Explosive
- PHYSICAL: Self-heating
- PHYSICAL: Pyrophoric
- PHYSICAL: Oxidizer
- PHYSICAL: Organic Peroxide
- PHYSICAL: Self-reactive
- PHYSICAL: Pyrophoric Gas
- PHYSICAL: Corrosive to Metal
- PHYSICAL: In Contact with Water Emits Flammable Gas
- PHYSICAL: Combustible Dust
- PHYSICAL: Hazard Not Otherwise Classified (HNOC)
- HEALTH: Carcinogenicity
- HEALTH: Acute Toxicity
- HEALTH: Reproductive Toxicity
- HEALTH: Skin Corrosion or Irritation
- HEALTH: Respiratory or Skin Sensitization
- HEALTH: Serious Eye Damage or Eye Irritation
- HEALTH: Specific Target Organ Toxicity
- HEALTH: Aspiration Hazard
- HEALTH: Germ Cell Mutagenicity
- HEALTH: Simple Asphyxiant
- HEALTH: Hazard Not Otherwise Classified (HNOC)

Inventory Location and Quantity

C.1 Chemical Location

Chemical Location Confidential EPCRA Yes No

Map # (Optional) Grid # (Optional)

C.2 Average Daily Amount

C.4 Largest Container

C.6 Days on Site

C.3 Maximum Daily Amount

C.5 Annual Waste Amount

C.7 Units gallons cubic feet pounds tons

Inventory Storage Information

D.1 Aboveground Tank Can Box Tank Truck, Tank Wagon

Underground Tank Carboy Cylinder Tank Car, Rail Car

Tank Inside Building Silo Glass Bottle Other

Steel Drum Fiber Drum Plastic Bottle

Plastic/Non-Metallic Drum Bag Tote Bin

D.2 Storage Pressure Ambient Above Ambient Below Ambient

D.3 Storage Temperature Ambient Above Ambient Below Ambient Cryogenic

Mixture Components

Hazardous Component Name	CAS Number	% by Weight	EHS	Additional Mixture Components
			<input type="radio"/> Yes <input type="radio"/> No	<div style="border: 1px solid gray; height: 100px; width: 100%;"></div>
			<input type="radio"/> Yes <input type="radio"/> No	
			<input type="radio"/> Yes <input type="radio"/> No	
			<input type="radio"/> Yes <input type="radio"/> No	
			<input type="radio"/> Yes <input type="radio"/> No	

E.2

Additional Chemical/Material Description

F. Additional Chemical Description Information

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Sample CERS Submittal Glossary

A. Chemical Identification and Physical Properties		
A.1	Common Name	Enter the appropriate description of the lab pack (e.g. “Lab Pack – Acidic Liquids”).
A.2	Physical State	Select “Solid”, “Liquid”, or “Gas”. CERS does not allow more than one physical state to be selected. Separate inventory items will need to be created for different physical states.
A.3	Hazardous Material Type	Select “Waste”.
B. Chemical Hazard Classification		
B.1	EHS (Extremely Hazardous Substance)	Select “Yes” or “No”. If the lab pack includes wastes that contain an EHS material, answer No to this field and follow instructions on section E below. (The definition of EHS can be found in 40 CFR, Part 355, Appendix A).
B.2	State Waste Code	Indicate the applicable waste code. CERS does not allow more than one 3-digit waste code to be entered. Lab packs typically have a State waste code of 551. However, if you report lab packs by hazard categories, use the most applicable waste code. State waste codes can be found on the Uniform Hazardous Waste Manifest, generator’s waste profile, or in 22 CCR Appendix XII .
B.3	Federal Hazard Categories	Select the Hazard Categories that are applicable to the wastes in the lab pack. You may provide specific information in the “Additional Chemical Description Information” box at the bottom of the page. If additional space is needed, you may upload a list of the wastes under “Miscellaneous State-required Document”. Note: This guidance is only for CERS reporting. Special requirements must be met when putting lab packs together including all applicable State and Federal laws.
C. Inventory Location and Quantity		
C.1	Chemical Location	Enter the location where waste is accumulated –required if subject to Hazardous Materials Business Plan (HMBP) and/or to the Emergency Planning and Community Right-to-Know Act (EPCRA).
C.2	Average Daily Amount	Enter the average volume of waste expected to be stored onsite at any one time.
C.3	Maximum Daily Amount	Enter the maximum volume of waste to be stored onsite at any one time.
C.4	Largest Container	Enter the volume of the largest container storing the waste.
C.5	Annual Waste Amount	Enter the estimated annual waste amount.
C.6	Days on Site	Enter the number of days in a year the waste is expected to be accumulated on site
C.7	Units	Select the unit of measure for the waste (gallons for liquids; cubic feet for gases; pounds or tons for solids).
D. Inventory Storage Information		
D.1	Storage Containers	Select all container types used to store the waste.
D.2	Storage Pressure	Indicate the pressure at which the waste is stored.
D.3	Storage Temperature	Indicate the temperature at which the waste is stored.
E. Mixture Components		
E.1	Hazardous Component Name	Use this section to enter any EHS materials included in the lab pack. Hazardous components of a mixture at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, are reportable.
E.2	Additional Mixture Components	Use this box if greater than five components are present in a mixture.
F. Additional Chemical/Material Description		
F.1	Use this section for any or all of the following: <ul style="list-style-type: none"> • Provide a list of acute and/or extremely hazardous waste included in the lab pack (by common name) • Provide a list of hazardous waste included in the lab pack (by common name) that require special handling (i.e. explosives, water reactive) 	

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