The following are the most common areas of non-compliance noted during inspections conducted by the Hazardous Materials Division. Conducting weekly environmental inspections at your facility can improve your regulatory compliance and assist you in reducing environmental problems in other areas as well. Review each section as you conduct your weekly inspection.

**Work and Accumulation Area**

- All hazardous waste containers and containers used for satellite accumulation of waste have properly completed hazardous waste labels. (See back for sample label)
- All hazardous waste containers and containers used for satellite accumulation of waste are fully closed at all times, except when adding or removing waste.
- All hazardous waste containers have been disposed of within allowable storage time. (See back for allowable accumulation times)
- All containers used for satellite accumulation of hazardous waste are managed yearly. (Satellite accumulation does not exceed one year).

**Hazardous Waste/Materials Recordkeeping**

- All employees handling hazardous materials/wastes have been properly trained. (Large Quantity Generators require training documentation)
- Hazardous Materials Business Plan (HMBP) has been updated, including chemical inventory, emergency contingency plan and annual carcinogen list. Updates to the inventory, emergency contact information and annual carcinogen list have been submitted to HMD as required, along with the Annual HMBP Certification Statement. If no updates are needed, HMBP Certification Statement is submitted annually indicating HMBP has been reviewed and is current. (Forms available on HMD website. Carcinogen list (Proposition 65 chemicals) available at: [http://www.oehha.ca.gov/prop65.html](http://www.oehha.ca.gov/prop65.html)).
- Hazardous Materials Business Plan/Emergency Contingency Plan has been implemented, maintained on site and available for review by employees and HMD Inspector.
- Copies of all hazardous waste manifests have been sent to the California Department of Toxic Substances Control (DTSC) P.O. Box 400, Sacramento, CA 95812-0400.
- TSDF signed copies of all manifest have been received and are available for inspection for a minimum of 3 years.

Please note that satisfying all the above does not guarantee compliance with all applicable laws, regulations or ordinances; this is not an all inclusive checklist. There may be other areas of environmental concern that you may chose to investigate further.

**Useful Contacts**

Hazardous Materials Division (619) 338-2231 [www.sdcounty.ca.gov/deh/hmd](http://www.sdcounty.ca.gov/deh/hmd)
California Department of Toxic Substances Control (DTSC) 1-800-72-TOXIC [www.dtsc.ca.gov](http://www.dtsc.ca.gov)
HAZARDOUS WASTE STORAGE AND DISPOSAL

Generator Status | Hazardous Waste Label
---|---

Small Quantity Generator (SQG)

Hazardous Waste Generation:
- Less than 1,000 kg (2,200 pounds) / month
- Less than 1 kg of acutely hazardous waste/month
- Waste quantity may never exceed 6,000 kg
- When generating less than 100 kg / month accumulation date starts when 100 kg is reached

Allowed Accumulation Time:
- 180 days or less, or
- 270 days if waste is transported 200 miles or more

Large Quantity Generator (LQG)

Hazardous Waste Generation:
- 1,000 kg (2,200 pounds) or more in any month
- 1 kg or more of acutely hazardous waste in any month

Allowed Accumulation Time:
- 90 days or less

Satellite Accumulation

Hazardous Waste Generation:
- 55 gallons or 1 quart of acutely or extremely HW

Allowed Accumulation Time:
- No longer than one year on site

Useful Approximations

<table>
<thead>
<tr>
<th>Hazardous Waste Generation</th>
<th>100 kg water</th>
<th>1000 kg water</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 kg water</td>
<td>27 gallons</td>
<td>270 gallons</td>
</tr>
<tr>
<td>Half-full 55-gallon drum</td>
<td></td>
<td>Five 55-gallon drums</td>
</tr>
</tbody>
</table>

Medical Waste Storage and Recordkeeping

http://www.dhs.ca.gov/ps/ddwem/environmental/med_waste/LawRegs/default.htm

- All medical waste containers are labeled with generator’s name, address and phone number when first put into use.
- All red biohazard bags are kept in rigid containers that are leak resistant and clean. Containers with tight fitting lids are used when transporting red biohazard bags throughout facility.
- Medical waste storage area is secured and posted with warning sign in both English & Spanish and is legible from a distance of 25 ft. {For specific wording see section 118310 of the Medical Waste Management Act (MWMA)}.
- Medical waste tracking documents for the past 2-3 years are available for review.
- Medical Waste Management Plan (MWMP) or equivalent is current and available for review. Large Quantity Generators of Medical Waste (generate 200 lbs/month or more) must initially submit a MWMP or equivalent to HMD and submit changes as they occur. Small Quantity Generators of Medical Waste (generate less than 200 lbs/month) must maintain a current MWMP or equivalent onsite.

HM-9635 (05/07) COUNTY OF SAN DIEGO CUPA DEPARTMENT OF ENVIRONMENTAL HEALTH – HAZARDOUS MATERIALS DIVISION