



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
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HOTELS & MOTELS

County of San Diego Hazardous Materials Guidance and Pollution Prevention

Hotels and motels may be subject to a variety of hazardous materials and environmental regulations depending on the amenities and services they provide. These may include the Hazardous Materials Business Plan (HMBP), Underground Storage Tank (UST), Aboveground Petroleum Storage Act (APSA), Hazardous Waste, and Medical Waste programs which are all administered by the County of San Diego, Department of Environmental Health Hazardous Materials Division (HMD). This document provides basic guidance on HMD programs and permit compliance requirements. For further information about HMD programs contact:

Hazardous Materials Division (858) 505-6880
Website: sandiegocounty.gov/content/sdc/deh/hazmat
Email: hmdutyeh@sdcounty.ca.gov

Hotel and motels with restaurants and pools may be subject to a Food Establishment or Pool Program permit with the Department of Environmental Health Food and Housing Division (FHD). For more information on those permits contact:

Food and Housing Division (858) 505-6900
Website: sandiegocounty.gov/deh/fhd
Email: fh dutyeh@sdcounty.ca.gov

Hotels and motels with emergency generators may be subject to a permit with the County of San Diego Air Pollution Control District (APCD). For more information on air quality permits contact:

Air Pollution Control District (858) 586-2600
Website: sdapcd.org
Email: airinfo@sdcounty.ca.gov

Hotels and motels are also subject to Fire Code requirements. Fire jurisdictions differ throughout the County of San Diego; for more information on Fire Code permits in your area contact your local fire authority. Within the City of San Diego contact:

City of San Diego Fire-Rescue Department (619) 533-4438
Website: sandiego.gov/fire/services/fireprev
Email: alegrej@sandiego.gov

WHEN IS A HAZARDOUS MATERIALS PERMIT REQUIRED?

This table lists common hotel and motel property features which may be subject to State laws and regulations enforced by the County of San Diego Hazardous Materials Division. If your property has any of these features or equipment, you may be required to obtain a permit. Some exemptions and exclusions do exist and depend on the quantity of the chemical stored, how the chemical is used, and the degree of hazard it poses. The requirements of each of the different State laws & regulations is explained in more detail in the pages following the table.

Table Key:

HM	Hazardous Materials
HMBP	Hazardous Materials Business Plan
APSA	Aboveground Petroleum Storage Act
HW	Hazardous Waste
MW	Medical Waste Management Act
UW	Universal Waste

Feature/Equipment	Hazardous Chemicals	Law/Regulation
*Pool, Spa, Fountain	Chlorines, Bromines, Acids	HM, HMBP
**Emergency Generator	Diesel, Natural Gas, Propane Waste Oil, Waste Antifreeze	HM, HMBP, APSA, HW
Elevators	Hydraulic Fluid	HM, HMBP, APSA
*Restaurant Outdoor Heaters	Carbon Dioxide, Propane	HM, HMBP
Laundry ***Car Wash	Detergents, Bleaches, Waxes	HM, HMBP
Boiler, Cooling Tower, Water Treatment System	Chemical Inhibitors, Softeners, Slaked Lime, Soda Ash, Algaecides	HM, HMBP
Maintenance	Paints, Paint Wastes, Aerosols, Fluorescent Lamps, Batteries, Electronic Wastes, Landscaping Chemicals, Pesticides	HM, HMBP, HW, UW
Forklifts, Welders	Propane, Oxygen, Acetylene, Argon, Carbon Dioxide, Helium	HM, HMBP
Housekeeping	Sharps, Pharmaceutical Waste	MW

* May also be subject to regulation by County of San Diego FHD

** May also be subject to regulation by County of San Diego APCD

*** May also be subject to regulation by City of San Diego Storm Water Division

HAZARDOUS MATERIALS (HM)

Hazardous materials include both hazardous substances and wastes (described below). Hazardous substances include all chemicals or products required by law to have a Safety Data Sheet (SDS) or placards during transportation. Examples commonly found at hotels or motels include swimming pool chemicals, laundry detergents, fuels, hydraulic fluids, paints, water treatment chemicals, and compressed gases. Hazardous materials must be managed according to the California Health and Safety Code (HSC) Chapter 6.95, section 25500 etc., and handlers must ensure that storage containers are in good condition and properly labeled. Handlers may also be subject to Hazardous Materials Business Plan (HMBP) requirements depending on the quantity of hazardous materials and hazardous wastes stored on site.

HAZARDOUS MATERIALS BUSINESS PLAN (HMBP)

With few exceptions, if you handle or store hazardous materials at or above the following thresholds, you are subject to HMBP requirements:

Solids:	500 pounds
Liquids:	55 gallons
Compressed Gases:	200 cubic feet

State law requires HMBP information to be submitted online through the California Environmental Reporting System (CERS). Help with CERS is available from HMD at 858-505-6990 from 8:00 AM to 3:00 PM, Monday through Friday. The CERS home page is: <http://cers.calepa.ca.gov/>

An HMBP is comprised of several components including facility information, hazardous materials inventory, site map, emergency response plan, and employee training plan. Your HMBP must be certified annually in CERS and your facility must have a designated emergency coordinator. Employees must be trained regarding hazardous materials management and emergency response procedures upon hire and receive refresher training at least annually. Employee training must be documented. Click here for HMBP guidance:

[Hazardous Materials Business Plan Instructions and Templates](#)

HAZARDOUS WASTES (HW)

Wastes are hazardous if they exhibit ignitable, corrosive, reactive, or toxic characteristics, or if they are listed as hazardous in federal or state regulations. Hazardous wastes are less commonly generated by hotels and motels and include items such as waste paint and used oil. Hazardous wastes are reportable in any amount and must be managed in compliance with California HSC Chapter 6.5 section 25100 etc. and Title 22 of the California Code of Regulations. Hazardous waste containers must be properly labeled and securely closed at all times except when waste is being added or removed. Disposal must be done within accumulation time limits by a California registered hazardous waste transporter and records must be maintained onsite for at least three years. Hazardous waste generators must maintain an active EPA Identification Number and train employees in hazardous waste management. Click here for more information for Small Quantity Hazardous Waste Generators: [Small Quantity Hazardous Waste Generator Information](#)

UNIVERSAL WASTES (UW)

Hotels and motels commonly generate Universal Wastes in the form of fluorescent light bulbs, common batteries (AA, AAA, C-cells, D-cells and button cell), electronic equipment, mercury thermostats, or non-empty aerosol cans. It is illegal to dispose of any of these items to the trash, including items abandoned by guests which must be disposed of properly by the facility. Commercial recyclers can also accept Universal Wastes. Click here for more information about Universal Wastes: [Universal Waste Information](#)

UNIVERSAL WASTE

Fluorescent Bulbs
Batteries
Aerosols
Electronics

SWIMMING POOLS, SPAS, AND FOUNTAINS

Pool chemicals such as chlorine and acid are hazardous materials. They are incompatible with each other and should be physically separated to prevent reactions. Because these chemicals are often stored in outdoor locations precautions should be in place to prevent storm water runoff contamination in the event of a spill. Releases of pool chemicals are particularly hazardous and may cause significant risk to public health and the environment. All spills and threatened releases must be reported immediately.

Click here for spill reporting instructions: [Spills and Release Reporting](#)



FUELS and PETROLEUM PRODUCTS

All fuels are hazardous materials including gasoline, diesel, and propane. Propane solely used for cooking or heating on the premises may be exempt from HMBP requirements under certain conditions. Emergency generators are often powered by fuel stored in an aboveground tank. If you have 1,320 gallons or more of petroleum products (shell capacity) you are subject to the Aboveground Petroleum Storage Act (APSA) and must implement a Spill Prevention Control and Countermeasures (SPCC) Plan. Click here for SPCC requirements:

http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_apsa.html



ELEVATORS

The two most common types of elevator systems are mechanical and hydraulic. Mechanical systems use a motor, cables, and counterweights, whereas hydraulic systems use a pump to move oil from a reservoir into a lift cylinder. Hydraulic fluid (a type of non-compressible oil used in elevator systems) is subject to HMBP reporting if the combined shell capacity of all petroleum containers and tanks over 55 gallon capacity on your property is 1,320 gallons or greater. Oil-filled electrical equipment such as transformers are included in this calculation. With some exceptions, if you store 1,320 gallons or more of petroleum products in aboveground containers, tanks, or equipment, you are subject to APSA and must implement an SPCC Plan. Click here for SPCC requirements:

http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_apsa.html



COMPRESSED GASES

Hotels may store compressed gases such as propane, welding gases, carbon dioxide, and emergency oxygen which are a hazard because of sudden pressure release, fire, and toxicity hazards. There are some exceptions for HMBP reporting of carbon dioxide if used solely for carbonated beverages and less than 6,000 cubic feet in gas cylinders or 3,500 cubic feet if cryogenic liquid in Dewars. There are also HMBP reporting exemptions for inert gases such as argon or nitrogen if less than 1,000 cubic feet. If you store more than one five-gallon cylinder of propane it is reportable.



LAUNDRY and CAR WASH CHEMICALS

Laundry chemicals include alkaline, acidic, and oxidizing detergents, neutralizers, brighteners, and softeners. Car wash chemicals include detergents, waxes, tire cleaners, and odor neutralizers. Most of these chemicals are hazardous materials; refer to the product safety data sheet (SDS) for specific hazard information. Some laundry chemicals may meet the criteria for an “irritant or sensitizer only” which have raised reporting thresholds.



WATER TREATMENT CHEMICALS

Hotels and motels with steam boilers, cooling towers, or water treatment systems may have corrosion, mineral scale deposit, and microbial growth inhibitors. Water softening chemicals include calcium hydroxide (slaked lime) and sodium carbonate (soda ash). Some of these chemicals are hazardous materials, others may qualify for a raised reporting threshold as an “irritant or sensitizer only”. Refer to the product SDS for specific hazard information.



PAINTS and WASTE PAINT

Some latex and most oil-based paints are hazardous materials and may be considered hazardous waste if discarded. Empty paint containers that are 5 gallons or less in size that are completely empty and dry, and empty aerosol cans free of propellant may be recycled or disposed of with solid waste. Recyclable leftover paint may be recycled for free at participating California Paint Care Program locations. Keep documentation of any waste you send offsite. To find a recycling location near you, visit the Paint Care website at: paintcare.org/drop-off-locations



HOUSEKEEPING WASTES

Housekeeping services may encounter hazardous items such as sharps and pharmaceutical waste abandoned by guests. Sharps include syringes, pen needles, intravenous needles, lancets, or blades. Pharmaceuticals include prescription medicines and over-the-counter drugs. Both sharps and pharmaceuticals abandoned by guests should be stored in a secure location in approved containers labeled with generator information. Disposal options include using a [California Licensed Medical Waste Transporter](#), a mail-back program, or taking the medical wastes to a collection site. Sites that accept limited medical wastes include Safe Medication Disposal Kiosks at local retail pharmacies (non-prescription medications and prescription pharmaceuticals), DEA sponsored [National Prescription Drug Take Back](#) events, and DEA [Controlled Substance Public Disposal Locations](#). Other alternative disposal options include encapsulation technologies which allow sharps disposal to solid waste. Click this link to learn more about alternative technologies for medical waste treatment approved by the California Department of Public Health: [Approved Alternative Medical Waste Treatment Technologies](#)



PERMIT COMPLIANCE

Hotels and motels subject to a hazardous materials permit with the County of San Diego HMD will undergo inspections by an Environmental Health Specialist to identify safety hazards and ensure compliance with existing State laws and regulations. The operator or owner of the hotel or motel must apply for a permit. Your inspector will also review the information you submit to CERS. Inspections are unannounced and conducted at intervals of one or two years, depending on the type of permit. Please contact us if you have any questions about the permit requirements and compliance with State law and County ordinance:



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