Common Violations & Hazardous Waste Requirements

Kelly Robertson
Environmental Health Specialist
Hazardous Waste Containers

- Must be labeled as “HAZARDOUS WASTE”
- Name & address of business
- Physical state and hazardous properties of waste
- Contents
- Accumulation start date
Date when 1st drop of waste goes in!
How to Keep a Clean, Readable Label on an Oily Drum?

Place the filled out label in a plastic baggie and duct tape it to the drum.
Waste Containers Must Be In Good Condition

Rusty Drum

The top is Bulging!!
HAZARDOUS WASTE CONTAINERS MUST BE KEPT CLOSED WHEN NOT DIRECTLY ADDING/REMOVING WASTE
Used Oil & Fuel Filters Label

DRAINED USED OIL AND GASOLINE FILTERS

ACCUMULATION START DATE ________
I CAN FIT ONE MORE!

The lid needs to be able to close completely.
Segregate used oil from used oil filters.

Drain filters completely!
What is “CALIFORNIA EMPTY”?

- **Pourable Liquid Containers:**
  - Empty is when there is no longer a pourable and / or spillable product from the container.

- **Solid/Semi-solid containers:**
  - Scrape out all contents.

- **Aerosol Cans:**
  - When the propellant and product are completely gone & there is no more ppssstttt…. 
Make sure these are CALIFORNIA EMPTY before putting in regular trash!
Lead Acid Batteries

- Store off of the ground on a rack or pallet.
- Put damaged batteries in a closed, leak-proof container (write the date).
- Contaminated ground will have to be removed and managed as hazardous waste.
Contaminated soil is now a **hazardous waste**.

**Use drip pans under leaking cars**
Spills Will Happen…

- Clean up spills RIGHT AWAY!
- Keep a Spill Kit or Absorbent near by
- Saturated Absorbent = HAZARDOUS WASTE!
  - Put saturated absorbent in waste container with Haz. Waste label.
Spills Will Happen…

Oil on lid

Anifreeze on lid.

VIOLATION!
Larger Spills

RELEASE REPORTING

Any significant release or threatened release must be reported IMMEDIATELY!

• First call 9-1-1
• Next call California Emergency Management Agency (CalEMA):
  1-800-852-7550
• Then call your local CUPA:
  619-338-2284
What violations do you see?
How to Determine your Generator Status

• Small Quantity Generator (SQG):
  – Generate between 220 and 2,200 pounds per month (approximately 27 to 270 gallons), and/or up to 1 kilogram (2.2 pounds) of acutely hazardous waste per month. *Less than 5-55 gallon drums total (all your wastes combined) per month.*

• Conditionally Exempt Small Quantity Generator (CESQG):
  – Generate less than 220 pounds (27 gallons) of H.W. per month. *Less than \( \frac{1}{2} \) drum total (all wastes combined) per month.*

• Large Quantity Generator (LQG) of H.W.:
  – Generate more than 2,200 pounds (270 gallons) and/or more than 1 kilogram (2.2 pounds) of acutely hazardous waste per month. *More than 5-55 gallon drums total (all your wastes combined) per month.*
Accumulation Storage Times

**Small Quantity Generators (SQGs):**

180 days from Accumulation Start Date (or 270 days *if* waste will be transported 200 miles or more).

**Conditionally Exempt Small Quantity Generators (CESQGs):**

Once 100 kg (~27 gallons or 200 lbs) has accumulated, your time clock begins and you have 180 days from that point to dispose of waste.

**Large Quantity Generators (LQGs):**

90 days from first date *any* amount of hazardous waste begins to accumulate.
Weekly Inspection
Title 22 CCR 66265.174; CFR 265.174

- Self check √
- On a **weekly** basis all hazardous waste accumulation areas must be inspected for spills & container condition:
  - Leaking?
  - Damage?
  - Rust?
  - Bulging?
  - Dimpling?
  - Oozing?
  - Crystals?
Weekly Inspections

• At this time, you should also check for:
  – Proper labels (complete? legible?).
  – Closed containers (with bung caps?).
  – Amount
  – Accumulation time
Aisle Space-

Must be sufficient to allow unobstructed movement of emergency personnel and equipment to any area to contain or control fires or spills.

Emergency personnel should not be expected to move heavy equipment, climb over tables, or crawl under equipment.
Tank vs. Container

Tank:
- Stationary Device
- If it has external piping, it is probably a tank...

Container:
- Portable Device
- Can be any size as long as it is designed to be portable.
Hazardous Waste Tank Requirements for LQGs

- Document daily tank system inspections
- Professional Engineer Assessment OR AST Certification & Engineering Assessment Exemption (if applicable)
- Other requirements pursuant to 66262.34(a)(1)(A)
Empty Containers

Containers larger than 5 gallons:
• Clearly label with the date emptied
• Manage within one year
  • Scrap Metal
  • Send Back to Supplier
  • RECYCLE if possible!

5 gallon or smaller:
• Can go to regular trash if “California Empty”
Shop Rags

• Oily rags must be handled by an industrial laundry service.
• OR managed as hazardous waste
• Store in closed containers
Universal Waste

- Fluorescent lamps
- Batteries (not lead-acid)
- Electronic Devices
- Aerosol cans (non-empty)
- Mercury Switches
Universal wastes **cannot** go to trash

Go to [www.earth911.org](http://www.earth911.org) for recycling options in your area.

Package Universal Wastes safely, to minimize risk of a release to environment.
Employee Training

At a minimum you must address these topics:

• Procedures for handling hazardous materials, including hazardous wastes.

• Procedures for coordinating with emergency response agencies.

• Use of emergency response equipment and materials.

• Emergency Response Plan implementation.
Employee Training

**Training Frequency:**
- Within 6 months of hire.
- “Refresher” training annually.

**Documentation:**
- Large Quantity Generators (LQGs) must document trainings with employee signatures. Include the job descriptions for employees handling hazardous waste. Keep documentation for at least 3 years after employee leaves business. 66265.16(d)&(e)

- Small Quantity Generators (SQGs) are required to do employee training, however documentation is not required.
**EMPLOYEE TRAINING DOCUMENTATION**

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

<table>
<thead>
<tr>
<th>TRAINING TOPIC</th>
<th>TRAINING TIME</th>
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<tr>
<td>□ Procedures for handling hazardous materials, including hazardous wastes.</td>
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<td>□ Procedures for coordinating with emergency response agencies.</td>
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<tr>
<td>□ Use of emergency response equipment and materials under the business control.</td>
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<tr>
<td>□ Emergency Response Plan implementation.</td>
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THE FOLLOWING PERSONS ATTENDED SESSION: 

<table>
<thead>
<tr>
<th>NAME</th>
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*Businesses may use this form or any other format that contains the same information to document training for the Hazardous Materials Business Plan.
In Review

- Keep hazardous wastes closed and labeled.
- Ensure containers of hazardous materials are “California Empty” prior to trash.
- Don’t store hazardous wastes longer than your accumulation time limit.
- Conduct weekly inspections to ensure you are in compliance.
- Train employees about hazardous waste, emergency response, and how to prevent unnecessary pollution.
QUESTIONS?