

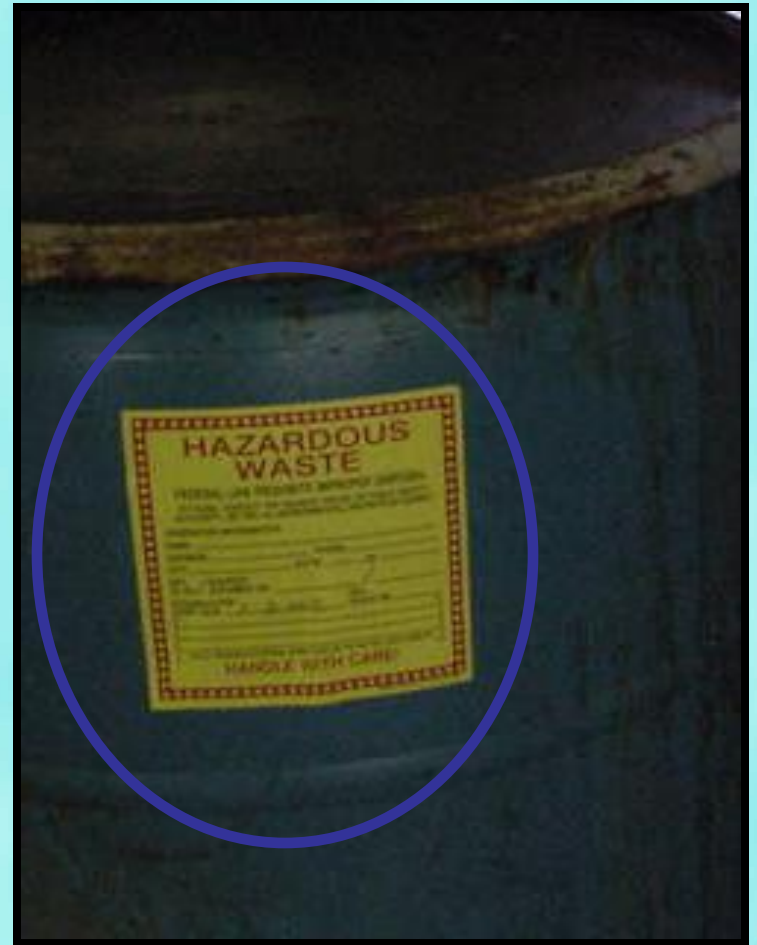
Common Violations & Hazardous Waste Requirements



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



HAZARDOUS WASTE

STATE & FEDERAL LAW PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY,
THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR
THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

PROPER D.O.T. SHIPPING NAME: _____ UN OR NA #: _____

GENERATOR'S NAME AND ADDRESS:

NAME: _____

ADDRESS: _____

CITY: _____ STATE: CA ZIP: _____

GENERATOR'S EPA ID NUMBER: _____

MANIFEST TRACKING
NUMBER: _____

ACCUMULATION START DATE:

____ / ____ / ____

CA WASTE NUMBER: _____

EPA WASTE NUMBER: _____

CONTENTS, COMPOSITION: _____

PHYSICAL STATE:

SOLID LIQUID

HAZARDOUS PROPERTIES:

FLAMMABLE TOXIC
 CORROSIVE REACTIVE OTHER

COMPLETE
FOR
STORAGE

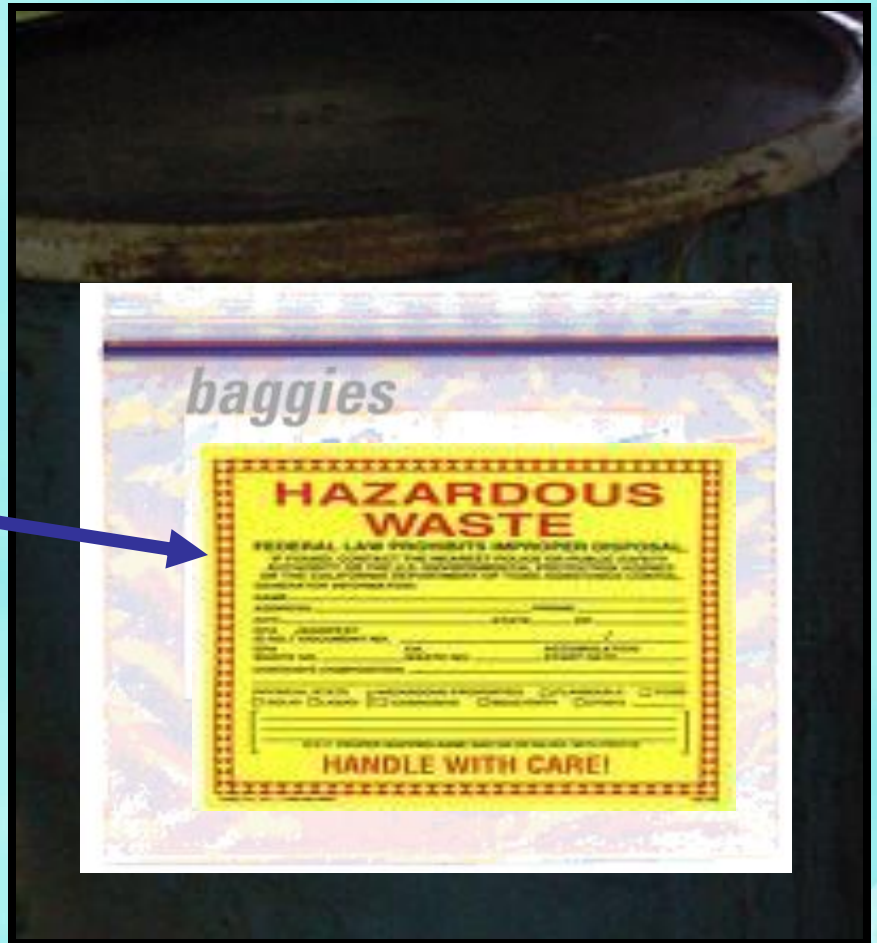
HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

COMPLETE
FOR
TRANSPORT

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



HAZARDOUS WASTE CONTAINERS MUST BE KEPT **CLOSED** WHEN NOT DIRECTLY ADDING/REMOVING WASTE



Used Oil & Fuel Filters Label



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....*



POURABLE!



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

VIOLATION!

Anifreeze on lid.

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 ½ 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



Hazardous Waste Storage

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...



TANK

Container:

- Portable Device
- Can be any size as long as it is designed to be portable.




ON WHEELS

PORTABLE CONTAINER

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)

	COUNTY OF SAN DIEGO	UPF PERMIT # _____
		DATE _____
AST CERTIFICATION & ENGINEERING ASSESSMENT EXEMPTION NOTIFICATION FOR LARGE QUANTITY GENERATORS		TANK CAPACITY _____
		CONTENTS _____
BUSINESS NAME _____		SECONDARY CONTAINMENT TYPE _____
		YEAR INSTALLED _____
ADDRESS _____		U/L APPROVED <input type="checkbox"/> Yes <input type="checkbox"/> No
		TANK ID (if applicable) _____
CITY/ZIP _____		SPECIALIST _____
		DATE OF REQUEST _____

I certify that the aboveground used oil/waste antifreeze tank system meets the requirements of the California Code of Regulation (CCR) for exemption from the Professional Engineering Assessment [reference Title 22 CCR section 66265.192(j)].

Owner/Operator Signature: _____ Print Name: _____ Date: ____ / ____ / ____

The Local Fire Marshal installation, usage, and design approval are attached, OR The Local Fire Marshal has reviewed this aboveground tank system for conformance with applicable regulations.

Fire Marshal's Approval Signature: _____ Print Name: _____ Date: ____ / ____ / ____

The Hazardous Materials Division (HMD) conditionally approves the use of the used oil/waste antifreeze aboveground storage tank system as long as you comply with all of the following terms and conditions:

REQUIRED TERMS AND CONDITIONS

1. The aboveground tank, installed after July 1, 1991, must contain used oil (as defined in HSC section 25250.1) or waste antifreeze only (a non-RCRA waste) and has limited aboveground piping within containment to handle a spill or leak.
2. The local Fire Marshal approved and/or permitted the installation, usage, and design per municipal codes and the tank operator maintains documentation supporting this requirement.
3. The primary tank is surrounded with greater than 100% secondary containment.
4. If the tank system is exposed to precipitation, the secondary containment must, in addition to the requirement of item 3 above, be able to handle a 25 year, 24 hour rainfall event, with no intrusion or flooding problems. To prevent such problems, the HMD strongly advises that the tank system be completely covered following all local building and zoning requirements.
5. The facility must have a written leak detection program and daily inspection logs on-site as required in 22 CCR sections 66265.194-195 for review by HMD inspectors. The facility operator must ensure that appropriate controls and practices are in-place at all times to prevent spills, leaks, or overflows from occurring. The secondary containment should be kept empty and dry, except when there is a leak or a spill, at which time the secondary containment must be thoroughly cleaned out within 24 hours. The cause of a leak or spill would need to be determined and corrective actions taken (refer. 22 CCR section 66265.196).
6. The tank must be installed and maintained on a non-permeable surface, i.e., concrete (in good repair) or sealed asphalt (in good condition).
7. The facility should maintain a photocopy of this notification on-site to show to an inspector during facility inspections.

Provided you do not change the configuration or location of the tank system, this exemption is good for the service life of the tank. Before you

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 WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____



Universal wastes **cannot** go to trash

Go to 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.

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?

