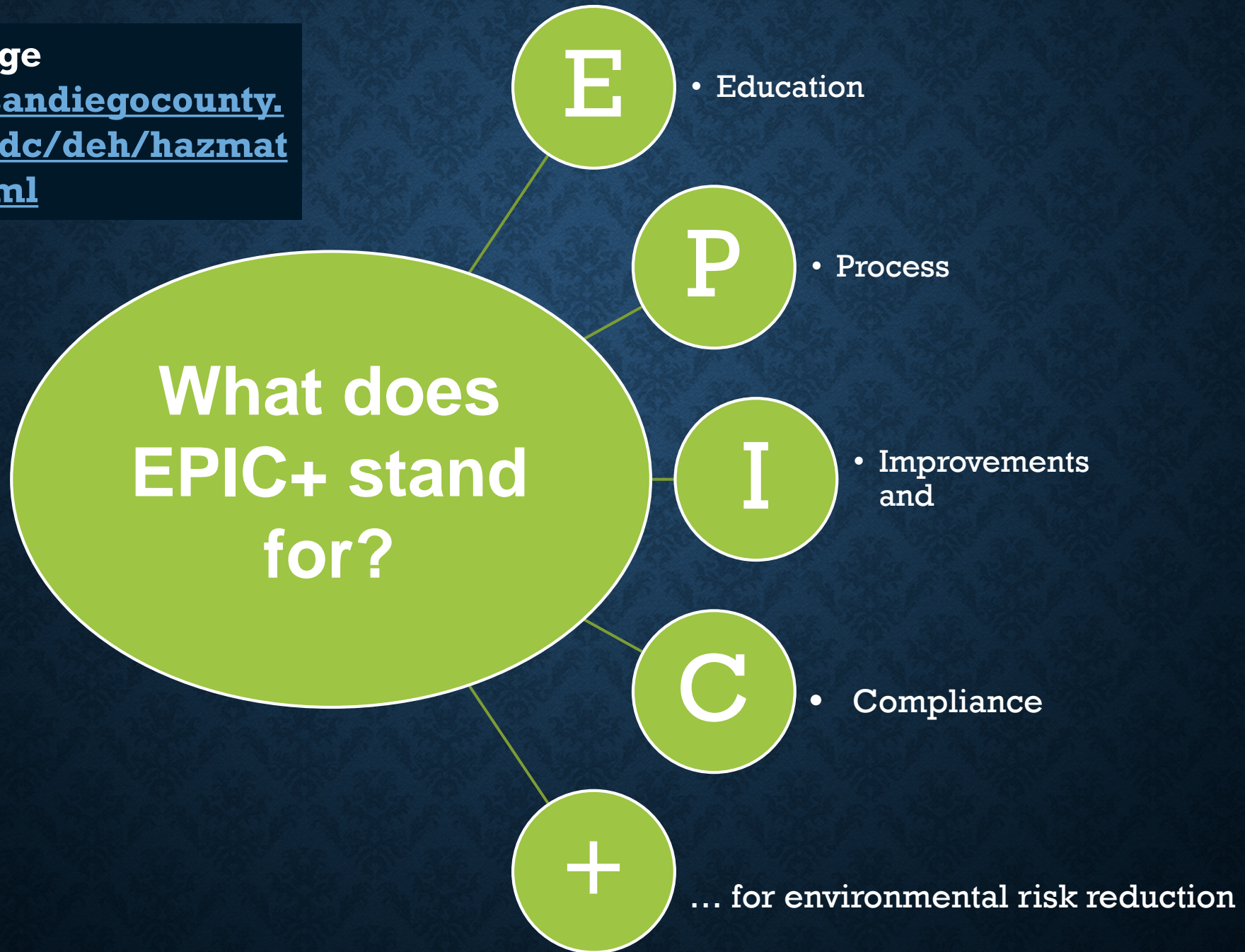


Section 1: Introduction

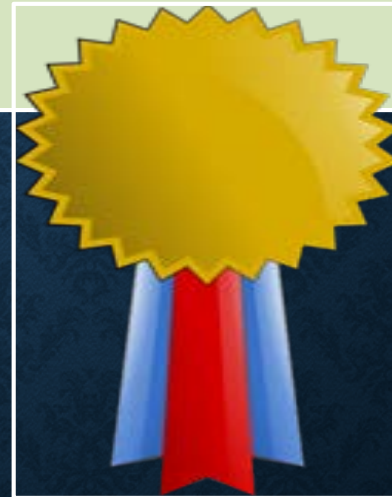
EPIC+ Webpage

https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_epic.html



Purpose of the EPIC+ Program

**To reduce the most common
hazardous materials,
hazardous waste, and medical
waste violations found at
biotech facilities.**





EPIC+ GOALS!



Demonstrate that education and outreach can be effective tools in obtaining compliance from the regulated community



Establish a risk-based inspection process to assist in directing resources to areas of higher risk and importance

EPIC+ PROGRAM PARTICIPATION

Maintain a standard of compliance during routine HMD inspections

- **Facilities must have 2 full HMD inspections, or parent company must be eligible**
- **Scoring guidelines are on the page two of the application**

Facility employee must complete annual EPIC+ training

- **A consultant may NOT undergo this training on your facility's behalf**

IMPORTANT REMINDER!

The facility is responsible for maintaining eligibility and demonstrating compliance during inspections.

Outside consultants will not be the only point of contact during emergencies at your facility.

Purpose of this Online Training

Increasing compliance with hazardous materials, hazardous waste, and medical waste requirements


To supplement the site-specific training programs already in place at your facility

Awareness of common violations found at biotech facilities

If your facility is new to the program,
you **must meet all the requirements and submit an application.**

This application can be found on our webpage, along with additional EPIC+ program information

https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_epic.html


County of San Diego
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
5500 OVERLAND AVE, SAN DIEGO, CA 92123
(858) 505-6657 <http://sdcdeh.org>
EPIC+ Application
EDUCATION, PROCESS IMPROVEMENTS, AND COMPLIANCE FOR ENVIRONMENTAL RISK REDUCTION
Biotech and Lab Research & Development Facilities

A. SITE INFORMATION			
Business Name: _____		UPFP Number: _____	
Site/Facility Address: _____		CA _____	
Street Number	Street Name	City	State Zip Code
B. APPLICANT INFORMATION			
Contact Person: _____		Title: _____	
Last Name	First Name	M.L.	
Telephone #: (____) _____		CONTACT PERSON MUST BE FACILITY EMPLOYEE AND CANNOT BE A CONSULTANT OR VENDOR FOR THE FACILITY	
E-Mail Address: _____			
C. NAME OF EMPLOYEES THAT ATTENDED SEMINAR OR COMPLETED ONLINE TRAINING			
Name: _____		Seminar/Online Training Date: ____/____/____	
Name: _____		Seminar/Online Training Date: ____/____/____	
TRAINED PERSONNEL MUST BE EMPLOYEE(S) AND CANNOT BE A CONSULTANT OR VENDOR FOR THE FACILITY			
D. COMPLIANCE HISTORY (INDICATE NUMBER OF VIOLATIONS RECEIVED)			
Inspection Date: ____/____/____	Class I: ____	Class II: ____	Minor: ____
Inspection Date: ____/____/____	Class I: ____	Class II: ____	Minor: ____
Date of last HMBP Certification (if applicable): ____/____/____			TO BE ELIGIBLE FOR EPIC+ EACH INSPECTION MUST SCORE FEWER THAN 15 POINTS (SEE REVERSE)
E. CERTIFICATION			
As the business representative I certify that this business meets and will continue to meet all the Performance Standards outlined on the reverse of this page. I understand that failure to comply with these standards will trigger a return to the 24-month inspection interval and a standard fee schedule.			
Print Name: _____		Job Title: _____	
Signature: _____		Date: ____/____/____	
Note: A new application must be submitted within 30 days whenever there is a significant change in information, facility location, ownership, and/or EPIC+ trained employee. Failure to resubmit may result in cancellation of the EPIC+ status.			
OFFICE USE ONLY			
Received by Specialist: _____ Date: ____/____/____		Reviewed by Supervisor: _____ Date: ____/____/____	
<input type="checkbox"/>	CERS Certification	<input type="checkbox"/>	Approved
<input type="checkbox"/>	Compliance history	<input type="checkbox"/>	Not Approved
<input type="checkbox"/>	Training completed		

HM-9155 (8-17)

END OF SECTION

Section 2: Program Implementation and Compliance


SECTION 2 OVERVIEW:

1. Violation Classification

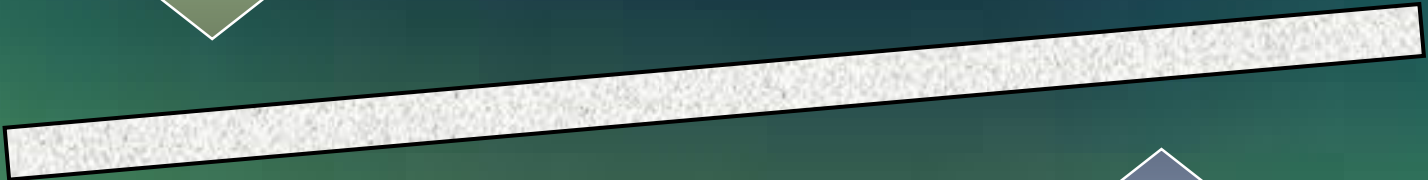
2. Return to Compliance

3. Enforcement

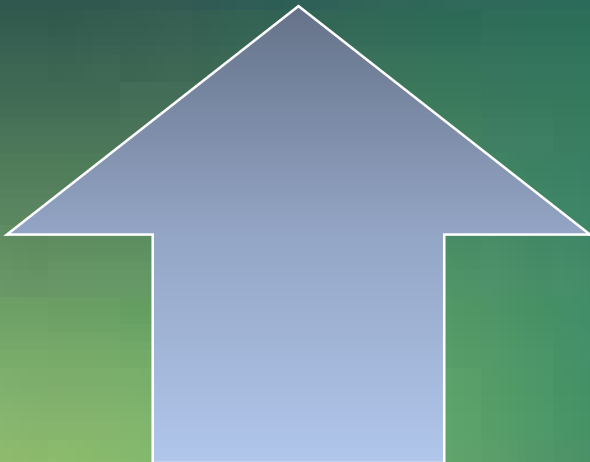
VIOLATION CLASSIFICATION:



The circumstances surrounding every violation vary depending on a multitude of factors, which will impact the violation classification.



Not every violation poses the same threat, but all require follow-up and correction.



Key Components of Classifying a Violation:



VIOLATION CLASSIFICATION

- Class I Violation
- Class II Violation
- Minor Violation

HSC 25404, 25110.8.5, 25117.6 & Title 22 66260.10



Class I Violations:

Class I Violations are cited on a "Notice of Violation"



COUNTY OF SAN DIEGO NOTICE OF VIOLATION

FACILITY NAME: **BIOTECH BIOTECH BIOTECH**
ADDRESS: **5555 CUPA WAY**
CITY/ZIP: **SAN DIEGO /92101**

OWNER'S NAME **COSD HAZARDOUS MATERIALS** CITY/ZIP **SAN DIEGO /92101**
ADDRESS **5555 CUPA WAY** PHONE _____

INSPECTION DATE: **01/17/2018** PAGE **1** OF **8**
RECORD ID #: **DEH2013-HUPFP-000309**
TIME START: _____ END: _____
SPECIALIST: **The Inspector**
INSPECTION CONTACT: **Mr. EHS**
TITLE: **Site Manager**
PHONE: _____
E-MAIL: _____

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations. This notice requires a formal written response and corrective action within the times specified.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: TITLE:

INTRODUCTION:

Components of a Class I Violation (one or more of the following)

Willful

Intentional

Negligent

Knowingly (or should have known)

Chronic Violations

Recalcitrant Violator

**Class I Violation:
Significant Threat**

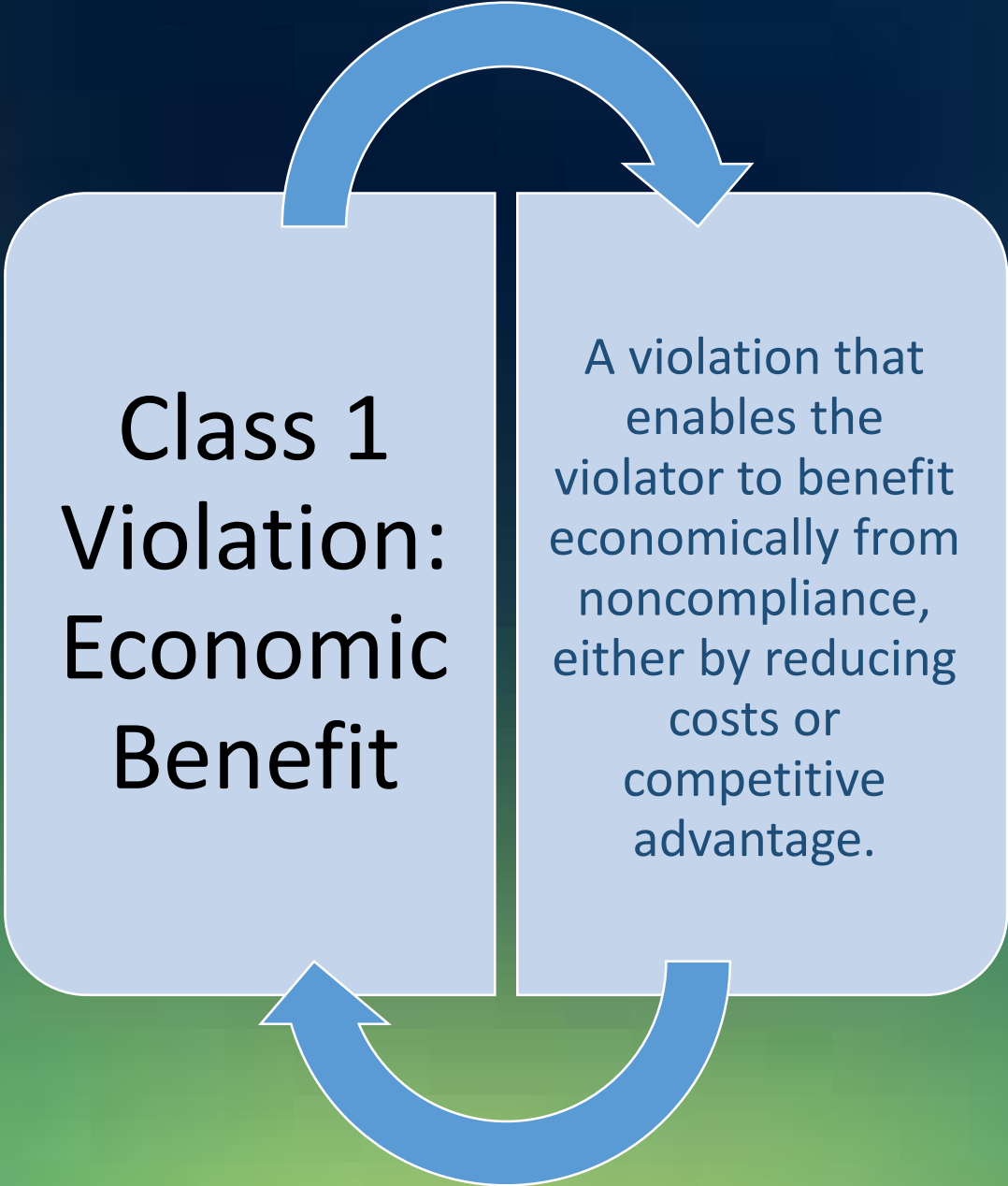
**Represents a
significant
threat to
human health
or safety or the
environment
due to the:**

**1) Volume of
the waste**

**2) Relative hazard
of the waste**

**3) Proximity
of population
at risk**





The diagram consists of a light blue rounded rectangle divided into two vertical panels. The left panel contains the text 'Class 1 Violation: Economic Benefit'. The right panel contains a definition: 'A violation that enables the violator to benefit economically from noncompliance, either by reducing costs or competitive advantage.' Two blue curved arrows connect the panels: one at the top pointing from left to right, and one at the bottom pointing from right to left, forming a circular flow.

Class 1 Violation: Economic Benefit

A violation that enables the violator to benefit economically from noncompliance, either by reducing costs or competitive advantage.

Violations can Escalate in Classification

“Chronic”

- Defined as a pattern of behavior. Violations of the same requirement identified in two consecutive inspections may be considered chronic

“Recalcitrant”

- Defined as person/business who actively refuses to comply with the regulatory requirements or who has engaged in a pattern of neglect or disregard for statutory or regulatory requirements.

Disclaimer!



Violations discussed throughout this training do not encompass ALL violations that may be cited during an inspection.

Refer to relevant codes of law or violation checklists included in your inspection reports for more information.

Class I Violation Examples

Class I Violation: Failed to notify CUPA of onsite hazardous waste treatment per Tiered Permitting requirements



Class I Violation: Unauthorized disposal of hazardous waste (illegal disposal)



Class I Violation Examples

Class I Violation: Unlawful transportation of hazardous waste (shipping hazardous waste without a hazardous waste manifest or not using a Cal. registered hazardous waste hauler)



Class I Violation: Did not immediately report release or threatened release





MINOR VIOLATION

Does not pose a significant threat to human health, safety, or the environment.

Components of a Minor Violation

Not Willful

Not Negligent

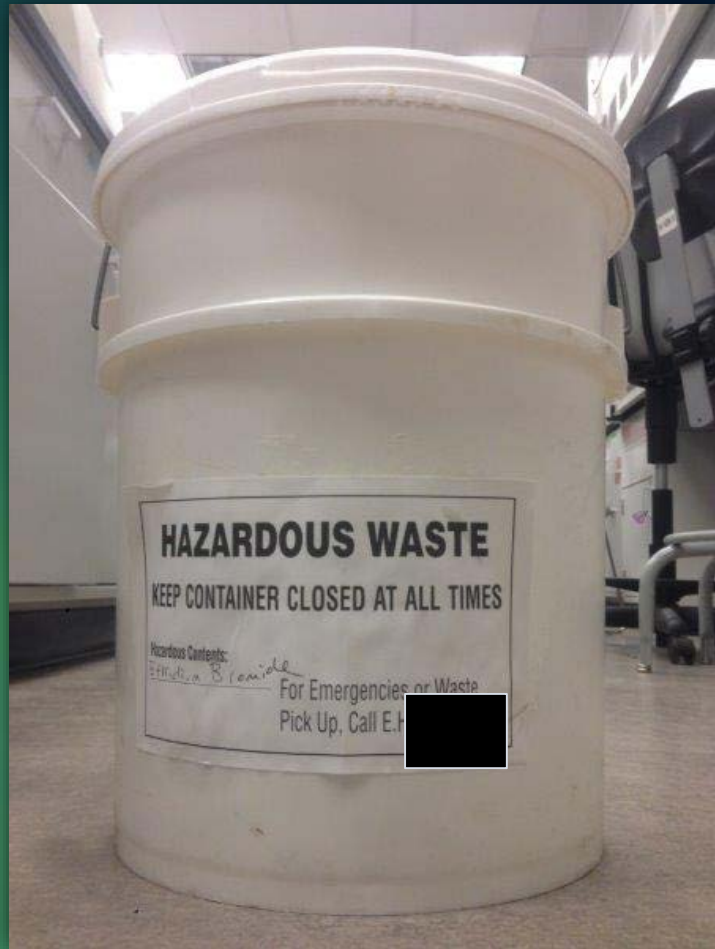
Not Knowing

Not Chronic

Not from a Recalcitrant Violator

NOT A CLASS II VIOLATION

Minor Violation Example



MINOR VIOLATION:
One low-risk hazardous
waste container with
incomplete hazardous
waste label

**Hazardous waste label is
attached but missing some
required components**

Minor Violation Example

Please print or type. (Form designed for use on 60-lb (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number

5. Generator's Name and Mailing Address
Generator's Site Address (if different from mailing address)

Generator's Phone
6. Transporter 1 Company Name
U.S. EPA ID Number
7. Transporter 2 Company Name
U.S. EPA ID Number
8. Designated Facility Name and Site Address
U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
1.								
2.								
3.								
4.								

14. Special Handling Instructions and Additional Information

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of the consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.21(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator/Offeror's Printed/Typed Name
Signature
Month Day Year

16. International Shipments: Import to U.S. Export from U.S. Port of entry/exit:
Transporter signature (for exports only):
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name
Signature
Month Day Year
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication: Space Quantity Type Residue Partial Rejection Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report/Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a.
Printed/Typed Name
Signature
Month Day Year

EPA Form 8700-22 (Rev. 2-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

MINOR VIOLATION: One TSDf signed manifest not available for review during inspection

Completely filled out manifest should be available for review during inspection including TSDf signature located here "cradle to grave"

Minor Violation Example

**MINOR VIOLATION:
Annual
carcinogen/reproductive
toxin list not submitted
through CERS**

Permit #:

Date:

**SAN DIEGO COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
Annual Carcinogen and Reproductive Toxin Reporting List**

Business Name:

Business Address:

Business Owner or Operator:

Please complete the following by entering the chemical name in the chemical name column and then place a check in the quantity column that most closely estimates the amount on hand. If measured by volume, check the appropriate gallon column(s). If measured by weight, check the appropriate pound column(s). If the chemical is a trade secret, you should check the trade secret box. For example, if you have one pint of benzene you would write benzene in the chemical name column and place a check in the <1-gallon column.

(PLEASE NOTE: the symbol < means less than).

Chemical Name	<1 gal.	<1 lb.	<10 gal.	<10 lbs.	<55 gal.	<500 lbs.	Trade Secret
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Submitted in the “locally
required documentation
section” in CERS**

Minor Violation Corrected on-site

A minor violation discovered during an inspection may be corrected by the facility during the inspection.

The minor violation will be documented in the inspection report, but no further follow-up action will be required.

BE ADVISED: If similar violations are discovered during future inspections, the violation is now repeated and may be escalated to Class II or above.

A Class II Violation is defined by what it is NOT:

**Not a Minor
Violation**

**CLASS II
VIOLATION**

**Not a Class I
Violation**

Generally a Class II Violation can be:

Repeat Minor Violation from previous inspections

A serious violation that is not severe enough to be defined as a Class I

A Minor violation that failed to be corrected within specified time frames

Violations that are cited repeatedly throughout a facility's inspection history

Violations demonstrating a pattern of negligence

Class II Violation Example

Class II Violation: Failed to re-certify the facility's Hazardous Materials Business Plan (HMBP) in CERS & significant changes to HMBP were observed during the inspection

More than one year since last re-certification

CERS Business Home Submittal

Home: Dans Farm
Home

Common Tasks


- Start Facility Submittal**
CERS will help walk you through the forms and documents required for your facility(s).
- Add Facility**
If you are new to CERS, or must add new facility(s), the Add Facility pages will ensure you get started correctly!
- People/Users**
You can allow/manage other people in your business who need to view or edit your facility reporting.
- Contact Your Local Regulator(s)**
Find contact information for your facility's local regulator(s).

Facilities Add Facility... Search...

Facility Name	Address	Last Submittal	CERS ID
Dans Farm	260 Hamilton Ave, Palo Alto 94301	10/2/2015	0160774

Start / Edit Submittal

Class II Violation Example



A photograph of a laboratory storage room. The room is filled with metal shelving units on both sides, densely packed with numerous glass bottles of hazardous materials. The bottles have white labels with black and red text. The room is lit by several pendant lights hanging from the ceiling. In the center of the room, there is a doorway leading to another area. A red text box is overlaid on the image, containing the text: "Class II Violation: Failed to submit in CERS a reportable hazardous material/waste after more than 30 days of storage/generation".

Class II Violation: Failed to submit in CERS a reportable hazardous material/waste after more than 30 days of storage/generation

Class II Violation Example

Class II Violation: Medical Waste Management Plan not established and not submitted to the CUPA (if Large Quantity Medical Waste Generator)

Class II Violation: Failed to provide or update primary emergency contact's information in CERS within 30 days of a significant change


County of San Diego
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 P.O. BOX 129261, SAN DIEGO, CA 92112-9261
 (858) 505-6880 FAX (858) 505-6848
<http://www.sdcdeh.org>


Medical Waste Management Plan

Facility Information	
Business Name	Unified Program Facility Permit #
Type of Business	Date
Street Address	City/ZIP
Person Responsible for implementing the Medical Waste Management Plan (MWMP)	
Name	
Title	Phone
Types of medical wastes (MW) generated	
<input type="checkbox"/> MW Sharps - e.g., needles, blades, scalpels, or broken glass or syringes contaminated with biohazardous waste. (human or animal) Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Blood or blood products - liquid blood or blood products, or other regulated body fluids, or articles contaminated with liquid blood or body fluids. Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Laboratory wastes - infectious specimens or microbiological cultures, stocks of infectious agents, live and attenuated vaccines, biologicals, and culture media. Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Pathology waste - human or animal tissues suspected to be infectious to humans Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Liquid or semi-liquid biohazardous laboratory waste - treated on site by chemical disinfection* and discharged to sewer. Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Isolation waste - waste contaminated with excretion, exudates or secretions from humans or animals who are isolated due to highly communicable diseases. Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> Trace chemotherapeutic waste Estimated monthly amount <input type="text"/> lbs	<input type="checkbox"/> Contaminated animals w/Highly communicable animal carcasses, body parts, tissues or fluids suspected to be contaminated by agents which are contagious. Estimated monthly amount <input type="text"/> lbs
<input type="checkbox"/> California-regulated pharmaceutical waste (non-RCRA, non-radioactive)	<input type="checkbox"/> Other (specify): _____

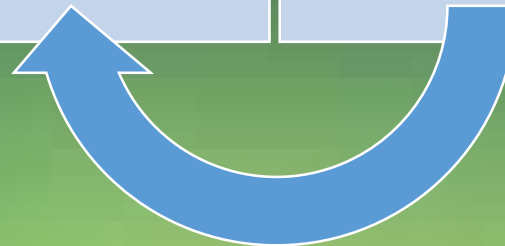




**RETURN TO COMPLIANCE
PROCEDURES**

After your facility has been cited violation(s) what is the next step?

**RETURN
TO
COMPLIANCE**



Return to Compliance (RTC) Process:

Step 1:

Review the corrective actions prescribed in the report



Step 2:

Correct the violations within the timeframes on the report



Step 3:

Complete/submit the “Corrective Action Form to Document Return to Compliance” & include supporting documentation requested

If corrective actions are not received within specified time frames...



Re-inspection and Re-inspection fees may be apply to determine compliance ...



Violations may be escalated



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME: Biotech
 ADDRESS: 123 Biotech Way
 CITY/ZIP: SAN DIEGO /92037

INSPECTION DATE: 05/09/2018 PAGE 1 OF 2
 RECORD ID #: DEH2013-HUPFP-000307
 TIME START: _____ END: _____
 SPECIALIST: _____
 INSPECTION CONTACT: Darth Vader
 TITLE: Sith
 PHONE: _____
 E-MAIL: _____

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

Yes	N/A		Yes	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	Unified Program Facility Permit Current	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Contingency Plan Available <input type="checkbox"/> LQG <input type="checkbox"/> SQG
<input type="checkbox"/>	<input type="checkbox"/>	Hazardous Materials Business Plan Available	<input type="checkbox"/>	<input type="checkbox"/>	Employee Training Records Available
<input type="checkbox"/>	<input type="checkbox"/>	Employee Training is Adequate	<input type="checkbox"/>	<input type="checkbox"/>	Universal Waste Managed Properly
<input type="checkbox"/>	<input type="checkbox"/>	Waste Disposal Records Available for Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste Containers <input type="checkbox"/> Closed <input type="checkbox"/> Labeled
<input type="checkbox"/>	<input type="checkbox"/>	Emergency Contacts Current <input type="checkbox"/> Updated today	<input type="checkbox"/>	<input type="checkbox"/>	Waste Containers in Good Condition
<input type="checkbox"/>	<input type="checkbox"/>	Chemical Inventory/Map Current <input type="checkbox"/> Updated today			Permit Expires On <u>09/30/2014</u>

Re-Inspection Fees May Apply When:




\$

A second visit is needed to verify compliance when no follow up was received



RE-INSPECTION FEES



REFER TO THE
FEE SCHEDULE
POSTED ON
HMD'S
WEBSITE FOR
CURRENT FEES

A second visit is needed because the facility denied consent to inspect



\$

Two types of inspection reports:



Notice to Comply



Notice of Violation

Notice to Comply

A "Compliance Inspection Report" with Minor or Class II Violations cited serves as a Notice to Comply

Documentation of corrective actions are due within the timeframes prescribed (usually 30 days)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME: **BIOTECH BIOTECH BIOTECH**
ADDRESS: **5555 CUPA WAY**
CITY/ZIP: **SAN DIEGO /92101**

INSPECTION DATE: **01/17/2018**
RECORD ID #: **DEH2013-HUPFP-0**
TIME START: _____ E
SPECIALIST: **The Inspector**
INSPECTION CONTACT: **Mr. EHS**
TITLE: **Site Manager**
PHONE: _____
E-MAIL: _____

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). **This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6.** This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

Yes	N/A		Yes	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	Unified Program Facility Permit Current	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Contingency Plan Available <input type="checkbox"/> LQG <input type="checkbox"/> SQG
<input type="checkbox"/>	<input type="checkbox"/>	Hazardous Materials Business Plan Available	<input type="checkbox"/>	<input type="checkbox"/>	Employee Training Records Available
<input type="checkbox"/>	<input type="checkbox"/>	Employee Training is Adequate	<input type="checkbox"/>	<input type="checkbox"/>	Universal Waste Managed Properly
<input type="checkbox"/>	<input type="checkbox"/>	Waste Disposal Records Available for Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste Containers <input type="checkbox"/> Closed <input type="checkbox"/> Labeled
<input type="checkbox"/>	<input type="checkbox"/>	Emergency Contacts Current <input type="checkbox"/> Updated today	<input type="checkbox"/>	<input type="checkbox"/>	Waste Containers in Good Condition
<input type="checkbox"/>	<input type="checkbox"/>	Chemical Inventory/Map Current <input type="checkbox"/> Updated today			Permit Expires On <u>09/30/2014</u>

CONSENT TO CONDUCT INSPECTION GRANTED BY: _____ TITLE: _____

Notice of Violation



COUNTY OF SAN DIEGO

NOTICE OF VIOLATION

INSPECTION DATE: 01/17/2018 PAGE 1 OF 8

RECORD ID #: DEH2013-HUPFP-000309

TIME START: _____ END: _____

SPECIALIST: The Inspector

INSPECTION CONTACT: Mr. EHS

TITLE: Site Manager

PHONE: _____

E-MAIL: _____

FACILITY NAME: BIOTECH BIOTECH BIOTECH

ADDRESS: 5555 CUPA WAY

CITY/ZIP: SAN DIEGO /92101

OWNER'S NAME COSD HAZARDOUS MATERIALS CITY/ZIP SAN DIEGO /92101

ADDRESS 5555 CUPA WAY PHONE _____

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations. This notice requires a formal written response and corrective action within the times specified.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: TITLE:

INTRODUCTION:

If Class I Violations are cited, they will be documented on a **Notice of Violation**. This signals the initiation of potential **formal enforcement**

Enforcement proceedings may commence, or the enforcement case will be referred to another agency.

Penalties can be imposed for each day in violation. Reinspection fees will be charged if additional inspections are required to determine compliance

END OF SECTION

**Section 3: Hazardous Materials
and the Hazardous Materials
Business Plan (HMBP)**

Section 3: Hazardous Materials Overview

Purpose of Hazardous Materials Regulations

Hazardous Materials Reportable Thresholds

Hazardous Materials Exemptions

Common Violations for Hazardous Materials

Record Keeping Requirements

Purpose of Hazardous Materials Regulations

Your Hazardous Materials Business Plan (HMBP) serves to provide critical information to emergency responders and ...


Ensure that facility personnel are familiar with emergency response procedures, including evacuation and coordination with emergency responders in case of spills or releases of hazardous materials

**HMBP is the
facility's
responsibility**

HMBP

- It is the facility's responsibility to ensure that employees are familiar with the contents of the HMBP.
- Be prepared to demonstrate to your inspector that you have access to your HMBP, either digitally or hard copy.

**Hazardous Materials
Business Plan**



HMBP Reporting Thresholds

≥55 gallons of a liquid

≥200 cubic feet of a gas
(some exemptions apply)

≥500 pounds of a solid

Highly toxic
compressed
gases with TLV
less than 10ppm
are reportable

Remember
Hazardous Waste
and Medical
Waste are
reportable in any
amount

Hazardous Materials Business Plans (HMBPs) are reported in CERS

HMBPs must be submitted at least annually. Submit the following at a minimum:

- Facility information
- Hazardous Materials Inventory
- Emergency Response & Employee training plan

CERS Business Home Submittals Facilities Compliance My Business

Home: Dans Farm
Home

Common Tasks

- START Start Facility Submittal**
CERS will help walk you through the forms and documents required for your facility(s).
- Add Facility**
If you are new to CERS, or must add new facility(s), the Add Facility pages will ensure you get started correctly!
- People/Users**
You can allow/manage other people in your business who need to view or edit your facility reporting.
- Contact Your Local Regulator(s)**
Find contact information for your facility's local regulator(s).

Facilities Add Facility... Search...

	Facility Name	Address	Last Submittal	CERS ID
Start / Edit Submittal	Dans Farm	260 Hamilton Ave, Palo Alto 94301	10/2/2015	10160774

Refer to HMD's CERS guidance page for more CERS related information:
https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html

DEFINITION OF A HAZARDOUS MATERIAL

“Hazardous Material” means a material... that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety, or to the environment if released into the workplace or the environment.

A “Hazardous Material” includes the following:

A substance or product for which the manufacturer or producer is required to prepare a material safety data sheet pursuant to the Hazardous Substances Information and Training Act or pursuant to any applicable federal law or regulation

A substance listed as a radioactive material in Appendix B of Part 30 of Title 10 of the Code of Federal Regulations, as maintained and updated by the Nuclear Regulatory Commission.

A substance listed pursuant to Title 49 of the Code of Federal Regulations.

A substance listed in Section 339 of Title 8 of the California Code of Regulations.

A material that is a hazardous waste, as defined by Sections 25115, 25117, and 25316

**Hazardous wastes can
also be subject to
HMBP law...**

**...when they are stored in
quantities greater than
or equal to HMBP
thresholds**



**For example... a
55-gallon drum of
corrosive waste is
subject to HMBP**



HMBP Exemption Examples

INERT compressed gases are exempt up to 1,000 cubic feet:

Nitrogen

Argon

Helium

Air

Freon

Xenon



Cryogenic Gases



Convert cryogenic gases to cubic feet to determine if the item is subject to HMBP

In CERS ... Report the item as a liquid with report units gallons

HMBP Exemption Examples

Refrigerant gases in a closed loop system are exempt from reporting up to 1,000 cubic feet



HMBP Exemption Examples

Hydraulic oils in elevator systems are exempt from reporting if the facility does not store greater than 1,320 gallons of petroleum products



HMBP Exemption Examples

Materials classified as hazardous solely as an irritant or sensitizer are exempt from reporting up to 550 gallons or 5,000 pounds

Agar

Non-Toxic Buffer Solution



HMBP Updates

The facility is responsible for updating their HMBP within 30 days of a significant change. These include but are not limited to....

100% or more increase/decrease in capacity for a hazardous material or waste

New hazardous material handled on-site in reportable quantities

Change in emergency contact information

Change in location of hazardous material which triggers change in site map

Does my HMBP need to be updated?



Inventory Updates

- Periodically check the facility's hazardous materials inventory and compare to reported quantities in CERS
- Check with purchasing and receiving for new chemicals stored on-site



Site Map Changes

- Tour the facility to ensure that all hazardous materials and hazardous wastes in reportable quantities are represented accurately on the HMBP site map



Emergency Information Changes

- Ensure your listed emergency contacts in CERS are current

What if there are **NO CHANGES** to your facility's HMBP???



Even if there are **NO CHANGES** to your facility's HMBP you are still required to resubmit in CERS **ALL ELEMENTS** at least once every twelve months as a certification.

What if your facility's HMBP is **NOT ACCEPTED** in CERS???

A **"NOT ACCEPTED"** CERS submittal may result in a **violation during inspection** if not addressed in a timely matter.

Read and pay careful attention to the comments provided in CERS. Follow directions provided in comments ...



Contact your inspector if you have additional questions or concerns ...



Make sure you resubmit changes that are made until your submittal is **"ACCEPTED"**

Always base your latest CERS submittal on your previously accepted submittal (not from scratch) or everything will be erased.

What hazardous material type do I mark in CERS???

If the item is a waste...

Check off "Waste" if the item is being shipped offsite as a waste

You may add the mixture components of the waste stream if necessary (i.e. waste flammable liquid mixture)

If the item is a material...

Check off "Pure" if material is a pure item (i.e. isopropyl alcohol)

Check off "Mixture" if material is a mixture (i.e. gas/liquid mixtures) and ensure that mixture components are included

CERS Helpful Tips

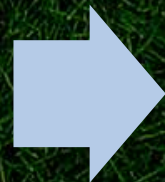
Ensure that your HMBP is updated annually and your facility is reporting all hazardous waste and medical waste **in any amount**

You are not required to report hazardous *materials* (non-waste) below reportable thresholds.

Ensure that your submittal is fully submitted (you will see a confirmation page).

If your HMBP is “NOT ACCEPTED” don’t panic!

Log in to CERS & review the comments provided



Start new submittal and make the requested changes



SUBMIT the edits

You may contact your inspector if you need more assistance or the **HMD CERS help desk staff at (858) 505-6990**

Permit Relocations

If your facility is relocating, you are required to notify HMD within 30 days of beginning operations at your new location

Step 1: Submit CERS Access/I.D. request form

Step 2: Once access has been granted, submit information through CERS for new location

Step 3: Submit closure notification in CERS for previous location



REMINDER!
HMD Permits are non-transferable from one owner to the next, or from one location to another

Permit Closures

If your facility changes owners or locations (including suite numbers) you are required to obtain a new UPFP

Procedures

Step 1:

Log into CERS and select "NO" to all facility information "Business Activities" section questions

Step 2:

Leave a comment to regulator stating the move out date and, if applicable, your new location and starting date

Step 3:

Submit the Facility Information section of CERS with your changes and comments. An inspector will conduct a closure inspection at a future date

HMBP RECORDKEEPING REQUIREMENTS



Electronic copies
are acceptable as
long as they are
readily available to
employees and
during inspections

HMBP ON-SITE?

Ensure that your HMBP is readily accessible to facility personnel at all times through one of the following:

Access to CERS

A hardcopy of the HMBP on-site

Access to an electronic copy of the HMBP



Annual Employee Training Documentation

Employees are required to be trained annually for:



Facilities subject to HMBP



Large quantity hazardous waste generators



Medical waste treatment facilities

Training Records shall be documented electronically or by hard copy and made available:



If subject to HMBP, records maintained for at least 3 years [HSC 25505 (a)(4)]



If your facility is a large quantity HW generator, until closure of the facility and for 3 years after termination of employment for former employees [CCR 66265.16 (e)]



If your facility is a medical waste treatment, records maintained for at least two years [HSC 117938 (b) (1-3)]

What kind of training?

“Training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the plans and procedures specified in paragraph (3)*. These training programs may take into consideration the position of each employee. This training shall be documented electronically or by hard copy and shall be made available for a minimum of three years.” HSC 25505 (a)(4)

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

	TRAINING TOPIC	TRAINING TIME
<input type="checkbox"/>	Procedures for handling hazardous materials, including hazardous wastes.	
<input type="checkbox"/>	Procedures for coordinating with emergency response agencies.	
<input type="checkbox"/>	Use of emergency response equipment and materials under the business control.	
<input type="checkbox"/>	Emergency Response Plan implementation.	

* Paragraph (3) refers to the facility's Emergency Response Plan

Training Frequency?

Employee training requirements are indicated in the consolidated emergency response and training plan template posted in CERS

EMPLOYEE TRAINING FREQUENCY AND RECORDKEEPING TRAINING MUST BE:

- Provided initially for new employees as soon as possible following the date of hire. New employees should not work in an unsupervised position that involves hazardous materials handling and/or hazardous waste management without proper training;
- Provided within six months from the date of hire for new employees at a large quantity generator;
- Ongoing and provided at least annually;
- Amended prior to a change in process or work assignment;
- Given upon modification to the Emergency Response/Contingency Plan.

Large Quantity Generator Training: Large quantity generators (1,000 kg or more) must retain written plan and documentation of employee training which includes:

- A written description of the type and amount of both initial and ongoing training that will be given to persons filling each job position having responsibility for hazardous waste management and/or emergency response.
- The name, job title and job description for each position at the facility related to hazardous waste management.
- Current employee training records must be retained until closure of the facility and former employee training records must be retained for at least three years after termination of employment.

Small Quantity Generator Training: Small quantity generators (less than 1,000 kg) must include basic hazardous waste management and emergency response procedures but a written employee training plan and training records are not required. In order to show that the facility has met the small quantity generator employee training requirement, an employee training plan and training records may be made available.

Hazardous Materials Business Plan Training: Businesses must provide initial and annual employee training that includes the content referenced above. The training may be based on the job position and training records must be made available for a period of at least three years.

CONSOLIDATED EMERGENCY RESPONSE/CONTINGENCY PLAN TEMPLATE

<https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/consolidated%20ER%20plan%202017.pdf>



A form developed by CalEPA to combine the:

- Emergency Response Plan (for hazardous materials) and
- Contingency Plan (for hazardous waste generators)



This template can also be used to satisfy:

- HMBP employee training description [HSC 25505 (a)(4)]
- HW employee training description [22 CCR 66262.34 (d)(4), 22 CCR 66265.16]



Template and instructions available on HMD's website, or through CERS

- You are not required to use this template. However, if you choose to use your own form, ensure that all required elements are included.

Common HMBP Violations

VIOLATION: HMBP not re-certified annually



VIOLATION: Initial/annual training not conducted or no records



Common HMBP Violations

VIOLATION: Inventory not complete or not updated to reflect 100% or more increase



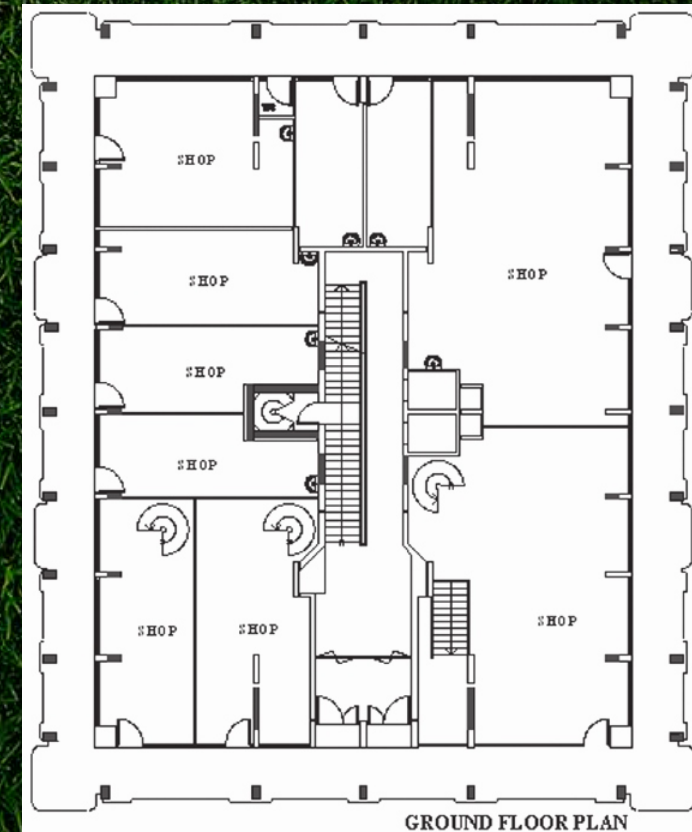
VIOLATION: Primary emergency contact listed is not current (change occurred more than 30 days ago)



Common HMBP Violations

VIOLATION: Site Map Inadequate

For each HMBP site map, certain information is required. Failure to submit a correct site map with all required information will result in a “not accepted” CERS inventory and may be a violation during inspection.



For site map guidance please refer to the following document:

[https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hmbp/HM-952%20\(10-16\).pdf](https://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hmbp/HM-952%20(10-16).pdf)

END OF SECTION

Section 4: Hazardous Waste



CENVO132



CENVO120



CENVO223



CENVO496

Outline

Section 1: Purpose

Section 2: Definition of a Hazardous Waste

Section 3: Characteristics of a Hazardous Waste

Section 4: Common Hazardous Waste Violations

Section 5: Hazardous Waste Recordkeeping Requirements

Section 6: Labeling

PURPOSE OF HAZARDOUS WASTE REGULATIONS

To ensure safe storage, proper waste disposal, and prevent releases of hazardous waste to the environment



DEFINITION OF A HAZARDOUS WASTE

“A solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible serious, illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.”

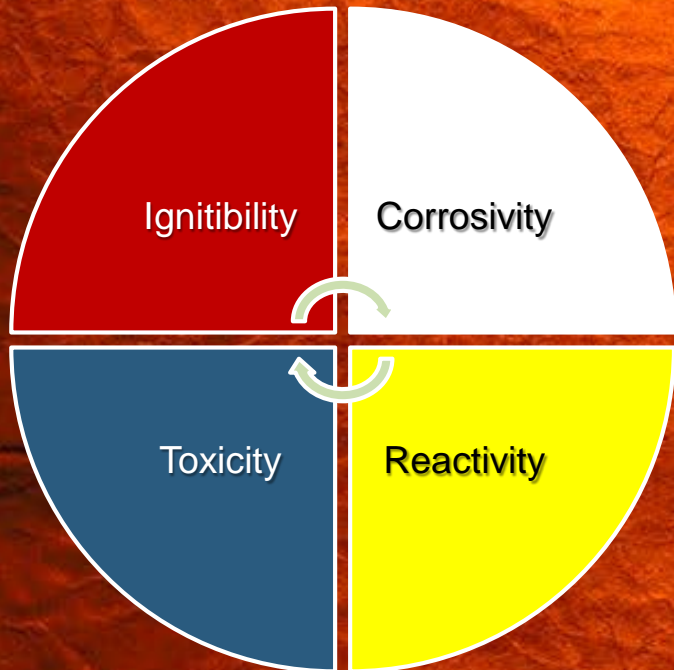
(40 CFR Part 261, Subpart B)

CALIFORNIA DEFINITION OF HAZARDOUS WASTE

22 CCR 66260.10 “Hazardous waste” means a hazardous waste as defined in section 66261.3 of this division. “Hazardous waste” includes acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste and universal waste.

What is a Hazardous Waste?

Any waste that has any of the following characteristics:



Or any waste listed in Title 22, California Code of Regulations or is under 40 CFR (e.g. F, K, U, P, are the U.S. EPA lists)

IGNITABILITY

Flash point < 140°F

Oxidizer,
Flammable Solid,
or Ignitable
Compressed Gas

EXAMPLES:

Acetonitrile, alcohols, acetone,
toluene, xylene, ether, organic
peroxide, acetylene, other
flammable solvents



CORROSIVITY

- $\text{pH} \leq 2.0$ or $\text{pH} \geq 12.5$
- Corrodes steel at a rate greater than 6.35 mm/year at a test temperature of 130°F
- Non-aqueous solution mixed with an equal weight of water has $\text{pH} \leq 2.0$ or $\text{pH} \geq 12.5$

Examples:

Acids, glass cleaner, hydroxides, bases, drain cleaners

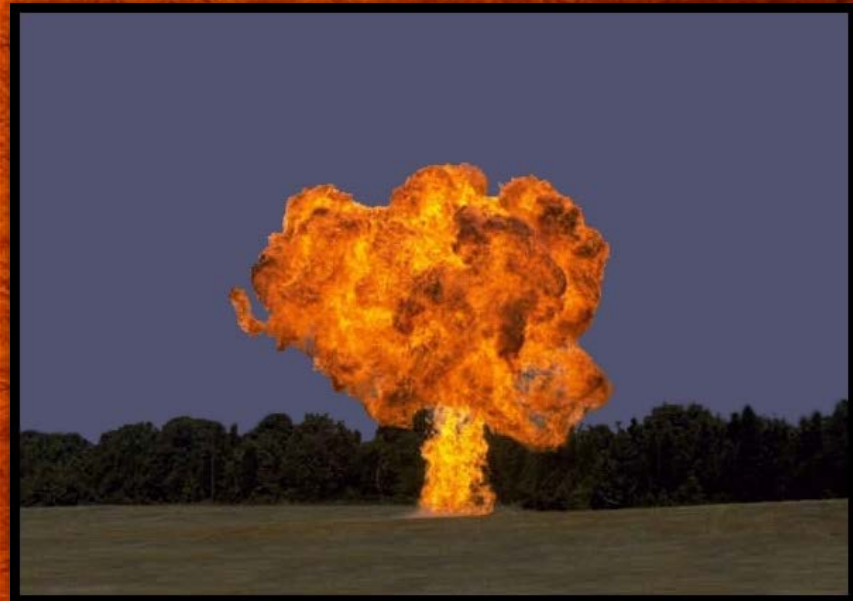


REACTIVITY

- Unstable and may explode under certain conditions such as heat, friction, or pressure
- Reacts with water
- It is a cyanide or sulfide bearing waste

Examples:

Picric acid, peroxide forming chemicals, ethyl ethers, dinitro compounds, azides



TOXICITY

- Toxicity encompasses both federal (RCRA) and California (non-RCRA) hazardous waste criteria

Examples:

Arsenic, mercury, lead (RCRA)

Zinc, nickel, cobalt (California)



CALIFORNIA TOXICITY

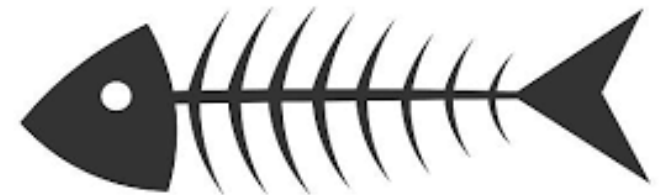
Fails WET- Waste Extraction Test

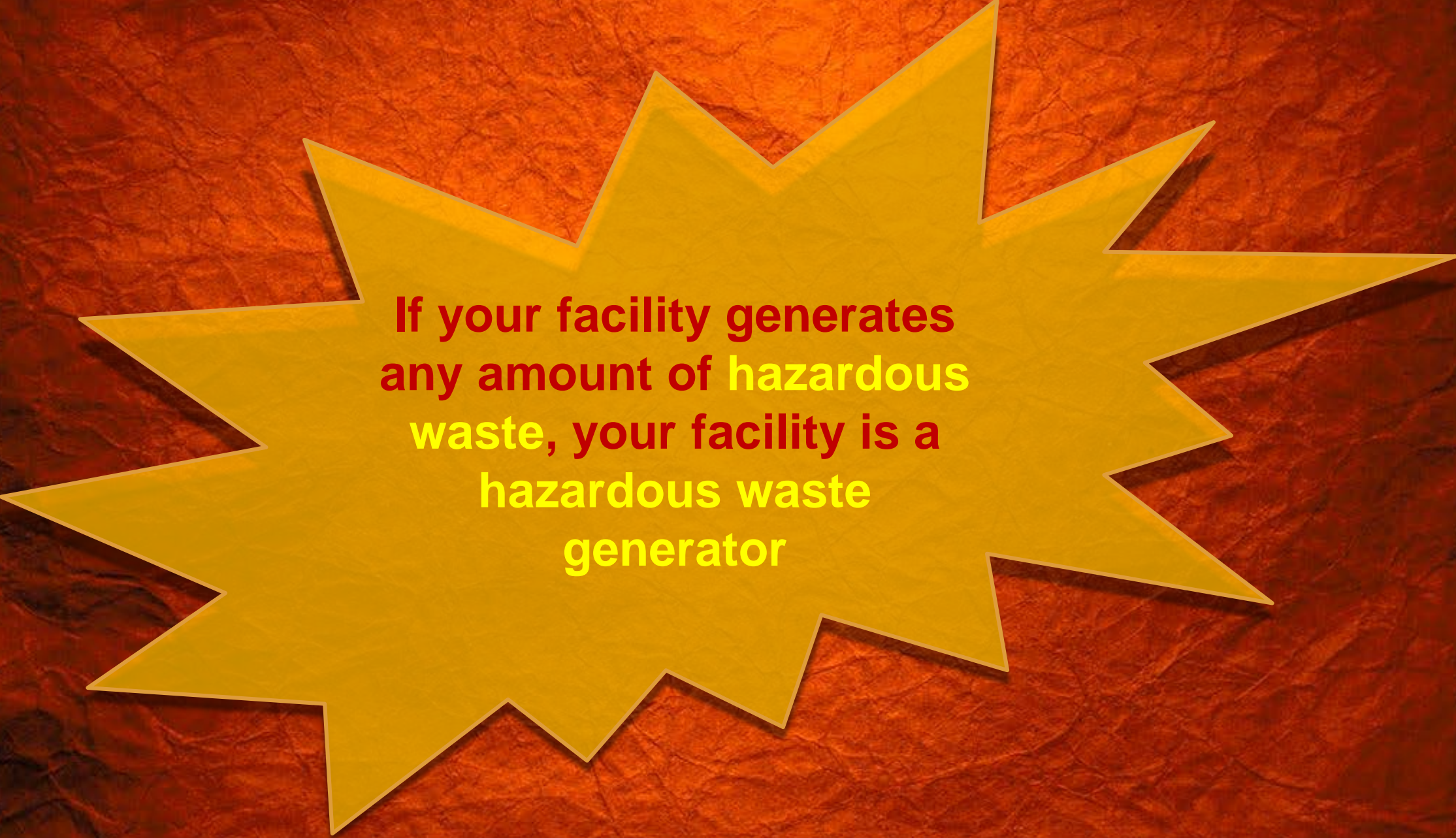
- **TTLIC and STLC**
(Total Threshold Limit Concentration and Soluble Threshold Limit Concentration)
- **Fails Acute Aquatic 96-hour Fish Bioassay**
- **Fails Toxic Characteristic Leaching Procedure (TCLP) Test**
- **LD 50/LC 50 (oral, dermal, or inhalation toxicity)**
- **Carcinogenic Substances- California reg. 22 CCR 66261.24(a)(7)**

Examples:

Heavy metals: mercury, lead, silver, chromic acid

<http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/index.cfm>





**If your facility generates
any amount of hazardous
waste, your facility is a
hazardous waste
generator**

HAZARDOUS WASTE GENERATOR CATEGORIES

LARGE QUANTITY GENERATOR (LQG)

- $\geq 2,200$ lbs/month of hazardous waste (1,000 kgs.)
- ≥ 2.2 lbs/month of acutely or extremely hazardous waste (1 kg.)

SMALL QUANTITY GENERATOR (SQG)

- Between 220-2,200 lbs/month of hazardous waste
- < 2.2 lbs/month of acutely or extremely hazardous waste

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)*

- < 220 lbs/month of hazardous waste
- < 2.2 lbs/month of acutely or extremely hazardous waste

*Federal regulations also refer to this as Very Small Quantity Generator (VSQG)

Waste Reporting in San Diego County

Per San Diego County Code **SDCC 68.904(a)(2)**, hazardous AND medical wastes must be reported through CERS if generated in **ANY AMOUNT.**



CERS

California Environmental
Reporting System



Hazardous Waste Generator Requirements Checklist

<input checked="" type="checkbox"/> Waste determination	<input checked="" type="checkbox"/> Training
<input checked="" type="checkbox"/> Accumulation time limits	<input checked="" type="checkbox"/> Shipping Requirements/Recordkeeping
<input checked="" type="checkbox"/> Labeling/marking	<input checked="" type="checkbox"/> Biennial Report (if applicable)
<input checked="" type="checkbox"/> Satellite Accumulation	<input checked="" type="checkbox"/> Empty container management
<input checked="" type="checkbox"/> EPA Identification Number	<input checked="" type="checkbox"/> ERM/Tiered Permitting (if applicable)
<input checked="" type="checkbox"/> Emergency response/contingency plan	<input checked="" type="checkbox"/> Waste reporting (CERS)

WASTE DETERMINATION IS THE GENERATOR'S RESPONSIBILITY

Conduct a proper waste determination on all waste streams at the **point of generation**.

Point of generation:
The point at which the generator determines that the material is no longer usable/is a waste

The waste determination must be conducted at **each** point of generation **prior** to being combined.

HOW TO DO A WASTE DETERMINATION?

This is accomplished by either:

- **Sending a representative sample of the waste to a State certified laboratory to conduct quantitative testing using EPA qualified testing methods**
- **Claiming and documenting “Generator Knowledge” of the waste stream**

Maintain documentation of waste determination for inspector review

See guidance document at:

https://www.dtsc.ca.gov/HazardousWaste/upload/HWMP_DefiningHW111.pdf

ILLEGAL DISPOSAL

HAZARDOUS WASTES MUST NOT BE DISPOSED OF TO SEWER, STORMWATER, AIR, OR MUNICIPAL TRASH.

GENERATORS MUST USE A CALIFORNIA REGISTERED TRANSPORTER

Please refer to DTSC's list of registered hazardous waste transporters: <http://hwts.dtsc.ca.gov/transporters>

LABELING REQUIREMENTS

22 CCR 66262.34(f)

- The words “Hazardous Waste”
- Accumulation start date
- Physical state
- Composition
- Hazardous properties
- Name and address of generator

HAZARDOUS WASTE

STATE AND FEDERAL LAWS 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 SUBSTANCE CONTROL

GENERATOR'S INFORMATION

NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ MANIFEST TRACKING NO. _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____
CONTENTS, COMPOSITION: _____

PHYSICAL STATE: SOLID LIQUID | **HAZARDOUS PROPERTIES:** FLAMMABLE TOXIC
 CORROSIVE REACTIVE OTHER _____

[_____]
[_____]
[_____]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

BRADY BRADYID.COM

EMPTY CONTAINER DISPOSAL

Containers or bottles previously containing hazardous chemicals must be empty of pourable contents prior to disposal ("California Empty").

E

Empty containers greater than 5 gallons in capacity must be marked with the date on which they were emptied, and managed within 1 year of that date.

Exception: Containers previously storing P-listed chemicals or an extremely hazardous waste must be triple rinsed. The rinsate must be managed as a hazardous waste.

F



EPA ID NUMBERS

EPA ID numbers are required for all hazardous waste generators

The type and quantity of hazardous waste generated determines whether the facility requires a Federal or California EPA ID number

If a business generates more than 1 kilogram of RCRA acutely hazardous waste per month or more than 100 kilograms of other RCRA waste per month, then the facility must obtain a **US EPA ID number** (CAR, CA, CAD, etc.)

If a business generates RCRA hazardous waste in amounts below federal EPA ID number requirements or generates non-RCRA hazardous waste (California only), then the facility is required to obtain a **California EPA ID number** (CAL, etc.)



EPA ID NUMBERS

Generators with RCRA EPA or California ID numbers must complete an annual information verification submittal online to keep their number active with the State DTSC.

<https://dtsc-web01.dtsc.ca.gov/eVQ/Home.aspx>



Annual ID number Verification Questionnaire – Generators, transporters, and facilities that are authorized to generate, store, transport, treat, and dispose of hazardous waste are required to annual verify their ID number information per **Health and Safety Code section 25205.16(b)**

DTSC FAQ page at:

http://www.dtsc.ca.gov/IDManifest/upload/eVQ_FAQs.pdf

CONTINGENCY PLAN

- All hazardous waste generators are required to have a contingency plan
- Please refer to **22 CCR 66265.52** for a list of required elements

CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS) CONSOLIDATED EMERGENCY RESPONSE / CONTINGENCY PLAN <i>Prior to completing this Plan, please refer to the INSTRUCTIONS FOR COMPLETING A CONSOLIDATED CONTINGENCY PLAN</i>				
A. FACILITY IDENTIFICATION AND OPERATIONS OVERVIEW				
FACILITY ID #	1. CERS ID	A1. DATE OF PLAN PREPARATION/REVISION	A2.	
BUSINESS NAME <i>(Same as Facility Name or DBA - Doing Business As)</i> 3.				
CUPA AUTO SHOP				
BUSINESS SITE ADDRESS 103.				
8888 EHS WAY				
BUSINESS SITE CITY 104.		CA	ZIP CODE 105.	
San Diego			92121	
TYPE OF BUSINESS (e.g., Painting Contractor) A3.	INCIDENTAL OPERATIONS (e.g., Fleet Maintenance) A4.			
AUTO REPAIR				
THIS PLAN COVERS CHEMICAL SPILLS, FIRES, AND EARTHQUAKES INVOLVING: (Check all that apply) A5.				
<input checked="" type="checkbox"/> 1. HAZARDOUS MATERIALS; <input checked="" type="checkbox"/> 2. HAZARDOUS WASTES				

WASTE ACCUMULATION TIME LIMITS DEPEND ON:

Amount of hazardous waste generated

LQG vs SQG vs CESQG

Where the hazardous waste is headed for disposal

Can be stored longer if a SQG and transported more than 200 miles away

Type of hazardous waste accumulation

Satellite vs 90/180 day storage area

SATELLITE ACCUMULATION

- A hazardous waste container (not a tank) may be stored at or near the point of generation and under the control of the generator.
- Full hazardous waste labeling requirements apply, though “Emptied Weekly” or “Emptied Daily” may be marked for Accumulation Start Date if the container is emptied as described.
 - Emptied Monthly is not acceptable!

HAZARDOUS WASTE
STATE AND FEDERAL LAWS 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 SUBSTANCE CONTROL

GENERATOR'S INFORMATION
NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ MANIFEST TRACKING NO. _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____ **Emptied Weekly**

CONTENTS, COMPOSITION: _____

PHYSICAL STATE: SOLID LIQUID | **HAZARDOUS PROPERTIES:** FLAMMABLE TOXIC
 CORROSIVE REACTIVE OTHER _____

[_____]
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

BRADY® BRADYID.COM

SATELLITE ACCUMULATION TIME LIMITS:

No more than 55 gallons (1 quart for acutely or extremely hazardous waste) of satellite accumulation per process

Must be moved to the 90/180 day storage area within 1 year of initial accumulation, or within 3 days of accumulating 55 gallons

The TOTAL time limit (whether or not the 55 gallon or 1 quart limit has been reached) is one year from initial accumulation.

IS IT ACCUMULATION OR IS IT STORAGE?

Improper treatment, storage, or disposal may qualify your facility as a treatment, storage and disposal facility (TSDF) which requires an additional permit by the Department of Toxic Substances Control (DTSC)

****Reminder: Weekly inspections of hazardous waste storage areas are required for all hazardous waste generators [22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.174]**

ACCUMULATION TIME LIMITS

Accumulation time limits for hazardous wastes vary according to how much hazardous waste a facility generates each month:

If your facility generates...

Less than 100 kg/month hazardous waste or less than 1 kg/month acutely hazardous waste

More than 100 kg/month hazardous waste but less than 1,000 kg/month, or more than 1 kg/month acutely hazardous waste

More than 1,000 kg/month hazardous waste

...then wastes must be disposed of within...

180 days of accumulating an aggregate 100 kg hazardous waste on site

180 days of initial accumulation

90 days of initial accumulation

...and your facility's generator status is...

Conditionally Exempt Small Quantity Generator (CESQG)

Small Quantity Generator (SQG)

Large Quantity Generator (LQG)

WHAT IF MY GENERATOR STATUS CHANGES THROUGHOUT THE YEAR?

MEDICAL WASTE: If your facility generates more than 200 pounds of medical waste in a month, your facility is a large quantity generator of medical waste for that 12 month period.

HAZARDOUS WASTE: Your facility must abide by LQG requirements during the months that your facility generates wastes above LQG thresholds. Ensure that additional documents (i.e. training plans) are updated accordingly.

TRAINING

Training is required for all hazardous waste generators

However, documentation of training is only required if the facility is:

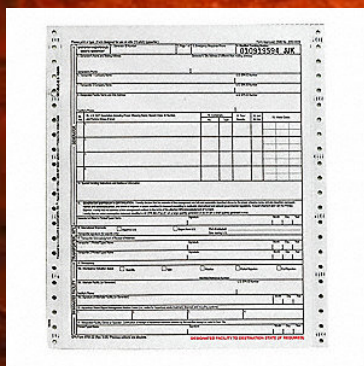
- Subject to HMBP
- Large quantity generator of hazardous waste
- Conducting medical waste treatment (medical waste training)

(Note: OSHA more stringent and requires documentation of employee training by employers)



SHIPPING REQUIREMENTS

It is the generator's responsibility to:



Use a currently registered hazardous waste hauler
[HSC 25163(a); 22 CCR 66263.41]

Use a hazardous waste manifest for shipping all
hazardous wastes [22 CCR 66262.23(a)]



A list of currently registered transporters is on DTSC's
website: <http://hwts.dtsc.ca.gov/transporters/>

MANIFESTS

Send copy of generator manifest to DTSC within 30 days [22 CCR 66262.23(a)(4)]



Maintain TSDf signature copies on site for inspector review for 3 years
[22 CCR 66262.40(a)]

BIENNIAL REPORT

If your facility is a RCRA large quantity generator, you are required to **complete the Biennial Report by March 1st on every even numbered year.** [22 CCR 66262.41(b)]

- Maintain copies onsite for 3 years [22 CCR 66262.40(b)]

RCRA Info webpage:

RCRA Info is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984.

<https://rcrainfopreprod.epa.gov/rcrainfo-help/application/industryHelp/index.htm#t=Introduction.htm>

TREATMENT 'CONDITIONAL' EXEMPTIONS FOR BIOTECHS/LABORATORIES



Benchtop
neutralization



Clean in Place
(CIP)



Disinfection by
bleaching &
sewering
(medical waste)



EXCLUDED RECYCLABLE MATERIALS & ONSITE HAZARDOUS WASTE TREATMENT HAVE ADDITIONAL REQUIREMENTS



Additional regulatory requirements may apply if your facility claims exemption under Excluded Recyclable Materials, or is engaged in onsite hazardous waste treatment.

Please contact your area inspector or the Hazardous Materials Division if this applies to your facility and you have questions about the requirements.

HAZARDOUS WASTE RECORDKEEPING REQUIREMENTS



Generator copies of manifests sent to DTSC within 30 days of generation [22 CCR 66262.23(a)(4)]



TSDf-signed copies of manifests maintained on site for 3 years [22 CCR 66262.40(a)]



Documentation of waste determination results maintained on site [22 CCR 66262.40(c)]

Additional recordkeeping and notification requirements will apply if your facility treats hazardous waste or claims exemptions under Excluded Recyclable Material

E - MANIFEST

Hazardous Waste Electronic Manifest System (e-Manifest)

- **On June 30, 2018, the U.S. Environmental Protection Agency (EPA) launched the Hazardous Waste Electronic Manifest System (e-Manifest). The system will improve access to higher quality and more timely hazardous waste shipment data and save industry and states valuable time and resources.**

Go to: <https://www.epa.gov/e-manifest> for detailed information. To use e-Manifest, generators will need an EPA Identification (ID) Number and register with e-Manifest.

GENERATOR IMPROVEMENT RULE ADOPTED BY U.S. EPA IN 2017

- On May 30, 2017, the United States Environmental Protection Agency's (US EPA's) Hazardous Waste Generator Improvement Rule (GIR) went into effect. However, because California is an authorized state the GIR does not take effect in California until DTSC adopts the rule, or parts thereof, via their rulemaking process.
 - Anticipate the State DTSC adopting parts of the revised federal regulations in late 2018 or 2019.
-
- See: https://www.dtsc.ca.gov/HazardousWaste/Generator_Improvement_Rule.cfm for more information.
 - Sign up for E mail subscriber list: <https://www.dtsc.ca.gov/ContactDTSC/ELists.cfm>

COMMON VIOLATIONS FOR HAZARDOUS WASTE

VIOLATION: Failed to properly label/update hazardous waste container and/or tank
22 CCR 66262.34(f)



VIOLATION: Hazardous waste accumulated beyond allowed accumulation time limits
HSC 25201(a); 22 CCR 66262.34(d); 40 CFR 262.34(e) and (f)



COMMON VIOLATIONS FOR HAZARDOUS WASTE

VIOLATION: Failed to comply with hazardous waste satellite container regulations **22 CCR 66262.34(e)**

VIOLATION: Failed to mark date on empty container larger than 5 gallons and/or manage it within one year **22 CCR 66261.7(b-e) &/or (r); 22 CCR 66261.7(f)**



COMMON VIOLATIONS FOR HAZARDOUS WASTE



VIOLATION: Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)

VIOLATION: Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)

VIOLATION: Failed to properly close hazardous waste container 22 CCR 66262.34(d)(2); 40 CFR 262.34 (d)(2), 265.173

VIOLATION: Failed to properly label/update hazardous waste container and/or tank 22 CCR 66262.34(f)

END OF SECTION

Section 5: Medical Waste



Medical Waste Outline

Medical Waste Management Act

Labeling and Storage Guidelines

Small Quantity Generators vs Large Quantity Generators

Medical Waste Treatment

Common Violations for Medical Waste

MEDICAL WASTE MANAGEMENT ACT HAS BEEN UPDATED

Ensure that your facility is using the most recent version for reference:

JANUARY 2017

**CALIFORNIA HEALTH AND SAFETY CODE
SECTIONS 117600 - 118360**

DEFINITION OF MEDICAL WASTE

Generally, medical waste is defined in the Medical Waste Management Act as waste that has been determined to be **infectious or potentially infectious to human beings.**

Please refer to the Medical Waste Management Act for a more detailed definition of medical waste.

Be advised that other regulatory agencies and/or professional organizations may have more stringent definitions of medical waste.



MEDICAL WASTE LABELING

All medical waste containers/bags are required to have a generator label on the outside of the container immediately upon use (NOT when ready for disposal or after the bag is tied off)

A generator label includes:

- **Facility name**
- **Address**
- **Phone number**

**A business
card works!**



*Refer to the guidance document in the notes section for a helpful chart

MEDICAL WASTE BAGS AND CONTAINERS

Biohazardous red bags must be:

- Puncture-resistant
- Contained in a rigid, leak-proof container in good repair, with a tight-fitting cover.
- Tied off after being filled to prevent expulsion of contents
- Labeled with a generator label on the outside of the bag *at the point of generation*

Sharps containers must be:

- Rigid, puncture-resistant, leak-resistant
- Resistant to opening after being sealed
- Labeled with a generator label *at the point of generation*

BENCHTOP STORAGE

Small biohazardous “benchtop” red bags used to collect non-breakable pipette tips do not need to have a generator information label.



PROPER USE OF RED BAGS



Waste stored in **biohazardous red bags** will be presumed **biohazardous waste**

Do NOT use red bags as municipal trash bags. If a **biohazardous red bag** is found at the landfill (without heat treatment tape), the source of the red bag will be investigated.



MEDICAL WASTE TIME LIMITS

WASTE STORAGE TIME LIMITS

Amount of medical waste stored at room temperature unless otherwise specified	BIOHAZARDOUS WASTE	SHARPS WASTE READY FOR DISPOSAL	NON-RCRA PHARMACEUTICAL WASTE READY FOR DISPOSAL	PATHOLOGY WASTE	TRACE CHEMOTHERAPY WASTE
<20 lbs/month	30 days	30 days	-	30 days	Manage as sharps or biohazardous waste according to the type of container used for storage and the type of waste.
≥20 lbs/month	7 days	30 days	-	7 days	
≥200 lbs/month	7 days	30 days	-	7 days	
Stored below 0° C (32°F)	90 days	90 days	-	90 days	
Any amount of Non-RCRA pharmaceutical waste	-	-	90 days when ready for disposal, or at least once per year	-	-

MEDICAL WASTE GENERATOR STATUS

	Small Quantity Generator (<200 pounds/month)	Large Quantity Generator (>200 pounds/month)
Medical Waste Management Plan	Required only if treating medical waste on site	Required
Medical Waste Tracking Record Retention	3 years	2 years

Training records are required if your facility treats medical waste on site.

PHARMACEUTICAL WASTE

Non-RCRA pharmaceutical waste can be managed as medical waste

Examples of non-RCRA pharmaceutical waste:

- Ibuprofen
- Propofol

RCRA pharmaceutical waste must be managed according to **hazardous waste** standards

Examples of RCRA pharmaceutical waste:

- Nicotine
- Arsenic Trioxide
- Warfarin
- Coumadin



TRACE CHEMO WASTE

Trace chemotherapy waste (<3% by weight) must be managed as medical waste

- Use sharps containers or yellow bags, depending on waste material

Bulk chemotherapy waste (>3% by weight) must be managed according to **hazardous waste** standards

- Use hazardous waste standards for labeling and storage



REMINDER!

Medical waste must be reported through CERS if generated in **ANY AMOUNT**

This includes biohazardous liquid waste that is treated with bleach solution and disposed to sewer

MEDICAL WASTE TREATMENT

If your facility treats medical waste through an autoclave, the following information will be verified during inspection:



Annual thermometer calibration records (for autoclave in use)



Monthly biological indicator testing records



Standard operating procedures (for autoclave)



Heat sensitive tape observed in use



Medical Waste Management Plan on-site available for review



Records of treatment: logs of dates/times/temperatures



Training records (if large quantity generator of medical waste)

If your facility is a Large Quantity Generator of medical waste and you treat your medical waste, you are required to obtain, before treating the waste, a **medical waste treatment permit** with the Hazardous Materials Division

Medical Solid Waste Security

- Some examples of medical solid waste are empty specimen containers, bandages, paper towels, paper products, dressings, articles containing non-fluid blood, surgical gloves, decontaminated medical waste, non-medical waste sharps, and biohazardous wastes that are not generated in human or animal health care.
- According to MWMA 117700(d): Medical waste **does not** include Waste that is not biohazardous, such as paper towels, paper products, articles containing nonfluid blood, and other medical solid waste products commonly found in the facilities of medical waste generators.



Medical Solid Waste Security

- The County of San Diego used to have a provision in our ordinance that required regulated facilities to secure medical solid waste to deny access to unauthorized persons (San Diego County Code 68.1211)

SEC. 68.1211. MEDICAL SOLID WASTE SECURITY.

Any person who is a generator, or an employee of a generator of medical solid wastes, shall assure that their medical solid waste, prior to disposal, is stored in an area secured as to deny access to unauthorized persons. If such wastes are placed in a trash receptacle or compactor which is accessible, at any time, to unauthorized persons, such receptacle or compactor shall be locked to prevent access to the contents to anyone other than authorized persons or refuse collection personnel.

(Amended by Ord. No. 8477 (N.S.), adopted 11-8-94, operative 1-1-95; amended by Ord. No. 9293 (N.S.), effective 1-12-01; amended by Ord. No. 9667 (N.S.), effective 8-14-04)

- However, this [section was repealed](#) effective **07/01/2021**

Therefore, as of 07/01/2021 restricting access to medical solid waste is no longer a requirement per the San Diego County Ordinance.



COMMON MEDICAL WASTE VIOLATIONS

VIOLATION: Primary containers accumulating MW not labeled with generator's name, address, and phone number (SDCC 68.1205)

VIOLATION: Biohazardous red bag waste stored >7 days at >0C (for generators of >20 lbs/month). HSC 118280(e)(1)(A)

Generator's Label

(Must include this information):

Name: I. M. Sharp, DDS
Address: 123 Needle Stick Drive
San Diego, CA 92101
Phone #: (619) 123-4567



COMMON MEDICAL WASTE VIOLATIONS

VIOLATION: MWMP not submitted to HMD (initial/updates) (LQG or treatment only) (HSC 117935, 118032, 117960, 117970)



County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(858) 505-6880 FAX (858) 505-6848

<http://www.sdcdeh.org>



Medical Waste Management Plan

END OF SECTION

Section 6: Conclusion

Thank you for completing the EPIC+ online training!

The goal of the EPIC+ training is to improve compliance through education. This training is one of the tools we use towards gaining compliance.

For any suggestions, comments, or concerns please contact your area inspector or the
HMD Duty Desk: (858) 505- 6880

Please feel free to contact your area inspector if you have any specific questions about your facility's process or practices.

FINAL STEPS

Please complete and submit the EPIC+ Application to participate in the EPIC+ program if you have not already done so.

The application does not need to be renewed annually, but you must re-enroll and complete the online training at least every 12 months OR attend our in-person seminar. HMD posts a new online program each July. Your training is good for one year, starting from the date you completed and passed your post test.

PLEASE REMEMBER TO TAKE THE POST TEST!



THE END!