



**Prepared for:**  
California Grocers Association

# Hazardous Waste Management Compliance Tool Kit

**California Facilities**

May 2015

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California Facilities

May 2015

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## 1. *INTRODUCTION*

This Hazardous Waste Compliance Tool Kit is intended to assist grocery stores and distribution centers in understanding how to comply with the rules governing hazardous waste management in California.

The tool kit includes a general description of the Do's and Don'ts with respect to management of hazardous waste. The Appendix contains several standard operating procedures that can be customized and adapted at individual stores and distribution centers.

### *HAZARDOUS WASTE TOOLKIT DISCLAIMER*

By providing this Toolkit and the accompanying workshops, California Grocers Association (CGA) and the CGA Educational Foundation (CGAEF) is providing an opportunity for its members and attendees to learn information regarding hazardous waste compliance that may be of interest to your company. The Toolkit and workshops are designed to provide practical and useful information on hazardous waste compliance. They do not cover other areas of compliance, such as hazardous materials management, health and safety programs, etc.

The Toolkit and workshops are not intended to be comprehensive or customized for your particular facilities and operations. They are general enough such that they can be used as a starting point towards achieving hazardous waste compliance for your company. To obtain a more customized Toolkit and/or assessment of your company's compliance with the hazardous waste laws and regulations, you may contact ERM and/or Downey Brand directly.

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## 2. *HAZARDOUS WASTE OVERVIEW*

Hazardous waste is regulated by the following agencies:

- federal [Environmental Protection Agency \(EPA\)](#)
- [California's Department of Toxic Substances Control \(DTSC\)](#)
- the [California Environmental Protection Agency \(CalEPA\)](#); and
- local Certified Unified Program Agencies (CUPAs)

Figure 2.1 provides an illustration of the various agencies listed above.

The federal Resource Conservation and Recovery Act (RCRA) govern the management of hazardous wastes.

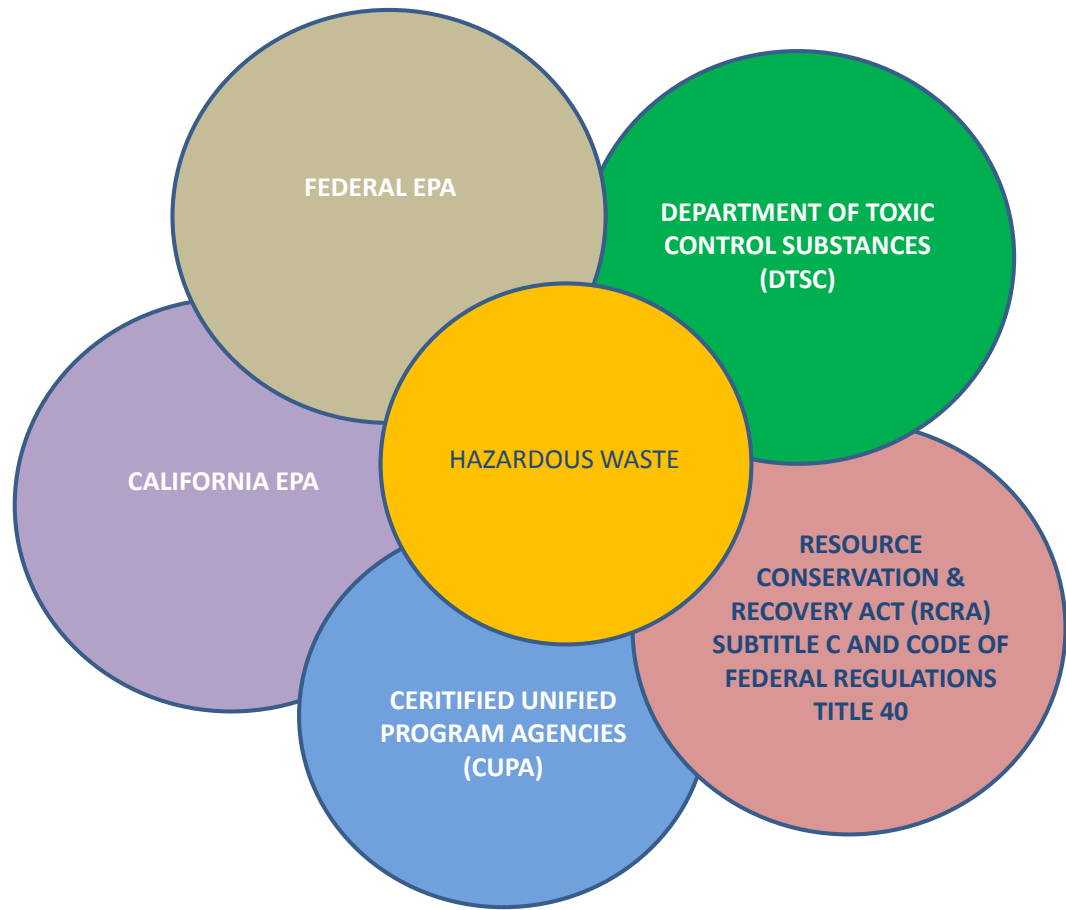
### **What is a RCRA- Hazardous Waste?**

The Resource Conservation and Recovery Act (RCRA) govern the management of hazardous wastes.

Any facility that generates a federal or state hazardous waste is subject to specific management requirements.

The relevant federal regulations are found in the [RCRA, Subtitle C, 42 USC 6921](#), and regulations at 40 CFR [260](#) to [279](#).

To be considered a hazardous waste, a material first must be classified as a solid waste (40 CFR §261.2). EPA defines solid waste as garbage, refuse, sludge, or other discarded material (including solids, semisolids, liquids, and contained gaseous materials). If a waste is considered solid waste, it must then be determined if it is hazardous waste (§262.11). Wastes are defined as hazardous by EPA if they are specifically named on one of four lists of hazardous wastes located in Subpart D of Part 261 (F, K, P, U) or if they exhibit one of four characteristics located in Subpart C of Part 261 (characteristic wastes).



***Figure 2.1 Agencies and Regulations Applicable to Hazardous Waste Management***

RCRA authorizes the EPA to delegate regulatory authority to the states. Almost every state has received RCRA authorization, including California.

RCRA authorization allows Cal/EPA's DTSC to enforce the state's hazardous waste management rules, which are more stringent than the federal requirements because they include the federal RCRA rules, as well as additional state requirements.

The California hazardous waste management statutes and regulations are found at California Hazardous Waste Control Act, California Health & Safety Code (CH & SC) [25100](#) to [25250.30](#), and 22 California Code of Regulations (CCR) [66250](#) to [66279.91](#), 22 CCR [67100.1](#) to [67100.14](#), 22 CCR [67383.1](#) to [68400](#), and 22 CCR [69000](#) to [69109](#). An overview of these regulations is given in Table 2.1.

**Table 2.1 Hazardous Waste Regulations Overview**

Brief Description	State Regulation	Federal Regulation
Definitions	<a href="#">22 CCR 66260</a>	<a href="#">40 CFR 260</a>
Defines hazardous waste	<a href="#">22 CCR 66261</a>	<a href="#">40 CFR 261</a>
Describes standards governing generators of hazardous waste	<a href="#">22 CCR 66262</a>	<a href="#">40 CFR 262</a>
Contains standards applicable to transporters of hazardous waste	<a href="#">22 CCR 66263</a>	<a href="#">40 CFR 263</a>
Includes requirements governing facilities that treat, store, or dispose of hazardous wastes	<a href="#">22 CCR 66264</a>	<a href="#">40 CFR 264</a>
Includes requirements for interim status facilities known as treatment, storage, and disposal facilities (TSDFs)	<a href="#">22 CCR 66265</a>	<a href="#">40 CFR 265</a>
Addresses standards applicable to recycling hazardous waste and waste that is managed in boilers and industrial furnaces (BIFs)	<a href="#">22 CCR 66266.1 et seq.</a>	<a href="#">40 CFR 266</a>
Sets forth treatment standards for waste that is to be sent to land disposal units (Land Disposal Requirements, or LDR)	<a href="#">22 CCR 66268</a>	<a href="#">40 CFR 268</a>
Sets forth the issuance and administration requirements for hazardous waste permits	<a href="#">22 CCR 66270</a>	<a href="#">40 CFR 270</a>
Describes requirements governing the characterization, storage, recycling, and disposal of used oil	Primarily <a href="#">California Health and Safety Code 25250 et seq.</a> , as well as <a href="#">22 CCR 66279</a>	<a href="#">40 CFR 279</a>



### 3. *HAZARDOUS WASTE GENERATOR CLASSIFICATION & OPERATOR REQUIREMENTS*

#### 3.1. *WHAT IS A HAZARDOUS WASTE?*

Waste is considered a hazardous waste based on properties that make it potentially dangerous or harmful to human health or the environment. It can be a liquid, solid, contained gases, or discarded unused commercial product, or discarded used material.

Waste is considered hazardous if it shows one or more of the following characteristics:

- **Ignitable:** Easily catches on fire. Examples include: liquid disinfectant sprays, drain cleaners, pesticides, charcoal lighter fluid.



- **Corrosive:** Causes deterioration, etching, or eating away of body tissue and other surfaces that it touches. Examples include: bleach, oven cleaners.



- **Toxic:** Poisonous and may cause injury or death if swallowed, inhaled, or absorbed through the skin. Examples include: medicines, window cleaners, and insecticides, anti-freeze, and paints.



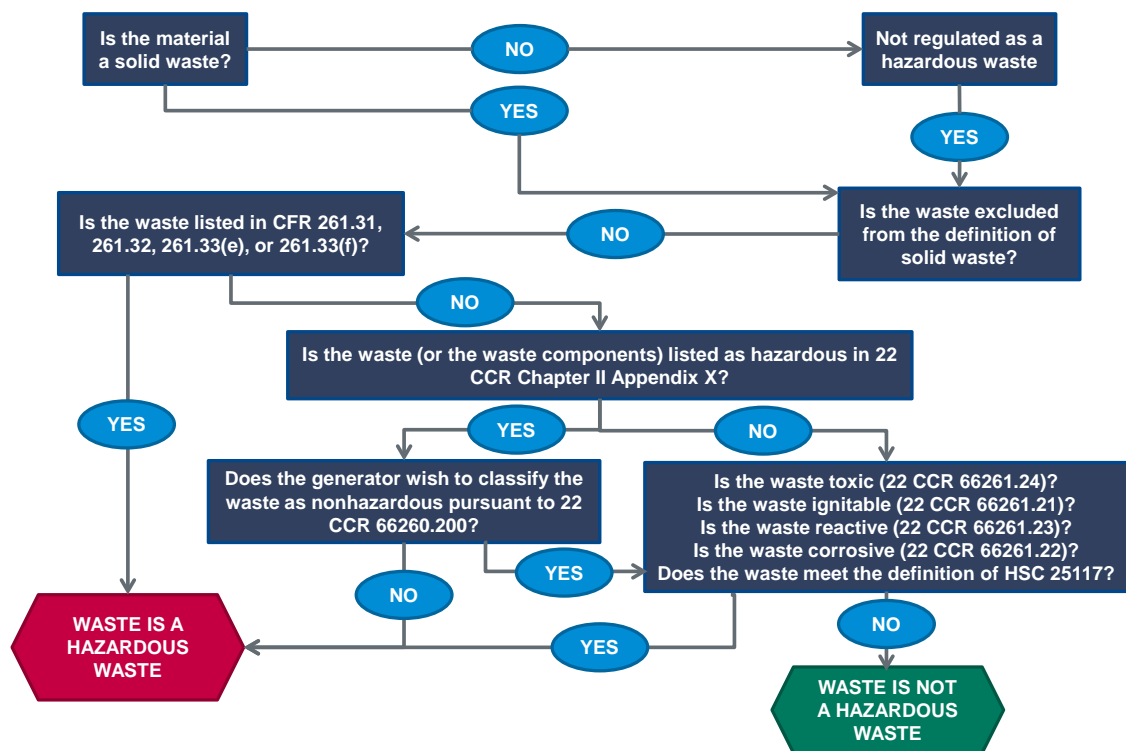
- **Reactive:** Reactive wastes are unstable under normal conditions. They can cause explosions or release toxic fumes, gases, or vapors when heated, compressed, or mixed with water. Examples include: drain openers, ammonia, and car batteries.

Note: Products can show more than one characteristic, for example brass/silver polish is **toxic, flammable and corrosive**; hairspray/hair dye is **toxic and flammable**.

### 3.2. HAZARDOUS WASTE DETERMINATION

A facility must first determine if the waste they generate is a hazardous waste.

*Figure 3.1* illustrates a flowchart that can be used to determine whether you have a hazardous waste.



*Figure 3.1 Hazardous Waste Determination Flowchart*

Note: A facility can also choose to rely on professional expertise to determine whether the waste is a hazardous waste or by sending the waste to a certified laboratory for testing and analysis.

### 3.3. *HAZARDOUS WASTE STREAMS*

Below are examples of common hazardous waste streams generated at a typical grocery facility:



Expired or Spilled Cleaning Chemicals (including “empty” containers)



Spent solvents and paints



Batteries



Mercury Lamps



Expired medications and pharmaceutical products



Used oil from equipment (including “empty” containers)



Oil soaked rags from cleaning of equipment

### 3.4. *HAZARDOUS WASTE GENERATOR CLASSIFICATIONS*

Under federal and California regulations, facilities that generate hazardous waste are grouped into three categories based on the amount of waste they generate (as shown in Table 3.1 below).

Most grocery facilities are classified as **Small Quantity Generator (SQG)**, and distribution centers will likely be classified as **Large Quantity Generator (LQG)**. **Note**, in California, the requirements for conditionally exempt small quantity generators are the same as for small quantity generators. As a result, grocery stores and distribution centers cannot claim an exemption from classification and from the hazardous waste requirements.

*Table 3.1 Hazardous Waste Generator Classification*

	<b>Large Quantity Generator (LQG)</b>	<b>Small Quantity Generator (SQG)</b>	<b>Conditionally Exempt Small Quantity Generator (CESQG)</b>
Waste Volumes	Generates: <ul style="list-style-type: none"> <li>- <b>1,000 kg (2,200 pounds)</b> or more of hazardous waste <b>a month</b>; or</li> <li>- more than <b>1 kg (2.2 pounds)</b> of acutely hazardous waste <b>a month</b>.</li> </ul>	Generates: <ul style="list-style-type: none"> <li>- More than <b>100 kg (220 pounds)</b> but less than 1,000 kg of hazardous waste a month; or</li> <li>- <b>up to 1 kg</b> of acutely hazardous waste a month.</li> </ul>	Generates: <ul style="list-style-type: none"> <li>- Up to 100 kg of hazardous waste a month; up to a total of 1 kg of acute hazardous waste a month; up to 100 kg of any residue; or</li> <li>- Contaminated soil, waste, or debris from the cleanup of a spill, onto land or water, of acutely hazardous waste a month.</li> </ul>

**Why are the different categories important?**

For each of the facility categories, the requirements for managing hazardous waste are different (for example, labeling of waste containers, how long waste can be accumulated at the facility, how waste must be stored, weekly inspections, hazardous waste manifest reporting and recordkeeping).

It is important that the store understands the distinction between the facility categories because SQGs and LQGs are subject to different standards.

While most grocery facilities operate under the SQG status, this status could quickly change from SQG to LQG if the facility generates 1,000 kg or more of hazardous waste in a given month.

Therefore, this Compliance Guide outlines requirements for both SQGs and LQGs. It is important for each facility to know how much hazardous waste it generates each month and which requirements (SQG or LQG) apply.

Table 3.2 below, summarizes the requirements for each of the three categories of facilities.

**Table 3.2 Hazardous Waste Generator Requirements Overview**

REQUIREMENT	CESQG	SQG	LQG
Waste Characterization	X	X	X
Obtain EPA ID Number	X	X	X
Manifesting	X	X	X
Exception Reporting	X - Modified	X - Modified	X
Weekly Inspections	X	X	X
Personnel Training	X	X	X
Personnel Training Program / Plan			X
Contingency Plan			X
Post Emergency Information	X	X	X
Emergency Equipment	X	X	X
Waste Container Management	X	X	X
Tank Management	X	X	X
Tank Labeling	X	X	X
Facility Closure			X
Biennial Report			X
Short-term Waste Accumulation Limit	Up to 55 gallons of hazardous waste and 1 quart of acutely or extremely hazardous waste*	Up to 55 gallons of hazardous waste and 1 quart of acutely hazardous waste*	Up to 55 gallons of hazardous waste and 1 quart of acutely hazardous waste*
Land Disposal Restriction Notification	X	X	X
Long-term Waste Accumulation Limit	180 Days once 100 kg of hazardous waste accumulated at long-term accumulation area*	180 Days	90 Days

\*California law prohibits storing wastes for more than one year from collection of the first drop or particle at a Satellite Accumulation Area regardless of whether 55 gallons have been accumulated at the Satellite Accumulation Area.

### 3.5. HAZARDOUS WASTE GENERATOR AND STORAGE REQUIREMENTS

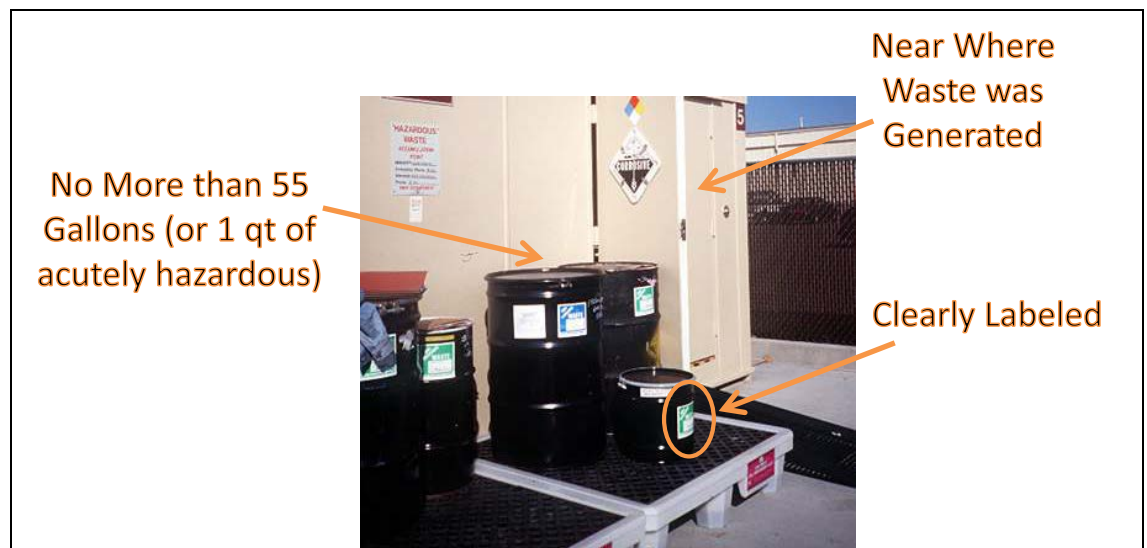
Regardless of generator status, facilities are required to have one emergency coordinator who is either on the premises or on call.

#### 3.5.1. Hazardous Waste Accumulation Areas

There are two kinds of hazardous waste Accumulation areas:

- 1) Satellite Accumulation Area
- 2) Long-term, Permitted Hazardous Waste Accumulation Area

##### 3.5.1.1. Satellite Accumulation Area



*Figure 3.2 Satellite Accumulation Area Requirements*

The satellite accumulation area is the location where waste hazardous waste is stored temporarily in a container, typically at or near the point where the waste is generated before it is moved to the central accumulation area. Satellite accumulation areas allow facilities to store up to 55 gallons of hazardous waste (or 1 quart of acute hazardous waste).

Grocery stores do not typically have satellite accumulation area on the store floor. However, at a distribution center, a satellite accumulation area may be located in the equipment maintenance area.

There are specific requirements of how hazardous waste must be stored and handled in the satellite accumulation areas. The requirements for waste accumulation and labelling in the satellite accumulation areas are less stringent compared to requirements for the central accumulation area.

These requirements are summarized below:

#### *Container*

The container must be under the control of the operator of the waste generation process.

- There must be no more than 55 gal of hazardous waste [this is the total of all the hazardous waste stored at the Satellite Accumulation Area or 1 qt. of acutely hazardous waste in containers.
- When waste is accumulated in excess of quantity limitations, the excess container must be marked with the date the excess amount began accumulating and the excess waste must be transferred to a permitted accumulation area within 3 days.

An example of a Satellite Accumulation Area is shown in *Figure 3.2*. Satellite Accumulation Area Requirements include:

#### *Labelling*

- For full labeling requirements refer to section 3.5.4 below. Labels are only required to contain the following (an example is given in):
  - Must say HAZARDOUS WASTE
  - Identify contents
  - Accumulation Start Date

*Figure 3.3 Example Satellite Accumulation Area Hazardous Waste Label*



3.5.1.2. *Permitted Hazardous Waste Accumulation*

A central hazardous waste accumulation area is where hazardous wastes are accumulated prior to being picked up for disposal, treatment, or recycling.

Requirements for these areas include:

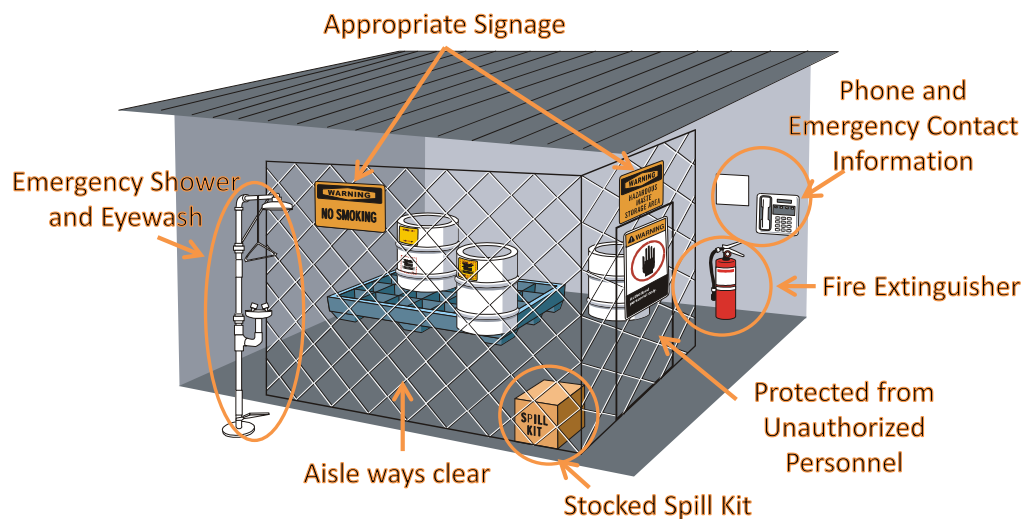
- The accumulation area must be locked or protected from unauthorized entry. A fence around the area is not required if it is in an area that is already restricted from unauthorized personnel.
- **Containers** must be labeled with the appropriate hazardous waste label.
- There must be **appropriate signage** identifying the area as hazardous waste storage, and a “No Smoking” signage.
- **Weekly inspections** must be conducted at these areas using the weekly inspection checklist.
- There must be **sufficient aisle space** to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the operation.
- The following **equipment** must be easily accessible, in working condition, and regularly tested:
  - Internal communications or alarm system capable of providing immediate emergency instruction to personnel.
  - Telephone or hand-held two-way radio capable of contacting local and emergency responders.



- Portable fire extinguishers and fire control equipment, including special extinguishing equipment (foam, inert gas, or dry chemicals).
- Fire hydrants or other source of water (reservoir, storage tank, etc.) with adequate volume and pressure, foam producing equipment, automatic sprinklers, or water spray system.
- **Spill control** equipment.
- Secondary containment for liquid wastes

*Figure 3.4* below provides an example of requirements for the central hazardous waste accumulation area.

*Figure 3.4: Permitted Long-term Accumulation Area Requirements*



### 3.5.2. *Hazardous Waste Compatibility*

Some types of chemicals (based on their chemical property / characteristic) when they come into contact with chemicals they are not compatible with can cause chemical reactions that could create a hazardous reaction. This could involve the production of toxic gas, accelerated corrosion, or an exothermic reaction (a chemical reaction that releases heat), which could result in an explosion and/or fire.

Even though hazardous waste is stored in containers, there is a risk of mixing if there is a material spill/release due to lack of proper storage or if there is a natural disaster that can cause a release of chemicals.

It is therefore important to understand what types of chemicals are compatible to store together and which are not compatible, so as to avoid mixing of incompatible chemicals.

Below is a general guidance describing which types of chemicals/materials should not be mixed or stored nearby.

Keep the following materials segregated from each other:

- **Acids and bases** (for example lead acid batteries and caustic cleaners)



- **Flammables or combustibles and oxidizers** (for example paint thinner and bleach)



- **Corrosives and flammables or combustibles** (for example acid cleaners and oil)



When storing hazardous wastes, it is important that the waste is not placed in containers made of materials that could pose compatibility issues like those mentioned above. For example do not place acids in metal drums because the acid will corrode the container and cause a leak.

Note: When in doubt consult the material's Safety Data Sheet (SDS) to identify chemical properties and hazard warnings.

### 3.5.3. *Container Management*

The following are requirements for hazardous waste containers (as illustrated in Figure 3.5):

- Containers must be compatible with the waste in them.
- Containers must be kept closed except when waste is actually being added.
- Containers must not be leaking, bulging, rusting, damaged, or dented.
- Store liquid waste containers on **secondary containment** pallets.
- **LQG Only:** Containers holding ignitable or reactive wastes must be placed at least 15m (50ft) from the facility's property line and incompatible wastes must be separated by a berm or wall



*Figure 3.5 Hazardous Waste Container Requirements*

Below in Figure 3.6 is an illustration of Federal EPA Best Management Practices for containers

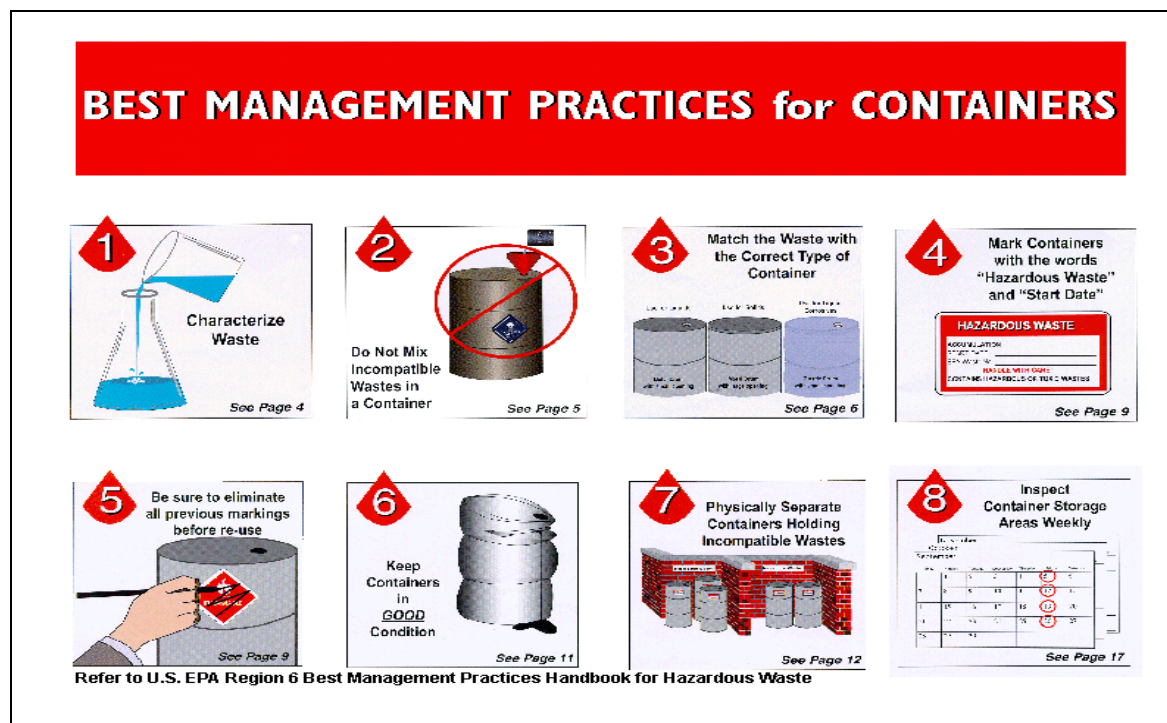


Figure 3.6 Federal EPA Best Management Practices for Container Management

### 3.5.4. Labeling

Each container in which hazardous waste is accumulated must be labeled with the following information (an example is shown in Figure 3.7):

- The words “Hazardous Waste”
- Composition and physical state of the waste (liquid, solid, or gas)
- Hazardous properties of the waste (e.g., reactive, ignitable)
- Name, address, and EPA identification number of the generator/facility
- Accumulation dates –
  - Initial Accumulation Date:
    - The date that the first drop or particle enters the container at the Satellite Accumulation Area, which starts the one-year clock for storage.
    - The date that a hazardous material container is emptied
    - The date you decide that stock chemicals are no longer needed

- **Full Date:** The date that the drum at the Satellite Accumulation Area is full (up to 55 gallons of each type of hazardous waste or one quart of each type of acutely or extremely hazardous waste), which starts the three-day clock for moving wastes from the Satellite Accumulation Area to the longer-term accumulation area.
- **Arrival Date:** The date that the full drum arrives at the long-term accumulation area, which starts the clock for storing waste after receipt from the Satellite Accumulation Area.
  - **SQG:** 180 day limit in long-term accumulation
  - **LQG:** 90 day limit in long-term accumulation

*Figure 3.7 Hazardous Waste Labeling Requirements*



### 3.5.5. *Accumulation Times*

In California hazardous waste must be removed from the site within one year of the accumulation start date regardless of whether the container is full or has been moved from the satellite accumulation to long-term accumulation. Otherwise:

- Waste is collected in the Satellite Accumulation Area until 55 gallons has accumulated (or one quart of acutely hazardous waste).

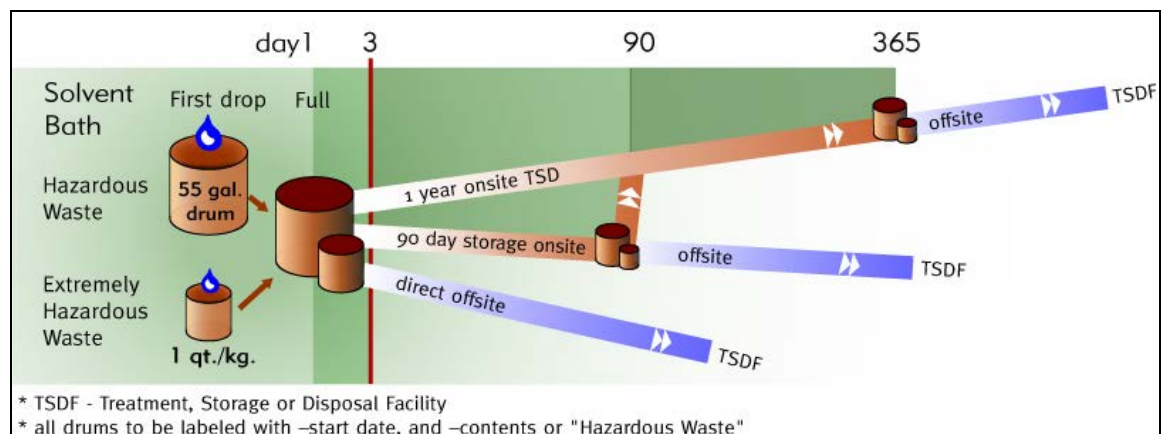


- Once there is 55 gallons (or one quart) the waste must be moved to the permitted hazardous waste accumulation area within 3 days.
- Waste is accumulated in the long-term area until picked up for disposal, treatment, or recycling
  - **SQG:** 180 day limit in long-term accumulation
  - **LQG:** 90 day limit in long-term accumulation

An illustration of the time line for hazardous waste accumulation is shown in Figure 3.8.

For SQGs, the 180-day accumulation limit may be extended to 270 days or less if the waste will be transported more than 200 miles or more for treatment, storage, or disposal.

*Figure 3.8 Hazardous Waste Accumulation Time Requirements*



### 3.5.6. Recordkeeping

All facilities, whether they are an LQG or SQG must keep following records on file for 3 years:

- [EPA identification number](#).
- Records of weekly inspection of the central accumulation area.
- Manifest for sending waste offsite for disposal or recycling.
- A copy of each signed manifest for until the facility receives a signed copy from the designated facility which received the waste. The returned signed copy is then retained as a record.
- If the waste being disposed of is restricted from land disposal, the manifest files should contain a copy of the LDR notice.

- Generators are required to keep records of waste analyses, tests, and waste.
- Training records (See Section 4 below for a detailed discussion).

**In addition to the recordkeeping requirements noted above, LQG facilities must keep the following additional documentation on file for 3 years:**

- Hazardous waste contingency plan, including a record of the time, date, and details of any incident that requires implementing the contingency plan.
- Written training plan.
- Biennial Report submitted to the DTSC by March 1 of each even-numbered year.

#### 4. *HAZARDOUS WASTE GENERATOR TRAINING REQUIREMENTS*

Improper waste handling could result in exposing employees to hazardous wastes. In addition improper disposal of hazardous waste could result in contamination of soil and water, and ultimately fines and enforcement from the regulatory agencies.

The best way to prevent generating unnecessary waste and to avoid problems relating to hazardous waste is to thoroughly train employees on how to perform their job duties safely and properly. This knowledge can lead to improved efficiency and reduced waste. Good training may also enable employees to identify ways to improve performance and processes.

It is not only a good idea to teach employees how to handle hazardous waste correctly and how to respond to emergencies, it is the law ([40 CFR 262.34\(d\)\(5\)\(iii\)](#), [22 CCR 66265.16](#), [22 CCR 66273](#)).

##### 4.1. *SQG TRAINING REQUIREMENTS*

SQGs must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies as part of their required on site job training. Training records on current personnel must be maintained until the closure of the facility. Records on former employees must be maintained for at least three years from the date the employee last worked at the store.

##### 4.2. *LQG TRAINING REQUIREMENTS*

LQGs must ensure that employees receive initial hazardous waste training within 6 months of receiving and/or changing a job assignment involving the management of hazardous waste.

Specifically, LQGs must ensure that personnel receive classroom or on-the-job training on handling, storage, and emergency response considerations of managing hazardous waste. At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:



- Using, inspecting, repairing, and replacing emergency and monitoring equipment
- Communications or alarm systems
- Response to fire or explosions
- Response to groundwater contamination incidents
- Shutdown of operations

Annual refresher training is also required to make sure employees stay on top of the requirements.

Employees must not work in unsupervised positions until they have completed the training requirements of this section.

#### **4.2.1. *LQG Training Plan***

Facilities must maintain a training plan at the facility that includes the following information:

- The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- A written job description for each position listed above. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above; and
- Records that document that the training or job experience required above has been given to, and completed by, facility personnel.

#### **4.3. *UNIVERSAL WASTE TRAINING***

Small Quantity Handlers of Universal Waste (SQHUW) (<5,000 kg of universal waste at any one time) must inform all employees who handle or have responsibility for managing universal wastes of the proper handling and emergency procedures appropriate to the type of universal waste handled at the facility.

The SQHUW should, although it is not required, maintain a written record by date indicating the names of personnel who received the information specified in this section. These records should be maintained for at least 3 years from the date the person last managed any universal waste at the facility.

*NOTE: It is not likely that grocery facilities will meet the threshold of a large quantity handler of universal waste (LQHUW), so LQHUW training requirements are not included in this compliance guide.*

#### **For More Information**

- ☞ Laws and Regulations: the state's regulations govern the disposal of these universal wastes can be found in Title 22 of the California Code of Regulations, Sections 66273.1 through 66273.90.
- ☞ Universal Waste Contact Information:
  - Federal Universal Waste Rule
    - Visit US EPA's Universal Waste Home Page:  
<http://www.epa.gov/epaoswer/hazwaste/id/univwast/index.htm>
  - California Universal Waste Rule
    - Visit the California Integrated Waste Management Board's website:  
<http://www.ciwmb.ca.gov/HHW/Info/default.htm>
    - Visit the DTSC's website:  
<http://dtsc.ca.gov/HazardousWaste/UniversalWaste/index.cfm>

#### **4.4. TRAINING RECORDKEEPING**

Hazardous waste management training record requirements for LQG and SQG facilities are as follows:

- **Current personnel:** keep records until closure of the facility;
- **Former employees:** keep records for at least three years from the date the employee last worked at the facility.

**Note:** Personnel training records may accompany personnel transferred within the same company.

## 5. WASTE MINIMIZATION

As a generator of hazardous waste, grocery facilities must always try to minimize the amount of waste generated. Two common approaches to minimizing waste include: (1) source reduction (e.g., ordering lower volumes of more benign chemicals) and (2) recycling.

### 5.1. REGULATORY OVERVIEW

**Regulation:** Federal Pollution Prevention Act of 1990 (42 USC 13101 *et seq.*, 40 CFR 370, 372)

**What is required:** Each owner or operator of a facility is required to file (with EPA) an annual toxic chemical release report. This report must describe toxic chemical source reduction and recycling initiatives for the previous calendar year, including the quantity of the chemical entering any waste stream before it is recycled, treated, or disposed of, and the percentage change from the previous year.

**Regulation:** California Waste Reduction Program (SB 14)

**What is required:** Requires certain generators to develop, implement, and update their own waste reduction programs. SB 14 affects almost all hazardous waste facilities generating more than 12,000 kilograms (13 tons) of hazardous waste or more than 12 kg (26 pounds) of extremely hazardous waste per year.

### 5.2. WASTE MINIMIZATION REQUIREMENTS

**LQGs** must have a program in place to reduce the volume and toxicity of waste generated to the degree the facility has determined to be economically practicable, currently available, and which minimizes the present and future threat to human health and the environment.

**SQGs** must make a good faith effort to minimize their waste generation and select the best waste management method that is available that the facility can afford.

## 6. HAZARDOUS WASTE CONTINGENCY PLAN

A contingency plan establishes the procedures that must be taken under RCRA to minimize hazards to human health and the environment caused by explosions, fires, or unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to the air, soil, or surface water. The plan must be in writing, and it must identify who will be in charge of implementation in the event of an emergency.

Under the federal rules, the plan's provisions must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. To prevent, mitigate, and abate emergencies, the following procedures, plans and equipment **must be provided for LQGs and are advisable for SQGs:**

### 6.1. GENERAL REQUIREMENTS

All operations must **minimize the possibility of a fire, explosion or any unplanned release** of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment.

At all times there must be at least one employee either on the premises or on call with the responsibility for coordinating all emergency response measures. This employee is the **emergency coordinator**.

All communications and alarm systems, fire protection equipment, spill control equipment and decontamination equipment, where required, must be **tested and maintained** as necessary to ensure its proper operation in time of emergency.

All hazardous waste handling personnel must have **immediate access** to an internal alarm or emergency communications equipment.

The generator must maintain **aisle space** to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of operation in an emergency.

## 6.2. *CONTINGENCY PLAN USE*

In the event of an emergency, the contingency plan is implemented by:

- Calling the Fire Department
- Containing and cleaning up small spills and releases if possible
- Contacting a private cleanup contractor to contain and cleanup large spills and releases

## 6.3. *EMERGENCY COMMUNICATIONS*

If only one employee is on the premises while the facility is operating, he/she must have immediate access to emergency communications equipment, such as a telephone or a hand-held two-way radio, capable of summoning external emergency assistance.

The following information must be posted next to the telephone (or other emergency communication device):

- The name and telephone number of the emergency coordinator;
- The location of fire extinguishers and spill control material, and fire alarm; and
- The telephone number of the fire department, unless the facility has a direct alarm.

## 6.4. *EMERGENCY RESPONSE EQUIPMENT*

The facility must have the following emergency response equipment onsite and easily accessible:

- Internal and external communication equipment
- Fire control equipment
- Water supply with adequate volume and pressure for fire suppression
- Spill control equipment
- Decontamination equipment
- Personal protective equipment

## 7. *STANDARD OPERATING PROCEDURES (SOPS)*

A Standard Operating Procedure (SOP) is a set of written instructions that document a routine or repetitive activity followed by an organization. The development and use of SOPs are an integral part of a successful quality system as it provides individuals with the information to perform a job properly, and facilitates consistency in the quality and integrity of a product or end-result. The term “SOP” may not always be appropriate and terms such as protocols, instructions, worksheets, and laboratory operating procedures may also be used. For the purposes of this Guidance, the term, “SOP” will be used.

In the Appendix are several SOPs to be customized by individual grocery facilities. Any wording in these documents that requires facility specific information such as the facility name has been highlighted in yellow for ease of personalization.

These documents are not intended to be a comprehensive discussion on Hazardous Wastes, but will focus on practical considerations and requirements for the handling, labeling, and storage of, and communication regarding, hazardous wastes within a grocer’s operational areas.

The following SOPs are included in the Appendix of this guide for your reference:

- [Hazardous Waste Management](#)
- [Used Oil Management](#)
- [Management of Parts Cleaning Units](#)
- [Management of Waste Paints - All Facilities](#)
- [Required Weekly Self-Inspections for Hazardous Waste Accumulation](#)
- [Recommended Monthly Self-Inspections for Hazardous Waste Accumulation](#)
- [Recommended Yearly Self-Inspections for Hazardous Waste Accumulation](#)
- [Hazardous Waste Recordkeeping Annual Checklist](#)

## 8. *DEFINITIONS*

**Acutely Hazardous Waste** – Waste that is fatal to humans in low doses or if it causes serious irreversible or incapacitating illness.

**Conditionally Exempt Small Quantity Generator (CESQG)** – Facilities that generate 100 kilograms or less per month of hazardous waste, or 1 kilogram or less per month of acutely hazardous waste.

**Corrosive** – Hazardous wastes such as acids or bases (pH less than or equal to 2, or greater than or equal to 12.5) that are capable of corroding metal containers, such as storage tanks, drums, and barrels. Battery acid is an example.

**Hazardous Waste** - Waste that exhibits one or more potentially hazardous characteristic: toxic, reactive, ignitable, or corrosive, or if it is listed as hazardous in applicable regulations

**Ignitable** – Hazardous wastes that can create fires under certain conditions, are spontaneously combustible, or have a flash point less than 60 °C (140 °F). Examples include waste oils and used solvents.

**Large Quantity Generator (LQG)** – Facilities that generate 1,000 kilograms per month or more of hazardous waste, or more than 1 kilogram per month of acutely hazardous waste.

**Reactive** - Hazardous wastes that are unstable under "normal" conditions. They can cause explosions, toxic fumes, gases, or vapors when heated, compressed, or mixed with water. Examples include lithium-sulfur batteries and explosives

**Safety Data Sheet (SDS)** – Written documents that provide information on the hazards of substances and how they should be safely used, stored, transported and disposed of. SDSs also describe emergency procedures, such as what to do in the event of a spill or fire.

**Satellite Accumulation Area** - A temporary collection area for hazardous waste in a container, not a tank, located at or near the point (i.e., process or piece of equipment) where the waste is generated.

**Secondary Containment** - a second barrier or an outer wall of a double enclosure which will contain any leak or spill from a storage container.

**Small Quantity Generator (SQG)** - Facilities that generate more than 100 kilograms, but less than 1,000 kilograms, of hazardous waste per month

**Standard Operating Procedures** - Established or prescribed methods to be followed routinely for the performance of designated operations or in designated situations

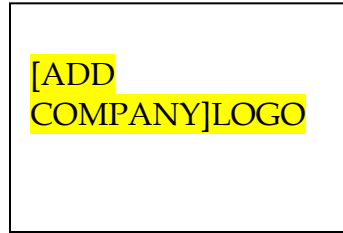
**Toxic** - Hazardous wastes that are harmful or fatal when ingested or absorbed (e.g., containing mercury, lead, etc.). When toxic wastes are land disposed, contaminated liquid may leach from the waste and pollute ground water.

**Waste** - any solid, liquid, contained gas, etc. that is discarded.



*Appendix A*  
*Standard Operating Procedures*

**SOP: HAZARDOUS WASTE MANAGEMENT**



**Effective Date:** \_\_\_\_\_

**Reviewed by:** \_\_\_\_\_

**PURPOSE:**

This Standard Operating Procedure ("SOP") is intended to:

- Ensure waste is properly characterized to determine if it is hazardous.
- Ensure that employees are properly managing hazardous wastes generated at the facility.
- Ensure containers accumulating hazardous waste are properly managed.
- Ensure that accumulation hold times are not exceeded.
- Ensure that hazardous wastes are not disposed of in the refuse or trash.
- Ensure personnel are trained to manage hazardous waste.

Scope

This SOP governs procedures for waste characterization and appropriate handling and labeling and accumulation procedures for hazardous waste generated at the facility. It also addresses how satellite accumulation and long term (90-day or 180-day accumulation) are monitored; the use of appropriate equipment to accumulate hazardous waste; and training of personnel.

Responsibilities

This SOP identifies the responsibilities of **JOB CATEGORY**. Only trained personnel are authorized to carry out the procedures contained in this SOP.

**PROCEDURE:**

**FACILITY NAME'S** policy is to manage hazardous waste in the following manner:

Hazardous Waste Characterization

Each facility manages chemicals, which, when they become wastes, may be considered hazardous wastes. **FACILITY NAME** is required to determine whether these wastes

meet the definition of “hazardous waste.” This determination may be performed by either testing representative samples of routine, predictable (and in some cases periodic) waste streams. Alternatively, the hazardous waste determination can be made by using knowledge of the chemicals and processes involved.

To determine if a waste is hazardous, perform the following steps:

- Determine whether the waste is excluded from regulation under 22 CCR § 66261.4. In most cases, these exclusions will not apply to waste water and drinking water operations.
- If the waste is not excluded from regulation, determine whether the waste is listed as a hazardous waste in [22 CCR § 66261](#) subpart D (federally-listed waste), or in [22 CCR § 66261.126](#) Appendix X (California regulated hazardous waste). A listed waste may include used oil, unused commercial chemical or off-specification product, and a spent solvent used for degreasing.
- If the waste is not listed as a hazardous waste, determine whether it exhibits a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic) by using knowledge of the waste or performing one of the following tests using a California state-certified environmental testing laboratory. It is often helpful to review of the Material Safety Data Sheet (SDS) to determine the hazardous characteristics of a hazardous material that later becomes a hazardous waste. A description of the waste characteristics is provided below.

### **Ignitability**

A waste is ignitable if a representative sample is easily combustible or flammable or if burnt it burns so vigorously that it creates a hazard. A waste is ignitable if it is:

- A liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, with a flash point of less than 140 degrees Fahrenheit (°F).
- A non-liquid capable under standard temperature of causing fire by means of friction, absorption or moisture, or spontaneous chemical changes and which when ignited burns so vigorously and persistently that it creates a hazard.
- An ignitable compressed gas as defined in the Department of Transportation (DOT) regulations.
- An oxidizer as defined in DOT regulations.

☞ An ignitable waste is assigned the EPA Hazardous Waste Number D001
----------------------------------------------------------------------

## Corrosivity

A waste is corrosive if a representative sample dissolves metals and other materials or burns the skin or eye on contact. A waste is corrosive if:

- It is aqueous and has a pH less than or equal to 2.0 or greater than or equal to 12.5.
- It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C.

☞ A corrosive waste is assigned the EPA Hazardous Waste Number D002

## Reactivity

A waste is reactive if it is unstable or undergoes rapid or violent chemical reactions such as catching fire, exploding or giving off fumes when exposed to or mixed with water, air or other materials. A reactive waste:

- Is normally unstable and readily undergoes violent change without detonating.
- Reacts violently with water.
- It forms potentially explosive mixtures with water.
- When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- It is capable of detonation or explosive reaction if it is subject to a strong initiating source or if heated under confinement.
- It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

☞ Wastes as described above are assigned the EPA Hazardous Waste Number D003

## Toxicity

A waste is toxic if it is listed in [22 CCR § 66261.24](#) and exceeds the listed regulatory level. If the waste appears on this list, or the toxicity thresholds for the waste are unknown, perform the following tests:

- Test the waste to determine if it exceeds the total threshold limit concentration (TTLIC). If so, the waste is a California Hazardous Waste. If not, continue as set forth below.
- If the waste's TTLIC value is ten times greater than the soluble threshold limit concentration (STLC), test the waste to determine if it exceeds STLC limits. If so, the waste is a California Hazardous Waste.
- If the waste's TTLIC value is 20 times the toxic characteristic leaching procedure (TCLP), analyze the waste using TCLP procedures to determine if the waste is a federally regulated hazardous waste under the Resource Conservation and Recovery Act (RCRA). If limits are exceeded, the waste is a RCRA hazardous waste.
- If the waste is not listed in [22 CCR § 66261.24](#) and does not exceed the listed regulatory level, conduct an aquatic bioassay test. If the waste fails this test, it is a California Hazardous Waste. If it does not fail the test, the waste is non-hazardous.

## Generator Management Standards

### EPA Identification (EPA ID) Number

Hazardous waste generators must have an identification number. This number identifies each generator on hazardous waste manifests and other paperwork. The identification number enables regulators to track the waste from origin to final disposal. These numbers are site-specific and there must be only one number at a single address.

☞ For more information or to apply for an EPA Identification Number, contact DTSC's Generator Information Services Section (GISS) at 1.800.618.6942 or visit [http://www.dtsc.ca.gov/IDManifest/ID\\_Numbers.cfm](http://www.dtsc.ca.gov/IDManifest/ID_Numbers.cfm).

### Hazardous Waste Accumulation

Under the hazardous waste requirements and to maintain its status as a small or large quantity generator, **FACILITY NAME** facilities must perform the following activities:

## Accumulation Time Limits

Accumulation time limits for hazardous waste depend on the facility's generator status. As mentioned above, most grocery store facilities operate under small quantity generator (SQG) status.

### SQG Accumulation Requirements

- SQGs generate **100-1,000 kg** (220-2,200 lbs.) of hazardous waste per month
- No more than **6,000 kg** (13,200 lbs.) of hazardous waste may be stored onsite at any one time
- Up to **55 gallons** of hazardous waste and 1 quart of acutely hazardous waste may be kept "at or near" the location where it is generated (this is called a "satellite accumulation area or (satellite accumulation point or "SAP)"). Once 55 gallons of a particular waste or 1 quart of acutely hazardous waste are generated, the waste must be moved (**within 3 days**) to the longer term (180-day) accumulation area at the site.
- Once the hazardous waste arrives at the long-term accumulation facility, the maximum allowed accumulation time is **180 days** or less from the first date on which any amount of hazardous waste begins to accumulate (or 270 days or less if the waste will be transported more than 200 miles or more for treatment, storage, or disposal).
- In no instance can hazardous wastes be stored for more than **one year** from the time of initial accumulation.
- The **accumulation start date** at the Satellite Accumulation Area and the 180-day storage facility must be clearly marked and visible for inspection on each accumulation unit.

### LQG Accumulation Requirements

- LQGs generate **1,000 kg or more** (2,200 lbs.) of hazardous waste per month
- No more than **6,000 kg** (13,200 lbs.) of hazardous waste may be stored onsite at any one time
- Up to **55 gallons** of hazardous waste and 1 quart of acutely hazardous waste may be kept "at or near" the location where it is generated (this is called a "satellite accumulation Area"). Once 55 gallons of a particular waste or 1 quart of acutely hazardous waste are generated, the waste must be moved (**within 3 days**) to the longer term (90-day) accumulation area at the site.
- The maximum allowed accumulation time is **90 days** or less from the first date on which any amount of hazardous waste begins to accumulate.

- In no instance can hazardous wastes be stored for more than **one year** from the time of initial accumulation.
- The **accumulation start date** must be clearly marked and visible for inspection on each accumulation unit.

## Container Storage

If hazardous waste is accumulated in containers, a generator must ensure:

- Accumulation is in closed containers that are in good condition and compatible with the waste.
- Containers are properly labeled. Each container in which hazardous waste is accumulated must be labeled with the following information:
  - The words “Hazardous Waste”
  - Accumulation start dates, with such date being visible for inspection:
    - The **date that the first drop or particle** enters the container at the Satellite Accumulation Area, which starts the one-year clock for accumulation.
    - **Full Date:** The date that the drum at the Satellite Accumulation Area is full (up to 55 gallons of each type of hazardous waste or one quart of each type of acutely or extremely hazardous waste), which starts the three-day clock for moving wastes from the Satellite Accumulation Area to the longer-term accumulation area.
    - **Arrival Date:** The date that the full drum arrives at the long-term accumulation area.
  - Composition and physical state of the waste, i.e. solid, liquid;
  - Statement or statements that call attention to the particular hazardous properties of the waste (e.g. flammable, reactive); and
  - Name and address of the generator.
- Weekly container inspections for compliance verification purposes.
- Manage containers to avoid ruptures or leaks.
- Place containers holding ignitable or reactive wastes at least 15m (50ft) from the facility’s property line and incompatible wastes must be separated by a berm or wall. (LQGs only)
- Ensure that each waste is stored in a suitable container and keep waste segregated to not mix incompatible materials. Keep containers securely

covered at all times except to add or remove wastes and store liquid waste containers on secondary containment pallets.

## Tank Storage

If hazardous waste is accumulated in aboveground storage tanks (ASTs), FACILITY NAME must ensure:

- Hazardous waste must not be stored in the tank for more than 90 (LQG) or 180 days (SQG).
- Tanks must be designed to hold hazardous waste and not collapse or leak.
- Closed tanks must be in good condition and compatible with the waste.
- Each AST in which hazardous waste is accumulated must be labeled with the following information:
  - The words “Hazardous Waste”
  - Accumulation start date
  - Composition and physical state of the waste (liquid, solid or gas)
  - Hazardous properties of the waste (e.g., reactive or ignitable)
  - Name, address, and EPA identification number of the generator/facility
  - No smoking signs must be conspicuously displayed where ignitable or reactive wastes are stored in tanks
- Inspections:
  - **LQGs:**
    - Above ground portions of the tank system and construction materials of the tank and in the area immediately surrounding the tanks (e.g., dikes) must be checked **at least daily** to detect corrosion or leaking *unless* leak detection systems are installed. If such systems are installed, Construction materials of the tank and in the area immediately surrounding the tanks (e.g., dikes) must be checked **at least weekly**.
    - Data must be gathered from monitoring equipment **at least once each operating day** to ensure that the tank is being operated according to its design
    - Secondary containment systems must be inspected **at least once each operating day**
  - **SQGs:**



- Construction materials of the tank and in the area immediately surrounding the tanks (e.g., dikes) must be checked **at least weekly** to detect corrosion or leaking
  - Discharge control equipment must be inspected **at least once each operating day**
  - Data must be gathered from monitoring equipment **at least once each operating day** to ensure that the tank is being operated according to its design
  - Level of waste in the tank is checked **at least once each operating day**
- Secondary Containment:
- **LQGs:** Most tanks and tank systems must have secondary containment. Secondary containment can include a liner, vault or double-walled tank. Appurtenances also must be contained. Secondary containment needs to be certified by a professional engineer registered in California. Secondary containment systems must be able to contain 100% of the capacity of the largest tank plus rainwater (if outside) from a 25-year, 24-hour rainfall.
- Waste Feed Cutoff:
- **SQGs:** Where hazardous waste is continuously fed into a tank, the tank must be equipped with a means to stop this inflow (e.g., waste feed cutoff system or by-pass system to a stand-by tank).

If hazardous waste is accumulated in underground storage tanks (USTs), please contact your Environmental Coordinator to obtain the federal and state requirements and instructions on proper management.

### **Empty Container Management**

A container or an inner liner removed from a container that has held any hazardous waste is California "empty" if:

- 1) **All wastes have been removed** that can reasonably be removed by inverting the container or chipping it out; OR
- 2) For containers that held an acute hazardous waste, the container or inner liner has been triple rinsed using a solvent capable of removing the waste and all pourable residues have been removed. **NOTE:** Triple rinsing activities shall require specific authorization from the DTSC unless subject to the provisions of HSC 25143.2(c)(2).

Under California law, there are three standards for empty containers, depending on the type of material that is held by the container. In short, it must not be possible for any

hazardous waste residue to be removed by scraping or chipping if it was a **non-pourable waste** or released by pouring out in any orientation for any **pourable waste**.

- For empty containers with a capacity of **5 gallons or less**, these containers must be recycled or properly disposed of with other solid waste generated at the facility
- Each empty container **larger than 5 gallons** that previously held a hazardous material must be marked “**EMPTY**” with the **date it was emptied** and:
  - Reclaimed for scrap value by shipping to a reputable reclaimer for metal recovery; or
  - Reconditioned or remanufactured
- Empty containers must be managed offsite within **1 yr. of being emptied**.
- Any off-site shipment for reclamation, reconditioning, and/or disposal must be to reputable facilities that have undergone a due analysis to determine that they are authorized to accept the waste.

## Disposal

Hazardous wastes must be legally transported and manifested by a Department of Toxics and Substances Control (DTSC) registered hazardous waste hauler to a permitted Treatment Storage Disposal Facility (TSDF).

## Management of Used Rags

Only cloth may be used with hazardous materials such as oils or parts cleaning solvents.

### Cloth Rags

- Collect dirty cloth rags in closed step cans or other containers in the maintenance shop.
- Label cans “Dirty Rags Only.”
- Return the rags to an industrial laundry for cleaning.
- Maintain invoices specifying the number of rags sent to the laundry.

### Disposable Rags

- **DO NOT** use disposable rags with hazardous materials.
- Place disposable rags in trash.

## **Training**

### **SQG Training Requirements**

SQGs must ensure that all employees *are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities* during normal facility operations and emergencies.

### **SQG Training Recordkeeping**

Hazardous waste management training records on current personnel must be kept until closure of the facility. Records on former employees must be kept for at least three years from the date the employee last worked at the facility.

### **LQG Training Requirements**

LQGs must ensure that employees receive initial hazardous waste training within 6 months of receiving and/or changing a job assignment involving the management of hazardous waste.

Specifically, LQGs must ensure that personnel receive classroom or on-the-job training on handling, accumulation, and emergency response considerations of managing hazardous waste. At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Using, inspecting, repairing, and replacing emergency and monitoring equipment
- Key parameters for automatic waste feed cutoff systems
- Communications or alarm systems
- Response to fire or explosions
- Response to groundwater contamination incidents
- Shutdown of operations

Annual refresher training is also required to make sure employees stay on top of the requirements.

***Employees must not work in unsupervised positions until they have completed the training requirements of this section.***

## LQG Training Plan

LQGs must maintain a training plan at the facility that includes the following information:

- the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- a written job description for each position listed above. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
- a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above; and
- records that document that the training or job experience required above has been given to, and completed by, facility personnel.

## LQG Training Recordkeeping

Training records on current personnel shall be kept until closure of the facility; training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

### **Recordkeeping**

Several documents must be maintained by generators and available upon request. Generally, the following documents must be kept for at least three (3) years:

- Hazardous waste manifests
- Exception reports for manifests (required for LQGs; modified for SQGs)
- Hazardous waste determinations
- Bills of lading (e.g., for used oil shipments) or receipts for empty containers, etc.
- Receipts for universal wastes
- Documentation for weekly inspections for hazardous waste containers
- Documentation for inspections of hazardous waste tanks

Other miscellaneous documents that **FACILITY NAME** may need to keep include:

- **Training program (LQGs)** and records of employee training
- **Hazardous Waste Contingency plan**, if applicable
- **Excluded recyclable materials reports**
- **SB 14 Hazardous Waste Source Reduction Plans and Progress Reports** (LQGs only and if applicable)
- **Biennial reports** (LQGs only)

Submitting a biennial report is required for a generator who ships any hazardous waste to a Transfer Storage Disposal Facility (TSDF) within the United States.

- ☞ The report is due by **March 1** of each even-numbered year and covers the previous year of hazardous waste activity.
- ☞ Copies must be retained for **three (3) years**.
- ☞ For more information regarding biennial reports, call the Biennial Report Hotline at (916) 322-2880.

The following checklists covering hazardous waste management can be found at the end of the Hazardous Waste Management section:

- [Required Daily/Weekly Self-Inspections for Hazardous Waste Aboveground Storage Tanks](#)
- [Required Weekly Self-Inspections for Hazardous Waste Accumulation](#)
- [Recommended Monthly Self-Inspections for Hazardous Waste Accumulation](#)
- [Recommended Yearly Self-Inspections for Hazardous Waste Accumulation](#)
- [Hazardous Waste Recordkeeping Annual Checklist](#)

### **Manifesting**

A Uniform Hazardous Waste Manifest (or Manifest) is a shipping document that travels with hazardous waste from the point of generation, through transportation, to the final treatment, storage, and disposal facility (TSDF). Each party in the chain of custody, including the generator, signs and keeps a copy of the manifest for tracking purposes. EPA ID numbers are needed by all parties that sign the manifest and hazardous waste transporters in California must be registered with the DTSC.

A final signed copy of the manifest must be returned to the generator by the TSDf and the generator is responsible for sending a copy of that signed manifest to DTSC within 30 days of waste shipment to the address below:

**DTSC Generator Manifests**  
**Department of Toxic Substances Control**  
**P.O. Box 400**  
**Sacramento, CA 95812-0400**

### Common Manifest Errors:

Errors with manifests can lead to fee errors, misdirected enforcement, incorrect data about the facility operation publicized on the website and FACILITY NAME paying correction fees. Below is a summary of common manifest errors to be aware of, so as to improve FACILITY NAME's manifesting practice and keep the errors to a minimum.

- Incorrect, invalid, or inactive generator ID number.
- Incorrect, invalid or inactive transporter ID number.
- Failure to verify ALL information on a pre-printed manifest at shipment.
- Failure to delete entire pre-printed information for waste not shipped.
- Incorrect or incomplete container, total quantity and/or unit weight information.
- Waste codes incorrect or incomplete.
- Failure to sign and/or date the manifest.
- Incorrect or incomplete dates; past dates or future dates.
- Transporter 1 signs in transporter 2 signature line.
- Failure to submit a legible copy.
- Generator fails to submit an exception report to DTSC when a signed facility copy is not received by the generator within 45 days.

### Hazardous Waste Transportation Requirements

When shipping hazardous waste on public roads, consult 49 CFR 173.4b. **FACILITY NAME** must:

- Only use transporters, and TSDf facilities that are registered or permitted by the DTSC and have obtained an ID number.
- The transporter must comply with Department of Transportation (DOT) requirements for packaging, labeling, training, and placarding as follows:

- *Packaging*: Hazardous waste must be packaged in containers that are in sound condition and are designed or maintained to contain hazardous waste.
- *Labeling*: Hazardous materials and hazardous waste containers must be marked in order to identify their contents and the hazard(s) posed by them in accordance with DOT requirements.

Transportation vehicles must be placarded on all four sides of the vehicle. If the waste shipment includes more than one hazard class, multiple placards must be used to indicate all the hazard classes.

**Record of Revisions:**

<b>Date:</b>	<b>Description:</b>	<b>Pages Affected:</b>	<b>Authorized by:</b>
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[ADD  
COMPANY]LOGO

## SOP: Used Oil Management

Effective Date: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

### PURPOSE:

California Health and Safety Code section 25250.4 requires that used oil be managed as a hazardous waste unless it has been recycled and is shown to meet the specifications for recycled oil in Health and Safety Code section 25250.1(b), or qualifies for a recycling exclusion under Health and Safety Code section 25143.2.

This SOP describes management practices to ensure compliance with California's used oil management regulations. This SOP does not address oils contaminated with polychlorinated biphenyls (PCBs).

### PROCEDURE:

**FACILITY NAME** personnel must adhere to the following procedure for managing used oil:

- Label all used oil containers, portable tanks and stationary tanks as "Used Oil" and label the container or tank with the initial accumulation date and hazard properties.
- All fill ports for piping leading to storage tanks must be labeled with the words "Used Oil." Ensure that all containers are in good condition and compatible with the storage of used oil.
- Ensure that used oil vessels and conveyances are properly managed to prevent oil leaks and spills.
- Ensure that used oil filters are managed either as hazardous waste or solid waste, under specified conditions.
- If a funnel is used in the bunghole of a container, it must either be removed when the container is not being added to (and the container closed), or be equipped with a valve or cover of some sort to prevent leakage if the drum should be turned over.

Refer to [Hazardous Waste Management SOP](#) for your appropriate generator status and follow all requirements contained therein for both containers and tanks.



## Definition of Used Oil

Any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use or as a consequence of extended storage, or spillage, is contaminated by physical or chemical impurities. Simply put, used oil is exactly what its name implies – any petroleum-based or synthetic oil that has been used.

## **Examples of Used Oil**

<b>Used Motor Oils</b>	<b>Used Industrial Oils</b>	<b>Other Oils</b>
Vehicle crankcase oils	Hydraulic oils	Transformer oils
Engine lubricating oils	Compressor oils	Refrigeration oils
Transmission fluids	Turbine oils	Metalworking oils
Gearbox and differential oils	Bearing oils	Railroad oils
Gear oils	Vegetable oils used for lubrication	

### **Waste synthetic oils that may be managed as used oil include:**

- Oil derived from coal, oil shale, or polymers;
- Water-soluble petroleum-based oils;
- Vegetable or animal oil used as a lubricant;
- Hydraulic fluid;
- Heat transfer fluid.

### **Used oil does NOT include:**

- Antifreeze,
- Brake fluid,
- Other automotive wastes,
- Fuels,
- Solvents.

**Substances which are not regulated as used oils include:**

- Oils with a flashpoint below 100°F;
- Oils mixed with hazardous waste;
- Wastewater containing small amounts of used oil;
- Oily wastes that are not used oil;
- Oily wastewaters that are not used oil;
- Tank bottoms;
- Used oil processing bottoms;
- Used oil re-refining distillation bottoms;
- Cooking oils (edible);
- Grease;
- Oils containing 5 parts per million (ppm) polychlorinated biphenyls (PCBs) or greater; and
- Oils containing more than 1,000 ppm total halogens.

**The Mixture Rule**

The used oil management regulations set forth six rules regarding the management of used oil that is mixed with a hazardous waste:

<b><u>A mixture of:</u></b>	<b><u>Is managed as:</u></b>
Used oil and listed hazardous waste	Hazardous waste
Used oil and characteristic hazardous waste	1) Hazardous waste if it exhibits a hazardous characteristic 2) Used oil if it does not exhibit a hazardous characteristic
Used oil and hazardous waste that is hazardous only because of the characteristic of ignitability	1) Used oil if it does not exhibit the characteristic of ignitability 2) Hazardous waste if it exhibits ignitability

## How to Manage Oil Leaks and Spills

- Take steps to prevent leaks and spills. Keep machinery, equipment containers, and tanks in good working conditions and be careful when transferring used oil.
- Have sorbent materials available on site
- If a spill or leak occurs, stop the oil from flowing at the source.
- Contain any spilled oil. For example, containment can be accomplished by erecting sorbent berms or by spreading a sorbent over the oil.
- Clean up the oil and recycle the used oil as you would have before it was spilled. If recycling is not possible, you first must make sure the used oil is not a hazardous waste and dispose of it appropriately.
- All used cleanup materials, from rags to sorbent booms, that contain free-flowing used oil must be handled according to the used oil management standards.
- Remove, repair, or replace the defective container immediately.

## Used Oil Filters

California requires used oil filters (UOF) to be managed as hazardous waste unless one of the following applies:

- The filters are deemed nonhazardous under state Cal/EPA rules or applicable federal waste characterization procedures.
- The filters are managed and recycled in compliance with the procedures described in this section.

For purposes of recycling, used oil filters are filters that contain a residue of used oil and are exempt from regulation as a hazardous waste under the scrap metal provision found in federal law at 40 CFR 261.6(a)(3)(iv).

## **Draining of Filters**

UOFs must be drained of all free-flowing oil. "Free-flowing oil" is a continuous stream of oil exiting the filter when the filter is inverted. If the filter has a device that stops the drainage of used oil from the filter, that device can be manipulated to allow the oil to leave the filter freely, or the filter may be punctured, crushed, drained, or opened in any other manner that will allow the used oil to drain from the filter.

## **Containers**

UOFs must be accumulated, stored, and transferred in a closed rainproof container that is capable of containing any used oil that may separate from the filters placed inside. Drums of UOFs should be sealed during transfer so that the used oil will not spill out if

the drums are laid on their sides. Drums must be secured as a load to prevent movement or tipping during transfer.

Used oil that is separated from the filters during draining procedures, or that accumulates in the container in which the filters are stored or transferred and remains there after the filters have been removed, must be managed as a hazardous waste.

**Container labeling.** Containers of drained UOFs must be labeled as "drained used oil filters" and not as hazardous waste. Generators of UOFs must indicate the initial date of accumulation on each container of filters.

Locations receiving UOFs must place the date of receipt on each container of filters received. These dates are used to calculate storage time compliance.

**Accumulation.** Accumulation of less than one ton of UOFs is limited to one year. Accumulation of one ton or more of UOFs is limited to 180 days. All accumulation beyond these limits requires a hazardous waste facility permit.

### Transporting Used Oil

Prior to transporting individual containers of used oil, **FACILITY NAME** facilities must ensure that shipping containers for used oil are labeled with a hazardous waste as follows:

**HAZARDOUS WASTE** - State and 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 Health Services.

- Generator's name and address
- Proper Department of Transportation (DOT) shipping name
- Uniform Hazardous Waste Manifest number and the shipping identification number (if an individual manifest is used).

**hazardous waste**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY  
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:  
NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
EPA / MANIFEST ID NO. / DOCUMENT NO. \_\_\_\_\_  
ACCUMULATION START DATE \_\_\_\_\_ EPA WASTE NO. \_\_\_\_\_

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

**handle with care!**

**FACILITY NAME** facilities must ensure that their used oil is transported only by registered hazardous waste transporters who have obtained an EPA identification number, using a hazardous waste manifest. The used oil must be transported to an authorized recycling facility.

However, **FACILITY NAME** facilities may transport, without registering as a hazardous waste hauler and without a hazardous waste manifest, used oil that is generated at the **FACILITY NAME** facility to a used oil collection center provided that:

- The facility transports the used oil in a vehicle owned by **FACILITY NAME**;
- The facility transports no more than 55 gallons of used oil at any time; and
- The contents of any single container do not exceed 55 gallons.

The generator transporting the used oil must contact the facility accepting the used oil before transporting more than 20 gallons of used oil and before transporting used oil in any container exceeding a 5-gallon capacity in order to verify that the location will accept the used oil.

**Determine if your facility needs to prepare a Spill Prevention Control and Countermeasure Plan (SPCC Plan)**

If **FACILITY NAME** has an aggregate aboveground oil storage capacity of 1,320 gallons (counting only containers that are  $\geq$  55 gallons or more in capacity) *OR* a completely buried oil storage capacity greater than 42,000 gallons, in addition to the management requirements above, your facility must prepare an SPCC Plan.

**RECORD OF REVISIONS:**

Date:            Description:            Pages Affected:            Authorized by:



SOP: Management of Parts Cleaning Units

Effective Date: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

**PURPOSE:**

Use parts cleaning units provided by a contractor to ensure proper management of waste.

*Parts Cleaning Units* are a sink type or similar unit used to clean parts. These units commonly use mineral spirits. Waste mineral spirits are a hazardous material and must be handled and disposed as a hazardous waste. If possible, use citrus or environmentally friendly parts cleaners.

**PROCEDURE:**

**FACILITY NAME'S** policy is the following:

- Do not put any chemicals other than parts cleaner in the parts cleaning unit.
- Parts cleaning units should be closed when not in operation to prevent evaporation and exposure to mineral spirits.
- The facility should contract with a vendor approved by the **Environmental Coordinator** to service the unit and remove waste. Prepare shipping documents in accordance with Hazardous Waste Management see [SOP: Hazardous Waste Management](#).

**ENVIRONMENTAL RECORDS:**

Follow Hazardous Waste Management procedures in [SOP: Hazardous Waste Management](#).

**RECORD OF REVISIONS:**

Date:	Description:	Pages Affected:	Authorized by:
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[ADD  
COMPANY]LOGO

SOP: Management of Waste Paints – All Facilities

Effective Date: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

**PURPOSE:**

Waste latex (water-based) and enamel (oil based) paints should be managed to reduce their effect on the environment.

**PROCEDURE:**

**FACILITY NAME'S** policy is to use latex paint wherever possible. Avoid using enamel paints.

Latex Paints (Water-Based)

- When possible, use leftover latex paint before purchasing new paints (or buy recycled latex paint)
- Collect waste latex paint in secured, indoor area
- Avoid storing at high temperatures
- Schedule regular pickups
- A bill of lading may be used if the latex paint is accepted by a certified latex paint recycler. Keep copy for 3 years.
- Container is “empty” when:
  - No paint pours out when held upside down;
  - Any paint remaining cannot be removed by chipping or scraping.

Enamel Paints (Oil Based)

If enamel paints are used at the facility, the following procedure should be followed:

- Empty excess enamel paint from paint cans into 55 gallon drum
- Label the drum “*Hazardous Waste*” with an accumulation start date
- Keep a record of how much/types of paint placed into the container
- When drum is full, move to 90-/180-day accumulation area

- Weekly inspections
- Schedule regular pickups.
- Keep copies of manifests for 3 years
- Container is “empty” when all the paint that can flow from the container is removed

**ENVIRONMENTAL RECORDS:**

Latex Paint

Maintain invoices, bills of lading or manifest for waste sent to the paint recycler in a central location for at least 3 years.

Enamel Paint

Follow [SOP: Hazardous Waste Management](#).

**RECORD OF REVISIONS:**

Date:	Description:	Pages Affected	Authorized by:
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SOP: Required Weekly Self-Inspections for Hazardous Waste Accumulation

Effective Date: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

**PURPOSE:**

State hazardous waste regulations require facilities that generate and store hazardous waste and are registered as a large quantity generator (LQG) or a small quantity generator (SQG) to perform weekly inspections of hazardous waste storage areas. This procedure has been designed to aid in complying with the required weekly inspection of the hazardous waste storage area and to provide guidance on what needs to be inspected.

**ROLES AND RESPONSIBILITIES:**

**PROCEDURE:**

Ensure compliance with the following checklist by:

- Printing the checklist.
- Inspecting the checklist items weekly to determine if the area and contents are in compliance. Include the location, date, and inspector’s name.
- If corrective actions are necessary, note the issue and action required on the checklist and then make the correction immediately if possible or call **TITLE** for assistance.
- Keeping signed checklists on file for a minimum of three years.

**RECORD OF REVISIONS:**

Date:	Description:	Pages Affected	Authorized by:
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## Weekly Self-Inspection Checklist for Long Term Hazardous Waste Accumulation

Location: \_\_\_\_\_

Date: \_\_\_\_\_

Inspector's Name: \_\_\_\_\_

Weekly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Signage</i>		The following signs are displayed in the permitted storage area: 1) "Hazardous Waste Accumulation Area" 2) "No Smoking Within 50 Feet" 3) "Authorized Personnel Only"		
<i>Emergency Equipment</i>	22 CCR 66265.32	The following emergency equipment is sited adjacent to the area where immediate access is available:  <u>Required:</u> 1) Internal communications equipment or alarm system 2) Telephone, or two-way radio capable of summoning emergency assistance from local emergency personnel 3) Portable fire extinguishers and other fire control equipment (foam, dry chemicals, etc.) 4) Water supply with adequate volume and pressure for fire suppression 5) Spill control equipment 6) Decontamination equipment		

Weekly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Emergency Equipment Continued:</i>		<u>Recommended:</u> 1) Empty "overpack" drum 2) Gloves 3) Goggles 4) Face Shield 5) Absorbent pads, socks and booms 6) Disposable bags 7) Spill response pocket guide or posters reflecting the same 8) Eye wash/shower 9) First aid kit		
	22 CCR 66265.33	Safety and emergency equipment is tested, well maintained, and in good working order.		
<i>Aisle Space</i>	22 CCR 66265.35	Adequate <b>aisle space</b> is provided to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of operation in an emergency.		
<i>Emergency Contacts</i>	22 CCR 66265.34	The following information is posted next to the telephone: 1) Name and telephone number of emergency contact 2) Location of fire extinguisher 3) Telephone number of local fire department		

Weekly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Empty Containers</i>	22 CCR 66261.7	Containers are adequately emptied of hazardous waste prior to disposal. <ul style="list-style-type: none"> <li>• <b>All wastes have been removed</b> that can reasonably be removed by inverting the container or chipping it out; OR</li> <li>• For containers that held an acute hazardous waste, the container or inner liner has been triple rinsed using a solvent capable of removing the waste and all pourable residues have been removed. <b>NOTE:</b> Triple rinsing activities shall require specific authorization from the Department unless subject to the provisions of Health and Safety Code Section 25143.2(c)(2).</li> </ul>		
<i>Waste Staging Area</i>	22 CCR 66265.31 – 37	The hazardous waste transfer, storage and generation areas are maintained and operated to minimize the possibility of any unplanned releases of hazardous waste or waste constituents which could threaten human health or the environment.  Safety and emergency communications equipment are tested, well maintained, and in good working order in all areas.		
	22 CCR 66264.176	Ignitable and reactive hazardous wastes are located at least 50 feet from the facility's property line. (LQGs only).		

Weekly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Secure Containers</i>	22 CCR 66262.34 and 66265.173	Containers of hazardous waste are closed at all times unless waste is being added or removed. (Inspect both Satellite Accumulation Area and long term storage)		
<i>Accumulation</i>	22 CCR 66262.34 and 66265.16	Storage conditions are adequate and adhere to the basics of SQG or LQG Hazardous Waste storage practices: <ul style="list-style-type: none"> <li>• Hazardous wastes are collected <b>at or near</b> the point of generation (Satellite Accumulation Area)</li> <li>• Once 55 gallons of hazardous wastes are accumulated, they must be moved to the <b>90-day or 180-day</b> staging area(s) or off-site.</li> <li>• Containers are labeled with the words "Hazardous Waste."</li> <li>• Containers clearly indicate the <b>accumulation start date</b> by which the first drop or particle of waste was added to the container.</li> <li>• Labels clearly show the contents of the hazardous waste, physical hazards associated with the waste, physical state of the waste, and generator name, address, and EPA Identification number.</li> <li>• All containers that store hazardous waste are in good physical condition and are compatible with the type of waste.</li> </ul>		
		Containers in satellite accumulation areas are labeled and stored at or near the point of waste generation and are under the control of the operator.		

Weekly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
		Accumulation times do not exceed allowable storage quantities (55 gallon/1 quart).		
<i>Accumulation Times</i>		<p>Hazardous wastes are stored in the long-term storage area less than 90-days (LQGs) or 180-days (SQG).</p> <p>Hazardous wastes at Satellite Accumulation Areas are stored on-site for less than one year.</p>		

**SOP: RECOMMENDED MONTHLY SELF-INSPECTIONS FOR HAZARDOUS  
WASTE ACCUMULATION**

**Effective Date:** \_\_\_\_\_

**Reviewed by:** \_\_\_\_\_

**PURPOSE:**

**ROLES AND RESPONSIBILITIES:**

**PROCEDURE:**

Ensure compliance with the following checklist by:

- Printing the checklist.
- Inspecting the checklist items yearly to determine if the area and contents are in compliance. Include the location, date, and inspector's name.
- If corrective actions are necessary, performing them immediately or call **TITLE** for assistance.
- Keeping signed checklists on file for a minimum of three years.

**RECORD OF REVISIONS:**

Date:            Description:            Pages Affected            Authorized by:

## Monthly Self-Inspection Checklist for Hazardous Waste Accumulation

Location: \_\_\_\_\_

Date: \_\_\_\_\_

Inspector's Name: \_\_\_\_\_

Monthly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Generator Status</i>	22 CCR 66261.12	Facility is registered as a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG) of hazardous waste.		
<i>Characterization</i>	22 CCR 66261.10	All potentially hazardous waste streams generated have been fully characterized.		
<i>Manifests</i>		Manifests are properly prepared and are attached to the signed copy returned from TSDF. Copies of manifests must be maintained on-site.		
	22 CCR 66262.40; 22 CCR 66262.41 and 42; 22 CCR 66262.23(a)(4)	LQGs: An Exception Report has been issued within 45 days of shipment to the EPA Regional Administrator for the Region in which the generator is located if a manifest has not returned with the third signature within 35 days.		



Monthly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
		SQGs: A legible copy of the manifest has been sent, with some indication that the SQG has not received confirmation of delivery, to EPA Regional Administrator if signed copy of manifest is not received within 60 days of the date the waste was accepted by the initial transporter		
<i>Empty Containers</i>	22 CCR 66261.7	Containers are adequately emptied of hazardous waste prior to disposal. <ul style="list-style-type: none"> <li>• <b>All wastes have been removed</b> that can reasonably be removed by inverting the container or chipping it out; OR</li> <li>• For containers that held an acute hazardous waste, the container or inner liner has been triple rinsed using a solvent capable of removing the waste and all pourable residues have been removed. <b>NOTE:</b> Triple rinsing activities shall require specific authorization from the Department unless subject to the provisions of Health and Safety Code Section 25143.2(c)(2).</li> </ul>		
<i>Disposal</i>	22 CCR 66262.23	Hazardous wastes are legally transported and manifested by a registered hazardous waste hauler to a permitted Treatment Storage Disposal Facility (TSDF).		

**SOP: RECOMMENDED YEARLY SELF-INSPECTIONS FOR HAZARDOUS WASTE  
ACCUMULATION**

**Effective Date:** \_\_\_\_\_

**Reviewed by:** \_\_\_\_\_

**PURPOSE:**

**ROLES AND RESPONSIBILITIES:**

**PROCEDURE:**

Ensure compliance with the following checklist by:

- Printing the checklist.
- Inspecting the checklist items yearly to determine if the area and contents are in compliance. Include the location, date, and inspector's name.
- If corrective actions are necessary, performing them immediately or call **TITLE** for assistance.
- Keeping signed checklists on file for a minimum of three years.

**RECORD OF REVISIONS:**

Date:	Description:	Pages Affected	Authorized by:
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## Yearly Self-Inspection Checklist for Hazardous Waste Accumulation

Location: \_\_\_\_\_

Date: \_\_\_\_\_

Inspector's Name: \_\_\_\_\_

Yearly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Permits</i>	CA HSC 25189.5(d)	Hazardous waste permits and EPA Generator ID Numbers are current and in good standing.		
<i>Training</i>	22 CCR 66262.34; 22 CCR 66265.16; 22 CCR 66273.36	<p><u>For SQGs:</u></p> <p>All employees exposed to hazardous waste are thoroughly familiar with proper handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.</p> <p><u>For LQGs:</u></p> <p>All employees who may be exposed to hazardous waste have taken the appropriate initial and annual refresher training on waste management procedures. Also refer to the <a href="#">Annual Hazardous Waste Recordkeeping Checklist</a> for records that should be maintained onsite.</p>		

Yearly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Disposal</i>	22 CCR 66262.23	Hazardous wastes are legally transported and manifested by a registered hazardous waste hauler to a permitted Treatment Storage Disposal Facility (TSDF).		
<i>Job Descriptions</i>	22 CCR 66265.16	Accurate and current job descriptions are maintained and documented for all personnel who manage hazardous waste.		
<i>Hazardous Waste Contingency Plan (for LQGs)</i>	22 CCR 66265.51, 66265.52	LQGs: A hazardous waste contingency plan, which outlines how the facility would respond to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste, is prepared. In addition, the facility has made attempts to make arrangements with local hospitals to familiarize them with the hazardous waste handled at the facilities and the types of injuries or illnesses which could result from fires, explosions, or releases. A copy of the plan is submitted to local police and fire departments, state and local emergency response teams, and local hospitals.		
<i>Biennial Report</i>	22 CCR 66262.41	LQGs: A biennial report is prepared and submitted by March 1 of every even numbered year (e.g., March 1, 2006). The report includes the following: <ol style="list-style-type: none"> <li>1) EPA ID #, name, and address of generator</li> <li>2) Calendar year covered by the report</li> <li>3) EPA ID #, name, and address of all TSDFs to which waste is shipped</li> </ol>		

Yearly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
		4) Name and EPA ID# of each transporter used during the reporting year for shipments to a TSDF 5) Description and quantity of each waste shipped off site 6) Description of efforts taken to reduce the volume and toxicity of waste generated 7) Description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.		
<i>Waste Minimization (for Large Quantity Generators only)</i>	SB 14	<ul style="list-style-type: none"> <li>• Do you have a formal policy/mission statement stating your commitment to source reduction?</li> <li>• Offer incentives for employees to promote good housekeeping practices?</li> <li>• Do you offer employee training on how to avoid excessive waste generation?</li> <li>• Employees trained in source reduction techniques?</li> <li>• Periodic sessions to keep employees up to date on source reduction measures?</li> <li>• Are hazardous materials stored in covered containers?</li> <li>• Is your hazardous materials storage area covered?</li> <li>• Store hazardous wastes and materials in a secure area</li> <li>• Implement safeguards to prevent the spillage of liquids while filling any storage tanks</li> <li>• Develop a prepared plan to respond to hazardous materials spills</li> </ul>		

Yearly Self-Inspections for Hazardous Waste Accumulation				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<p><i>Waste Minimization (for Large Quantity Generators only)</i> <i>Continued:</i></p>	SB 14	<ul style="list-style-type: none"> <li>• Routinely inspect all waste storage tanks, drums, and containers for leaks and proper storage</li> <li>• Routinely inspect and maintain equipment and processes to prevent leaks and spills</li> <li>• Conduct practice drills for major spills</li> <li>• Look into the use of nonhazardous or less hazardous material alternatives</li> <li>• Segregate waste streams</li> <li>• Store materials close to the process areas where they are used</li> <li>• Establish procedures for cleaning process equipment</li> </ul> <p>If you are planning any future plant modernizations, consider replacing existing equipment with more efficient ones which generate less hazardous waste.</p>		

**SOP: RECOMMENDED HAZARDOUS WASTE RECORDKEEPING ANNUAL  
CHECKLIST**

**Effective Date:** \_\_\_\_\_

**Reviewed by:** \_\_\_\_\_

**PURPOSE:**

Several documents must be maintained by generators and available upon request by state or federal agencies.

**ROLES AND RESPONSIBILITIES:**

**PROCEDURE:**

Generally, the following documents must be kept for at least three (3) years:

- Hazardous waste manifests
- Exception reports for manifests (LQGs); documentation of non-receipt of signed copy of manifest (SQGs)
- Hazardous waste determinations
- Bills of lading (e.g., for used oil shipments)
- Receipts for universal wastes
- Documentation for inspections for hazardous waste tanks
- Land ban documentation

**Other miscellaneous documents that facilities must be kept include:**

- Documentation for weekly inspections for hazardous waste containers (for LQGs)
- **Training program** and records of employee training
- **Hazardous Waste Contingency plan**, if applicable
- **Excluded recyclable materials reports**
- Documentation of **hazardous waste amounts** that qualify the facility as a SQG

➤ **Biennial reports** (LQGs only)

Submitting a biennial report is required for a LQG who ships any hazardous waste to a Transfer Storage Disposal Facility (TSDF) within the United States.

- ☞ The report is due by **March 1** of each even-numbered year and covers the previous year of hazardous waste activity.
- ☞ Copies must be retained for **three (3) years**.
- ☞ NOTE: Some states use their own biennial report form.

Ensure compliance with the following checklist by:

1. Printing the checklist.
2. Inspecting the checklist items to determine if the area and contents are in compliance. Include the location, date, and inspector's name.
3. If corrective actions are necessary, performing them immediately or call **TITLE** for assistance.
4. Keeping signed checklists on file for a minimum of three years.

**RECORD OF REVISIONS:**

Date:	Description:	Pages Affected	Authorized by:
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## Hazardous Waste Recordkeeping Annual Checklist

Location: \_\_\_\_\_

Date: \_\_\_\_\_

Inspector's Name: \_\_\_\_\_

Hazardous Waste Recordkeeping Annual Checklist				
Topic	Citation	Action Item	Compliant? (Y/N)	Comments (Explain "No" answers)
<i>Permits</i>	22 CCR 66262.12(a)	Hazardous waste permits, and EPA Generator ID Numbers are current and in good standing.		
<i>Record Keeping</i>	22 CCR 66262.40(a)	Manifests are retained for three years from the date the waste was accepted by the initial transporter.		
	22 CCR 66262.40(c)	Hazardous waste determination records (test results, analyses, and other hazardous waste determinations) are retain for three years from date waste sent to an on-site or off-site treatment, storage, or disposal facility (TSDF).		
	22 CCR 66262.40(b)	Biennial reports and exception reports (LQGs only) are retained for three years from the due date of the report.		
	Recommended BMP	Copy of correspondence to EPA Regional Administrator indicating that SQG has not received confirmation of delivery to TSDF via a signed manifest returned to the SQG.		
		Bills of lading (e.g., for used oil shipments) are retained for three years.		

<b>Hazardous Waste Recordkeeping Annual Checklist</b>				
<b>Topic</b>	<b>Citation</b>	<b>Action Item</b>	<b>Compliant? (Y/N)</b>	<b>Comments (Explain "No" answers)</b>
	40 CFR 262.20(e)(2)	SQG "reclamation agreement" is retained for at least three years after the agreement's termination or expiration.		
	22 CCR 66262.34(a)	Documentation for inspections of hazardous waste tanks and 90-/180-day storage areas are retained for 3 years.		
	22 CCR 66268.7	Land ban documentation are retained for three years		
	22 CCR 66265.16	Training records pertaining to hazardous waste handling and emergency response are retained for 3 years		
	Best Management Practice	Documentation of hazardous waste amounts that qualify the facility as a SQG are retained 3 years		
	22 CCR 66265.31	Hazardous Waste Contingency plan is current and reviewed annually.		