



HW: The Good, The Bad & The Ugly

Richard Medina, Sr. Hazardous Materials Program Manager

W-B1

February 28, 2024



**26th California Unified Program
Annual Training Conference
February 26-29, 2024**

Outline

- Pre-Inspection Preparation
- On-Site Inspection Procedures
- Evaluation of a Haz Waste Label
 - Components of a Haz Waste Label
 - Components of a Universal Waste Label
- Dangers and Hazards during an Inspection
- The Good, The Bad The Ugly
- Follow-up & Overview

Pre-Inspection Preparation

- Importance of preparing for inspections
 - Compliance Assurance
 - Risk Mitigation
 - Efficiency & Organization
 - Employee Training & Awareness
 - Practicing Proactive Approach to Conducting Inspections.



Hazard Recognition

- Pre-plan your inspection
 - Identify any known exposure to hazards
- Survey your work area when you arrive
 - Pick a path
- Select the appropriate PPE
- Situational Awareness
- Report threats of injury to site personnel & your Supervisor immediately



Personal Protective Equipment (PPE)



On-Site Inspection Procedures

- Examination of Hazardous Waste Storage Areas
 - Have site personnel escort you to the hazardous storage waste areas
 - Not all facilities are designed the same, ask questions.
 - This is a good opportunity to evaluate the overall cleanliness of the area, good separation, compatible containers and clearly marked labeling
 - It is ok to be unsure, ask and document, seek help

On-Site Inspection Procedures

- Arrival and Initial Assessment
 - Download Site Map from CERS

Hazardous Materials Business Plan Map

Facility Name: _____ Facility Address: _____ Pg. ___ of ___
Date: _____

Emergency Contact Name: _____ Phone Number: _____

↑
North

Map Requirements per HSC 25505(a)(2):

<input type="checkbox"/> Adjacent Streets	<input type="checkbox"/> Internal roads	<input type="checkbox"/> Access and exit points	<input type="checkbox"/> Loading areas	<input type="checkbox"/> Hazardous material handling and storage areas
<input type="checkbox"/> Emergency response equipment	<input type="checkbox"/> Emergency shutoffs	<input type="checkbox"/> Storm drains and sewer drains	<input type="checkbox"/> Evacuation staging areas	

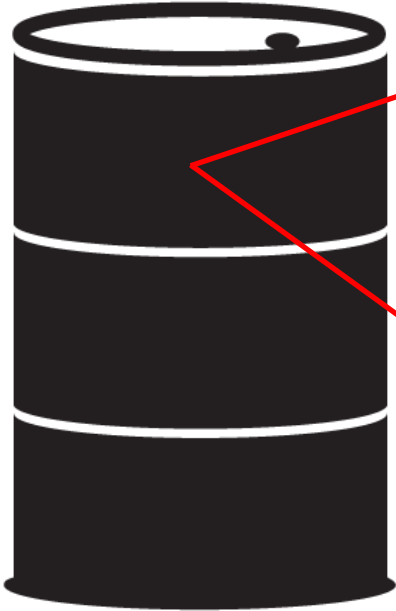
On-Site Inspection Procedures

- Exam and observation of Hazardous Waste Storage Areas
- Evaluation of Labeling
- Documentation Practices
 - Manifest
 - Training
- Determination of Accumulation Time Limits

On-Site Inspection Procedures

- During Inspections you may encounter a variety of non-compliance items:
 - Leaking containers
 - Missing labels
 - In-compatible containers
 - Lack of aisle space / adequate separation

Evaluation of a Haz Waste Label



HAZARDOUS WASTE
STATE AND FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL
GENERATOR'S INFORMATION:
NAME: _____
ADDRESS: _____ PHONE: _____
CITY: _____ STATE: _____ ZIP: _____
EPA _____ MANIFEST _____
ID NO.: _____ TRACKING NO.: _____
EPA WASTE CA WASTE ACCUMULATION
NO.: _____ NO.: _____ ST ART DATE: _____
CONTENTS, COMPOSITION: _____

PHYSICAL STATE:	HAZARDOUS PROPERTIES:
<input type="checkbox"/> SOLID <input type="checkbox"/> LIQUID	<input type="checkbox"/> FLAMMABLE <input type="checkbox"/> TOXIC <input type="checkbox"/> CORROSIVE <input type="checkbox"/> REACTIVE <input type="checkbox"/> OTHER

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

Evaluation of Labeling

- “Hazardous Waste”
- CA CCR Title 22 statement “.....”
- Waste Generator Address
- EPA ID
- Manifest Tracking No.
- Contents
- Physical State
- Hazard Properties
- DOT Shipping Name

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CONTENTS, COMPOSITION: _____

PHYSICAL STATE:	HAZARDOUS PROPERTIES:
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D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Components of Hazardous Waste Label

- Words “Hazardous Waste” & Statement
- 22 CCR § 66262.32 Marking
 - (2) On and after September 5, 2006, before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator shall mark each container of 119 gallons or less used in such transportation with the following words and information displayed in accordance with the requirements of 49 Code of Federal Regulations section 172.304:
 - 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 Toxic Substances Control.

Components of Hazardous Waste Label

- 22 CCR § 66262.32 Marking
 - Generator's Name and Address
 - Generator's EPA Identification Number
 - Manifest Tracking Number
 - EPA ID
 - CalEPA ID

Components of Hazardous Waste Label

- Accumulation Start Date
- 22 CCR § 66262.34 Accumulation Time
- (f)(1) the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container and portable tank;
- (3)(A) composition and physical state of the wastes;
- (3)(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);
- (3)(C) name and address of the person producing the waste.

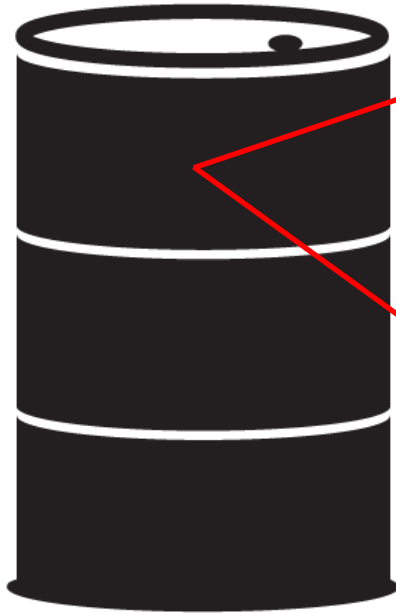
Components of Hazardous Waste Label

- Generator Address
- Physical State
- Accumulation Start Date
- Hazard and Composition of Hazardous Waste
- Universal Waste or Recycled Classification

Recyclable Hazardous Waste

- 22 CCR § 66266.2 – List of Recyclable Hazardous Wastes
- Lead Acid Batteries
 - 22 CCR § 66266.81 – Requirements
 - (a) talks about quantity and time and utilizing a manifest or bill of lading for tracking and recordkeeping (3 years 22 CCR § 66262.40)
 - (b) (c) & (d) talk about the handling, storage and transporting of *damaged lead acid batteries*.

Evaluation of U-Waste Label



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Evaluation of Labeling

22 CCR § 66273.34 Labeling & Marking

- “Universal Waste”
- Universal Waste—Battery(ies)
- Universal Waste—Mercury Containing Equipment,
- Universal Waste—Lamp(s)
- Universal Waste Electronic Device(s)
- Universal Waste CRT(s)
- Universal Waste CRT Glass
- Universal Waste-PV module(s)

- Consolidate – Universal Waste—Electronic Device(s)/Universal Waste—CRT(s)/Universal Waste-CRT Glass.



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Dangers and Hazards during Inspections

- Chemical Exposure Risks
- Physical Hazards (e.g., Fire, Explosions)
- Environmental Contamination
- Containers shall have no evidence of leakage, spillage or damage

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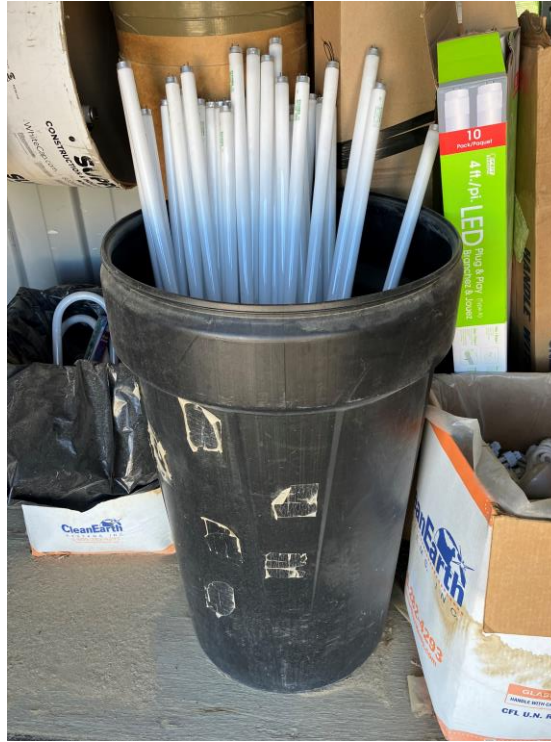


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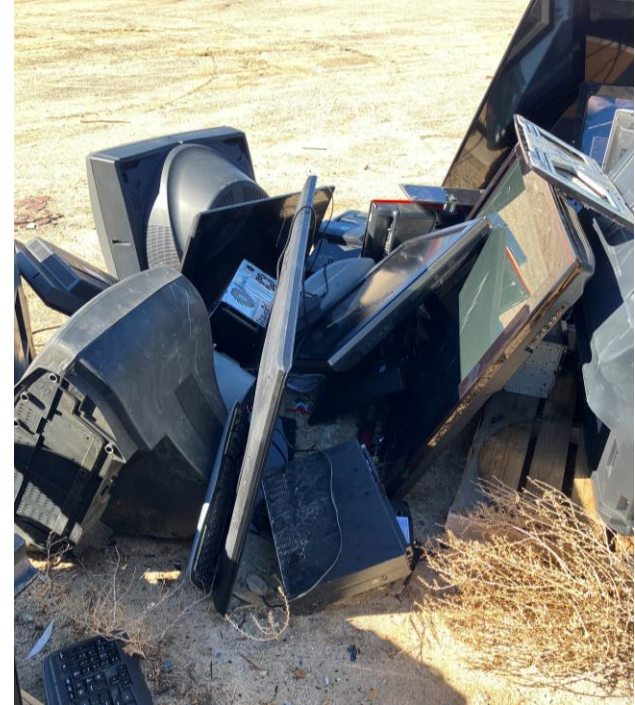
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Follow-Up Actions

- Documentation of Findings
- Corrective Actions and Recommendations
- Try to correct as many violations during the inspection
- Consider enforcement measures if necessary
- Always perform a de-brief at the end of your inspection

Conclusion

- Pre-inspection
- Inspection Procedures
- Importance of Proper Hazardous Waste labeling
- Sample Sites





Any Questions?

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