

	SOP-614 (Ver. 3) Hazardous Waste and Materials Program
Standard Operating Procedure (SOP)	Effective: 1/25/2022 Supersedes: 11/02/2020
Approved By: James D. Herberg General Manager 	

I. Purpose

The Orange County Sanitation District (OC San) is committed to managing hazardous waste in a manner that eliminates or minimizes the effect it has on human health and the environment.

The Hazardous Waste and Materials Program (HWMP) is a critical element in the success of the OC San’s commitment to that goal. This program must be understood and complied with by all employees and contractors charged with the responsibility of handling, transporting, storing, and disposing of hazardous waste generated by OC San or by a designee on our behalf.

II. Background

The program contains procedures to allow our employees and contractors to handle, transport, and dispose of hazardous waste in a manner that meets regulatory requirements, uses a best practices approach, promotes hazardous waste minimization, and protects human health and the environment.

OC San will manage, store, and dispose of waste generated due to business activities or emergencies, including but not limited to maintenance-derived waste, investigation-derived waste, demolition, and renovations.

III. Definitions

Aboveground Storage Tank (AST): An aboveground storage is any one or combination of tanks, which could be constructed from metal, plastic, composite materials—or some combination of all three that are located completely above the ground surface.

Acutely Hazardous Waste: Waste that has been found to be fatal to humans in low doses or, in the absence of data on human toxicity, has been shown in studies to have an oral LD₅₀ toxicity (in rabbits) of less than 2mg/l, or a dermal LD₅₀ toxicity of less than 200mg/kg, or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible illness.

Authorized Signer: Those who have been designated through appointment from the Sanitation District and who have received regulatory training in Hazardous Materials and Management for Compliance with DOT requirements. Refer to Attachment A for a list of authorized signers.

Biohazard Label: A label affixed to containers of regulated waste, refrigerators/freezers and other containers used to store, transport or ship blood and OPIM (Other Potentially Infection Materials). The label must be fluorescent orange red in color with the biohazard symbol and the word biohazard on the lower part of the label.

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Consolidation Site: A site to which hazardous waste initially collected from a remote site, as defined in the Health and Safety Code section 25121.3, is transported to a consolidation site, which is operated by the Generator of the hazardous waste.

Contaminated: The presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

Contaminated Sharps: Any contaminated objects that can penetrate the skin including, but not limited to needles, scalpels, broken glass, capillary tubes, and the exposed ends of dental wire.

Consolidated Unified Program Agency (CUPA): the unified program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement. The state agencies are responsible for these programs and set the standards for their program while local governments implement the standards. The unified program is implemented at the local county level.

Hazardous Materials: Any product regulated by OSHA, Department of Transportation (DOT), and any other regulatory agency.

Hazardous Waste: A liquid, solid, contained gas, or sludge wastes that are corrosive, flammable, reactive and/or toxic as defined by Title 22 of the California Code of Regulations, Section 66261. Hazardous wastes, such as contaminated soils, liquids, and other wastes as listed and defined in 40 CFR 261.3, or regulations as hazardous waste in California pursuant to Chapter 6.5, Division 20, California Health and Safety Code, or those substances defined as hazardous wastes in 49 CFR 171.8, shall be handled, transported, labeled, stored and disposed of in accordance with Federal OSHA, Cal/OSHA, DOT and other applicable regulatory agencies.

Hazard Waste Manifest: A written document that accompanies a shipment of hazardous waste during transport.

Hazardous Waste Minimization: Methods to minimize the amount of hazardous waste before the wastes are generated. The term includes source reduction and environmentally sound recycling.

Large Quantity Generator: Large-Quantity Generators of Hazardous Waste produced in one calendar month during a reporting year: 1. Greater than or equal to 1,000 kilograms (2,200 lbs.) or more of non-acute RCRA hazardous waste (which includes quantities imported by importer site); or 2. Greater than 1 kg. (2.2 lbs.) of any RCRA acute hazardous waste listed in 40 CFR sections 261.31 or 261.33(e); or 3. Greater than 100 kg (220 lbs.) of residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water, of any RCRA acute hazardous waste listed in 40 CFR sections 261.31 or 261.33(e); and/or 4. Treated, stored, or disposed of RCRA hazardous wastes on-site (TSDF).

Non-RCRA Hazardous Waste: Non-RCRA Hazardous Waste: All hazardous waste regulated in the State of California, other than RCRA (federally regulated) hazardous waste. A hazardous waste is presumed to be RCRA hazardous waste, unless it is determined pursuant to Section 66261.101 that it is a non-RCRA hazardous waste.

Resource Conservation and Recovery Act (RCRA): The act that gives EPA the authority to control hazardous waste from the "cradle to grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste.

Reportable Quantity (RQ): is the minimum quantity of a hazardous substance which, if released, is required to be reported.

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Small Quantity Generator: Generators of less than 1,000 kg of hazardous waste per month, excluding universal wastes, and/or 1kg or less of acutely or extremely hazardous waste per month.

Straight Bill of Lading: A document signed by a carrier (a transporter of goods) or the carrier's representative and issued to a cosigner (the shipper of goods) that evidences the receipt of goods for shipment to a specified designation and person.

Storage Facility: A hazardous waste facility at which the hazardous waste is either: Held onsite past the applicable time limit (90/ 180/270 days); Held for any period at an offsite facility that is not a transfer facility; or Held at a transfer facility for periods longer than six days, or longer than 10 days for transfer facilities located in industrial areas. DTSC may extend the above period for hazardous waste that is generated because of an emergency release and that is collected and temporarily stored by emergency rescue personnel, as defined in Section 25501, or by a response action contractor, upon the request of emergency rescue personnel or the response action contractor. The hazardous waste is held at a transfer facility for any period in a manner other than in a container or tank. The hazardous waste is held at a transfer facility for any period and handling occurs other than the transfer of packages or containerized hazardous waste from one vehicle to another. A grant of authorization from the Department is required for a Hazardous Waste Storage Facility.

Treatment, Storage, and Disposal Facility (TSDF): Is the treatment, storage, and disposal facility by technique or process designed to change the nature of a hazardous waste physically, chemically, or biologically. The TSDF also is designed to store or hold hazardous waste for a temporary period, after which the hazardous waste is treated, disposed of, or stored elsewhere. The final disposal consists of discharge, deposit, injection, dumping, spilling, leaking, or placing any solid or hazardous waste on or in the land or water.

Underground Storage Tank (UST): An underground storage is any one or combination of tanks, including pipes connected thereto, that are used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground.

IV. Roles and Responsibilities

A. Risk Management Division

1. Implement and manage the overall program for hazardous waste and materials to ensure that all employees are trained at the level required for handling and storing, of hazardous waste.
2. Responsible for communicating with third-party vendor for the transport and disposal of hazardous waste.
3. Develop a program and procedures for properly managing hazardous waste and recycling waste as applicable.
4. Select contractors in accordance with OC San procurement requirements and to have the contractor properly transport and dispose of hazardous waste in a manner that limits OC San's liability and minimizes environmental impact.
5. Establish and maintain an annual budget for the disposal of hazardous waste generated by OC San activities.

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6. Determine which employees will receive hazardous waste training and provide final approval for the training.
7. Inspect waste accumulation areas weekly and address findings in a timely manner. Inspections may be delegated to trained and authorized staff or contractors.
8. Interface with hazardous waste transporters and disposal facilities.
9. Prepare and sign hazardous waste manifests prior to transport.
10. Participate in required hazardous waste management and DOT training.
11. Interface with local, state, and federal agencies regarding waste storage, handling, and disposal.
12. Complete required regulatory reporting, including but not limited to hazardous waste fee and tax reports.
13. Analyze proposed legislation on hazardous waste issues for potential impact to OC San.
14. Annually review and update, as applicable, this program and related program elements.
15. Maintain program recordkeeping as required by applicable federal, state, or local regulations.

B. Environmental Technician

1. Consolidate waste from remote locations (i.e. off-site ferric chloride chemical dosing stations) on quarterly basis.
2. Prepare and sign hazardous waste manifests prior to transport of waste materials for consolidation.
3. Participate in required hazardous waste management and DOT training.

C. Employees

1. Comply with all the standard operating procedures and all elements of this program as it pertains to them.
2. Ensure hazardous waste and materials are stored in proper containers and labeled.
3. Manage hazardous waste in accordance with this program as it pertains to them.
4. Notify their supervisors and/or Risk Management for any issues or assistance with hazardous waste and material requirements.
5. Ensure hazardous waste and material training are conducted in compliance with regulatory requirements and OC San program and policies.

D. Contractors

1. Comply with all standard operating procedures and all elements of this program as well as the Contractor's Hazardous Waste Management Plan and all applicable federal, state, and local regulations for storage, management, transport, and disposal.

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2. Notify OC San and Risk Management of Lead and Asbestos related work prior to abatement, demolition, remodel, or remediation.
3. Provide sampling and analytical results prior to storage and/or disposal of hazardous wastes from soil-related waste materials to determine waste determination and profiling and status of methods of disposal.
4. Contractors shall use OC San approved hazardous waste transportation and disposal vendor.
5. Notify Risk Management of hazardous waste related work to prepare the signing of the manifest by OC San authorized personnel and to receive copies of the manifested paperwork.
6. Notify Risk Management one (1) month in advance of all construction projects that will generate hazardous waste offsite so Risk Management can procure a temporary EPA ID for disposing of generated waste.

E. Project Coordinators and Construction Management

1. Contact Risk Management regarding new waste streams or handling/transport and disposal of hazardous waste.
2. Ensure projects have adequate funding for hazardous waste management.
3. Manage hazardous waste in accordance with this program.
4. Ensure contractors store and properly label hazardous waste in proper containers and on proper secondary containment.

F. Division Generating Hazardous Waste

1. Division management shall provide a list of employees requesting participation in the hazardous waste management training program.
2. Determination shall be determined by job tasks involving the handling of hazardous waste.
3. Manage hazardous waste in accordance with this program.
4. Develop processes that minimize the amount of hazardous waste generated.
5. Ensure hazardous waste is placed in appropriate containers.
6. Contact the Risk Management Division regarding hazardous waste pick up including types and quantities.
7. Contact the Risk Management Division regarding new waste streams, handling, transport, and disposal options.
8. Do not transport hazardous waste between OC San facilities or disposal sites without prior authorization from Risk Management.
9. Hazardous waste shall not be transported in personal vehicles at any time.

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10. Only use hazardous waste transporters and disposal companies approved by Risk Management Division.

V. Procedure

A. General

1. Only trained personnel shall handle, store, and dispose hazardous waste and materials.
2. Personal protective equipment (PPE) appropriate for waste types shall always be worn when handling, storing, and disposing of hazardous wastes.
3. Wastes shall not be mixed or stored with other incompatible waste streams in the same location.
4. Hazardous wastes shall not be poured into a drain or wastewater streams.
5. All incidental spills of hazardous waste shall be reported and promptly cleaned up.
6. Hazardous waste accumulation areas shall be maintained in an orderly fashion.

B. Manifests / Bill of Ladings

1. Personnel authorized to sign waste manifests shall be trained in accordance with this program.
2. All waste manifests will be signed by OC San, except where permission is granted to a licensed hazardous waste contractor, and they have been assumed the role of generator. Authorization for the licensed hazardous waste contractor to assume role of generator shall be granted by the Risk Management Safety and Health Supervisor and for only a specified time.
3. A ball point pen shall be used to sign the original copy of the manifest. The signer shall press firmly down on the paper when making corrections to the manifest as well as signing the copy.

C. Containers

1. All containers holding hazardous waste or hazardous materials shall be kept closed, except when adding or removing materials from the container.
2. All containers shall be properly labeled with the proper label types and accumulation dates if said containers are used for waste accumulation.
3. Approved containers used to accumulate, or store waste shall be maintained in good condition and not be modified or altered.
4. The hazardous waste containers used to accumulate waste shall not show signs of severe oxidation, corrosion, rusting or apparent structural defects.
5. Containers shall not be filled to the top with liquid or solids and shall allow headroom for expansion.

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6. Containers shall be compatible with the product or waste content. Hazardous materials and wastes shall be accumulated in DOT approved containers.
7. Corrosives shall be stored in compatible containers and shall not be placed in metal drums or metal containers.
8. To avoid chemical reactions such as heat, fire, explosion, pressure, etc., wastes shall not be mixed.
9. Hazardous waste shall not be placed in a container that previously held an incompatible waste or material.
10. Waste and materials that have ignitable and reactive characteristics shall be kept away from sparks, open flames, extreme heat, static electricity sources, and other sources of ignition.
11. Storage containers holding a hazardous waste or material that is incompatible with any other waste or materials stored nearby shall be physically separated from the other materials by means of a dike, berm, or wall. Containers containing flammable waste will be stored in a flammable cabinet.

D. Labeling

1. Hazardous waste labels are made available in the central waste accumulation areas by Risk Management. Please contact Risk Management if you are not able to find a specific label for the waste material. may be obtained from Risk Management.
2. Waste profiles have been determined for routine waste disposed of by OC San. Pre-printed labels are available for each of the waste materials that have a waste profiles completed. At a minimum, the following information must be provided on each waste label:
 - Company Name
 - Address
 - Phone Number
 - EPA Identification Number
 - Accumulation Start Date
 - Physical State
 - Hazardous Properties
3. Label shall be adhered effectively to the hazardous waste container. Labels shall be placed horizontally across the container so it can be easily read. Do not place the label on the container lid.
4. Labels shall be legible.
5. Empty hazardous waste and materials containers that previously contained liquid or solid hazardous waste shall be identified as "Empty" with appropriate label.
6. Accumulation start dates shall be indicated on the labels as soon as waste accumulation begins.

E. Empty Containers

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1. Empty drums shall not have further dripping of substance when inverted and inverted at various angles.
2. No empty drums shall contain any remaining pourable materials or hazardous waste.
3. If the container held a hazardous waste, one of the following conditions shall be met for the container to be empty:
 - a. The container has been cleaned by another method that has been shown by tests conducted by the generator to achieve equivalent removal.
 - b. The container has been triple-rinsed with a solvent capable of removing the chemical product or waste.
 - c. A container that has held a compressed gas hazardous waste is considered empty when the pressure in the container approaches atmospheric pressure.
4. Containers that have not been emptied as described in this section shall be managed as hazardous waste.

F. Hazardous Waste Accumulation Areas

1. Satellite Accumulation

- a. Hazardous waste may be generated at or near the point where it is initially generated.
- b. Up to 55-gallons of hazardous waste or 1-quart of acute or extremely hazardous waste may be accumulated at each point of generation. The 55-gallon or 1-quart limit applies to either:
 - 1) The process or group of processes
 - 2) Each separate waste stream if incompatible
- c. The container must be under the control of the operator of the process that generates the waste.
- d. Containers must be labeled with hazardous waste labels.
- e. When the 55-gallon or 1-quart limit is reached, the waste must be marked with the date and, within three days, moved to the 90-day or 180-day Central Area Waste Accumulation. This new date is the start date for the 90- or 180-day accumulation allowance.
- f. The maximum permitted onsite accumulation allowed for any waste is one year (365 days).

2. Central Area Waste Accumulation

- a. Hazardous waste may only be stored in these areas for 90- or 180-days depending on generator status.
- b. All wastes shall be stored in proper containers and shall have a hazardous waste label sticker with the accumulation start date written of the day the container accumulates wastes.
- c. This area shall be inspected at least weekly.

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3. Maps of the waste accumulation areas can be found in the Maps Library of the San Box.

G. Blood-borne Pathogens Biohazard Waste and Sharps

1. Regulated Biohazard Waste

- a. Handling, storage, treatment, and disposal for all regulated waste shall be in accordance with Health and Safety Code and federal, state, and local regulations.
- b. All blood or blood products contaminated wastes shall be in biohazard waste bags and/or container.
- c. Containers with biohazard waste shall be labeled with the words "Biohazard Waste" or with the international biohazard symbol and the word "BIOHAZARD" on the lid and on the sides as to be visible from any lateral direction.
- d. Biohazard waste shall not be disposed of before being treated by an offsite treatment facility.

2. Disposal of Sharps Containers

- a. Sharps shall be in approved sharps disposal containers.
- b. Sharps container shall be closed prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping and labeled.
- c. The disposal container shall be color-coded with proper labels affixed to containers of regulated waste.
- d. Labels required shall include the international symbol for biohazardous waste or sharps waste and shall be fluorescent orange or orange-red or predominately so, with lettering and symbols in a contrasting color.
- e. Sharps containers shall only be filled $\frac{3}{4}$ to the top as to avoid overfilling of sharps.
- f. All biohazard wastes and sharps shall be disposed of by a vendor that is authorized by Risk Management.

H. Recycled Waste

1. OC San and Contractors shall seek safe and effective ways of recycling, reusing, and reclaiming hazard wastes.
2. The following wastes shall be recycled:
 - a. Universal Waste
 - 1) Universal waste shall accumulate onsite no longer than 270 days.
 - 2) Universal waste shall be disposed of by methods of recycling or reclamation by OC San's contracted vendor and its facility and paper generated for universal waste shall be recorded on a Straight Bill of Lading and not on a Uniform Hazardous Waste Manifest to satisfy the requirements of shipping and transportation.
 - 3) The following materials are accepted as recyclable universal waste and therefore shall never be disposed of in regular trash:
 - Batteries (lead acid, NiCad, etc.)

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- Lamps
 - Electronic Devices
 - Empty Aerosol Cans
 - Mercury-containing Equipment (thermostats, motor vehicle light switches, pressure or vacuum gauges, counterweights and dampers, thermometers, gas flow regulators, etc.)
 - Cathode Ray Tubes (CRTs)
 - Cathode Ray Tube Glass
 - LCD desktop monitors
 - Laptop Computers with LCD Displays
 - LCD and Plasma Televisions
 - Copiers
 - Fax Machines
 - Printers
- 4) Hazardous waste labels shall be clearly marked with the phrase “Universal Waste” along with the content such as “Used Batteries,” “Waste Pesticide,” or “Waste Mercury.” The label shall be clearly marked with the initial date of when the waste was accumulated.
- 5) Used batteries shall be stored in a non-reactive, structurally secure, and closed container. The hazardous waste sticker shall be labeled with the initial start date and the words “Universal Waste-Used Batteries.”

I. Used Oil

1. Used oil must be treated as a hazardous waste unless if it is determined to be exempted. OC San may test used oil to determine if the oil is exempt. If exemption is sought, testing will be completed following Section 25220.1(a)(3)(B). If the used oil is exempt, then the use oil may be managed as a recyclable material.
2. Used oil cannot be mixed with any listed hazardous waste or material that exhibits a hazardous waste characteristic.
3. Bulk used oil is collected at the following locations:
 - a. Plant 1 CenGen, 2,000 gallons capacity tank of Used Oil Underground Storage Tank, Northeast of the building
 - b. Plant 2 CeGen, 2,000 gallons capacity tank of Used Oil Underground Storage Tank, Southeast of the building

J. Used Oil Filters

1. Used oil filters shall be drained of free-flowing used oil.
2. Accumulated, stored, and transferred in a rain-proof container that is capable of containing any oil that may be separate from the filters.
3. Stored in containers with the lid sealed or closed at all times, except when being filled.
4. Legibly labeled with the words “Used Oil Filters” with the accumulation start date.
5. Transported offsite to be recycled.

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K. Oil/Solvent Rags

1. Oil/solvent soaked rags shall be placed in covered red accumulation containers daily.
2. No other materials shall be disposed of in the red containers.
3. No free liquids shall accumulate in the container and no hazardous wastes can be added after the rags original use.
4. Soiled rags shall be consolidated to Plant 1 and Plant 2 Warehouse, Fleet Services, or Central Generation on a weekly basis for laundering.
5. Accumulation containers for oil or solvent rags can be found in the following locations:
 - Plant 1 Fleet services
 - Plant 1 Central Generation Maintenance Bay
 - Plant 1 Rebuild Shop
 - Plant 1 Warehouse
 - Plant 1 Paint shop
 - Plant 2 Maintenance Building
 - Plant 2 Warehouse
 - Plant 2 Central Generation Maintenance Bay

L. Underground Storage Tanks

1. Underground Storage Tanks (UST) shall provide a method, or combination of methods or release detection that can detect a release from any portion of the tank and the connected underground piping that routinely contains product.
2. USTs shall be calibrated and maintained, and capable of notifying the operator in the event of a leak. OC San maintains a list of underground storage tanks which can be provided upon request.
3. Spill containment supplies are provided at a location adjacent to the UST.

M. Aboveground Storage Tanks

1. All aboveground storage tanks shall have their NFPA diamond visible, be labeled with its contents, and the initial accumulation start date.
2. All containers storing hazardous materials or waste shall have tight-fitting lid that is kept closed except when the waste or material is being added or removed.
3. All Aboveground Storage Tanks shall be inspected on a weekly basis and the records of the inspection sheet shall be kept on file.

N. Waste Determination and Profiling

1. Hazardous wastes that are managed and will be disposed of shall undergo waste determination and profiling prior to shipping.
2. Risk management will determine if the hazardous waste meets either of the following waste characteristics: toxic, corrosive, reactive or flammable.

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3. Risk Management may perform testing the hazardous waste to determine characteristic or apply generator's knowledge of the hazard characteristic of the waste in the process used.
4. Risk Management shall work with its contracted environmental service vendor to create profiles for the wastes.

O. Training

1. Hazardous Waste Generator (RCRA) and Supplemental Hazardous Communication and Hazardous Waste Training
 - a. This training is assigned to all employees are who are likely to dispose of waste at OC San's satellite and central waste areas.
 - b. This course provides basic information on hazardous waste determination and characterization. In addition, this course describes the three types of generator status (Conditionally Exempt Small Quantity Generator, Small Quantity Generator, and Large Quantity Generator) along with applicable requirements. This training addresses accumulation, labeling, and other management requirements for both satellite accumulation areas and 90-day accumulation areas. The importance of, and methods for, waste minimization, and spill prevention and response are defined.
 - c. Employees shall complete training within 6 months after their date of their employment or assignment to a facility, or to new position at facility, or to a new position at a facility.
 - d. Training shall be completed on an annual basis.
 - e. Employees shall not work unsupervised positions until completion of training.
2. Hazardous Waste Management Training
 - a. Facility personnel managing, handling, transporting, and disposing hazardous waste shall receive this training for waste characterization, determining proper shipping names, manifesting, completing land disposal notices, and recordkeeping purposes. Training provides these facility personnel in accumulation point inspections, updates in hazardous waste regulations, and waste lists.
 - b. DOT training shall be completed at least once every three years to meet the training requirements set forth in 49 CFR 172.
3. DOT Hazardous Materials Training
 - a. Facility personnel managing, handling, transporting, and disposing hazardous waste shall receive this training to understanding the following:
 - Label, mark, inspect, or design containers
 - Place hazardous materials into containers
 - Prepare hazardous materials for transportation
 - Prepare bills of lading or hazardous waste manifests
 - Operate a vehicle used to transport hazardous materials
 - b. DOT training shall be completed at least once every three years to meet the training requirements set forth in 49 CFR 172.
4. Offsite Consolidation of Hazardous Waste

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- a. Employees transporting consolidated wastes from offsite to Plant 1 or Plant 2 Central Area Waste Accumulation shall receive DOT Hazardous Materials and Management of Hazardous Waste Training.
- b. Request for training shall be made to Risk Management.

5. Training Records

- a. Risk Management maintains the list of trained personnel. The list of persons may change periodically. Training records can be provided upon request.
- b. Please refer to the Hazardous Waste Material Safety Training Matrix for a list of OC San job classifications and corresponding training.

P. Reporting Requirements

1. Manifest Reporting to DTSC

- a. OC San shall receive a copy of each hazardous waste manifest from the TSDf that shows final disposition of the waste within 30 days from transport.
- b. Past 35 days of not receiving the Manifest from the TSDf, OC San shall contact the TSDf.
- c. Past 45 days, OC San shall send an exception letter to the DTSC (Department of Toxic Substances Control).
- d. Risk Management shall keep the original manifest.
- e. Under California law, generators will still be required to send the generator copy of the manifest to DTSC by mail. The only exception is when a manifest starts and finishes as an electronic manifest in the e-Manifest System. The generator shall within 30 days of each shipment of hazardous waste submit to DTSC a legible copy of each manifest used. Please send to: DTSC Generator Manifests Department of Toxic Substances Control P.O. Box 400 Sacramento, CA 95812-0400

2. Biennial Hazardous Waste Generator Reporting

- a. Large quantity generators shall submit a report to DTSC by March 1st every two years regarding the nature, quantity, and disposition of hazardous waste generated at the facility.
- b. The Federal and State hazardous waste regulations require the reporting of hazardous waste activities of RCRA (Resource Conservation & Recovery Act) waste on a biennial basis on odd-numbered calendar years for the previous even-numbered calendar years and shall be postmarked no later by March 1st.
- c. The total sum of pounds for the RCRA wastes shall be calculated for each plant to determine filing status by referring to the manifests for the applicable year.
- d. If either or both plants are exempt from filing the biennial report, OC San shall complete the Biennial Report Exemption Form.

3. SB-14 Hazardous Waste Source Reduction Reporting

- a. Generators who generate over 12,000 kilograms (26,455 lbs.) of hazardous waste or 12 kilograms (26.45 lbs.) of extremely hazardous waste must file a SB-14 Hazardous Waste Source Reduction Plan.

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- b. If generators exceed the requirements, then the generator shall determine if the wastes are exempt from SB-14 reporting. If all wastes are exempt, then SB-14 reporting is not required.

If required to file a SB-14 report, OC San shall reduce the generation of hazardous waste at its source as well as recycle hazardous waste to show efforts in hazardous waste source reduction. Where source reduction or recycling is not feasible, the waste should be treated in an environmentally safe manner to minimize the present and future threat to human health and the environment.

4. Hazardous Materials Business Plan

- a. Facilities that generate handle hazardous materials or mixtures containing a hazardous materials that has a quantity at any one time during the reporting year equal to or greater than 55 gallons (liquid), 500 pounds (solids), or 200 cubic feet (compressed) gas.
- b. The Hazardous Materials Business Plan (HMBP) is submitted through the California Environmental Report System (CERS) by March 1st of every year.
- c. Depending on participating agencies, the documents shall be submitted via portal system on esubmit.ocgov.com by authorized users, or hardcopies shall be mailed in to the local CUPA agency.
- d. The HMBP shall be reviewed every year, or within 30 days of a change in reporting materials.
- e. Business plans are required for each facility where these materials are stored.
- f. Business plans shall include inventory of hazardous materials located at the facility in quantities listed above, emergency response plans and procedures, training, and a site map showing locations of site features, material storage, and other safety systems.

5. Remote Waste Consolidation

- a. OC San consolidating any hazardous waste chemicals (i.e., oils, ferrous chloride filters) at offsite locations such as the pump stations shall submit the Remote Waste Consolidation Site Annual Notification Form in CERS during the HMBP submission.
- b. No annual notification need be submitted if there are no chemicals to be reported due to lack of need to consolidate.

Q. Inspections

1. Quarterly Audits

- a. Quarterly hazardous waste and materials inspections shall be conducted by Risk Management.
- b. All records and findings shall be logged onto the waste inspection sheet form found on Cority. All findings shall be addressed and corrected within a month of the findings.
- c. The inspection shall look for the following:
 - Proper labeling of hazardous waste and materials.
 - Use of proper secondary containment for drums containing 55 gallons or more of liquid.

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- Proper secondary containment shall not be filled with rainwater or any spill content
- All drums shall be in good condition and free of rust, corrosion, defects, and leaks.
- Universal waste, such as batteries, shall not exceed the 365 days accumulation period
- Spillage or overflow of hazardous waste or materials shall not be observed at satellite accumulation sites
- All hazardous waste and materials shall be segregated and placed in compatible drums as described in this program.
- All drums containing either hazardous materials or waste shall have lids closed and sealed tightly.
- Spill containment kits are in good condition and stocked.

2. Weekly Audits

- a. Central Area Waste and Satellite Area Accumulation shall be inspected once a week.
- b. The environmental services contractor shall conduct the weekly inspection and turn the inspection form with any findings to Risk Management.
- c. If the environmental service contractor is not scheduled on the day that the weekly inspection is completed, Risk Management will perform the inspection.

R. Hazardous Waste (Program) Audit

1. The hazardous waste program will be audited annually by a third party to assess compliance with hazardous waste regulations.
2. The audit shall evaluate the status of hazardous waste management compliance programs and best management practices at the facility.
3. All materials required for evaluation and review by the auditor shall be made available upon auditor's request.
4. The audit shall provide OC San with a list of issues requiring review and actions by the owner of responsibility.
5. The list requiring review and corrective action shall be completed within 3 months of when the list was provided.

S. Recordkeeping and Retention

1. Hazardous material records (i.e., Business Plans, Hazardous Materials Inventory, Disclosures) will be retained for five (5) years in accordance with the OC San retention schedule.
2. Hazardous waste records (i.e., manifests, disposals) will be retained for the life of the organization in accordance with the OC San retention schedule.
3. Program audits shall be kept for a minimum of one year.
4. The job title for each position related to hazardous waste management, and the name of the employee filling each job.

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5. A written job description for each position related to hazardous waste management, including the requisite skill, education or other qualifications and duties of employees assigned to each position.
6. A written description of the type and amount of both introductory and continuing training that will be given to each person filling each of these positions. Records that document that the training or job experience required has been given to, and completed by, facility personnel.
7. Training records on current personnel must be kept until closure of the site. Training records on former employees must be kept for at least three years from the date the employee
8. Hazardous materials and waste training records for required DOT shall include the following:
 - a. The employee's name
 - b. The most recent training completion date of the employee's training
 - c. A description, copy, or the location of the training materials used to certify that the employee has been trained and tested.

VI. References

California Health and Safety Code, Section 25110.10

Title 22, California Code of Regulations, Section 66262

EPA (Environmental Protection Act) www.epa.gov

DTSC (Department of Toxic Substances and Control) www.dtsc.ca.gov

DOT (Department of Transportation) www.dot.gov

Chapter 6.95, Division 20 of the California Health and Safety Code (H&SC) and Chapter 116, Section 11022 of Title 42

CUPA (Certified Unified Program Agency (www.occupainfo.com))

VII. Revision History

Version	Date	By	Reason
1.0	11/21/2003	Bauer, Wesley	Initial
2.0	07/20/2020	Hachim, Sabrina	Periodic Update – Refer to Program Change Log
3.0	12/13/2021	Frattali, John	Annual Program Review – Refer to Program Change Log