

COUNTY OF SACRAMENTO
Environmental Management
Department (EMD)

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EMD is the Certified Unified Program Agency (CUPA) for Sacramento County including its incorporated cities. The Sacramento County CUPA Program is administered by the EMD Environmental Compliance Division.

DISCLAIMER - The information contained in this Compliance Assistance Bulletin is based upon the statutes and regulations and is intended to provide a basic overview to help achieve compliance. This document does not replace or supersede relevant statutes and regulations and is not intended as legal advice. All interested parties should monitor changes to relevant statutes and regulations for updates.

FOR MORE INFORMATION

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VETERINARY CARE FACILITIES



ENVIRONMENTAL MANAGEMENT
DEPARTMENT (EMD)

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BACKGROUND

Veterinary Services including Animal Hospitals/ Urgent Care Facilities, Clinics/Offices, Grooming Operations and Shelters/ Kennels may as part of their normal operations generate hazardous waste (HW).

Certain wastes are regulated as HW because they are listed; Code of Federal Regulation (40 CFR 261.30) or California Code of Regulation (22 CCR appx XII), a California presumptive HW (22 CCR appx X) or meet one of the following characteristic: ignitability, corrosivity, reactivity or toxicity (22 CCR 66261.21 through 66261.24).

Generators are required to determine if generated waste is HW. Waste characterization can be achieved through analytical testing and/or generator knowledge which the EPA defines as:

- Process knowledge (e.g., information about chemical feedstocks and other inputs to the production process);
- Knowledge of products, by-products, and intermediates produced by the manufacturing process;
- Chemical or physical characterization of wastes;
- Information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste;
- Testing that illustrates the properties of the waste;
- Reliable/ relevant information about properties of the waste or constituents.

COMMON HAZARDOUS WASTE AT VETERINARY FACILITIES

- **Procedure space:** Carb-o-lime, chlorhexidine, silver nitrate sticks, gastric tubing.
- **Radiology:** Spent photo fix solution containing silver.
- **Laboratories:** Ethanol, methanol, xylene, formalin.
- **Pharmacies:** multi-dose vaccines, insulins, phenobarbital.
- **Cleaning:** Sporox, 70% Alcohol solutions, Sporox II, glutaraldehyde and OPA, Triclosan. Steam Chemical Indicator Strips
- **Grooming:** silver containing shampoos and topicals. Expired products.
- **Housing/Kenneling:** Various kennel cleaning agents.
- **Cancer/Chemotherapeutic Agents:** Arsenic Trioxide; Mitomycin C; Cyclophosphamide.

WHAT HAZARDOUS WASTE GENERATORS MUST DO

REQUIRED DOCUMENTS:

- Hazardous Waste Generator Permit from Sacramento County Environmental Department (SCEMD).
- State or Federal Environmental Protection Agency (EPA) Identification Number (obtain at www.dtsc.gov)
- Hazardous waste disposal documents (e.g. manifests, bills of lading, etc.) for past 3 years.
- Hazardous or non-hazardous waste characterization documentation.

ON-SITE MANAGEMENT:

- Properly label all hazardous waste containers (22 CCR § 66262.34(f))
- Hazardous wastes must be stored in suitable containers (e.g. do not store liquid waste in cardboard containers)
- Maintain hazardous waste containers in good condition (free of dents, rust, etc.)
- Hazardous waste containers must be kept closed unless adding or removing waste
- Handle hazardous waste containers to minimize spills and accidental releases
- Maintain spill management materials onsite (e.g. rags, absorbent, etc.)
- Report any significant spill to EMD and Office of Emergency Services

TRAINING REQUIREMENTS

- Employee training is required for all hazardous waste facilities.
- Employees should be thoroughly familiar with routine and emergency procedures for handling and managing hazardous waste.

EMERGENCY EQUIPMENT

- Have and maintain emergency equipment (e.g. fire extinguishers)
- Maintain adequate aisle space for emergency responders.
- Label emergency shut-offs.