

November 2016

IMPORTANT NOTICE

Proper Hazardous Materials and Hazardous Waste Management at Schools

The Sacramento County Environmental Management Department (EMD) is the local Certified Unified Program Agency (CUPA) and is responsible for enforcing hazardous material and hazardous waste programs within Sacramento County as detailed in California Health and Safety Code (H&SC) Chapters 6.5 and 6.95 and California Code of Regulations (CCR) Titles 19 and 22. EMD has become aware of several common violations noted during inspections at schools and has created this guidance document to assist schools with achieving regulatory compliance.

HAZARDOUS MATERIALS BUSINESS PLAN (HMBP)

An HMBP is required to be completed and implemented if a school stores or handles hazardous materials and/or hazardous waste in the following reportable quantities: 500 pounds of a solid, 55 gallons of a liquid, 200 cubic feet of a gas. Some examples of hazardous materials found at schools are science lab chemicals, paints, welding gases, and automotive fluids. A completed HMBP must be electronically submitted annually to the California Environmental Reporting System (CERS). EMD offers free workshops to businesses needing help with their HMBP submittals to CERS. Please contact EMD at (916) 875-8550 to register for one of the free workshops or if you have questions about the HMBP Program.

HAZARDOUS WASTE GENERATORS

Waste generators are required to determine if a waste generated on-site is a regulated hazardous waste (22 CCR 66262.11). Generators can make this determination using their knowledge of each waste stream and/or analytical testing. Certain wastes are regulated as hazardous wastes because they are either a federally listed hazardous waste (40 CFR 261.30), a California listed hazardous waste (22 CCR Appendix XII), or a California presumptive hazardous waste (22 CCR Appendix X). Wastes can also meet the definition of a regulated hazardous waste if they meet one of the characteristic thresholds below:

- **IGNITABILITY** (22 CCR 66261.21) – Wastes that may be set afire or burst into flame spontaneously. Liquids with a flash point less than 140 degrees Fahrenheit (60 degrees Celsius).
- **CORROSIVITY** (22 CCR 66261.22) – Wastes that are acidic or basic (caustic) and may cause human burns or degradation to metals. Wastes that have a pH of less than or equal to 2 or greater than or equal to 12.5.
- **REACTIVITY** (22 CCR 66261.23) – Wastes that may have explosive properties or of chemical activity.
- **TOXICITY** (22 CCR 66261.24) – Wastes that may be harmful to human health or the environment.

For more information pertaining to the proper accumulation, labeling, and record keeping for hazardous waste, please visit "Guidelines for Generators of Hazardous Waste" on EMD's website at <http://www.emd.saccounty.net/EC/CUPA/Documents/Form/HazWasteGeneratorBooklet.pdf>

AREAS OF CONCERN

Schools should investigate their respective departments/school grounds regarding HMBP disclosure and proper hazardous waste management and disposal. Some of these departments/areas include (but are not limited to):

- *Chemistry / Biology Labs*
- *Arts / Ceramics / Photography*
- *Auto Shop / Metal Shop / Wood Shop*
- *Custodial / Groundskeeping*
- *Pool chemical storage*
- *Theatre / Student Government*

BENCHTOP TREATMENT

Hazardous waste treatment typically requires authorization from EMD, but schools may perform limited hazardous waste treatment without authorization as described in H&SC 25200.3 If a school treats any hazardous wastes under this statutory exemption, ensure all requirements of the exemption are met and documented.

ACID NEUTRALIZATION TANK SYSTEMS

EMD has identified acid neutralization tanks at several schools. They are typically adjacent to the science wing and below grade. The sinks and drains from the science buildings are usually plumbed to a neutralization tank system which utilizes limestone chips to neutralize weak acids in order to protect sewer piping. These types of systems are not designed or permitted to treat hazardous wastes such as strong corrosives or metal bearing wastes. Science staff should be trained on proper identification of hazardous wastes, what waste streams can be disposed of to the sink, and proper neutralization tank maintenance. If you have any questions regarding acid neutralization tanks, please contact EMD at (916) 875-8550 or County of Sacramento Business Environmental Resource Center (BERC) at (916) 874-2100.

COMMON INSPECTION VIOLATIONS OBSERVED

- *Failure to make a proper hazardous waste determination for each waste generated on-site.*
- *Improper labeling of hazardous materials/ hazardous waste containers or tanks.*
- *Failure to properly train employees in regards to hazard communication, hazardous waste management and spill response.*
- *Failure to manage hazardous wastes in a manner that prevents discharge to the environment (spills).*
- *Failure to properly implement employee hazard communication training as observed by unsecured compressed gas cylinders or storage of incompatible hazardous materials together.*

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- *Transporting hazardous wastes from individual schools to a district corporation yard.*
- *Failure to retain all hazardous waste disposal documentation for the previous 3 years.*

If you have any questions regarding the HMBP Program and/or hazardous waste, please contact EMD at (916) 875 -8550 and ask to speak with an Environmental Specialist. Environmental Specialists are available Monday-Friday, 2:00 p.m. – 3:00 p.m.

The information contained in this Important Notice 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.

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