



**San Diego Unified School District**

# **Safety Office**

# **HAZARDOUS MATERIALS / WASTE MANAGEMENT COMPLIANCE MANUAL**

## TABLE OF CONTENTS

- I. Introduction
- II. Responsibilities
  - A. District Safety Office
  - B. Site Administrators
  - C. Chemical Hygiene Officers
  - D. District Employees
- III. Management of Hazardous Materials
  - A. SDUSD Hazard Determination
    - 1. Prohibited (Class I)
    - 2. Restricted (Class II)
    - 3. Approved (Class III)
  - B. Worker Protection (Cal/OSHA) – Hazard Communication, Chemical Hygiene
    - 1. Written Program
    - 2. Hazardous Materials Inventory
    - 3. Material Safety Data Sheets (MSDSs)
    - 4. Labeling
    - 5. Training
    - 6. Outside Contractors
  - C. Environmental Protection (Cal/EPA) – Business Plan
  - D. Storage
    - 1. General
    - 2. Compressed Gas Cylinders
  - E. Transportation of Gas Cylinders
    - 1. Quantity Limits
    - 2. Other Requirements
  - F. Reporting the Release of Hazardous Materials
- IV. Management of Hazardous Waste
  - A. Waste Determination
  - B. EPA ID Numbers
  - C. Storage (containers, labeling, accumulation time, etc)
  - D. Transport and documentation (manifests, receipts)
  - E. Training
  - F. Other Wastes
    - 1. Universal Waste (except for electronic devices)
    - 2. Electronic Devices
    - 3. Empty Containers (including gas cylinders)
  - G. Emergency Procedures
- V. Management of Medical Waste
  - A. Sharps Biohazardous Waste
  - B. Non sharp Biohazardous Waste
  - C. Medical Solid Waste

## I. INTRODUCTION

Federal, state, and local environmental impact regulations require strict control of handling, storage, and disposal of all materials that have been designated as hazardous or toxic to human health or to the environment. The requirements for hazardous waste generation can be found in the California Health and Safety Code (HSC) and Title 22 California Code of Regulations, Division 4.5 (CCR.). In San Diego County, these laws and regulations are enforced by the County of San Diego, Hazardous Materials Division (HMD). The HMD has also been designated to enforce the hazardous materials (business plan) requirements (Chapter 6.95 of the HSC), the medical waste requirements (Division 104, Part 14 HSC and Title 6 Division 8 Chapter 12 of the County Code), and the underground storage tank requirements (Chapter 6.7 of Division 20 of the HSC and Title 23 CCR and County Code of Regulatory Ordinance Title 6, Division 8, Chapter 10). District sites that handle and store these waste/materials are subject to HMD inspections to ensure compliance with these requirements.

In addition to the requirements enforced by HMD, the California Occupational Safety and Health Administration (Cal/OSHA) has regulations regarding the use and storage of hazardous materials. These regulations are found in Title 8 CCR. The Department of Transportation (DOT) has regulations regarding the transportation of hazardous materials.

The Occupational Safety and Health Administration (OSHA) defines a hazardous material as any element, chemical compound, or mixture of elements and/or compounds which is a physical hazard or a health hazard. Hazardous materials are used and stored by Maintenance and Custodial Operations, Landscape Operations, Science and Industrial Arts Departments, Nursing and Wellness and construction related activities. Many of these materials such as gasoline, oils, paints, solvents, and some laboratory chemicals are in regular use throughout the school district. Any hazardous material that becomes a waste to be discarded must undergo a hazardous waste determination as required by law. Some wastes may be subject to federal regulations. The State of California also has identified certain wastes to be hazardous, biohazardous or restricted. Contact the Safety Office for guidance to properly dispose of hazardous wastes. For specific requirements and District policy refer to Administrative Procedure 5120, Hazardous Materials/Waste, Handling/Storage/Disposal [http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/ap5120\\_Hazmat\\_handling\\_waste\\_storage\\_disposal.pdf](http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/ap5120_Hazmat_handling_waste_storage_disposal.pdf)

The purpose and intent of this manual is to provide guidance to all District employees that handle hazardous materials and wastes. Suggestions or questions concerning this manual should be directed to the Safety Office.

## II. RESPONSIBILITIES

### A. District Safety Office

The District Safety Office coordinates and monitors the District's Hazardous Material/Waste management including:

- ✓ Identifying and classifying hazardous materials
- ✓ Evaluating products for safety prior to use (hazard determination)
- ✓ Assisting with the handling, storage, and disposal of waste and materials
- ✓ Maintaining and publishing a listing of district hazardous waste generating sites
- ✓ Providing "Right to Know" (hazard communication) information
- ✓ Assisting in compliance with applicable environmental and occupational health regulations
- ✓ Reviewing regulatory requirements
- ✓ Responding to staff concerns regarding hazardous materials/waste, and
- ✓ Providing training as needed

### B. Site Administrators

Site Administrators are responsible for overall site safety and compliance with procedures/requirements for safe handling of hazardous materials/waste.

### C. Chemical Hygiene Officers (CHO)

The CHO is responsible for implementing the hazardous waste and materials procedures at their site. This includes

- ✓ Inspecting storage areas to ensure that materials are properly labeled, stored by compatibility, and in a manner to prevent unauthorized releases into the air, water, soil, storm drain, or sewers
- ✓ Contacting the Safety Office when the site is ready for hazardous waste pick-up
- ✓ Maintaining records as required (disposal documentation, inventories, business plans, training records, etc)
- ✓ Ensuring staff at the site are trained appropriately
- ✓ Participating in hazardous waste/materials inspections by regulatory agencies.
- ✓ Facilitating the emergency contingency plan for environmental emergencies
- ✓ Coordinating with agencies responding to environmental emergencies
- ✓ Reporting to the Site Administrator

### D. All District Employees

All district employees are required to follow these procedures for hazardous materials/waste management. District staff that fail to comply with District policies and environmental regulations can be subject to disciplinary actions in accordance with the District Injury/Illness Prevention Program and employee contract language.

### III. MANAGEMENT OF HAZARDOUS MATERIALS

Sites that manage hazardous materials must comply with the SDUSD's hazard determination procedures, the Cal/OSHA Hazard Communication Program, the Business Plan requirements, DOT regulations, and other storage requirements.

#### A. SDUSD Hazard Determination

All products that contain chemicals used in the District shall undergo a hazard determination evaluation. Material Safety Data Sheets (MSDSs) for new products shall be submitted to the Safety Office prior to use for a hazard determination. The Safety Office staff will evaluate the MSDS to identify and assess the hazards, if any, that employees may be exposed to when using the product. Science chemicals and other products that contain chemical ingredients that have been evaluated by the Safety Office Based can fall into one of three categories:

1. Prohibited (Class I): Class I chemicals and products are prohibited or not recommended for use within the district and may not be ordered or brought onto campus. For example, metallic mercury is no longer permitted for instructional purposes, or products that are carcinogenic or toxic. If you find any prohibited chemicals, contact the Safety Office for proper removal.
2. Restricted (Class II): Class II chemicals may only be used for demonstration purposes and prepared/presented only by instructors who are familiar with their hazardous properties. These chemicals are to be secured when not in use and should not be retained longer than one (1) year from the date of purchase. Quantities should be kept at a minimum. Other products may have restrictions to minimize exposure to students and staff.
3. Approved: (Class III): Class III chemicals are approved for student usage provided that the instructors are familiar with their hazardous properties. Only chemicals that are required for the curriculum should be ordered. These chemicals are to be secured when not in use. Quantities should be kept at a minimum. Class III also includes various products that have been evaluated by the Safety Office and determined to be safe to use at school sites. These products also include hazardous materials used by Custodial and other District departments .

Products must undergo an evaluation and be approved for usage in the District a request for product evaluation can be obtained from the District Safety Office <http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/Restricted%20Chemicals%20APPRFORM0%20rev%209-10-12.pdf>.

Products that have undergone an evaluation and have been approved, are restricted or not recommended for usage are listed and filed in the District Safety Office <http://www.sandi.net/Page/36205>.

No hazardous materials shall be used, handled, or stored at any elementary school unless the principal has been notified and approves such activity in accordance with the Safety Office

and Administrative Procedure 5120. This includes, but is not limited to, pesticides, cleaning chemicals, solvents, toxic art supplies, science projects, and experiments.

## B. Worker Protection (Cal/OSHA) – Hazard Communication

The hazard communication requirements apply to the use and storage of hazardous materials. The purpose of the standard is to minimize exposure to chemicals by providing adequate information to the employees. The hazard communication program has several important components further described in Administrative Procedure 5119, Hazard Communication Program.

[http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/ap5119\\_Hazard\\_Communication.pdf](http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/ap5119_Hazard_Communication.pdf).

In summary, these components include:

### 1. Written Program\*

All sites that use or store hazardous materials must have a written Hazard Communication Program (unless the only products on site are exempt from the regulation). Refer to District Procedure 5119.

- Labs are required to also have a written chemical hygiene program.

### 2. Hazardous Materials Inventory

All sites must maintain a complete list of all hazardous materials stored and/or used at their sites using the Site Chemical Inventory Form <http://www.sandi.net/Page/36205>. This inventory and the corresponding MSDSs will be maintained and kept current (reviewed at least annually) by the Site Administrator or designee. Old inventories (that list chemicals no longer in use) are required to be maintained for 30 years.

### 3. Material Safety Data Sheets (MSDS)

MSDSs will be obtained and kept current for any hazardous substance purchased, used, handled, or stored. Requests to manufacturers and vendors for MSDSs are the responsibility of the Site Administrator or designee. A master file should be maintained in the Site Administration office as well as in the immediate area where the hazardous substance(s) are being used. Employees requesting copies of MSDS should contact their Site Administrator or designee. These MSDSs must be readily accessible to employees in their work areas. MSDSs for products that are no longer used or stored will be maintained for 30 years. Copies of MSDS are also available upon request from the District Safety Office <http://www.sandi.net/Page/36205>.

#### 4. Labeling

No unidentified or unlabeled substance will be used, handled, or stored. Whenever possible, hazardous materials should be left in the original labeled container. This label should include product identity, appropriate hazard warning, and name /address of manufacturer. If the original label falls off /becomes unreadable or the product is transferred to another container, ensure that the container is, at a minimum, labeled with the product identity and appropriate hazard warning.

#### 5. Training

All employees must receive initial training on any hazardous materials with which they work or are exposed to. The training must include: the requirements of the Hazard Communication standard, a review of the written program, the location of the MSDSs, how to read and understand MSDSs and labels, how to identify operations where hazardous substances are present, methods to detect the presence of hazardous substances in the workplace, the physical and health hazards of the substances in their work area (this training may be based on general classes of hazardous substances or may be product-specific), and the employee rights under the Standard. This training must be repeated whenever the hazards change. Records of this training must be kept on the form "Record of Employee Safety Training" <http://www.sandi.net/Page/1948>.

#### 6. Outside Contractors

To ensure that outside contractors work safely, the Site Administrator or designee is responsible for informing contractors that there may be hazardous products present at their sites. This will include recognition of hazardous substances to which they may be exposed while on the site, precautions the employees may take to lessen the possibility of exposure by use of appropriate protective measures, any applicable emergency procedures, the location of MSDSs and the written Hazard Communication Program, and a summary of the labeling system used in the workplace. Contractors shall inform the Safety Office of any chemicals brought onto the site and provide MSDSs for these chemicals. No hazardous materials may be brought to elementary school sites without prior notification to the school's principal.

### C. Environmental Protection (HMD) – Emergency Contingency Plans (ECP) and Hazardous Materials Business Plan (HMBP) requirements

All sites that generate small quantities of hazardous waste are required to have emergency contingency procedures (ECP). ECP forms are available from the District Safety Office <http://www.sandi.net/Page/1948>.

Sites that store any one product/hazardous waste 55 gallons (liquid) or 500 pounds (solid\*), or 200 ft<sup>3</sup> (compressed gas\*) are subject to additional requirements to prevent and mitigate releases of hazardous materials (HMBP).

Sites that store any one product that is classified as a hazard solely as an irritant or sensitizer in quantities greater than 550 gallons (liquid) or 5000 pounds (solid) are subject to additional requirements to prevent and mitigate releases of hazardous materials (HMBP).

Sites that store any one product solely as a compressed gas (argon, carbon dioxide, helium, and nitrogen) in quantities greater than 1,000 ft<sup>3</sup> \* are subject to additional requirements to prevent and mitigate releases of hazardous materials (HMBP).

\*Exemptions are provided for:

- Carbon dioxide used for beverages (less than 3500 ft<sup>3</sup>)
- Propane used for cooking, heating or cooling (less than 1,000 ft<sup>3</sup>)
- New lubricating oil not to exceed 275 gals and not more than 55 gals of any grade of oil
- Other exemptions may apply, contact the Safety Office for other exemptions on certain hazardous materials.

. This includes providing to HMD the following hazardous materials business plan components

- ✓ A yearly certification of the business plan
- ✓ An inventory of large volume products
- ✓ A site map indicating locations of these materials and other important emergency information
- ✓ Identification of emergency contacts

A phone notification roster and list of emergency equipment do not need to be submitted but must be kept on site.

In addition to the written business plan, employees must be trained on an annual basis on how to respond to a chemical emergency. This training must include at a minimum, safe handling of hazardous materials, communication / coordination with emergency response agencies, and use of emergency equipment. This training must be done annually. Records of this training must be kept on the form "Record of Employee Safety Training" <http://www.sandi.net/Page/1948> for 3 years in the Hazardous Materials Binder.

## D. Storage

### 1. General

Hazardous materials and waste should be stored in a manner to prevent accidental reactions, explosions, or discharges. The MSDS and other sources of information must be reviewed to ensure that the container type, location, and proximity to other chemicals and ignition sources are suitable. The Safety Office is available to help determine how hazardous materials should be stored.



## 2. Compressed gas cylinders

Compressed gas cylinders can be extremely hazardous when misused or abused and can pose a variety of hazards due to their pressure and/or content. Depending on the particular gas, there is a potential for simultaneous exposure to both mechanical and chemical hazards.

Gases used may be:

- ✓ Flammable or combustible
- ✓ Corrosive
- ✓ Explosive
- ✓ Poisonous
- ✓ Inert
- ✓ Acidic
- ✓ Reactive or
- ✓ A combination of hazards

Employees must be trained in inspection, handling, transport, and use.

Storage of compressed gas cylinders – general principles:

- ✓ Gas cylinders must be secured at all times to prevent tipping. Use appropriate material, such as chain, plastic coated wire cable, commercial straps, etc., to secure cylinders.
- ✓ Gas cylinders cannot be stored in public hallways or other unprotected areas.
- ✓ Cylinders must be segregated by hazard classes while in storage. Oxidizers (e.g., oxygen) must be separated from flammable gases (e.g., acetylene), and empty cylinders must be isolated from filled cylinders.
- ✓ The proper storage for oxygen cylinders requires that a minimum of 20 feet is maintained between flammable gas cylinders and oxygen cylinders or the storage area be separated, at a minimum, by a firewall five (5) feet high with a fire rating of 30 minutes.
- ✓ Store out of direct sunlight and away from sources of heat and ignition; temperatures must not exceed 125 F.
- ✓ Acetylene cylinders must never be stored on their sides.
- ✓ When the cylinders are not connected for use, turn off, remove the regulator, and place valve protectors (safety caps) on gas cylinders. (Note: small cylinders that are not designed to have a valve protector cap are not required to have a valve protector cap in place).
- ✓ Cylinders must be protected from damage. Do not store cylinders near elevators or gangways, or in locations where heavy-moving objects may strike or fall on them.
- ✓ Cylinders must be stored where they are protected from the ground to prevent rusting.
- ✓ Cylinders should be protected against tampering by unauthorized individuals.
- ✓ Storage areas must be well-ventilated, cool, dry, and free from corrosive materials
- ✓ Empty cylinders must be labeled “empty.”

## Welding Carts

Cylinders of oxygen and acetylene may be placed immediately next to one in welding carts provided that:

- ✓ **If the cylinders will not be used within 24 hours**, the regulators must be removed and the valve protector caps put on.
- ✓ A fire extinguisher is available on the cart

## E. Transportation of Gas Cylinders

Several types of trucks transport compressed cylinders (e.g., AC trucks, refrigeration trucks, grounds trucks). The storage of these cylinders during transportation is subject to the DOT regulations.

### 1. Quantity Limits

For acetylene, oxygen, propane, nitrogen, argon/carbon dioxide, and refrigerants, keep the amounts less than a combined gross weight of 440 pounds or an individual cylinder weight of 220 pounds. Quantities greater than these amounts require extensive requirements such as the need for shipping papers, emergency response information, placarding and formal DOT training.

### 2. Other Requirements

However, regardless of the amount, the cylinders do need to be secured, have the regulators off and the valve protectors on (if the cylinder is designed to have a valve protector). In addition, transporting compressed gas cylinders in an enclosed vehicle (e.g., a van) is not good safety practice (due to possible sources of ignition within the vehicle and/or displacement of oxygen should there be a leak).

## F. Reporting the Release of Hazardous Materials

For **non-emergency** releases of hazardous materials, the school site should immediately contact the Safety Office (if during work hours) or the School Police at (619) 291-9198 (if after hours).

For **emergency** releases of hazardous materials, the school site should immediately contact 911 and the Safety Office.

Reporting requirements for hazardous materials releases are available from the District Safety Office.

<http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/SDUSD%20HAZMAT%20Spill%20Reporting.pdf>

## IV. Management of Hazardous Waste

School sites that produce hazardous waste are considered to be "generators" of hazardous waste. Managing the hazardous waste includes the following steps:

### A. Waste Determination

The generator should notify the Safety Office whenever hazardous wastes or potentially hazardous wastes are generated by completing and submitting the form, Hazardous Waste Notification Form which is available on the District website.

For waste streams that have not been previously characterized, a Request for Hazardous Waste Determination Form is available on the District website.

### B. Environmental Protection Agency (EPA) Identification Numbers

Each location that generates hazardous wastes requires a specific EPA ID #. The number enables regulators to track the waste from origin to final disposal ("cradle to grave"). A list of current EPA ID numbers is provided as an attachment in Administrative procedure 5120. If your site needs an EPA ID# but does not have one, contact the Safety Office for assistance.

### C. Storage Containers, Labeling and Accumulation Time

Hazardous wastes must be stored in proper containers

- ✓ If hazardous waste will be generated, contact the Safety Office to obtain a container. The container will include instructions and a hazardous waste label.
- ✓ Containers may not be severely rusted or have apparent structural defects, or leaks. **If a container is leaking, immediately contact the Safety Office for assistance.**
- ✓ Containers must be kept closed unless waste is being added or removed
- ✓ If more than one hazardous waste is stored in the same container, the wastes must be compatible.
- ✓ Used oil may not be mixed with any other hazardous waste (e.g., solvents).
- ✓ Containers storing ignitable or reactive wastes must be at least 15 meters (50 feet) from the site's property line.
- ✓ Containers storing ignitable waste must be grounded or bonded when transferring waste.
- ✓ Containers must be stored in a manner that prevents an accidental release to the environment.
- ✓ **As soon as waste begins to collect in the container**, label it with the water-proof stickers provided by the Safety Office (see example). Do not put the hazardous waste label on the container before waste is collected. The label must include the following information.
  - The waste accumulation start date\* and the words "HAZARDOUS WASTE"
  - The physical state and composition of the waste
  - Warning words indicating the particular hazards of the waste, such as: toxic, flammable, corrosive, or reactive
  - The establishment/business name and address of the facility which generated the waste

\*This date is the date waste is first placed into the container or tank.

Prior to transport offsite, the remaining label information must be completed. Storage areas shall be inspected weekly to ensure that the waste is being stored according to the requirements.

#### Storage Maximum Time

The regulations with respect to storage time (including satellite accumulation) are summarized below:

Monthly Generation Of Hazardous Waste for the Entire Site	Accumulation Time Limit (Storage Maximum)	Accumulation Start Date
Large Quantity Generator (LQG) Generates hazardous waste more than 1000kg (2200lbs)/month	90 days	First day the waste begins to accumulate
Small Quantity Generator (SQG) Generates hazardous waste more than 100kg (220lbs) and less than 1000kg (2200lbs)/month <sup>a</sup>	180 days <sup>c</sup>	First day the waste begins to accumulate
Conditionally Exempt Small Quantity Generator (CESQG) Generates hazardous waste less than 100 kg (220lbs)/month <sup>a</sup>	90 days <sup>c</sup>	Once 100 kg (220lbs) has been accumulated <sup>d</sup>
Point of Generation (Satellite) Generates hazardous waste at the initial point of accumulation in a satellite location	3 days after 55 gals the hazardous waste is accumulated, the container must be moved to a 90 day accumulation area	First day the waste begins to accumulate

- <sup>a</sup> And less than 1 kg (2.2 lbs) of acutely/extremely hazardous waste
- <sup>b</sup> Or one quart of acutely/extremely hazardous waste
- <sup>c</sup> Storage maximum can be extended to 270 days if the distance to the treatment or disposal facility is more than 200 miles
- <sup>d</sup> Prior to accumulating 100 kg (220 lbs), there is no maximum time limit specified in the regulations

More detailed information regarding storage times is provided in the attached link ([http://www.dtsc.ca.gov/HazardousWaste/upload/HWM\\_FS\\_Accumulating\\_HazWaste\\_Generators.pdf](http://www.dtsc.ca.gov/HazardousWaste/upload/HWM_FS_Accumulating_HazWaste_Generators.pdf)).

#### D. Transport and Documentation

When shipping hazardous waste from a site, a generator must use only transporters, and, treatment, storage and disposal facilities (TSDF) that are registered or permitted by the California Environmental Protection Agency (Cal/EPA) and have an EPA ID #. In addition, it is the generator's (District) responsibility to ensure compliance with the DOT requirements for container packaging, labeling and marking, to ensure that the transport vehicle is correctly placarded and that employees have been properly trained.

A hazardous waste manifest is a document that accompanies hazardous waste from the generator's site, through the transportation and to the TSDF. The manifest requires signatures by the generator (SDUSD), the transporter, and the TSDF.

Prior to transporting hazardous waste offsite, the hazardous waste transporter will fill out the manifest. The generator or their designee shall ensure:

- ✓ The site's EPA ID # ( #1), name (SDUSD), site address, and phone number are correct (#5)
- ✓ The mailing address is listed as 4860 Ruffner St. San Diego CA 92111 (#5)
- ✓ The transporter is listed as the transporter (with their EPA ID #) (# 6 and/or 7)
- ✓ The designated facility is listed (with their EPA ID #) (#8)
- ✓ The number of drums and quantity of waste is correct

Although the transporter is preparing the manifest, SDUSD is responsible for ensuring its accuracy. Only SDUSD employees are permitted to sign the Generator's Certification (# 15)

Once the transporter has signed it,

- ✓ Copies of the manifest are provided to the transporter
- ✓ The "Generator's Initial" manifest should be kept at the site and a copy of the "Generator's Initial" should be sent to the Safety Office at 4860 Ruffner St. San Diego CA 92111.
- ✓ The Safety Office will mail a copy of the manifest to the Cal/EPA Department of Toxic Substance Control within 30 days.
- ✓ Once the hazardous waste is received, the TSDF will mail the completed copy to the Safety Office within 30 days.
- ✓ The completed copy will be scanned and stapled to the original copy and retained by the Safety Office for three years.
- ✓ The Safety Office will send a copy of this completed manifest to the site and maintain the records for three years.

If the completed copy is not received within 35 days of shipping the waste, the Safety Office will contact the TSDF to request a completed copy. If the completed copy is not received within 45 days, the Safety Office will prepare an Exception Report.

Records of the transport offsite must be received and maintained in the Hazardous Materials Binder by the Site Administrator or Chemical Hygiene Officer (CHO) for a minimum of three years.

## Waste Receipts

Some hazardous waste may be transported off-site using a much easier receipt system (instead of a manifest). This includes antifreeze, automotive batteries, drained used oil filters, used tires, waste oil, universal wastes and sharps or medical wastes. The Site Administrator or Chemical Hygiene Officer (CHO) is responsible for maintaining these records in the Hazardous Materials Binder for a minimum of three years. A copy of the waste receipt must be sent to the Safety Office.

## E. Training

District personnel that handle hazardous waste must receive initial and annual training on the following topics:

- ✓ Hazardous waste procedures
- ✓ Labeling
- ✓ Disposal
- ✓ Recordkeeping, and
- ✓ Emergency procedures

Records to document this training must include the job title for each position, the name of the employee filling each job, and a signature. These records must be kept for three years on the "Record of Employee Safety Training" form <http://www.sandi.net/Page/1948>.

## F. Other Wastes

1. Universal Waste (except for electronic devices) Universal wastes are hazardous wastes that are generated by most facilities and are managed under less stringent requirements than other hazardous wastes. Universal wastes include:
  - ✓ **Batteries:** rechargeable nickel-cadmium batteries, silver button batteries, mercury batteries, small sealed lead acid batteries (burglar alarm and emergency light batteries), most alkaline batteries, carbon-zinc batteries, and any other batteries that exhibit a characteristic of a hazardous waste.  
NOTE: Spent automotive-type lead acid storage batteries are not universal wastes.
  - ✓ **Lamps:** fluorescent tubes, high intensity discharge lamps, sodium vapor lamps, and any other lamps that exhibit a characteristic of a hazardous waste. Spent lamps are managed by the District Custodial Operations.
  - ✓ **Mercury containing wastes:** Please note that mercury containing devices are no longer allowed in the classrooms for instructional use or for usage in the nurse's office. Contact the Safety Office if these devices are discovered.
    - Mercury thermostats that contain small glass capsules of mercury
    - Mercury thermometers

- Pressure or vacuum gauges that contain mercury such as U tube manometers, barometers, and sphygmomanometers (blood pressure meters.)
  - Mercury-containing motor vehicle switches
  - Rubber flooring that contains mercury (for example older gymnasium that were poured in place)
  - Novelties that contain mercury or mercury batteries such as some singing greeting cards, flashing athletic shoes, jewelry, and other devices.
- floors
- ✓ **Non empty aerosol cans:** cans that cannot be emptied through normal usage due to a clogged nozzle, etc.
  - ✓ **Designated non-functional and/or obsolete electronic devices (including cathode ray tubes [CRTs])** – see below

Proper management of universal waste includes:

- ✓ Store all universal waste in a designated area
- ✓ Store all universal waste so that they do not spill, break, or are released into the environment
- ✓ Label each container with the words:  
     Universal Waste - \_\_\_\_\_ {insert specific type of waste}  
     Accumulation Start Time \_\_\_\_\_
- ✓ Contact For universal waste lamps and batteries, contact Physical Plant Operations Work Order Desk at 858- 627-7250 or submit a request on-line through the iService desk to arrange a pick up (Note universal waste must be transported offsite within 1 year)
- ✓ Warehouse staff will pick up the universal waste, leave you a receipt and a new container (if necessary).
- ✓ Site Administrator or designee must keep records of disposal documentation (receipt, tracking order, etc) in the Hazardous Materials Binder for three years.

For more detailed information on managing universal waste, see

[http://www.dtsc.ca.gov/HazardousWaste/UniversalWaste/upload/UW\\_Factsheet1.pdf](http://www.dtsc.ca.gov/HazardousWaste/UniversalWaste/upload/UW_Factsheet1.pdf)

## 2. Electronic Devices

Electronic devices include items such as computer monitors, keyboards, printers, TVs, etc. These devices are transferred to the Materiel Control Unit (MCU) using the "Request for Equipment Transfer" form located on line –

<http://old.sandi.net/services/equipment.asp>. Once the devices are received by the MCU, SDUSD staff prepares the devices for recycling or for auction. If a device is no longer functional or is obsolete, it is managed as a universal waste from that point forward.

## G. Emergency Procedures/ Contingency Plans

All District hazardous waste generators must comply with these requirements regarding preparedness and prevention to minimize the possibility of a fire, explosion or any unplanned release of hazardous materials or hazardous waste constituents to air, soil, or surface water that could threaten human health or the environment.



To report spills to the of hazardous materials or waste, spill reporting forms are available from the District Safety Office

<http://www.sandi.net/cms/lib/CA01001235/Centricity/Domain/144/SDUSD%20HAZMAT%20Spill%20Reporting.pdf>.

Generating sites must be equipped with the Following:

- (1) Internal communication or alarm system to provide immediate instruction to personnel;
- (2) A telephone, two-way radio, or similar device, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams;
- (3) Portable fire extinguishers, fire control equipment, spill containment equipment and decontamination equipment; and
- (4) Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems.

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.

Whenever hazardous waste is being handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

If only one employee is on the premises while the facility is operating, he/she must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance. 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.

The generator must attempt to make the following arrangements, as appropriate, for the types of waste handled at the site and the potential need for the services of these organizations:

- (1) Arrangements to familiarize police and fire departments, emergency response teams and the local Office of Emergency Services with the layout of the facility, properties of the hazardous waste, associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes;
- (1) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority:



(3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers;

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries or illnesses that could result from fires, explosions or releases at the facility; and

(5) Where State or local authorities decline to enter into such arrangements; the generator must document the refusal in the operating record.

At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This employee is the emergency coordinator. Post the following information next to the telephone:

(1) The name and telephone number of the emergency coordinator;

(2) The location of fire extinguishers and spill control material, and, if present, fire alarm;

(3) The telephone number of the fire department, unless the facility has a direct alarm.

The emergency coordinator or his/her designee must respond to any emergencies that arise. In the event of a:

(1) Fire, call the fire department or attempt to extinguish it using a fire extinguisher;

(2) Spill, contain the flow of hazardous waste to the extent possible, and as soon as is practicable, clean up the hazardous waste and any contaminated materials or soil;

(3) Fire, explosion, or other release that could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water, the generator must immediately notify the National Response Center (using their 24-hour toll free number 800/4248802). (40 C.F.R. Section 262.34(d)(5)(iv)).

### Chemical Spill Responsibility

Ensure spills are reported or cleaned up in a timely manner, clean up nuisance spills even if someone else spills them. Know the properties of the materials you are working with and take reasonable steps to prevent spills.

### Nuisance Spills

Are spills of less than 1 gallon of material that you know the hazards of and have the ability to clean.

- Assess the hazard
- wear appropriate PPE

If you are unsure of the hazard of a spill or need assistance with PPE selection, call the Safety Office at 858-627-7174.

### Potentially Hazardous Significant Spills

Are spills of greater than 1 gallon or smaller spills of materials of

- Toxic materials
- Carcinogens
- Flammable liquids
- Compounds of unknown toxicity

In the event of a significant spill during school hours that does not pose an immediate danger to life or health contact Safety Office at 858) 627-7174. In the event of a significant spill after hours that does not pose an immediate danger to life or health please call School Police Services at 619-291-9198.

For spills that pose an immediate danger to life or health please call 911 first than, when the situation allows, contact the Safety Office.

### 3. Empty Containers

Empty used containers greater than 5 gallons must be properly managed. An empty container is defined as:

- ✓ A container that stored hazardous liquid that is completely drained so that no liquid can drain from the container when it is tilted or held upside down.
- ✓ A container that stored a solid or non pourable hazardous material (powders, sludges, grease, thick resins, etc) that is completely scraped out with no remaining build-up inside of the container

Empty containers meeting these definitions:

- ✓ Must be labeled “empty” with the date emptied
- ✓ At least once per year, the container must be re-evaluated. If still empty and the container will continue to remain on site, put the new date on the container

For details on empty container management,

<http://www.dtsc.ca.gov/HazardousWaste/upload/Managing-Empty-Containers.pdf>

#### Special cases of empty containers

Empty aerosol containers:

If the contents and pressure are completely dispensed and the spray mechanism is in place and is not defective (and only if it is not a reactive waste), then the empty aerosol containers may be disposed of in the trash.

Empty gas cylinders:

Re-useable gas cylinders that are empty should be returned to the supplier. Label the empty cylinder “empty.”

For non-reusable cylinders,

- ✓ Ensure that the cylinder is empty (verify using a pressure gauge)
- ✓ Label the cylinder as “Empty”

- ✓ Attempt to return to the manufacturer. If they will not take it,  
If possible, remove the valve so that it is obvious that the cylinder is not under pressure (it is open to the atmosphere). It can then be disposed of as scrap metal  
If that is not possible, call the SO.

## V. Management of Medical Waste

Medical waste includes biohazardous waste and medical solid waste. SDUSD generates sharp biohazardous waste and medical solid waste at site nursing offices and non-sharp biohazardous waste in certain labs (e.g., petri plates).

### A. Sharps Biohazardous Waste

Sharps must be stored in designated sharps containers which are properly labeled with the site's name, address, telephone number and accumulation date.

- ✓ Once the sharp waste is ready for disposal (maximally filled to  $\frac{3}{4}$  capacity), the Nurse contacts Ocean Blue to request a pick up.
- ✓ Ocean Blue assigns a tracking document and gives it to the Warehouse.
- ✓ The Warehouse will deliver an empty white bucket to the custodian's office.
- ✓ The white bucket will be taken to the nurse's office (by the custodian). The Nurse will remove the empty (new) sharps container and ensure that it is labeled as indicated above. The Nurse will put the full sharps container in the white bucket and return it to the custodian's office.
- ✓ The Warehouse driver will return to the school and pick-up the full sharps container and deliver it to the Supply Center.
- ✓ The Warehouse will provide the Nurse with a tracking document which must be maintained in the Hazardous Materials Binder for three years.

In addition to the tracking document, the site is required to have Medical Waste Management Plan and a Limited Quantity Haulers Exemption which allows District Warehouse delivery drivers to pick up & transport the full sharps containers. These documents must be maintained in the Hazardous Materials Binder.

### B. Non Sharp Biohazardous Waste

Non sharp biohazardous waste (e.g., plastic petri dishes) must be stored in a red biohazard bag inside a closed, clean, leak resistant and rigid container. The container must be labeled with the generator's information (name and address) and the words "Biohazardous Waste" or the international biohazard symbol and the word "BIOHAZARD."

Depending on the amount of waste generated, the waste must be picked up within a certain time frame (less than 20 pounds per month, within 30 days; greater than 20 pounds per month, within 7 days).

When the site is ready for pick-up, they should contact the SO. Records of the waste transported off site must be kept in the Hazardous Materials Binder for three years.

### C. Medical Solid Waste

Medical solid waste is solid waste of obvious medical origin (e.g., gloves, dressings containing non liquid blood, etc.). Medical solid waste must be stored in an area secured so as to deny access to unauthorized persons, animals, wind, rain, insects and rodents

prior to disposal. This can be accomplished by storing it in a locked dumpster or a locked enclosure or by keeping inside of your facility until it is ready for pick-up.