

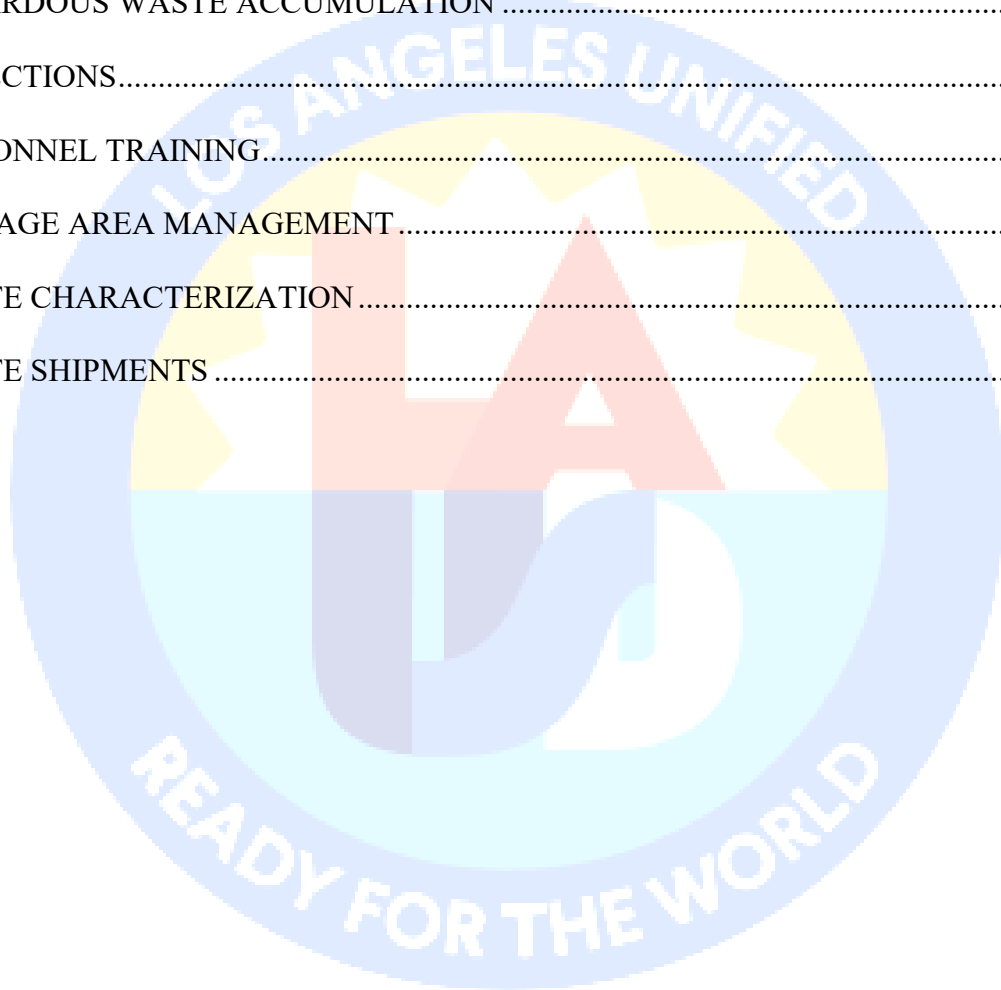
**LOS ANGELES UNIFIED SCHOOL DISTRICT  
HAZARDOUS WASTE MANAGEMENT  
PROCEDURES  
FOR  
MAINTENANCE AND OPERATIONS AND  
GARAGES**

The logo of the Los Angeles Unified School District is a circular emblem. It features a blue outer ring with the text "LOS ANGELES UNIFIED" at the top and "READY FOR THE WORLD" at the bottom. Inside the ring is a stylized sun with rays, and a large, colorful "LA" monogram. The "L" is orange and the "A" is red. Below the "LA" is a light blue horizontal band.

Office of Environmental Health and Safety  
333 S. Beaudry Avenue, 21st Floor  
Los Angeles, California 90017  
(213) 241-3199

TABLE OF CONTENTS

	Page
INTRODUCTION.....	1
CONTAINER LABELING.....	2
CONTAINER MANAGEMENT.....	3
HAZARDOUS WASTE ACCUMULATION.....	5
INSPECTIONS.....	7
PERSONNEL TRAINING.....	9
STORAGE AREA MANAGEMENT.....	11
WASTE CHARACTERIZATION.....	14
WASTE SHIPMENTS.....	17



## **INTRODUCTION**

### **OEHS HAZARDOUS WASTE MANAGEMENT PROGRAM**

The generation and storage of hazardous waste in the workplace presents an array of safety, disposal, and financial concerns. The OEHS Hazardous Waste Management Program has been established to address these concerns in a manner which is safe, cost-effective, and regulatory-compliant.

The Hazardous Waste Management Program is an integrated system in which District facilities work with OEHS and waste management contractors to safely identify, store, and dispose of hazardous waste. This program establishes procedures for waste identification, storage, shipment, and emergency response. It also provides auditing and record keeping procedures for individual facilities to plan, direct, and track all aspects of hazardous waste management.

### **HAZARDOUS WASTE POLICY AND PROCEDURES MANUAL**

The OEHS Hazardous Waste Management Policy and Procedure manual is a working document that includes policies, procedures, inspection forms, and directions for implementing all phases of hazardous waste management. By implementing this program and using the resources within this, manual District facilities can manage hazardous waste efficiently and responsibly with respect to human health, the environment and district, state, and federal regulations.

## Hazardous Waste Management Container Labeling

---

### 1. OVERVIEW:

The purpose of this procedure is to outline the requirements associated with the labeling of containers used to accumulate hazardous waste onsite for 90 days or less as regulated by California (22 CCR 66262.34).

### 2. PROCEDURE:

LAUSD will clearly label each waste container used to accumulate hazardous waste (i.e., 55-gallon drums, 5-gallon cans, roll off bins) with the following information:

- The name, address, telephone number and EPA Identification Number of the facility.
- The date waste was first placed in the container.
- The words “Hazardous Waste”.
- A description of the waste (i.e., waste paint, antifreeze, used paint filters with solvent).
- Identity of waste codes.
- Identity of proper D.O.T. shipping name.

### 3. ENVIRONMENTAL RECORDS:

- Conduct weekly inspections of containers as described in the Inspection Procedure.
- Retain the completed *Hazardous Waste Inspection* forms for a minimum of 3 years.

### 4. RECORD OF REVISIONS:

Date:

Description:

Pages Affected:

Authorized by:

## Hazardous Waste Management Container Management

---

### 1. OVERVIEW:

This procedure outlines the requirements associated with the labeling and management of containers used to accumulate hazardous waste onsite for **90 days or less** as regulated by California (22 CCR 66262.34).

### 2. PROCEDURE:

LAUSD will perform the following procedure for managing hazardous waste containers:

#### 55-Gallon Drums

- Place waste in container provided by CWI
- Keep containers closed except when waste is being added or removed.
- Collect different types of waste in different containers (e.g., waste water based paint, solvent based paint).
- Keep hazardous waste liquid drums inside a secondary containment system.
- Label containers with the following information;
  - The name, address, telephone number and EPA Identification Number of the facility.
  - The date waste was first placed in the container.
  - The words “Hazardous Waste”.
  - A description of the waste (i.e., waste paint, antifreeze, used paint filters with solvent).
  - Identity of waste codes.
  - Identity of proper D.O.T. shipping name.
- Inspect the hazardous waste storage area in accordance with the Inspection Procedure looking for items such as leaking containers, condition of drums and condition of secondary containment

#### Rolloff bins

- Keep rolloff bins closed except when waste is being added or removed.
- Label rolloff bins with the following information.

- The name, address, telephone number and EPA Identification Number of the facility.
- The date waste was first placed in the container.
- The words “Hazardous Waste.”
- A description of the waste (i.e., waste paint, antifreeze, used paint filters with solvent).
- The composition and physical state of the waste (i.e., liquid, solid).
- The hazards associated with the waste (i.e., flammable, corrosive, or reactive).
- The date the first waste is place in the container.
- Inspect the hazardous waste storage area in accordance with the Inspection Procedure looking for items such as leaking containers, condition of drums and condition of secondary containment
- Contact CWI to dispose of waste within 90 days of beginning waste accumulation.

**3. ENVIRONMENTAL RECORDS:**

- Conduct weekly inspections of containers used to accumulate hazardous waste and log the results of these inspections on a *Hazardous Waste Inspection* form as provided in Inspection Procedure.
- Retain the completed *Hazardous Waste Inspection* forms for a minimum of 3 years.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

## Hazardous Waste Accumulation Areas

---

### 1. OVERVIEW:

This procedure outlines the waste accumulation requirements for hazardous waste generators within the State of California (22 CCR 66262.34/22 CCR 66265.170-.178).

### 2. PROCEDURE:

Follow the procedures below when accumulating hazardous waste in containers.

#### *Satellite Accumulation Area*

A satellite accumulation area can be used to accumulate up to 55-gallons of a specific wastestream at or near the point of generation provided it is under control of the operator.

- Obtain a new and clean 55-gallon drum provided by CWI.
- Complete and attach a hazardous waste label (See example label for specific wastestream). Use permanent ink to complete the label.
  - Write facility name and address on label
  - Place EPA Hazardous Waste Identification Number on the label. This is a number specific to your facility used to track hazardous waste activities. If you do not have an EPA ID number contact Environmental Affairs.
  - Write a description of the waste (e.g. Waste Paint)
  - Identity of waste codes.
  - Identity of proper D.O.T. shipping name.
- Attach Satellite Accumulation Label and complete initial date (Date first drop of waste is placed in container.)
- Place container inside the designated Satellite Accumulation Area. The area should include;
  - Sign designating “Satellite Accumulation Area,”
  - Area should be marked with off with yellow stripes
- Keep container closed unless waste is added or removed.
- When container is full, complete full date and move to the 90-day hazardous waste storage area within 3 days.
- If the drum is not full within 9 months of the initial date move the 90-day hazardous waste accumulation area.
- If you only generate waste periodically or in different locations throughout the facility place container in the hazardous waste storage area.

**3. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:



## 90-Day Area Inspections

---

### 1. OVERVIEW:

Hazardous waste generators are required to inspect the facility as often as necessary to identify malfunctions, deterioration, operator errors, and discharges that may lead to a release of hazardous waste to the environment or become a threat to human health (22 CCR 66265.15). Such inspections are required to be recorded in writing and retained on-site for 3 years.

### 2. PROCEDURE:

LAUSD will conduct weekly inspections of the hazardous waste container storage areas for the following items

- Containers are situated within a designated hazardous waste storage area.
- Containers are closed.
- Containers are not leaking.
- Containers are properly labeled (identified as “Hazardous Waste”, list the name and address of the facility, physical state of the waste, hazards associated with the waste and a description of the waste). (See Procedure --)
- Containers are appropriately labeled with their contents.
- The earliest accumulation start date is identified (waste must be shipped offsite within 90-days of the earliest accumulation start date).
- Adequate aisle space is present between each container and secondary containment pallet (at least two feet where necessary).
- Containers are in good condition, with no damage, leaks, corrosion or swelling.
- There are no unusual odors or discolorations.
- Area is secured to prevent access by unauthorized personnel.
- Area is signposted with “Hazardous Waste”, “Authorized Personnel Only” and “No Smoking” signs.
- Area’s safety and emergency equipment operates properly (i.e., spill control equipment, emergency communications equipment including phone lists, fire extinguishing systems, eyewash and shower).
- Log inspection results on *Hazardous Waste Inspection* form (attached).

**3. ENVIRONMENTAL RECORDS:**

Sign and date each completed *Hazardous Waste Inspection* form.

- File completed *Hazardous Waste Inspection* form in designated area.
- Retain completed *Hazardous Waste Inspection* forms for 3 years from date of completion.
- Ensure completed *Hazardous Waste Inspection* forms are available for review upon request.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

## Personnel Training

---

### 1. OVERVIEW

This procedure outlines the personnel training requirements for hazardous waste generators within the State of California (22 CCR 66262.34 / 22 CCR 66265.16).

### 2. PROCEDURE:

The facility will develop a training program to train individuals involved in hazardous waste management to perform their duties safely. The training program will be provided as follows:

- The training will be directed by a person trained in hazardous waste management procedures.
- The training program will provide:
  - An overview of the hazardous waste management Standard Operating Procedures.
  - Familiarization with the contingency plan requirements, including emergency procedures and emergency equipment.
  - Procedures for using, inspecting, and repairing emergency equipment.
  - Operation of controls, communications, and alarm systems.
  - Specific response procedures in the event of fires, explosions, and soil/water contamination.
  - Individual responsibilities associated with hazardous waste management. These include:

M&O Waste Coordinator is responsible for managing hazardous waste including reviewing manifest, inspecting the waste storage area, contacting CWI, and recordkeeping associated with waste management.
- Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least 3 years from the date the employee last worked at the facility.

### 3. ENVIRONMENTAL RECORDS:

- Maintain the written hazardous waste training program on-site.
- Retain training records on current personnel until closure of the facility.
- Retain training records on former employees for at least 3 years from the date the employee last worked at the facility.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

## 90-Day Storage Area Management

---

### 1. OVERVIEW:

This procedure outlines the California regulatory requirements for hazardous waste generating facilities that store hazardous waste onsite for 90 days or less (22 CCR 66262.34). A facility is required to obtain a waste storage permit if it accumulates hazardous waste onsite for more than 90 days

### 2. PROCEDURE:

LAUSD will manage its storage area in accordance with the following guidance and ensure that the waste is transported offsite within 90 days of commencement of accumulation:

#### A. General

1. Maintain at least two feet of aisle space between rows of drums and roll off bins.
2. Label the containers with the following information;
  - The name, address, telephone number and EPA Identification Number of the facility.
  - The date waste was first placed in the container.
  - The words “Hazardous Waste”.
  - A description of the waste (i.e., waste paint, antifreeze, used paint filters with solvent).
  - Identity of waste codes.
  - Identity of proper D.O.T. shipping name.
3. Keep containers closed except where waste is added or removed.
4. Keep hazardous waste liquid containers in a secondary containments system.
5. Place the following signs on the fence
  - Hazardous Waste Storage Area

- No Smoking
- Authorized Personnel Only

6. Place the following emergency equipment adjacent to the area:

- Telephone (immediately available at the scene of operations) or a hand-held, two-way radio.
- Fire extinguisher.
- Eye wash/shower.
- First aid kit
- Spill Control Equipment such as;
  - Gloves
  - Goggles
  - Face Shield
  - Absorbent pads, socks, and booms
  - Disposable bags
  - Broom Shovel
- Place the following information next to the telephone:
  - Name and telephone number of emergency contact,
  - Location of fire extinguisher,
  - Local fire department phone number.
- Fence the 90-day hazardous waste storage area to prevent access by unauthorized personnel.
- Inspect the hazardous waste storage area in accordance with the Inspection Procedure looking for items such as leaking containers, condition of drums and condition of secondary containment.
- Ship waste to an approved hazardous waste treatment, storage and disposal facility within 90 days of the date waste was first accumulated

### **3. ENVIRONMENTAL RECORDS:**

- Maintain a Hazardous Waste Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.
- Submit the Contingency Plan to local police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services.
- Train all facility hazardous waste handlers in accordance with Personnel Training Procedure.
- Retain all records of facility inspections onsite for at least 3 years.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

## Waste Characterization

---

### 1. **PURPOSE:**

A facility that generates a solid waste is required to determine whether that waste is a hazardous waste (22 CCR 66262.11). Such determination usually requires characterization to identify whether a listed hazardous waste is present or if the waste exhibits hazardous characteristics: corrosivity, reactivity, ignitability, or toxicity by using knowledge of the waste stream or through analytical testing.

### 2. **PROCEDURE:**

(OEHS assists the District) LAUSD works with CWI (OEHS) to characterize its solid waste using the following procedure:

- Determine whether the waste is excluded from regulation under 22 CCR 66261.4 or 22 CCR 66261.6. In most cases these exclusions will not apply to your facilities.
- If the waste is not excluded from regulation, determine whether the waste is listed as a hazardous waste in 22 CCR 66261 subpart D (federally-listed waste), or in 22 CCR 66261.126 Appendix X (California regulated hazardous waste). Waste you may generate that a listed include absorbent and oil, anti-freeze, oil filters, asbestos, waste paint, and waste paint thinner.
- If the waste is not listed as a hazardous waste, determine whether it exhibits a hazardous characteristic of corrosivity, reactivity, ignitability, or toxicity by using generator knowledge of the waste or performing the following tests:
  - Ignitability
    - The waste is a liquid with a flashpoint equal to or less than 140 degrees Fahrenheit.
    - The waste is a flammable, compressed gas or an oxidizer.
  - Corrosivity
    - The waste is a liquid and has a pH equal to or less than two, or equal or greater than 12.5, or by mixture with an equivalent weight of water produces a solution with those pH characteristics.
  - Reactivity



- The waste is unstable or undergoes rapid or violent chemical reactions, such as catching fire, exploding, or giving off fumes, when exposed to or mixed with water, air or other materials.
- Toxicity
- The waste is listed in the attached table and exceeds the listed regulatory level.
  - If the waste is listed, or the toxicity thresholds for the waste are unknown, perform the following tests:
    - Test the waste to determine if it exceeds the total threshold limit concentration (TTLC). If so, the waste is a California Hazardous Waste. If not, continue.
    - If the waste’s TTLC value is 10 times greater than the soluble threshold limit concentration (STLC), test the waste to determine if it exceeds STLC limits. If so, the waste is a California Hazardous Waste.
    - If the waste’s TTLC value is 20 times the toxic characteristic leaching procedure (TCLP), analyze the waste using TCLP procedures to determine if the waste is a RCRA (federally regulated) hazardous waste. If limits are exceeded, the waste is a RCRA hazardous waste.
  - If the waste is not listed in the attached table and does not exceed the listed regulatory level, conduct an aquatic bioassay test. If the waste fails this test, it is a California Hazardous Waste. If it does not fail the test, the waste is non-hazardous.
- Determine whether the waste can be excluded from the hazardous waste regulations because it belongs in one of the following categories. If the waste is excluded, manage the waste as described.
- Empty containers
- Completely empty containers are generally not considered hazardous wastes although larger quantity containers may contain enough residue to still exhibit a characteristic of hazardous waste. Exclude empty containers from the hazardous waste requirement only if the following conditions are met:
    - The containers are empty, i.e., as much of the contents have been removed as possible so that none will pour out in any orientation. In the case of solids, the contents have been removed to the extent practical, and aerosol cans have been emptied by using the valve.

- If the empty containers are 5 gallons or less in capacity, dispose them as non-hazardous solid waste or have them scrapped for metal recovery.
- If the empty containers are greater than 5 gallons in capacity, label the containers with a start date and the word “Empty” and use the containers in one of the following methods within 1 year of emptying:
  - return the container to the vendor for re-use;
  - send the container to a drum recycler for reconditioning; or
  - use or recycle the container onsite.

➤ Waste Oil Filters

- Drain all used metal canister oil filters of all free-flowing oil, accumulate, store and transfer the filters in a closed, rainproof container labeled “Drained Used Oil Filters”, and transfer the filters for recycling.

➤ Scrap Metal

- Scrap metal is excluded from the definition of a hazardous waste unless it is finely divided.

**3. ENVIRONMENTAL RECORDS:**

- Retain records of all test results, waste analyses or other determinations for at least 3 years from the date the waste was last sent to onsite or offsite treatment, storage or disposal.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

## Waste Shipments

---

### 1. **PURPOSE:**

The purpose of this procedure is to outline the requirements associated with the shipping of hazardous waste by a hazardous waste generator (22 CCR 66262.20 through 66262.42). These requirements include who to contact, the use of Hazardous Waste Manifests, as well as the preparation of Biennial Reports and Exception Reports.

### 2. **PROCEDURE:**

#### Contact for Pickup of Hazardous Waste

When waste is ready for pickup contact CWI at \_\_\_\_\_. CWI will arrange for a time to pick up the waste at your facility and provide appropriate paperwork

#### Hazardous Waste Manifest

CWI will provide a completed hazardous waste manifest when they pick up a shipment of hazardous waste. LAUSD is responsible for reviewing the manifest to ensure it is accurate with respect to the items identified below. Compare the manifest to the example manifest for the specific wastestream.

The areas of the manifest to be reviewed include:

- |               |   |
|---------------|---|
| Box 1:        | Is the EPA Hazardous Waste Generator Number correct?  |
| Box 3:        | Is your facility name and address correct? Also identify a facility contact that should receive the returned manifest.                                  |
| Box 4:        | Is the facility phone number correct?   |
| Box 5 and 6:  | Is this the correct waste transporter name and hazardous waste identification number? (Boxes 7 and 8 are used if additional transporters are required.) |
| Box 9 and 10: | Is the facility to which you agreed to send the waste correct?  |
| Box 11:       | Is the shipping name correct? This should be the proper shipping name as required by the US Department of Transportation (DOT). (see example manifest)  |
| Box 12-14:    | Are the quantities identified correct?  |
| Box I:        | Is the correct waste code included?   |
| Box 15:       | Are there any special handling instructions that should be included?  |

Box 16: By signing the document you are certifying that the waste manifest is correct and accurate. You are also certifying that the facility has a program in place to minimize waste.

Box 17: Obtain the handwritten signature of the initial transporter and the date of acceptance on the manifest.

- Retain two copies of the signed manifest and give the remaining copies to the transporter. Retain one copy identified as “generator’s copy” in your records; send the second copy (blue copy) to the California Department of Toxic Substance Control (DTSC) within 30 days of shipping the waste. The address is on the bottom of the manifest.
- Prior to shipment, confirm that all appropriate placard and labels required by the US DOT are placed on the containers and trucks.
- A third copy (yellow copy) of the manifest will be mailed to LAUSD from the destination (treatment, storage and disposal) facility. This copy should be stapled to the original copy and retained in the files.
- If a copy of the manifest from the destination facility is not received within 35 days of shipping the waste contact the destination facility and request a copy. If a copy is not received within 45 days, prepare an exception report (see below).

#### Land Disposal Restriction Notice

- CWI will supply a Land Disposal Restriction (LDR) Form with each shipment of hazardous waste. The LDR will be associated with a single manifest.
- Review the LDR form to ensure it identifies the corresponding manifest number for the waste shipment, the date of the shipment, the EPA waste code for each waste stream identified on the corresponding manifest and the treatment technologies associated with the waste code.
- Attach the copy of the LDR form to the corresponding manifest.

#### Exception Reporting

- If LAUSD does not receive an acknowledgment copy of the manifest signed by the destination facility within 35 days of shipping the waste, perform the following:
  - Contact the transporter and/or destination facility. If they do not have a signed copy, determine the status of the hazardous waste and notify OEHS.
- If LAUSD does not receive the acknowledgement copy of the manifest signed by the destination facility within 45 days of shipping the waste, submit an Exception Report to the DTSC and copy OEHS. The Exception Report must include:

- A legible copy of the manifest for which LAUSD does not have a signed returned copy.
- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

### Biennial Report

- Prepare and submit a single copy of a Biennial Report to the DTSC by March 1<sup>st</sup> of each even numbered year.
- Ensure the Biennial Report covers generator activities during the previous year and includes the following information:
  - The EPA identification number, name and address of the generator.
  - The calendar year covered by the report.
  - The EPA identification number, name and address for each offsite TSDF in the U.S. to which waste was shipped during the previous year.
  - A description, EPA hazardous waste number (from 40 CFR 261 subpart C or D), DOT hazard class, and quantity of each hazardous waste shipped offsite for shipments to a TSDF within the U.S. This information must be listed by EPA identification number of each such offsite facility to which waste was shipped.
  - A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.
  - A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.
  - The certification signed by the generator or authorized representative.

### **3. ENVIRONMENTAL RECORDS:**

- Keep a copy of each original manifest and corresponding manifest signed by the destination facility for 3 years from the date the waste was accepted by the initial transporter.
- Keep a copy of Land Disposal Restriction form for 5 years
- Submit a Biennial Report to the Regional Administrator by March 1<sup>st</sup> of each even numbered year and retain a copy for 3 years.

- Retain a copy of Exception Reports for 3 years.

**4. RECORD OF REVISIONS:**

Date:

Description:

Pages Affected:

Authorized by:

**Environmental Health and Safety Action List**

Task*	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Hazardous Material Inspection	Weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly
Haz. Material Inventory	Review/ Revise	Submit										
Hazardous Material Business Plan (HMBP)	Review/ Revise	Submit, if revised										
HMBP Training					Prep.	Train						
Review MSDS	Review											
Housekeeping Inspection	Weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly
OSHA 200 Posting	Prepare	Post	Remove									
Review H&S Programs		Review										
H&S Training					Prep.	Train						
EH&S Documentation Review		Review										
Hazardous Waste Inspection	Weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly	weekly
Conduct Haz. Waste Training				Prep.	Train							
Ship Haz. Waste					Prep.	Ship					Prep.	Ship
Latex Paint Disposal					Prep.	Ship					Prep.	Ship

\* See EH&S Tickler System Task Definition Sheet for specific instructions for each task.