

November 2016

IMPORTANT NOTICE

Hazardous Waste Determination at Dialysis Clinics

The Sacramento County Environmental Management Department (EMD) is the local Certified Unified Program Agency (CUPA) and is responsible for enforcement of the hazardous material and hazardous waste programs within Sacramento County. EMD has become aware that many dialysis clinics use concentrated cleaning agents such as Renalin to sterilize medical equipment and then discharge the resulting waste to the sanitary sewer. Per the Safety Data Sheet (SDS), Renalin has hazardous waste characteristics at full strength. Renalin, as well as any other cleaning agent, may display similar hazardous characteristics after being used. Before a potential hazardous waste is discarded, the waste generator is responsible for making a hazardous waste determination. **This document has been created to assist facilities in understanding hazardous waste characteristics and to provide hazardous waste determination guidance.**

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 noted below.

- **IGNITABILITY** (22 CCR 66261.21) – Wastes that may be set afire or burst into flame spontaneously. Liquids with a flashpoint 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. Waste 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 chemical activity.
- **TOXICITY** (22 CCR 66261.24) – Wastes that may be harmful to human health or the environment.

Waste generators are required to determine if each 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 via generator knowledge and/or using analytical testing. Keep in mind that legitimate analytical testing involves taking a representative sample(s) at the point of generation.

1. REPRESENTATIVE SAMPLE means a sample of a universe or whole (e.g., waste pile, lagoon, ground water) which can be expected to exhibit the average properties of the universe or whole (22 CCR 66262.10).

2. POINT OF WASTE GENERATION is the point where a waste produced by a system, process, or waste management unit is determined to be a hazardous waste (22 CCR 66262.10).
3. GENERATOR KNOWLEDGE is any person familiar with a process, who has the knowledge to utilize tools such as Safety Data Sheet (SDS), analytical test results, pH, oxidizer or Renalin test strips, etc. in order to make a waste determination.
4. ANALYTICAL TESTING can be used exclusively or in conjunction with Generator Knowledge in making a waste determination. It's important that the appropriate test method be used when making a waste determination. Test method guidance is available at <http://www.epa.gov/solidwaste/hazard/testmethods/index.htm>.

NOTE: Discharging hazardous waste to the sanitary sewer system is a violation and could subject the facility owner/operator to potential fines/penalties. Discharging non-hazardous waste to the sewer may require a discharge permit; contact Sacramento Regional County Sanitation District (SRCSD) for assistance at (916) 876-6064.

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

If you have any questions regarding hazardous waste determination, 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.