

# Surviving a Hazardous Waste Inspection “A Guide to Record Keeping”

Hazardous Waste records are to be maintained for 3 years

## **1. Hazardous Waste Management Plan:**

What is this: This document is an overview of the waste management for your specific dental practice.

### Contents:

- Types of Hazardous Waste
- Storage of Hazardous Waste
- Transport: HW hauler information & wastes associated with the specific hauler
- Labeling and monitoring of wastes
- Responsible individuals
- Volume generated

### Helpful hints and details:

- Lamps are considered to be a universal waste, however must still be managed as a waste. Lamps are to be labeled as “Lamps.”
- Used oil is technically not a hazardous waste, however must still be managed as a waste. The oil is to be labeled as “Used Oil.”
- Recommend to review and update as needed and at a minimum 1 x per year to ensure current records.
- Date management plan at time of review.

## **2. Hazardous Waste User Log:**

What is this: This document is a record of all Hazardous wastes, universal wastes and used oil.

### Contents:

- Wastes
- Waste amounts generated in a given year

### Helpful hints and details:

- Amalgam Waste water calculation may vary depending on the amount of water used for patients as well as for flushing the lines at the end of the shift. Figure accordingly.
- This document is especially help for inspections and self audits.

## **3. Pharmaceutical Hazardous Waste Hauler manifests and log sheet**

What is this: This document is a record of pharmaceutical waste produced in the practice. The record would reflect wasted anesthetics and medical emergency drugs. (non-scheduled drugs)

### Contents:

- Information regarding manifest reporting
- Records of pick-ups

### Helpful hints and details:

- It is the responsibility of the staff to report pharmaceutical manifests to the appropriate address.
- Dates associated with mailing are critical.

#### **4. Waste Hauler pick-up sheets and records (amalgam, fixer...)**

What is this: This document is a record of Hazardous Wastes picked up that are not manifested. These waste haulers will leave a single "pick-up" sheet at the time of the pick-up.

Contents:

- Date of pick-up and staff initials

Helpful hints and details:

- Recommend to use a separate sheet for each hauler that is used.

#### **5. Waste Hauler pick-up sheets and records (used oil)**

What is this: Same as #4

#### **6. Hazardous Waste Weekly Container Inspection log**

What is this: This document is a record of the required weekly inspection of all hazardous waste containers.

Contents:

- EPA number
- Problems and corrective action

Helpful hints and details:

- It is not acceptable to have containers lids a-jar
- It is not acceptable to cut a drop-hole in the lids for easy access
- 3 sample forms have been included for your choosing. All forms have been acceptable at various hazardous waste inspections.

#### **7. Amalgam Recovery Program Certificate**

What is this: This certificate is received after registering the amalgam separator with the MDA/Met Council. The certificates are valid for a period of 5 years.

Helpful hints and details:

- Installation form has been included.
- It is the responsibility of the practice to report changes in units to the MDA.
- Sample certificate has been included.

#### **8. Amalgam Recovery Program annual statement**

What is this: It is an acknowledgement that amalgam separator is in place and in proper working condition.

Helpful hints and details:

- This document is mailed out to the practice in June/July each year and is to be completed and returned as noted in letter.
- Retain a photocopy of this statement.
- On the 5<sup>th</sup> year when the certificates are issued, there will not be an annual statement.

#### **9. Amalgam Separator Checking**

What is this: This document is a record of the weekly integrity checks of the amalgam separator.

Helpful hints and details:

- Some counties require the time of the check to be documented.

### **10. Hazardous Waste Identification Number (MPCA document with EPA number)**

What is this: The Hazardous Waste ID number is required to ship wastes. The number is site specific. (A number is required for each location address)

Contents:

- Dental Practice information
- Hazardous wastes produced in the practice
- Any changes in information must be made by completing a new form with the appropriate information.

Helpful hints and details:

- Instructions for completion of application have been included.
- Following application, the MPCA will mail a document reflecting the EPA number.

### **11. Hazardous Waste license (photocopy)-original is posted in public area of practice**

What is this: Dental practices outside of the 7-county metro area are required to apply for a hazardous waste license with the MPCA (MN Pollution Control Agency)

Helpful hints and details:

- Most dental practices are considered to be a minimal generator. (no license and no fees)

### **12. Testing records**

What is this: Testing records are required for all chemical indicators used in the dental practice. Most indicators contain lead or barium. Testing insures that the lead and barium are below the federal allowable limit.

Helpful hints and details:

- There are currently a number of manufacturers that have indicators that are not considered to be a hazardous waste and are willing to provide the lab testing paperwork.
- Lab testing paperwork is required. It is not acceptable to simply state in a letter that a product is not hazardous.
- Some known non-hazardous indicators are made by Patterson Dental, Peelview, IMS...
- Recommend to contact your dental supplier for more information to obtain testing records. Testing records can also be located on the internet.

### **13. Hazardous Waste Inspection/Self audit records**

What is this: Each time a Hazardous Waste inspection is performed, the inspector will leave a copy of the inspection. Some counties do not perform inspections, instead they send out paperwork for self reporting.

Contents:

- Findings of the hazardous waste at the practice.

Helpful hints and details:

- Recommend to be accurate in reporting waste amounts, as this is what determines the level of generator status and licensing fees.
- It is the responsibility of the practice to report any changes in waste streams.
- Reminder to notify the county if your practice changes from traditional film processing to digital radiography.