Preparing for a CUPA Inspection

SafetyNet #: 120

If you work with hazardous materials and/or accumulate hazardous waste, you can expect to be inspected by your local county’s Environmental Health Department (CUPA) a minimum of once every three years. However, you should always be prepared for an inspection at any time. You should take the following steps to insure that you are in compliance with state and federal regulations:

- All chemical hazardous waste containers must disposed of through Environmental Health and Safety (EH&S) within 9 months of the date that waste was first placed in the container, or 90 days if 1 pound or 1 quart of acutely hazardous waste is accumulated. Prudent practice is to dispose of waste within 90 days.

- Each chemical hazardous waste container must have a UC Davis hazardous waste label that is completely filled out, including the date (month, day, year) when waste was first placed in the container. Hazardous waste labels can be downloaded here [1].

- Keep hazardous waste containers closed with a secure lid except when adding or removing waste. This includes HPLC type equipment that empties into waste containers.

- Hazardous waste containers must be in good condition and compatible with the chemical constituents of the waste.

- Hazardous waste containers must be properly managed. Incompatible waste should be segregated, ignitable waste should be stored at least 5 feet from ignition sources, and secondary containment used when there is a possibility of leakage/overflow.

- An accurate, updated chemical inventory must submitted to EH&S via the on-line Chemical Inventory System [2] (CIS) annually. EH&S will e-mail CIS account holders and remind them of this requirement.

- Material Safety Data Sheets (MSDSs) must be available for all hazardous chemicals in your facility. Although on-line access is acceptable, EH&S recommends that you retain hard copies for commonly used hazardous materials in your work area.

- Personnel in the laboratory must be trained on procedures for spills of hazardous waste and/or hazardous materials. Spill procedures must be posted in the laboratory. SafetyNet #13 [3] may be used to meet this requirement. All personnel (including PI’s) must be trained initially and have refresher training annually thereafter. Training must be documented with subject content, signature and date.

During an inspection, any violations should be corrected on the spot if possible. Remember, don’t argue with inspectors on compliance issues. EH&S will negotiate with the inspector on your behalf to make sure that the regulations are applied appropriately and fairly.
Related content

1. Guidelines for Chemical Spill Control