



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

RCRA Large Quantity Generators of Hazardous Waste

EFFECTIVE DATE: **10/01/2024**PAGE **2** OF **4**

RECORD ID #: _____

FACILITY NAME: *

ADDRESS: *

CITY/ZIP: *

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. Incorporated provisions of Title 40 of the Code of Federal regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator; LQG = Large Quantity Hazardous Waste Generator

HAZARDOUS WASTE REQUIREMENTS FOR RCRA LQGS ONLY

RECORD KEEPING/OPERATIONAL REQUIREMENTS

- | # | <u>VIOLATION DESCRIPTION</u> |
|----------------------------------|---|
| <input type="checkbox"/> HMD0131 | Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. SDCC 68.904; 68.905; 68.907.1 |
| <input type="checkbox"/> HMD0150 | Failed to submit complete and accurate Facility Information in CERS. 27 CCR 15188(b-c); SDCC 68.904(b) |
| <input type="checkbox"/> 3130028 | Failure to keep records of any test results, waste analyses, or other determinations made in accordance with section 66262.11 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. 22 CCR 12 66262.40(c) |
| <input type="checkbox"/> 3110001 | Failure to obtain or maintain an Identification Number prior to treating, storing, disposing of, transporting or offering for transportation any hazardous waste. Maintenance of ID numbers must be annually verified using the Electronic Verification Questionnaire (eVQ). 22 CCR 12 66262.18; HSC 6.5 25205.16(b) |
| <input type="checkbox"/> 3110031 | Failure to maintain ID number by notifying DTSC by March 1 of each even numbered year. Re-notification must be done by using EPA form 8700-12 22 CCR 12 66262.18(d)(2) |
| <input type="checkbox"/> 3110003 | Failure to properly complete the Uniform Hazardous Waste Manifest. 22 CCR 12 66262.23(a) |
| <input type="checkbox"/> 3110004 | Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 6.5 25160(b)(3); 22 CCR 12 66262.42 |
| <input type="checkbox"/> 3110005 | Failure to keep a copy of each properly signed manifest for at least three years from the date the waste was accepted by the initial transporter. The manifest signed at the time the waste was accepted for transport shall be kept until receiving a signed copy from the designated facility which received the waste. 22 CCR 12 66262.40(a) |
| <input type="checkbox"/> 3110006 | Failure to send a legible copy of each hazardous waste manifest that originated in paper form to DTSC within 30 days of each shipment of hazardous waste. 22 CCR 12 66262.23(a)(4); HSC 6.5 25160(b)(1)(C) |
| <input type="checkbox"/> 3110017 | Failure of a generator of hazardous waste that meets the conditions to be transported on a consolidated manifest to comply with one or more of the required consolidated manifesting procedures and retain copies of receipts for three years. HSC 6.5 25160.2 |
| <input type="checkbox"/> 3110019 | Failure to retain for at least three years a legible copy of each manifest or bill of lading which identifies spent lead-acid storage batteries shipped to a person who stores the batteries or who uses, reuses, recycles or reclaims the batteries or their components. 22 CCR 16 66266.81(a)(4)(B) |
| <input type="checkbox"/> 3130002 | Failure to determine whether waste is restricted from land disposal. 22 CCR 12 66262.17(a)(9); 22 CCR 18 66268.7(a) |
| <input type="checkbox"/> 3130027 | Failure to comply with Drip Pad requirements, including but not limited to design and operating requirements, annual assessment, contingency plan, inspections, and closure requirements. 22 CCR 12 66262.17(a)(3); 22 CCR 15 66265.440 - 66265.445 |
| <input type="checkbox"/> 3110021 | Failure of any person who recycles more than 100 kilograms per month of recyclable material under a claim that the material qualifies for exclusion or exemption, to submit recyclable materials report every two years. HSC 6.5 25143.10 |
| <input type="checkbox"/> 3130029 | Failure to properly manage used oil filters and/or fuel filters in accordance with the requirements. 22 CCR 16 66266.130; HSC 6.5 25250.22 (c)(5) |
| <input type="checkbox"/> 3110020 | Failure to report program data electronically. HSC 6.11 25404(e)(4) |
| <input type="checkbox"/> 3150004 | Failed to properly manage a recyclable material. HSC 25143.2, 25143.9 |
| <input type="checkbox"/> 3110022 | Failure to annually submit notification of generator's intent to remotely consolidate hazardous waste. HSC 25110.10(d) |
| <input type="checkbox"/> 3110008 | Failure of a generator to conduct, when required, a source reduction evaluation review and plan every four years, and/or failure of the review and plan to contain all required information. 22 CCR 31 67100.7, 67100.8 |
| <input type="checkbox"/> 3110009 | Failure of a large quantity generator to prepare a summary progress report every four years, using DTSC's Form # 1262 (3/99) titled "Summary Progress Report". 22 CCR 31 67100.9 |
| <input type="checkbox"/> 3110010 | Failure to adequately complete, and maintain for review, all requirements of the source reduction evaluation review and plan (SB-14). 22 CCR 31 67100.3, 67100.4, 67100.5; HSC 6.5 25244.19, 25244.21 |
| <input type="checkbox"/> 3110007 | Failed to complete the Biennial Report by March 1st on even numbered year and maintain a copy for 3 years. 22 CCR 66262.40(b), 66262.41 |
| <input type="checkbox"/> 3110004 | Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 25160(b)(3); 22 CCR 66262.42 |

DISPOSAL AND TRANSPORTATION

- | # | <u>VIOLATION DESCRIPTION</u> |
|----------------------------------|---|
| <input type="checkbox"/> 3110002 | Failure to prepare a Uniform Hazardous Waste Manifest and, if necessary, a Continuation Sheet, before the transport of a hazardous waste off-site for transfer, treatment, storage, or disposal. 22 CCR 12 66262.20 |
| <input type="checkbox"/> 3130001 | Failure to determine if wastes generated are hazardous waste by using generator knowledge or applying testing method. 22 CCR 12 66262.11 |
| <input type="checkbox"/> 3150001 | Failed to use a DTSC registered hazardous waste transporter to transport hazardous waste. HSC 25163(a) |
| <input type="checkbox"/> 3150003 | Failure to dispose of hazardous waste at a facility which has a permit from DTSC or disposing of hazardous waste at any point which is not authorized or which does not have a valid ID number. 22 CCR 12 66262.18(c); HSC 6.5 25189.5(a) |
| <input type="checkbox"/> HMD0308 | Impermissible dilution of hazardous waste. 22 CCR 66268.3(a) |
| <input type="checkbox"/> HMD0305 | Disposed of used oil illegally. HSC 25250.5(a), 25189.5(a) |
| <input type="checkbox"/> HMD0306 | Failed to properly dispose of oil-based paint &/or hazardous waste latex paint liquid. HSC 25217.1, 25189.5(a) |

STORAGE AND HANDLING

- | # | <u>VIOLATION DESCRIPTION</u> |
|----------------------------------|---|
| <input type="checkbox"/> 3130030 | Failure to meet the spent lead acid battery management requirements, when handling, storing, or transporting more than 10 lead acid batteries at any one time. 22 CCR 16 66266.81(a)(1) |
| <input type="checkbox"/> 3130032 | Failed to properly manage 'damaged' spent lead acid batteries so as to minimize the release of acid and lead and to protect the handlers and the environment. 22 CCR 66266.81(b) |
| <input type="checkbox"/> 3130029 | Failure to properly manage used oil filters and/or fuel filters in accordance with the requirements. HSC 25250.22; 22 CCR 66266.130 |
| <input type="checkbox"/> 3150005 | Failure to prevent intentional contamination of used oil with other hazardous waste other than minimal amounts of vehicle fuel. HSC 25250.7(a) |
| <input type="checkbox"/> HMD0222 | Failed to properly label Excluded Recyclable Materials (ERM) accumulated in a container or tank. HSC 25143.9(a) |



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

RCRA Large Quantity Generators of Hazardous Waste (continued)

EFFECTIVE DATE: **10/01/2024**PAGE **3** OF **4**

RECORD ID #: _____

- HMD0216 Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3)(A); 22 CCR 66262.34(f)
- HMD0217 Failed to repackage and properly label damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)
- 3130023 Failed to comply with hazardous waste satellite container regulation. 22 CCR 66262.15(a)
- 3130024 Failed to mark date on empty container larger than 5 gallons &/or properly manage it within one year. 22 CCR 66261.7
- 3130035 Failure of the owner or operator managing laboratory hazardous waste in a laboratory accumulation area to comply with the accumulation, storage, management, training, and/or record-keeping requirements. HSC 25200.3.1(c)
- 3130003 Failed to properly label/date hazardous waste container or portable tank. 22 CCR 66262.17(a)(5)(A)
- 3130004 Failure to send hazardous waste offsite for treatment, storage, or disposal within 90 days for a generator who generates 1000 kilograms or more of RCRA hazardous waste or one kilogram of acute hazardous waste per month. 22 CCR 12 66262.17(a), 66262.17(e); HSC 6.5 25123.3(b)(1)
- 3130005 Failure to: (1) Accumulate hazardous waste in a container that is in good condition. (2) Immediately transfer the hazardous waste from a leaking container to a container that is in good condition; or (3) Immediately manage the waste in some other way that complies with waste management requirements. 22 CCR 12 66262.17(a)(1)(B), 66262.15(a)(1)
- 3130006 Failure to accumulate or store hazardous waste in a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. 22 CCR 12 66262.17(a)(1)(C), 66262.15(a)(2)
- 3130007 Failure to meet the following container management requirements: (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak. 22 CCR 12 66262.17(a)(1)(D), 66262.15(a)(4)
- 3130008 Failed to inspect hazardous waste storage area(s) at least weekly. 22 CCR 66262.17(a)(1)(E)
- 3130009 Failed to keep reactive and/or ignitable waste at least 50 ft. from the property line. 22 CCR 66262.17(a)(1)(F)1.
- 3130010 Failure to: (1) Store incompatible wastes and/or material in the same container or an unwashed container without ensuring it does not (a) generate extreme heat or pressure, fire or explosion, or violent reaction; (b) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (c) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (d) damage the structural integrity of the device or facility containing the waste; or (e) through other like means threaten human health or the environment; or (2) Separate a container accumulating hazardous waste that is incompatible with any waste or material stored in any other container, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device. 22 CCR 12 66262.17(a)(1)(G)
- 3130013 Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. 22 CCR 12 66262.17(a)(6), 66262.251
- HMD0235 Generator did not accumulate hazardous waste in a container or tank. 22 CCR 66262.34(a)(1)(A)

TRAINING, CONTINGENCY PLAN & ER PROCEDURES

VIOLATION DESCRIPTION

- # 3110011 Failure to include all the requirements in the Contingency Plan OR failure to review and immediately amend as necessary. 22 CCR 12 66262.17(a)(2), 66262.261, 66262.263
- 3110012 Failure to maintain a copy of the contingency plan and all its revisions at the facility and to submit a copy (including the Quick Reference Guide) to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services when first becoming subject to the Large Quantity Generator requirements or after amending the existing contingency plan. 22 CCR 12 66262.17(a)(2), 66262.262
- 3120001 Failure to provide employees with hazardous waste training program of class room, computer-based or electronic instructions or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with 22 CCR Chapter 12, and/or failure to provide training within the first six months after the date of their employment or assignment to a facility, or to a new position at a facility and annually thereafter. 22 CCR 12 66262.17(a)(7)
- 3110033 Failure to maintain training records on current personnel until closure of the facility and for former employees for at least three years from the date the employee last worked at the facility. The Training Program Plan shall include the following: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position, duties of facility personnel assigned to each position, and a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position. 22 CCR 12 66262.17(a)(7)
- 3120003 Failure to ensure that general awareness training and function specific job training are provided every 24 months. 22 CCR 12 66262.17(a)(7)(A)4
- 3120004 Failure to provide training to employees engaged in shipping hazardous waste commensurate with their responsibilities and 49 CFR 172.704 and to ensure re-training at least every 3 years. 22 CCR 12 66262.17(a)(7)(A)1
- 3130015 Failed to test and maintain all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment to assure its proper operation in time of emergency. 22 CCR 66262.17(a)(6), 66262.253
- 3110032 Failure to maintain documentation of the arrangements with the local fire department and other emergency response agencies; or if none exist, that the attempt to make the arrangements was made. 22 CCR 12 66262.17(a)(6), 66262.256(b)
- 3130016 Failure to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. 22 CCR 12 66262.255
- HMD0418 Failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, including the posting of a "No Smoking" sign(s), & separate and protect from sources of ignition or reaction. 22 CCR 66265.17(a)
- 3130018 Failure to prepare and implement a written Contingency Plan 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. 22 CCR 12 66262.17(a)(6), 66262.260, 66262.265
- 3130014 Failure of the facility to maintain the following emergency equipment or equivalents unless none of the hazards posed by waste handled at the facility could require the particular kind of required equipment: 1) An internal communications or alarm system*; 2) A device, such as a telephone (immediately available at the scene of Operations/ Maintenance) or a hand-held two-way radio, 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 control 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. 22 CCR 12 66262.17(a)(6), 66262.252, 66262.254
- 3130037 Failed to have an emergency coordinator on the premises or on call, and available to respond during an emergency and when a release occurs. 22 CCR 12 66262.17(a)(6), 66262.264

RCRA AIR EMISSION REQUIREMENTS

VIOLATION DESCRIPTION

- # 3130025 Failure to comply with air emission requirements for waste in containers as specified in articles 27, 28, and 28.5 of chapter 15. 22 CCR 12 66262.17(a)(1)(A)
- 3130026 Failure to comply with air emission requirements for waste in tanks as specified in articles 27, 28, and 28.5 of chapter 15. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.202



COUNTY OF SAN DIEGO
COMPLIANCE INSPECTION REPORT
RCRA Large Quantity Generators of Hazardous Waste
(continued)

EFFECTIVE DATE: **10/01/2024**

PAGE **4** OF **4**

RECORD ID #: _____

HAZARDOUS WASTE TANK SYSTEM FOR RCRA LQGS

#	<u>VIOLATION DESCRIPTION</u>
<input type="checkbox"/> 3110013	Failed to obtain and maintain a written assessment certified by an independent, qualified, registered professional engineer for the hazardous waste tank system. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(a)
<input type="checkbox"/> 3110014	Failure to include all required information in the new tank system assessment. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(k)
<input type="checkbox"/> 3110015	Failed to obtain CUPA approval prior to the replacement of equipment for a tank system. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(m)
<input type="checkbox"/> 3110023	Failure of generator to obtain assessment or reassessment every five (5) years or the remaining service life of the tank system, as stated in the engineer's assessment, whichever is less. This assessment applies to onground or aboveground tank systems containing only non-RCRA hazardous wastes generated onsite, or for a small quantity generator onground or aboveground tank systems containing RCRA hazardous wastes generated onsite. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(h)
<input type="checkbox"/> 3130011	Failed to maintain tank operating requirements: 1) Spill prevention control; 2) Overfill prevention control, and/or; 3) maintenance of sufficient freeboard in uncovered tanks. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.194
<input type="checkbox"/> 3130012	Failure to conduct and document inspections of hazardous waste tank systems each operating day and retain records of those inspections at the facility. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.195(a), 66265.195(c)
<input type="checkbox"/> 3130019	Failure to meet required secondary containment requirements for hazardous waste tank systems or components. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.193
<input type="checkbox"/> 3130020	Failure of the owner or operator to inspect and document the cathodic protection systems to ensure the proper operation within six months after initial installation, and annually thereafter; and all sources of impressed current at least bimonthly (i.e., every other month). 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.195(b), 66265.195(c)
<input type="checkbox"/> 3150002	Failure of owner or operator to: (1) Place a notice in the operating record within 30 days after closure identifying the location of the waste accumulation unit within the facility; or (2) Properly close a hazardous waste tank system ensuring the minimization of further maintenance and that the required requirements have been met. (3) Notify DTSC using form 8700-12 within 90 days of closure of the waste accumulation unit. 22 CCR 12 66262.17(a)(8)(A), 66262.17(a)(8)(C)
<input type="checkbox"/> 3140001	Failure to immediately remove from service a tank system or secondary containment system from which there has been a leak, spill, is unfit for use and comply with applicable requirements. 22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.196
<input type="checkbox"/> HMD1619	Failed to have required safety measures for hazardous waste tank system holding ignitable or reactive waste. 22 CCR 66265.198(a)(b)
<input type="checkbox"/> 3130022	Failure to label stationary hazardous waste tanks "hazardous waste", mark the tank with the hazard(s) of the waste, and mark with an accumulation start date. May use a log or other record to show that a batch tank has been emptied within the applicable accumulation time period or for flow through systems, demonstrate using tank volumes and flow rates that waste entering the tank would exit the tank within the applicable accumulation time period. 22 CCR 12 66262.17(a)(5)(B)

UNIVERSAL WASTE REQUIREMENTS FOR RCRA LQGS

#	<u>VIOLATION DESCRIPTION</u>
<input type="checkbox"/> 3110026	Failed to obtain a California ID Number from DTSC or federal ID Number from USEPA prior to accumulating 5,000 kgs or more of Universal Waste. 22 CCR 66273.32(a)
<input type="checkbox"/> 3120002	Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
<input type="checkbox"/> 3130038	Failed to properly label or mark Universal Waste container, package, or pallet (excluding CESQUWG) 22 CCR 66273.34
<input type="checkbox"/> 3130039	Failed to properly dispose of Universal Waste within one year. 22 CCR 66273.35
<input type="checkbox"/> HMD0147	Failed to keep records of offsite Universal Waste shipment(s) available for inspection for 3 years. 22 CCR 66273.39(c),(d)(2)
<input type="checkbox"/> 3140003	Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 23 66273.33, 66273.33.5, 66273.33.6, 66273.37
<input type="checkbox"/> 3150006	Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a); 22 CCR 66273.31(a), 66273.8(b)
<input type="checkbox"/> 3110027	Failure of a universal handler of PV modules, electronic devices, and/or CRTs from an offsite source to notify DTSC 30 days prior to acceptance. 22 CCR 66273.32(c), (e)
<input type="checkbox"/> 3110028	Failure of a universal waste handler to submit an annual report that includes all required information to DTSC by February 1 of every year. 22 CCR 66273.32(d), (f)
<input type="checkbox"/> 3110029	Failure of the universal waste handler who sends electronic devices or CRTs to any foreign destination to notify DTSC 60 days prior to export and send a copy to the CUPA. 22 CCR 66273.40(a)(2),(3) & (4)
<input type="checkbox"/> 3110030	Failed to notify the CUPA of aerosol processing procedures prior to commencement of operations. HSC 25201.16(j)
<input type="checkbox"/> 3130040	Failed to meet accumulation, labeling, marking, &/or containment standards for Universal Waste aerosol containers. HSC 25201.16(f)
<input type="checkbox"/> 3130041	Failure of the universal waste handler to manage universal waste aerosol cans in a manner that prevents fire, explosion, and the unauthorized release of any universal waste or component of a universal waste to the environment. HSC 6.5 25201.16(e)
<input type="checkbox"/> 3110024	Failure to obtain Certified Appliance Recycler certification (CAR) from DTSC. HSC 25211.4
<input type="checkbox"/> 3110025	Failure of certified appliance recycler (CAR) to provide documentation that all materials that require special handling (MRS) have been properly removed and managed. HSC 25211.2, 25211.3
<input type="checkbox"/> 3130033	Failure of certified appliance recycler (CAR) to properly remove and dispose of all materials that require special handling (MRS). HSC 25212 [and HSC 6.5 25211.3]