

Generator Inspection Checklist

Facility Name

Identification Number

Facility Address

Date(s) Inspected

Inspected By

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

Table of Contents

| | |
|--|-----------|
| DISCLAIMER..... | 3 |
| HAZARDOUS WASTE DETERMINATION | 3 |
| IDENTIFICATION NUMBERS | 3 |
| UNAUTHORIZED DISPOSAL AND STATEMENT | 3 |
| THE MANIFEST | 4 |
| PRE-TRANSPORT REQUIREMENTS | 4 |
| ACCUMULATION TIME | 5 |
| USE AND MANAGEMENT OF CONTAINERS | 7 |
| TANK SYSTEMS..... | 8 |
| DRIP PADS | 13 |
| AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS..... | 14 |
| AIR EMISSIONS STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS..... | 15 |
| PREPAREDNESS AND PREVENTION | 16 |
| CONTINGENCY PLAN AND EMERGENCY PROCEDURES..... | 16 |
| PERSONNEL TRAINING | 17 |
| RECORDKEEPING AND REPORTING | 18 |
| EXPORTS OF HAZARDOUS WASTE | 19 |
| IMPORTS OF HAZARDOUS WASTE..... | 19 |
| IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES..... | 20 |
| RECYCLABLE MATERIALS..... | 20 |
| LAND DISPOSAL RESTRICTIONS | 21 |
| SOURCE REDUCTION | 21 |
| CONTACT | 21 |

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

Note: All citations are to the California Code of Regulations, title 22, division 4.5 unless otherwise indicated.

DISCLAIMER

This checklist is intended to provide guidance only. This checklist does not replace or supersede relevant statutes and regulations. The information contained in this checklist is based upon the statutes and regulations in effect as of the date the policy and procedure was signed. Interested parties are advised to keep apprised of subsequent changes to relevant statutes and regulations.

HAZARDOUS WASTE DETERMINATION

Failed to determine if waste is hazardous by exclusion from regulation, testing the waste according to acceptable methods, or applying knowledge of the hazard characteristic. (66262.11)

IDENTIFICATION NUMBERS

1. Generator treated, stored, disposed of, transported or offered for transportation, hazardous waste without having received an Identification Number. [66262.12 (a)]
2. Generator offered hazardous waste to transporters or to transfer, treatment, storage or disposal facilities that have not received an Identification Number. [66262.12 (c)]
3. Used the consolidated manifesting procedure without obtaining an identification number (generators of photographic waste of less than 100 kg per month are exempt from this requirement). [Health & Safety Code, section 25160.2(b)(10)]

UNAUTHORIZED DISPOSAL AND STATEMENT

1. Disposed or induced disposal of hazardous wastes at unauthorized point. [Health & Safety Code, section 25189.5(a)]
2. Made false statement(s) in application, label, manifest, record, report, permit or other document. [Health & Safety Code, section 25189.2(a)]
3. The owner/operator of the site disposed hazardous wastes without a permit or authorization. [Health & Safety Code, section 25201(a)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

THE MANIFEST

1. Generator transported, or offered for transportation, hazardous waste for off-site transfer, treatment, storage, or disposal without preparing a manifest. [66262.20 (a)]
2. Failed to designate on the manifest one facility that is permitted to handle the waste. [66262.20 (b)]
3. Failed to complete the generator and waste section and sign the manifest certification. [66262.23 (a)(1)]
4. Failed to obtain the handwritten signature of the initial transporter and date of acceptance. [66262.23.(a)(2)]
5. Failed to retain two copies of the manifest. [66262.23.(a)(3)]
6. Failed to submit within 30 days to DTSC a copy of each manifest used. [66262.23 (a)(4)]
7. Failed to give the remaining copies of the manifest to the transporter. [66262.23 (b)]
8. Failed to send three copies of the manifest dated and signed to the owner or operator of the designated facility or the last water transporter to handle the waste in the United States (U.S.) if exported by water for shipments of hazardous waste within the U.S. solely by water. [66262.23(c)]
9. Failed to send at least three copies of the manifest dated and signed to the next non-rail transporter, or the designated facility if transported solely by rail, or the last rail transporter to handle the waste in the U.S. if exported by rail for rail shipments of hazardous waste within the U.S. which originate at the site of generation. [66262.23(d)]

PRE-TRANSPORT REQUIREMENTS

1. Failed to package the hazardous waste in accordance with the applicable Department of Transportation regulations on packaging under Title 49 CFR (Parts 173, 178, and 179) before transporting or offering for transportation off-site. (66262.30)
2. Failed to label each package of hazardous waste in accordance with the applicable Department of Transportation regulations on hazardous materials under Title 49 CFR (Part 172) before transporting or offering for transportation off-site. (66262.31)
3. Failed to mark each package of hazardous waste in accordance with the applicable Department of Transportation regulations on hazardous materials under Title 49 CFR (Part 172) before transporting or offering for transportation off-site. [66262.32 (a)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

4. Failed to mark each package of hazardous waste of 110 gallons or less with the following words and information displayed in accordance with the requirements of Title 49 CFR (Part 172.304) before transporting or offering for transportation off-site. [66262.32 (b)]

HAZARDOUS WASTE - State and Federal Law Prohibit Improper Disposal. If found, contact the nearest police or public safety authority, the U.S. Environmental Protection Agency or the Department of Toxic Substances Control (DTSC).

Generator's name and Address _____
Manifest Document Number _____

5. Failed to ensure that the transport vehicle is correctly placarded according to the Department of Transportation regulation for hazardous materials under Title 49 CFR (Part 172, Subpart F) before transporting or offering for transportation hazardous waste off-site. [66262.33]

ACCUMULATION TIME

1. Accumulated hazardous waste in containers on-site for 90 days or less without a permit or grant of interim status and failed to comply with the applicable requirements of the Use and Management of Containers, Air Emission Standards for Process Vents, Air Emission Standards for Equipment Leaks, and Air Emission Standards for Tanks, Surface Impoundments and Containers. [66262.34 (a)(1)(A)]
2. Accumulated hazardous waste in tanks on-site for 90 days or less without a permit or grant of interim status and failed to comply with the applicable requirements of Tank Systems, Air Emission Standards for Process Vents, Air Emission Standards for Equipment Leaks, and Air Emission Standards for Tanks, Surface Impoundments and Containers. [66262.34 (a)(1)(A)]
3. Accumulated hazardous waste on drip pads on-site for 90 days or less without a permit or grant of interim status and failed to comply with the applicable requirements of Drip Pads, Air Emission Standards for Process Vents, Air Emission Standards for Equipment Leaks, and Air Emission Standards for Tanks, Surface Impoundments and Containers. [66262.34(a)(1)(B)]
4. Failed to maintain records of a description of procedures to ensure that all hazardous wastes are removed from the drip pad and associated collection system at least once every 90 days. [66262.34(a)(1)(B)(1)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

5. Failed to document each hazardous waste removal, including the quantity removed from the drip pad and the sump or collection system and the date and time of removal. [66262.34(a)(1)(B)(2)]
6. Accumulated hazardous waste in containment buildings on-site for 90 days or less without a permit or grant of interim status and failed to comply with the applicable requirements of Containment Buildings and professional engineer certification. [66262.34 (a)(1)(C)]
7. Failed to maintain records of: [66262.34 (a)(1)(C)(1)and(2)]
 - a. A written description of procedures to ensure that each waste volume remains in the unit for no more than 90 days.
 - b. A written description of the waste generation and management practices showing that they are consistent with respecting the 90-day limit.
 - c. Documentation that the procedures are complied with.
 - d. Documentation that the unit is emptied at least once every 90 days.
8. Failed to mark each container and tank with the date upon which each period of accumulation begins. [66262.34(a)(2)]
9. Failed to mark or label each hazardous waste container or tank used for onsite accumulation with the following: [66262.34(a)(3)]
 - a. HAZARDOUS WASTE
 - b. Composition and physical state of the hazardous waste
 - c. Particular hazardous property of the hazardous waste
 - d. Name and address of the person producing the waste
10. Generator accumulated hazardous waste on-site for 90 days or less without a permit or grant of interim status and failed to comply with the requirements of Preparedness and Prevention, and Contingency Plan and Emergency Procedures, Personnel Training and Waste Analysis Plan. [66262.34(a)(4)]
11. Generator accumulated hazardous waste for more than 90 days without a permit or grant of interim status or being granted of an extension to the 90-day period. [66262.34(c)]
12. Less than 1,000 Kg-generator accumulated hazardous waste for more than 180 days or 270 days and exceeded the 6,000-Kg limit. [66262.34(d)(1)]
13. Less than 1,000 Kg-generator accumulated hazardous waste for more than 180 days or 270 days and failed to comply with the accumulation time requirements for small quantity generators (Title 40 CFR Part 262.34 (d)(e)(f). [66262.34(d)(2)]
14. Less than 1,000 Kg-generator accumulated hazardous waste for more than 180 days or 270 days and held more than 1 Kg of acutely hazardous waste or extremely hazardous waste for more than 90 days. [66262.34(d)(3)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

15. Generator accumulated less than 55 gallons of hazardous waste, one quart of acutely hazardous waste or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, but failed to meet any of the following requirements: [66262.34(e)(1)]
 - a. Hazardous waste is accumulated in containers, other than tanks, at the initial accumulation point.
 - b. The generator does not hold the waste onsite for more than one year from the initial date of accumulation, or for longer than the applicable accumulation period.
 - c. The initial date of waste accumulation is clearly marked and visible for inspection on each container used.
 - d. The generator complies with the use and management of containers.
16. Failed to comply within three days with the satellite accumulation requirements after accumulating an amount of hazardous waste, acutely hazardous waste or extremely hazardous waste equal to any applicable quantity limitation. [66262.34(e)(3)]
17. Failed to comply with the wastestreams and volume requirements of the consolidated manifest procedure. [Health & Safety Code, section 25160.2(c)(2)(B)]

USE AND MANAGEMENT OF CONTAINERS

1. Failed to transfer hazardous waste from a container that is not in good condition to a container that is in good condition. (66265.171)
2. Failed to use a container made of or lined with materials, which will not react with, and are otherwise compatible with, the hazardous waste. (66265.172)
3. Failed to close a container holding hazardous waste during transfer and storage, except when it is necessary to add or remove the waste. [66265.173(a)]
4. Opened, handled, transferred or stored a container holding hazardous waste in a manner which may rupture the container or cause it to leak. [66265.173(b)]
5. Failed to conduct a weekly inspection on areas where containers are stored or transferred. (66265.174)
6. Placed containers holding ignitable or reactive waste less than 15 meters (50 feet) from the facility's property line. (66265.176)

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

7. Placed incompatible waste, or incompatible wastes and materials in the same container. [66265.177(a)]
8. Placed hazardous waste in an unwashed container that previously held an incompatible waste or material. [66265.177(b)]
9. Failed to separate or protect a container holding hazardous waste from nearby containers holding incompatible waste or materials. [66265.177(c)]
10. Container or inner liner > 5 gal. not marked with date emptied and not managed pursuant to 66261.7(e) within one year of date emptied. [66261.7(f)]
11. Containers or inner liners of containers containing hazardous wastes that are not empty per 66261.7(b) or (d) are not managed as hazardous wastes. [66261.7(p)]

TANK SYSTEMS

1. Assessment of Existing Tank System's Integrity

- a. Tank systems that do not have a secondary containment
 - 1) Owner or operator failed to determine that the tank system is not leaking or is unfit for use. [66265.191(a)]
- b. Failed to obtain and keep on file a written assessment reviewed and certified by a qualified registered engineer in California that attests to the tank systems integrity by the following dates:
 - 1) January 12, 1988, for tanks containing RCRA hazardous wastes and meeting the generator eligibility requirements. [66265.191(a)(1)]
 - 2) July 1, 1991, for tanks containing only non-RCRA hazardous wastes, and tanks containing RCRA hazardous wastes and meeting the generator eligibility requirements. [66265.191(a)(2)]
- c. Tank systems that transfer, store or treat materials that become hazardous wastes following the dates indicated below:
 - 1) July 14, 1986, for tanks containing RCRA hazardous wastes and meeting the generator eligibility requirements: Failed to conduct an assessment by this date of the tank systems integrity within 12 months after the date the waste becomes a hazardous waste. [66265.191(c)(1)]
 - 2) July 1, 1991, for tanks containing only non-RCRA hazardous wastes, and tanks containing RCRA hazardous wastes and meeting the generator eligibility requirements: Failed to conduct an assessment by this date of the tank

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

- systems integrity within 12 months after the date the waste becomes a hazardous waste. [66265.191(c)(2)]
- d. Failed to assess onground or aboveground tank systems containing only non-RCRA hazardous wastes generated onsite by January 24, 1998. [66265.191(e)(2)(A)]
 - e. Failed to assess tank systems authorized under Permit-by-Rule, Conditional Authorization and Conditional Exemption by January 24, 1998. [66265.191(e)(2)(A)]
 - f. Failed to assess onground or aboveground tank systems containing RCRA hazardous wastes generated on site by January 24, 1998. [6265.191(e)(2)(B)]
 - g. Generator or owner or operator authorized under Permit-by-Rule, Conditional Authorization, or Conditional Exemption operating a non-RCRA underground tank system or an underground tank system otherwise exempt from permitting requirements pursuant to the Federal act failed to comply with applicable standards relating to underground tank systems. [66265.191(f)]
 - h. Failed to keep assessment records on file at the facility until closure of the facility. [66265.191(e)(1)]

2. Design and Installation of New Tank Systems or Components

- a. Owners or operators failed to ensure that the new tanks systems and components are adequately designed and have sufficient structural strength, compatibility with the wastes to be managed and corrosion protection. [66265.192(a)]
- b. Owners or operators failed to keep a written assessment on file certified by a qualified engineer registered in California. [66265.192(a)]
- c. Failed to ensure that proper handling procedures are adhered in order to prevent damage to the system during installation. [66265.192(b)]
- d. Failed to equip underground systems, components and piping with backfill material. [66265.192(c)]
- e. Failed to test tanks and ancillary equipment for tightness prior to being covered, enclosed or placed in use. [66265.192(d)]
- f. Failed to support and protect ancillary equipment against physical damage and excessive stress. [66265.192(e)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

3. Containment and Detection of Releases

- a. Failed to provide secondary containment for all new tank systems or components. [66265.193(a)(1)]
- b. Failed to provide secondary containment within two years after January 12, 1987, for all existing tanks systems which have been used to transfer, store or treat EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027 and generator eligibility requirements were met. [66265.193(a)(2)(A)]
- c. Failed to provide secondary containment within two years after July 1, 1991, for tanks containing RCRA hazardous wastes and generator eligibility requirements were met. [66265.193(a)(2)(B)]
- d. Failed to provide secondary containment within two years after January 12, 1987, for existing tank systems of known and documentable age that: or have reached 15 years that:
[66265.193(a)(3)(A)]
 - 1) Contain RCRA hazardous wastes
 - 2) Meet the generator eligibility requirements.
 - 3) Facility has reached 15 years of age
- e. Failed to provide secondary containment within two years after July 1, 1991, for existing tank systems of known and documentable that: [66265.193(a)(3)(B)]
 - 1) Contain only non-RCRA hazardous wastes
 - 2) Contain RCRA hazardous wastes
 - 3) Meet the generator eligibility requirements.
 - 4) Facility has reached 15 years of age
- f. Failed to provide secondary containment within two years after January 12, 1987, for existing tank systems for which the age cannot be documented that: [66265.193(a)(4)(A) and (B)]
 - 1) Contain RCRA hazardous wastes,
 - 2) Meet the generator eligibility requirements
 - 3) Facility has reached 15 years of age
- g. Failed to provide secondary containment within two years after July 1, 1991, for existing tank systems for which the age cannot be documented that: [66265.193(a)(5)(A) and (B)]
 - 1) Contain only non-RCRA hazardous wastes,
 - 2) Contain RCRA hazardous wastes,
 - 3) Meet the generator eligibility requirements
 - 4) Facility has reached 15 years of age
- h. Failed to provide secondary containment within two years after January 12, 1987, for tank systems that: [66265.193(a)(6)(A) and (B)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

- 1) Transfer, store or treat materials that become hazardous wastes
- 2) Contain RCRA hazardous wastes
- 3) Meet the generator eligibility requirements.

4. General Operating Requirements

- a. Placed hazardous wastes or treatment reagents in tank systems that cause the tank, its ancillary equipment, or the secondary containment to fail. [66265.194(a)]
- b. Failed to use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems. [66265.194(b)]

5. Inspections

- a. Owner or operator failed to inspect daily, where present, the following:
 - 1) overfill/spill control equipment [66265.195(a)(1)]
 - 2) corrosion or release of waste on the aboveground portions of the tank system [66265.195(a)(2)]
 - 3) data gathered from monitoring equipment and leak-detection equipment [66265.195(a)(3)]
 - 4) erosion or signs of hazardous release around the surrounding accessible portion of the tank system [66265.195(a)(4)]
 - 5) level of waste in the tank [66265.195(a)(5)]
- b. Failed to inspect cathodic protection systems. [66265.195(b)]
- c. Failed to document in the operating record of the facility an inspection of the above items. [66265.195(c)]

6. Response to Leaks or Spills

- a. Failed to immediately remove from service a tank system or secondary containment system from which there has been a leak or spill. (66265.196)
- b. Failed to comply with emergency procedures. [66265.196(a)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

- c. Failed to prevent the flow or addition of hazardous wastes. [66265.196(b)]
- d. Failed to remove hazardous wastes from the tank system or secondary containment system. [66265.196(c)]
- e. Failed to notify DTSC within 24 hours of detection any release of hazardous waste to the environment. [66265.196(e)(1)]
- f. Failed to obtain certification from a qualified engineer registered in California that the tank system has been repaired and can be returned to service. [66265.196(g)]
- g. Failed to submit certification to DTSC within seven days after returning the tank system to use. [66265.196(g)]
- h. At closure of a tank system, owner or operator failed to remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste and manage them as hazardous waste. [66265.197(a)]
- i. Failed to close the tank system and perform post-closure care. [66265.197(b)]

7. Special Requirements for Ignitable or Reactive Wastes and Incompatible Wastes

- a. Placed ignitable or reactive waste in a tank system. [66265.198(a)]
- b. Failed to comply with the requirements for the maintenance of protective distances during handling of ignitable or reactive wastes in tanks. [66265.198(b)]
- c. Placed incompatible wastes, or incompatible wastes and materials in the same tanks system. [66265.199(a)]
- d. Placed hazardous wastes in a tank system that has not been decontaminated and previously held incompatible waste or materials. [66265.199(b)]

8. Waste Analysis and Trial Tests

- a. Failed to conduct waste analyses and trial treatment or storage tests. [66265.200(a)]
- b. Failed to obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will meet the requirements. [66265.200(b)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

DRIP PADS

1. Failed to obtain, review, update, and re-certify annually a written assessment of the drip pad. [66265.441(a)]
2. Failed to develop a written plan for upgrading, repairing and modifying the drip pad. [66265.441(b)]
3. Failed to submit to DTSC certification and as-built drawings for the drip pad upon completion of all repairs and modifications. [66265.441(c)]
4. Failed to ensure that new drips pads meet the design, installation and operating requirements. (66265.442)
5. Failed to comply with drip pads=design and operating requirements. (66265.443)
6. Failed to design, construct, operate, and maintain a run-on control system. [66265.443(e)]
7. Failed to design, construct, operate, and maintain a run-off management system. [66265.443(f)]
8. Failed to obtain a statement from an independent, qualified, professional engineer registered in California certifying that the drip pads meet the design requirements. [66265.443(g)]
9. Failed to remove drippage and accumulation precipitation from the associated collection system. [66265.443(h)]
10. Failed to frequently clean the drip pad surface and record the date and time of each cleaning. [66265.443(i)]
11. Failed to operate and maintain drip pads to minimize tracking of hazardous wastes. [66265.443(j)]
12. Failed to maintain records sufficient to document that all treated wood is held on the pad following treatment. [66265.443(k)]
13. Failed to manage immediately collection and holding units associated with run-on and run-off control systems after storms. [66265.443(l)]
14. Failed to repair drip pads within a reasonable amount of time after discovery of a condition that may have caused or has caused a release of hazardous waste. [66265.443(m)]
15. Failed to notify DTSC within 24 hours after discovery of the condition. [66265.443(m)(1)(D)].
16. Failed to submit to DTSC a written notification and certification that repairs and clean up have been completed. [66265.443(m)(3)]
17. Failed to maintain documentation of past operating and waste handling practices. [66265.443(n)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

18. Failed to obtain a statement from an independent, qualified professional engineer, registered in California, that the liners after construction meet the design requirements. [66265.444(a)]
19. Failed to maintain certification at the facility. [66265.444(a)]
20. Failed to inspect drip pads weekly and after storms for wear and leakage. [66265.444(b)]
21. At closure, owner or operator failed to remove or decontaminate all waste residues, contaminated containment system components, contaminated soils, and structures and equipment contaminated with waste and manage them as hazardous waste. [66265.445(a)]
22. Failed to close the facility and perform post-closure care after finding out that not all contaminated subsoil can be removed or decontaminated. [66265.445(b)]

AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS

1. Failed to monitor monthly for leaks each pump in light liquid service. [66265.1052(a)(1)]
2. Failed to equip each compressor with a seal system. [66265.1053(a)]
3. Failed to determine a criterion that indicates failure of the seal system, the barrier fluid system or both. [66265.1053(e)(2)]
4. Failed to operate each pressure relief device in gas/vapor service with no detectable emissions. [66265.1054(a)]
5. Failed to equip each sampling connection system with a closed-purge, closed-loop, or closed-vent system. [66265.1055(a)]
6. Failed to equip each open-ended valve with a cap, blind flange, plug, or a second valve. [66265.1056(a)(1)]
7. Failed to monitor monthly for leaks each valve in gas/vapor or light liquid service. [66265.1057(a)]
8. Failed to monitor pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors within five days after evidence of a potential leak was found. [66265.1058(a)]
9. Failed to repair leak within fifteen days after it was detected. [66265.1052(c)(1), [66265.1053(g)(1), [66265.1057(d)(1), [66265.1058(c)(1)]
10. Failed to comply with the recordkeeping requirements. (66265.1064)

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

**AIR EMISSIONS STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS
AND CONTAINERS**

1. Failed to develop and implement a written plan and schedule to perform the inspections and monitoring. [66265.1089(b)]
2. Failed to comply with the recordkeeping requirements for air emissions control of tanks, surface impoundments, and containers. (66265.1090)

3. Tanks

- a. Failed to control air pollutant emissions from each tank. (66265.1085)
- b. Failed to make first efforts at repair of the defect within five days after the defect was detected. [66265.1085(k)(1)]
- c. Failed to complete the repair 45 days after the defect was detected. [66265.1085(k)(1)]
- d. Failed to conduct subsequent inspection and monitoring following the initial inspection and monitoring of the cover. [66265.1085(l)]

4. Surface Impoundments

- a. Failed to control air pollutant emissions from the surface impoundment. [66265.1086(b)]
- b. Failed to make first efforts at repair of the defect within five days after the defect was detected. [66265.1086(f)(1)]
- c. Failed to complete the repair 45 days after the defect was detected. [66265.1086(f)(1)]
- d. Failed to conduct subsequent inspection and monitoring following the initial inspection and monitoring of the cover. [66265.1085(g)]

5. Containers

- a. Failed to control air pollutant emissions from each container. [66265.1087(b)]
- b. Failed to use containers that meet the applicable U.S. Department of Transportation regulations on packaging hazardous materials for transportation. [66265.1087(f)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

PREPAREDNESS AND PREVENTION

Requirements may vary depending on the size of the generator.

1. Failed 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. (66265.31)
2. Failed to equip the facility with an internal communications or alarm system capable of providing immediate voice or signal instruction. [66265.32(a)]
3. Failed to equip the facility with a device capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams. [66265.32(b)]
4. Failed to equip the facility with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment. [66265.32(c)].
5. Failed to provide adequate water volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems. [66265.32(d)]
6. Failed to test and maintain all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment. (66265.33)
7. Failed to provide personnel involved in handling hazardous waste immediate access to an internal alarm or emergency communication device. [66265.34(a)]
8. Failed to provide an employee working alone immediate access to a device capable of summoning external emergency assistance. [66265.34(b)]
9. Failed to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. (66265.35)
10. Failed to make arrangements with State or local authorities and local hospitals to familiarize them with the layout of the facility and properties of hazardous waste handled and associated hazards. (66265.37)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES*

Requirements may vary depending on the size of the generator.

1. Failed to have a contingency plan for fire, explosion, or release of hazardous waste. [66265.51(a)]
2. Failed to carry out the contingency plan for fire, explosion, or release of hazardous waste. [66265.51(b)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

3. The contingency plan failed to describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste. [66265.52(a)]
4. The contingency plan failed to describe arrangements agreed to by State and local authorities and local hospitals. [66265.52(c)]
5. The contingency plan failed to list and update qualified persons to act as emergency coordinators. [66265.52(d)]
6. The contingency plan failed to list and update all emergency equipment and decontamination equipment. [66265.52(e)]
7. The contingency plan failed to describe an evacuation plan. [66265.52(f)]
8. The contingency plan failed to include the current telephone number of the State Office Emergency Services. [66265.52(g)]
9. Failed to maintain a contingency plan at the facility. [66265.53(a)]
10. Failed to submit a copy of the contingency plan to State and local authorities and local hospitals that maybe called upon to provide emergency services. [66265.53(b)]
11. Failed to review and amend the contingency plan when necessary. (66265.54)
12. Failed to have an emergency coordinator either on the facility or on call at all times. (66265.55)
13. Emergency coordinator failed to implement emergency procedures immediately in an imminent or actual emergency situation. (66265.56)
14. Facility owner or operator failed to note in the operating records the time, date, and details of any incident that requires implementing the contingency plan. [66265.56(j)]
15. Facility owner or operator failed to submit a written report to DTSC within 15 days after the incident. [66265.56(j)]

PERSONNEL TRAINING*

Requirements may vary depending on the size of the generator.

1. Facility owner or operator failed to have a personnel training program in hazardous waste management procedures. [66265.16(a)(1)]
2. Facility personnel failed to successfully complete a training program to assure compliance with hazardous waste requirements. [66265.16(a)(1)]
3. A person trained in hazardous waste management procedures did not direct the training program. [66265.16(a)(2)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

4. The training program failed to ensure that facility personnel are able to respond effectively to emergencies. [66265.16(a)(3)]
5. Facility personnel failed to successfully complete the training program within six months after their hiring date. [66265.16(b)]
6. Facility personnel failed to take part in an annual review of the initial training required. [66263.16(c)]
7. Facility owner or operator failed to maintain training program documents at the facility. [66265.16(d)]
8. Facility owner or operator failed to keep training records of current and former employees for three years. [66265.16(e)]

RECORDKEEPING AND REPORTING

1. Failed to keep a copy of each signed manifest for three years from the date the waste was accepted by the initial transporter. [66262.40(a)]
2. Failed to keep a copy of each Biennial Report and Exception report for three years from the due date of the report. [66262.40(b)]
3. Failed to keep records of any test results, waste analyses or other waste determinations for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. [66262.40(c)]
4. Generator who ships hazardous wastes offsite to a transfer, treatment, storage or disposal facility within the United States failed to submit a Biennial Report to DTSC. [66262.41(b)]
5. Generator who treats, stores or disposes of hazardous waste onsite failed to submit an annual report. [66262.41(c)]
6. Generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days from the date the waste was accepted by the initial transporter failed to contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. [66262.42(a)]
7. Generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days from the date the waste was accepted by the initial transporter failed to submit an Exception Report to DTSC. [66262.42(b)]
8. Generator who operates or authorizes the operation of a TTU to treat hazardous waste on-site failed to sign and provide a source reduction certificate and a proposed method of treatment certificate. [66262.45(a)]
9. Generator who authorizes an independent TTU owner or operator to treat waste on-site failed to provide the certification to the TTU owner or operator. [66262.45(b)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

10. Generator who operates a FTU to treat hazardous waste on-site failed to sign and provide a source reduction certificate and a proposed method of treatment certificate. [66262.45(c)]
11. Generator who treats or authorizes the treatment of hazardous waste with a TTU allowed any TTU or combination of TTUs to be operated on-site for more than one year. (66262.47)
12. Failed to keep copies of receipts for three years under the consolidated manifest procedure. [Health & Safety Code, section 25160.2(b)(3)]

EXPORTS OF HAZARDOUS WASTE

1. Exported hazardous waste to a foreign country without the following: (66262.52)
 - a) Notification of intent to export
 - b) Receiving country's consent for RCRA hazardous waste
 - c) Copy of EPA Acknowledgment Consent for RCRA hazardous waste
2. Exported hazardous waste without notifying U.S. EPA and DTSC. [66262.53(a)]
3. Exported non-RCRA hazardous waste without notifying DTSC. [66262.53(b)]
4. Failed to renotify U.S. EPA and DTSC on any changes in the conditions of the original notification. [66262.53(d)]
5. Failed to furnish U.S. EPA additional information requested by the receiving country. [66262.53(e)]
6. Failed to comply with the manifest requirements. (66262.54)
7. Failed to file an exception report with U.S. EPA and DTSC for RCRA hazardous waste and DTSC for non-RCRA hazardous waste. (66262.55)
8. Failed to file an annual report with U.S. EPA and DTSC. (66262.56)
9. Failed to keep a copy for at least three years of the following: [66262.57(a)]
 - a) Notification of intent to export
 - b) EPA Acknowledgment of Consent
 - c) Confirmation of delivery
 - d) Annual Report

IMPORTS OF HAZARDOUS WASTE

1. Failed to meet manifesting requirements. [66262.60(b)]
2. Failed to use a manifest provided by DTSC. [66262.60(c)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Facility owner or operator failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. [66265.17(a)]
2. Failed to place No Smoking signs wherever there is a hazard from ignitable or reactive waste. [66265.17(a)]
3. Facility owner or operator failed to conduct the handling of ignitable, reactive and incompatible wastes in a manner to prevent: [66265.17(b)]
 - a. generation of extreme heat or pressure, fire or explosion, or violent reaction
 - b. production of uncontrolled toxic mists, fumes, dusts, or gases to threaten human health or environment
 - c. production of uncontrolled flammable fumes or gases to pose a risk of fire or explosions
 - d. damage of the structural integrity of the device or facility containing the waste
 - e. threat to human health or the environment
4. Failed to document compliance based on literature, trial tests, waste analyses, or similar treatment. [66265.17(c)]

RECYCLABLE MATERIALS

1. Intentionally contaminated used oil with other HW, other than small amounts of vehicle fuel. (Health & Safety Code, section 25250.7)
2. Damaged lead acid batteries not properly managed and labeled. [66266.81(b)]
3. Disposed of used oil by discharge to sewers, drainage systems, water, incineration, or burning as fuel, or disposal on land without authorization. [Health & Safety Code, section 25250.5(a)]
4. Used Oil, recycled oil, or oil exempt was used as dust suppressant or weed control agent and failed to meet applicable standards. [Health & Safety Code, section 25250.5(b)]
5. Intentionally contaminated used oil with other hazardous waste, other than small amounts of vehicle fuel. (Health & Safety Code, section 25250.7)
6. Failed to manage used oil separated from used oil filters during drainage process as HW. [66266.130(c)(6)]
7. Failed to retain copy of manifest or bill of lading for spent lead acid batteries for three years. [66266.81(a)(4)(B)]
8. Failed to retain copies of used oil receipts for three years. [Health & Safety Code, section 25250.8(b)(3)]

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INSPECTION POLICY AND PROCEDURE
#EO-02-006-PP**

9. Failed to keep bill of lading for used oil filters for three years.
[66266.130(c)(5)]

LAND DISPOSAL RESTRICTIONS

1. No determination whether waste is restricted from land disposal.
[66268.7(a)(1)]
2. Failed to notify the receiving facility in writing of the following
[66268.7(a)(2)(B)]:
- a. Non-RCRA hazardous waste category
 - b. Manifest number associated with the shipment
 - c. Waste analysis data
3. Failed to submit a signed notice and certification for LDR waste that does not require further treatment. [66268.7(a)(2)(A)]
4. Failed to submit a notification that waste is subject to an exemption to the receiving facility. [66268.7(a)(3)(A)]
5. Failed to retain on-site determination/waste analysis records.
[66268.7(a)(5)]
6. Failed to retain notifications, certifications, and other records for 3 years. [66268.7(a)(8)]

SOURCE REDUCTION

1. Generator was subject to SB 14 and failed to prepare and retain current source reduction documents as applicable and make them available to the inspector within five days. [Health & Safety Code, sections. 25244.15 (d), 25244.19 through 25244.21]
2. Source Reduction Evaluation Review and Plan (a.k.a. Source Reduction Plan, or Plan) failed to contain required elements, such as certification, amounts of wastes generated, process description, block diagrams, and implementation schedule of selected source reduction measures. (67100.5)

CONTACT:

Hazardous Waste Management Program
Statewide Compliance Division
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806
(916) 322-0349 (916) 324-7193

OR John Galicia
(916) 255-4367
jgalicia@dtsc.ca.gov