

Permit By Rule Operating Requirements

Mickey Pierce
Santa Clara Co. DEH
HMCD

For the next while:

- We'll have a discussion of the current rules for operating under Permit By Rule
 - Different rules for CA, CE, CESQT
- Give you a chance to ask specific questions about your situation(s)

Notification

- Annual update to information and submittal to the CUPA
- Subject to verification during inspection
- Including activities not on list does not allow (legally) treatment
 - There are limited wastes and activities allowed: If you're not doing one of them, its not allowed under PBR (Onsite Treatment)!

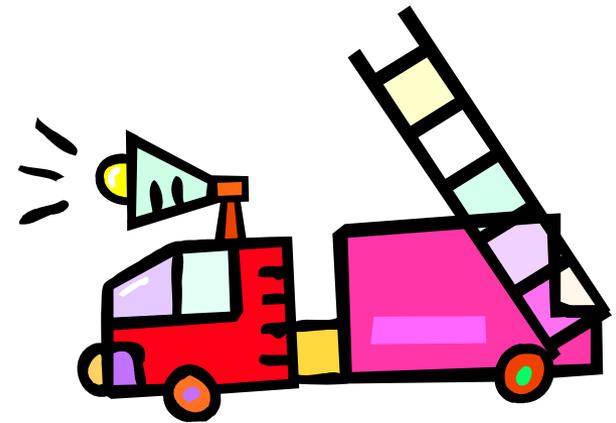
UNIFIED PROGRAM CONSOLIDATED FORM
HAZARDOUS WASTE
ONSITE HAZARDOUS WASTE TREATMENT NOTIFICATION – FACILITY PAGE

Page <u> </u> of <u> </u>	
BUSINESS NAME (Same as FACILITY NAME or DBA - Doing Business As)	FACILITY ID#
II. STATUS	
NOTIFICATION STATUS 600	PERMIT STATUS (Check all that apply) 601
<input type="checkbox"/> a Amended <input type="checkbox"/> b Initial <input type="checkbox"/> c Renewal (PBR Only)	<input type="checkbox"/> a Facility Permit <input type="checkbox"/> b Interim Status <input type="checkbox"/> c Standardized Permit <input type="checkbox"/> d Variance <input type="checkbox"/> e Consent Agreement
III. NUMBER OF UNITS AT FACILITY	
(Indicate the number of units you operate in each tier, attach one unit notification page for each unit except CE-CL)	
A	Conditionally Exempt - Small Quantity Treatment (CESQT) (May not function under any other tier) 602
B	Conditionally Exempt - Specified Wastestream (CESW)
C	Conditionally Authorized (CA)
D	Permit by Rule (PBR)
E	Conditionally Exempt - Limited (CEL)
F	Conditionally Exempt - Commercial Laundry (CE-CL) (No unit page is required for laundries)
G	TOTAL UNITS (Must equal the number of unit notification pages attached plus the number of CE-CL units)
IV. CERTIFICATION AND SIGNATURE	
<p>Waste Minimization I certify that I have a program in place to reduce the volume, quantity and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.</p> <p>Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete.</p> <p>I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.</p>	
SIGNATURE OF OWNER/OPERATOR	DATE 603
NAME OF OWNER/OPERATOR 604	TITLE OF OWNER/OPERATOR 605
REQUEST FOR SHORTENED REVIEW PERIOD (CE and CA only) <input type="checkbox"/> Yes <input type="checkbox"/> No State Reason for Request:	
V. ATTACHMENTS (Check if attached)	
ALL tiers except CE-CL (Laundries) must submit: <input type="checkbox"/> 1 One unit specific notification page and one treatment process page per unit <input type="checkbox"/> 2 Plot Plan (or other grid/map) PBR & CA ONLY: <input type="checkbox"/> 1 Closure Financial Assurance (formerly DTSC form 1232) <input type="checkbox"/> Self Certified (< \$10,000) <input type="checkbox"/> Other mechanism <input type="checkbox"/> 2 Prior Enforcement History, if applicable	PBR ONLY <input type="checkbox"/> 1 Tank and container certifications, if required <input type="checkbox"/> 2 Notification of local agency or agencies <input type="checkbox"/> 3 Notification of property owner, if different from business owner

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Page <u> </u> of <u> </u>	
FACILITY ID#	BUSINESS NAME (Same as FACILITY NAME or DBA - Doing Business As)
I. TREATMENT UNIT	
UNIT ID# 606	UNIT TYPE/TIER 607
UNIT NAME 610	MONTHLY TREATMENT VOLUME 611
NUMBER OF TANKS 608	NUMBER OF CONTAINERS/TREATMENT AREAS 609
SPECIFIC WASTE TYPE TREATED (narrative) 613	
TREATMENT PROCESS DESCRIPTION (narrative) 614	
(NOTE: for each treatment unit, complete and attach the appropriate Waste And Treatment Process Combinations page)	
II. BASIS FOR NOT NEEDING FEDERAL PERMIT (Check all that apply)	
<input type="checkbox"/> a. The treated waste is not a hazardous waste under federal law (California-only waste). <input type="checkbox"/> b. Treated in waste water treatment units (tanks) and discharged to a publicly owned treatment works (POTW)/sewering agency or under an NPDES permit. <input type="checkbox"/> c. Treatment in elementary neutralization units. <input type="checkbox"/> d. Treatment in a totally enclosed treatment facility. <input type="checkbox"/> e. Federal conditionally exempt small quantity generator (generated 100 kg, approximately 27 gallons, or less of hazardous waste in a calendar month).	<input type="checkbox"/> f. Treatment in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month. <input type="checkbox"/> g. Recyclable materials are reclaimed to recover silver or other precious metals. <input type="checkbox"/> h. Empty container rinsing and/or treatment. <input type="checkbox"/> i. Other (specify below)
III. RESIDUALS MANAGEMENT DESCRIPTION (Check all that apply)	
<input type="checkbox"/> a. Discharge non-hazardous aqueous waste to POTW or sewer. <input type="checkbox"/> b. Discharge non-hazardous aqueous waste under a NPDES permit. <input type="checkbox"/> c. Dispose of non-hazardous solid waste residues at an offsite location.	Residual hazardous waste hauled offsite by a registered hauler. 616 <input type="checkbox"/> d. Offsite recycling <input type="checkbox"/> e. Thermal treatment <input type="checkbox"/> f. Disposal to land <input type="checkbox"/> g. Further treatment <input type="checkbox"/> h. Other method of disposal (describe below)
SECONDARY CONTAINMENT INSTALLATION DATE (if required) 617	

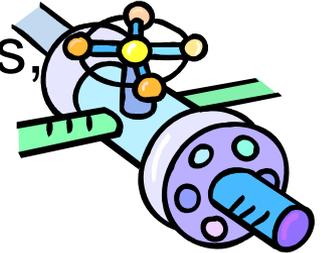
The Basics



- Generator Standards apply
 - Prepare a written contingency plan
 - Business Plan Emergency Plan or SPCP plan can suffice as long as it has all required elements
 - Training Plan and Records
 - Specific to those that operate the treatment unit
 - What job titles/personnel operate the unit? What do they do? What special things do they need to know?
 - Waste Minimization Certification
 - Site Security

More Basics

- Container and Tank Management
 - Tank Integrity and Containment Assessment
 - Every 5 years, or when tanks or parts replaced or repaired
 - Re-assess affected parts, note effect on system as whole
 - Includes tanks, ancillary equipment (pumps, piping), and containment
 - Must show that seismically sound
 - Overfill and containment leak detection systems
 - Can often be satisfied by visual inspection



Tank Assessments

- Must be certified by an independent certified professional engineer
 - Civil, mechanical final sign off
 - Other disciplines can do work “under” them
- Model Available
- Guidance available
 - <http://www.calcupa.net/technical/hazwaste/WASTE-AST-GUIDANCE-FINAL.pdf>
 - <http://www.unidocs.org/hazmat/hazardous-waste/un-047.pdf>

http://www.calcupa.net/technical/hazwaste/WASTE-AST-GUIDANCE-FINAL.pdf - Microsoft Internet Explorer provided by Dept. of Toxic

File Edit Go To Favorites Help

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Address http://www.calcupa.net/technical/hazwaste/WASTE-AST-GUIDANCE-FINAL.pdf Links

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REQUIREMENTS FOR HAZARDOUS WASTE TANK SYSTEMS

DEFINITIONS

APPLICABILITY OF HAZARDOUS WASTE TANK SYSTEM REQUIREMENTS

NEW TANK SYSTEM REQUIREMENTS

- **Design and Installation of New Tank Systems or Components Holding RCRA Hazardous Waste**
- **Written Assessment Requirements for Tanks holding Non-RCRA Hazardous Waste or RCRA-Exempt Waste, or Tiered Permit Tank System**
- **Reassessment Requirements after Tank System Modification**
- **Limited Exemption from Engineering Assessment**

SECONDARY CONTAINMENT REQUIREMENTS

EXISTING TANK SYSTEM REQUIREMENTS

DAILY TANK SYSTEM INSPECTIONS

Done Unknown Zone

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Container Containment

- For containers in which treatment is being conducted
 - **NOT** for accumulation containers
- Must have containment installed
- Containment must be certified by a professional engineer (in writing)
 - Assessment only of containment meeting requirements of 66265.175



Marking the System

- Exterior of each tank/container used for treatment should be marked noting:
 - Unit name/number
 - EPA ID Number
 - Operator's name (company name)

Daily Operations



- Daily inspections of system
 - Need to keep written logs of inspections
 - Overfill/spill control equipment
 - Aboveground tank areas (for corrosion, leaks)
 - Secondary containment area (for releases, liquids, erosion)
 - Waste level in open top tanks
 - Inspections may be done more often than once a day if you need (open top tank with no overflow alarm in secondary containment)

Daily Operations

- Operation Log
 - Enough detail to be able to adequately fill out the notification form
 - Info on the quantity of influent of the waste
 - Info on the quantity of effluent of the waste
 - Disposition of the effluent (to POTW, TSDF, etc)

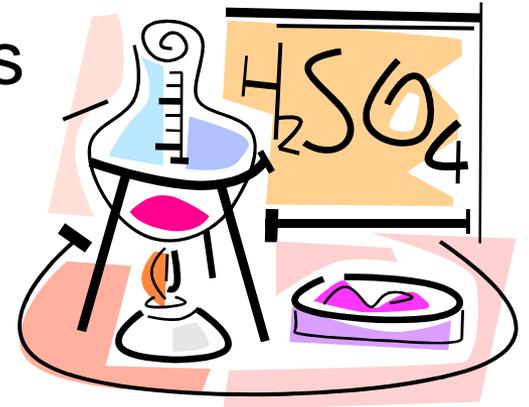


Waste Analysis Plan

- Purpose:
 - Ensure your system can properly treat the waste
 - Ensure that all wastes are eligible for treatment
- Does your plan do these things?
- Does the frequency of testing match the inflow to the system? (batches of varying contents may need to be sampled more than once a year)

Waste Analysis Plan

- Plan that describes:
 - What waste is being tested
 - What analytes are being tested for
 - Test methods for those analytes
 - Location of testing
 - Frequency of testing



- Keep records of all tests done!

Closure Plan/Cost Analysis

- Written Closure Plan and cost analysis for:
 - Removal of all waste in system (assume full)
 - May account for onsite treatment of waste
 - Demolition and removal of system
 - Transportation
 - Labor
 - Decon of system and containment
 - Sampling and analysis to ensure “clean” closure
 - Certification by Professional Engineer
- Procedures for doing all of the above



Closure Plan and Cost Analysis

- Total closure cost may be adjusted for property or equipment value
- Cost estimate must be adjusted annually
 - Use inflation factor
 - Take into account depreciation of equipment if value is being claimed
 - <http://www.metchem.com/used-equip.htm>
 - <http://www.usedwatertreatmentequipment.com/>
 - <http://www.bid-on-equipment.com/7500.htm>



Inventory Of Used Equipment

[Filter Presses \(100s\)](#) [Sludge Dryers\(200s\)](#) [Clarifiers \(300s\)](#) [Plating Machines \(400s\)](#)

[Scrubbers \(500s\)](#) [Waste Water Treatment Systems \(600s\)](#)

[Ovens \(700s\)](#) [Misc Waste Treatment Equipment \(800s\)](#)

[Misc.\(900s\)](#) [Spin Dryers \(1000s\)](#) [Pressure Filters\(1100\)](#) [Rectifiers \(1200\)](#)

[Water Treatment Equipment \(1300\)](#)

Filter Press Inventory

Item#	Click to enlarge	DESCRIPTION listed from smallest to largest	AS IS	RECONDITIONED *
		New and Used Replacement Filter Press Plates, as well as Cloths and Gaskets for any Filter Press!		Call for prices
123 B		Used Lenser/Klinkau 470MM gasketed center feed polypro plates with 4 corner return. New plates also available. Call for prices.	\$140 each	\$210 each -- cleaned with new cloths and gaskets
819 A		Filter Press Plates. Non-gasketed Center feed, four corner return, recessed polypropylene plates. 1200 MM. Quantities over 25 are 25% off	\$300 each	\$400 each (with cloths)

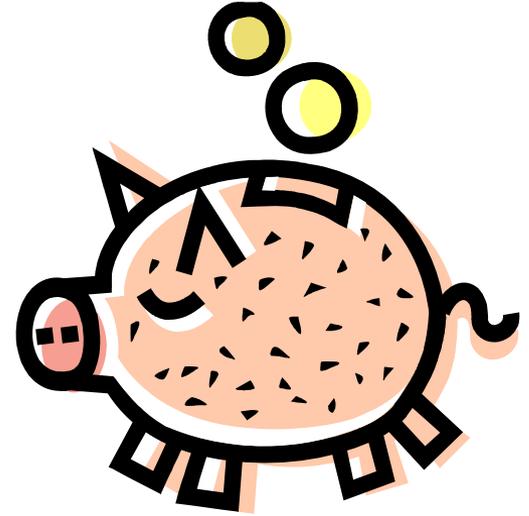
Financial Assurance

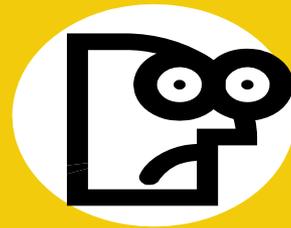
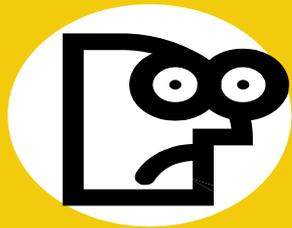
- IF closure cost estimate is <\$10,000
 - Need only to file a letter with CUPA stating that CCE is less than \$10K and that no mechanism is required
- IF estimate is >\$10,000, you need to fund a “financial mechanism” and submit a copy of that mechanism to the CUPA
 - CUPA will be named as beneficiary or co-beneficiary

*** \$10K applies to total for all PBR units***

Financial Mechanisms

- Certificate of Deposit
- Restricted Savings Account
- Corporate Guarantee
- Closure Bond
- Insurance Policy
- Letter of Credit





It's QUESTION TIME !!

