

# Conditionally Authorized Hazardous Waste Treatment Inspection Checklist

## UNIFIED PROGRAM AGENCY (UPA)

### File Review

Violation #	Summary
F008	Failure to pay the Conditionally Authorized Tiered Treatment permit fees. KCOOC 8.04.030
H456	Failure to obtain a hazardous waste facilities permit, or other grant of authorization, prior to accepting, treating, storing, or disposing of a hazardous waste at the facility, area, or site. HSC 6.5 25201(a)
H869	Failure to report program data electronically. HSC 6.11 25404(e)(4)
H406	Failure to electronically submit the signature page for the onsite treatment notification. HSC 6.5 25200.3(e)
H873	Failure to identify the following information in CERS: all generator information, all Conditional Authorization treatment units, accurately list number of tanks and containers in each unit, and plot plan/map that shows unit locations are properly identified. HSC 6.5 25200.3(e)(3)
H407	Failure to electronically submit to the CUPA an amended notification within 30 days of any change in operation which necessitates modifying any of the information submitted in the notification. HSC 6.5 25200.3(k)
H409	Failure to prepare a written estimate of the cost of closing each unit which includes the cost that would be incurred for closing a treatment unit when using the owner or operator or generator's own staff and/or personal equipment taking into account any salvage value that may be realized from the sale of wastes, facility structure or equipment, land or other facility assets. This estimate shall be submitted as an attachment to the Certification of Financial Assurance for Permit by Rule and Conditionally Authorized Operations/ Maintenance page(s) of the Unified Program Consolidated Form (x/99). 22 CCR 45 67450.13(a)(1)
H408	Failure to adjust Closure Costs for inflation / deflation by March 1st. 22 CCR 45 67450.13(a)(2)
H410	Failure to submit financial assurance form upon a change or when there is an increase in the closure costs. 22 CCR 45 67450.13(a)(3), 67450.13(a)(4)
H405	Failure to submit a Phase I Checklist to DTSC within one year of commencing operations. HSC 6.5 25200.14(b)(1)

### On Site Records

Violation #	Summary
H419	Failure to obtain and maintain a written assessment reviewed and certified by an independent, qualified, professional engineer prior to placing the tank system in service. The written assessment shall state that, the new hazardous waste tank system has sufficient structural integrity, is acceptable for the transferring, storing and treating of hazardous waste, and that the tanks and containment system including the foundation, structural support, seams, connections, and pressure controls (if applicable) are suitably designed to meet the regulation. The tank assessment shall be valid for 5 years. 22 CCR 45 67450.3(c)(9)(F); 22 CCR 15 66265.192(a), 66265.192(h)
H866	Failure of the 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, and tank systems authorized under Permit-by-Rule, Conditional Authorization, and Conditional Exemption or for a small quantity generator onground or aboveground tank systems containing RCRA hazardous wastes generated onsite. 22 CCR 67450.3(c)(9)(F); 22 CCR 15 66265.192(h)
H416	Failure to include all required information in the new tank system assessment. 22 CCR 45 67450.3(c)(9)(F); 22 CCR 15 66265.192(k)
H417	Failure of the generator conducting CE, CA, or PBR treatment activity to annually obtain and maintain a current P.E. assessment of the existing Hazardous Waste tank systems which lacks secondary containment meeting the requirements of section 66265.193. The P.E. assessment shall determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the waste(s) to be transferred, stored or treated to ensure that it will not collapse, rupture, or fail. At a minimum, this assessment shall include all elements of the tank integrity assessment. 22 CCR 15 66265.191(a), 66265.191(b), 66265.191(c), 66265.191(e)
H421	Failure to include all required information in the tank system assessment. 22 CCR 15 66265.191(g); 22 CCR 45 67450.3(c)(9)(F)
H422	Failure to obtain CUPA approval prior to the replacement of identical or functionally equivalent tank system parts or components. 22 CCR 15 66265.192(m); 22 CCR 45 67450.3(c)(9)(F)
H430	Failure of the generator to prepare and maintain onsite, for a period of five years, adequate records to demonstrate that requirements and conditions of the grant of conditional authorization are met. HSC 6.5 25200.3(c)(6), 25200.3(c)(7)
H431	Failure to prepare and maintain onsite for five years, a treatment system inspection program and the log of inspections conducted. HSC 6.5 25200.3(c)(5), 25200.3(c)(7)

## General Operating Requirements

Violation #	Summary
H881	Failure of the generator treating hazardous wastes under grant of conditional authorization to comply with the requirements applicable to the treatment process. HSC 6.5 25200.3(a), 25200.3(b)
H876	Failure to treat only hazardous waste that is generated onsite. HSC 6.5 25200.3(c)(8), 25189
H885	Treated hazardous waste in excess of 5,000 gallons/unit or 45,000 pounds in any calendar month, whichever is less, unless the wastes are: <ul style="list-style-type: none"> <li>• Dilute aqueous waste which are hazardous solely due to the presence of inorganic constituents;</li> <li>• Dilute aqueous waste which are hazardous solely due to the presence of organic constituents;</li> <li>• Neutralization of acidic or alkaline wastes that are hazardous only due to corrosivity or toxicity that results only from the acidic or alkaline material, in elementary neutralization units, if the wastes contain less than 10 percent acid or base constituents by weight; If the waste contains more than 10 percent acid or base constituents by weight, the volume treated in a single batch at any one time shall not exceed 500 gallons.</li> <li>• Treatment of oil mixed with water and oil/water separation sludges, using any of the following treatment technologies listed. HSC 6.5 25200.3(b)(1)</li> </ul>
H880	Failure to maintain adequate records to demonstrate compliance with all applicable pretreatment standards and with all applicable industrial waste discharge requirements issued by the agency operating the publicly owned treatment works into which the wastes are discharged. HSC 6.5 25200.3(c)(7)
H884	Failure to provide secondary containment for treatment in containers. HSC 6.5 25200.3(c)(4), 66264.175(a); 66264.175(b)
H457	Failure of the generator to remove or decontaminate all containment system components and structures or equipment contaminated with hazardous waste and soils and provide written notification of all closure activities at the closure of the treatment unit. HSC 6.5 25200.3(g)

## Observations

Violation #	Summary
H453	Failure to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction including but not limited to: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste. 22 CCR 15 66265.17(a), 67450.3(c)(9)(A)
H890	Failure to provide a posted sign stating "Danger Hazardous Waste Area - Keep Out" and to provide one of the following means of security to the active hazardous waste portion of the facility: <ol style="list-style-type: none"> <li>1) A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) which continuously monitors and controls entry; or</li> <li>2) A) An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff), which completely surrounds area; and B) A means to control entry, at all times, through the gates or other entrances (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility). 22 CCR 15 66265.14; HSC 6.5 25200.3(c)(1)</li> </ol>

## General Facility Requirements

Violation #	Summary
H420	Administration/Documentation - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J038	Administration/Documentation - General Local Ordinance
H458	Training - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J041	Training - General Local Ordinance
H459	Operations/Maintenance - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J044	Operations/Maintenance - General Local Ordinance
H460	Release/Leaks/Spills - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J047	Release/Leaks/Spills - General Local Ordinance
H432	Abandonment/Illegal Disposal/Unauthorized Treatment - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J050	Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance