

## Conditionally Exempt Hazardous Waste Treatment Inspection Checklist UNIFIED PROGRAM AGENCY (UPA)

### File Review

Violation #	Summary
F009	Failure to pay the Conditionally Exempt Tiered Treatment permit fees. KCOC 8.04.030
H519	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)
H870	Failure to report program data electronically. HSC 6.11 25404(e)(4)
H468	Failure to electronically submit the signature page for the onsite treatment notification. HSC 6.5 25201.5(d)(7)
H874	Failure to identify the following information in CERS: all generator information, all Conditionally Exempt 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 25201.5(d)(7)
H469	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 25201.5(i)

### On Site Records

Violation #	Summary
H475	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)
H867	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)
H472	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)
H473	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)
H476	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)
H477	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)
H485	Failure of the generator to prepare and maintain onsite, for a period of three years, the following: (1) adequate records to demonstrate compliance with all applicable pretreatment standards and discharge requirements issued by the agency operating the POTW; (2) records of the dates, concentrations, amounts, and types of waste treated; and (3) written operating instructions. HSC 6.5 25201.5(d)(3), 25201.5(d)(5), 25201.5(d)(6)
H486	Failure to prepare, implement, and maintain onsite, for three years at the facility, a treatment system inspection program and log of inspections conducted. HSC 6.5 25201.5(d)(4), 25201.5(d)(5)

## General Operating Requirements

Violation #	Summary
H882	Failure of the generator treating hazardous wastes to comply with the requirements of the conditional exemption applicable to the treatment process. 22 CCR 45 67450.11(a); HSC 6.5 25201.5(a), 25201.5(c)
H877	Failure to treat only hazardous waste that is generated onsite. HSC 6.5 25201.5(d)(1), 25189
H879	Failure of the generator to maintain adequate records to demonstrate that they are in compliance with all applicable pretreatment standards and waste discharge requirements and treatment residuals managed and disposed in accordance with applicable federal, state, and local requirements. HSC 6.5 25201.5(d)(6)
H886	Failure to comply with total monthly treatment limitation of 55 gallon or 500 lbs. when the hazardous waste is not extremely hazardous waste and hazardous waste permit is not required for any other activity at that facility. HSC 6.5 25201.5(a)
H493	Failure of a facility laundering reusable soiled textile materials to meet the requirements of the conditional exemption applicable to the process. HSC 6.5 25144.6
H878	Failure of the generator to remove or decontaminate all waste residues, containment system components, soils, and other structures or equipment contaminated with hazardous waste, and provide written notification of all closure activities at the closure of the treatment unit. HSC 6.5 25201.5(d)(8)

## Observations

Violation #	Summary
H516	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)

## General Facility Requirements

Violation #	Summary
H461	Administration/Documentation - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J039	Administration/Documentation - General Local Ordinance
H462	Training - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J042	Training - General Local Ordinance
H463	Operations/Maintenance - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J045	Operations/Maintenance - General Local Ordinance
H464	Release/Leaks/Spills - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J048	Release/Leaks/Spills - General Local Ordinance
H465	Abandonment/Illegal Disposal/Unauthorized Treatment - General 22 CCR Multiple Chapters, Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
J051	Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance