

Household Hazardous Waste Collection Facility Inspection Checklist UNIFIED PROGRAM AGENCY (UPA)

File Review

Permanent HHW Collection Facility

Violation #	Summary
H594	Failure of the operator of the PHHWCF to submit a Permanent Household Hazardous Waste Collection Facility Permit by Rule Notification to CUPA or authorized agency a minimum of 45 days in advance of the planned commencement of operation. 22 CCR 20 66270.60(d)(6)
H599	Failure of the owner or operator of PHHWCF to prepare and submit a financial assurance certification of closure for the PHHWCF, with an established mechanism or by self-insuring for public agencies using DTSC Form 1220 (2/96) with original signatures. 22 CCR 45 67450.30(c)
H595	Failure to prepare, submit, and maintain onsite an estimate of the maximum cost projected of closing the PHHWCF. 22 CCR 45 67450.30(b)(3); 22 CCR 45 67450.30(b)(4)
H596	Failure of the operator to adjust annually the closure cost estimate for inflation within sixty (60) days prior to the anniversary date of the original establishment of the financial mechanism or to revise the closure cost estimate no more than thirty (30) days after a change in the closure plan increases the cost of closure. 22 CCR 45 67450.30(b)(1)(2)

Temporary HHW Collection Facility

Violation #	Summary
H597	Failure of the operator of the THHWCF to submit a Temporary Household Hazardous Waste Collection Facility Permit by Rule Notification to CUPA or authorized agency a minimum of 45 days in advance of the date the first session of the THHWCF commences operation. 22 CCR 20 66270.60(d)(5)

On Site Records

Violation #	Summary
J069	Failure to maintain shipping papers for the transfer of HHW from one HHWCF to another. HSC 6.5 25163(f)(2)
J070	Failed to ensure that proxy deliveries of HHW are accompanied by a certification noting the proxy delivery's circumstances and that the proxy delivery person is not doing so for profit. HSC 6.5 25218.5(a)(1)(A)(ii), 25218.8(b)(3)(A)(ii)

Permanent HHW Collection Facility

Violation #	Summary
H617	Failure of the PHHWCF operator to complete, maintain as part of the operation plan, and file a Phase I assessment within 1 year of commencing operation. 22 CCR 45 67450.25(a)(5)
H606	Failure of the owner or operator to prepare and maintain for the tank systems: professional engineering certification provided by a manufacturer, an independent professional engineer registered in the State of California or a professional engineer employed by the local government entity and from a different division or agency than the operator. Failure of owner or operator to obtain tank reassessment every five years. 22 CCR 45 67450.25(a)(2)(G); 22 CCR 15 66265.192(h)
H618	Failure of the owner or operator to prepare and maintain a written waste analysis plan describing the procedures which the operator or contractor will carry out to characterize unidentified wastes received at the facility including field analysis methods such as Hazardous Category (HAZCAT) analysis. 22 CCR 45 67450.25(a)(2)(A)
H620	Failure of the PHHWCF to prepare and maintain an operation plan containing all required information. 22 CCR 45 67450.25(a)(3)
H619	Failure of the PHHWCF operator to assure that copies of the operation plan, all records which identify receipts and shipments of hazardous wastes from household and small quantity commercial sources and all notifications pertaining to the PHHWCF Operations/Maintenance are maintained and available upon demand by the CUPA, or authorized agency for a period of at least three years from the commencement of the PHHWCF. 22 CCR 45 67450.25(a)(3)
H622	Failure of the PHHWCF operator to establish a separate record which identifies the name, address, and identification number of the CESQG, the type(s) and quantity(ies) of hazardous wastes accepted from small quantity commercial sources, and the fees paid to the PHHWCF for the management of those wastes. 22 CCR 45 67450.25(a)(4), 67450.4(g)
H621	Failure of the PHHWCF operator to submit a written report to the appropriate CUPA or authorized agency of any incidents of noncompliance with any regulatory requirement that may have occurred within 15 days of such an occurrence. 22 CCR 45 67450.25(a)(4), 67450.4(i)

Temporary HHW Collection Facility

Violation #	Summary
H601	Failure of the THHWCF to prepare and maintain an operation plan containing all required information. 22 CCR 45 67450.4(b)

H592	Failure of the THHWCF operator to assure that copies of the operation plan, all records which identify receipts and shipments of hazardous wastes from household and small quantity commercial sources and all notifications pertaining to the THHWCF Operations/ Maintenance are maintained and available upon demand by the CUPA, or authorized agency for a period of at least three years from the commencement of the THHWCF. 22 CCR 45 67450.4(h)
H598	Failure of the THHWCF operator to establish a separate record which identifies the name, address, and identification number of the CESQG, the type(s) and quantity(ies) of hazardous wastes accepted from small quantity commercial sources, and the fees paid to the THHWCF for the management of those wastes. 22 CCR 45 67450.4(g)
H593	Failure of the THHWCF operator to submit a written report to the appropriate CUPA or authorized agency of any incidents of noncompliance with any regulatory requirement that may have occurred within 15 days of such an occurrence. 22 CCR 45 67450.4(i)

General Operating Requirements

Permanent HHW Collection Facility

Violation #	Summary
H623	Failure of the PHHWCF to operate with a large enough work area to accommodate all necessary personnel, storage, vehicles, and equipment. 22 CCR 45 67450.25(a)(4), 67450.4(d)(3)
H624	Failure of the PHHWCF to have a physical barrier to delineate the handling and storage area. 22 CCR 45 67450.25(a)(4), 67450.4(d)(5)
H602	Failure of the PHHWCF to operate with a significant buffer zone. 22 CCR 45 67450.25(a)(4), 67450.4(d)(2)
H628	Failure of the PHHWCF to meet all requirements when bulking wastes. 22 CCR 45 67450.25(a), 67450.4(e)
H629	Failure of the PHHWCF to operate in a location that is clearly marked to control public access. 22 CCR 45 67450.25(a)(4), 67450.4(d)(1)
H627	Failure of the PHHWCF to have a continuous base that is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation that meets the requirements of section 66264.175(b)(1). 22 CCR 45 67450.25(a)(4)
H631	Failure of the PHHWCF to have a roof or canopy that covers the handling, sorting, and bulking areas. 22 CCR 45 67450.25(a)(4), 67450.4(d)(7)
H632	Failure of the PHHWCF storage area to meet all site security requirements. 22 CCR 45 67450.25(a)(4), 67450.4(d)(9)
H633	Failure of the PHHWCF to have a storage area to store reactive and ignitable waste. 22 CCR 45 67450.25(a)(4), 67450.4(d)(6), 66265.17(a), 66265.17(b)
H634	Failure of the PHHWCF to have traffic control which is one way, directed by staff, and assures all persons remain in their car during waste transfer, unless requested to exit the vehicle to provide access to the waste being delivered. 22 CCR 45 67450.25(a)(4), 67450.4(d)(10); HSC 6.5 25218.3(e)
H635	Failure of the PHHWCF to post around the area signs stating "Danger! Hazardous Waste Area - Unauthorized Personnel Keep Out" and are visible at 25 ft. 22 CCR 45 67450.25(a)(4), 67450.4(d)(8)

Temporary HHW Collection Facility

Violation #	Summary
H603	Failure of the THHWCF to operate with a large enough work area to accommodate all necessary personnel, storage, vehicles, and equipment. 22 CCR 45 67450.4(d)(3)
H604	Failure of the THHWCF to have a physical barrier to delineate the handling and storage area. 22 CCR 45 67450.4(d)(5)
H605	Failure of the THHWCF to operate with a significant buffer zone. 22 CCR 45 67450.4(d)(2)
H607	Failure of THHWCF to meet all requirements when bulking wastes. 22 CCR 45 67450.4(e)
H608	Failure of the THHWCF to operate in a location that is clearly marked to control public access. 22 CCR 45 67450.4(d)(1)
J052	Failure of the THHWCF to have the area paved and covered with a plastic tarp of at least 6 mm thick and ensure all tears and punctures are repaired. 22 CCR 45 67450.4(d)(4)
J053	Failure of the THHWCF to have a roof or canopy that covers the handling, sorting, and bulking areas. 22 CCR 45 67450.4(d)(7)
H611	Failure of the THHWCF storage area to meet all site security requirements. 22 CCR 45 67450.4(d)(9)
H612	Failure of the THHWCF to have a storage area to store reactive and ignitable waste. 22 CCR 45 67450.4(d)(6)
H613	Failure of the THHWCF to have traffic control which is one way, directed by staff, and assures all persons remain in their car during waste transfer, unless requested to exit the vehicle to provide access to the waste being delivered. 22 CCR 45 67450.4(d)(10); HSC 6.5 25218.3(e)
H614	Failure of the THHWCF to post around the area signs stating "Danger! Hazardous Waste Area - Unauthorized Personnel Keep Out" and are visible at 25 ft. 22 CCR 45 67450.4(d)(8)

Observations

Permanent HHW Collection Facility

Violation #	Summary
H647	Failure of the PHHWCF to dispose of hazardous waste within one year of accumulation start date. 22 CCR 45 67450.25(a)(6)
H648	Failure of the PHHWCF operator to obtain authorization to accept waste from VSQG's. 22 CCR 45 67450.25(a)(3)(B), 67450.4(b)(9)

Temporary HHW Collection Facility

Violation #	Summary
H615	Failure of the THHWCF operator to obtain authorization to accept waste from VSQG's. 22 CCR 45 67450.4(b)(9)
H649	Failure of the THHWCF operator to remove and decontaminate structures, equipment, soil and all collected materials and wastes within 144 hours after termination of the session and assure that all contaminated materials and wastes were removed by a registered hazardous waste transporter. 22 CCR 45 67450.4(f)

Materials Exchange Program

Permanent HHW Collection Facility

Violation #	Summary
J054	Failure of a HHW program to have a complete quality assurance program which sets guidelines for participating container screening, acceptance, and evaluation, as well as when containers no longer meet protocols and becomes a waste. HSC 6.5 25218.11.5
J055	Materials exchange program is not informing customers to use materials in a manner consistent with their original use. HSC 25218.12(a)(2)
J056	Materials exchange program failed to collect required information from commercial entities who will re-distribute materials received from the program. Materials exchange program failed to collect required information from commercial entities who will re-distribute materials received from the program. HSC 25218.12(b)(1)
J057	Materials exchange program failed to collect required annual report from commercial entities who accepted materials for the purpose of redistribution. HSC 25218.12(b)(2)
J058	Materials exchange program failed to stop supplying materials to commercial entities who accepted materials for the purpose of redistribution but who have not provided required information or annual report. HSC 25218.12(b)(3)

Notification and Operation

Recycle-Only HHW

Violation #	Summary
H600	Failure of the operator of a recycle-only household hazardous waste collection facility not operating under a hazardous waste facilities permit to comply with notification and operation requirements. HSC 6.5 25218.2, 25218.8

General Facility Requirements

Violation #	Summary
F007	Failure to pay the Household Hazardous Waste permit fees. KCOC 8.04.030
H587	Administration/Documentation - General 22 CCR Multiple Chapters Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
H642	Administration/Documentation - General Local Ordinance
H588	Training - General 22 CCR Multiple Chapters Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
H643	Training - General Local Ordinance
H589	Operations/Maintenance - General 22 CCR Multiple Chapters Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
H644	Operations/Maintenance - General Local Ordinance
H590	Release/Leaks/Spills - General 22 CCR Multiple Chapters Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
H645	Release/Leaks/Spills - General Local Ordinance
H591	Abandonment/Illegal Disposal/Unauthorized Treatment - General 22 CCR Multiple Chapters Multiple Sections; 40 CFR 1 265; HSC 6.5 Multiple Sections
H646	Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance