

COMPLIANCE EVALUATION INSPECTION REPORT

Quemetco, Inc.  
720 South 7th Avenue  
City of Industry, CA 91748  
(818) 330-2294

EPA ID# CAD066233966

INSPECTED BY: Statewide Compliance Division  
Sylvia Vanderspek, Nancy Steele and Maria Kelly

DATE OF INSPECTION: July 13, 1994

DATE OF REPORT: July 29, 1994

REPORT PREPARED BY: Sylvia Vanderspek

Quemetco, Inc.  
Inspection Report

I. Purpose:

To conduct a Compliance Evaluation Inspection of a major RCRA storage and treatment facility operating under interim status.

II. Representatives Present:

Quemetco, Inc. (Quemetco)

Robert Finn, Vice President, California Operations  
Alfredo Avila, Environmental Manager  
Joe Garcia, Air Quality Supervisor

Department of Toxic Substance Control (DTSC)

Sylvia Vanderspek, Hazardous Substance Scientist  
Nancy Steele, Hazardous Substance Scientist  
Maria Kelly, Environmental Protection Specialist

III. Owner/Operator:

Quemetco, Inc. (Quemetco) is a subsidiary of Revere Smelting and Refining (RSR) Corporation. Quemetco operates as a secondary lead smelter which recycles lead acid batteries. The person responsible for the Quemetco's hazardous waste management is Alfredo Avila, Environmental Manager.

IV. Background:

November 19, 1980 - Quemetco filed a Part A application describing themselves as a treatment and storage/disposal facility.

May 16, 1983 - DTSC issued Quemetco an Interim Status Document (ISD) for storage and treatment of hazardous waste with the stipulation that groundwater monitoring be conducted at the facility.

November 18, 1984 - DTSC issued Quemetco a Notice of Violation (NOV) citing the following:

1. Non-compliance with groundwater monitoring as required by the ISD;
2. Presence of groundwater contamination;

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3. Failure to report increases in detected groundwater constituents;
4. Failure to submit a groundwater assessment.

November 8, 1985 - DTSC rescinded Quemetco's authorization to operate the surface impoundment. The Environmental Protection Agency (EPA) began an enforcement action due to the groundwater contamination requiring Quemetco to close the surface impoundment.

November 8, 1985 - Quemetco refiled a new part A application with DTSC, reclassifying their waste piles as product rather than hazardous waste.

March 18, 1987 - The United States District Court, Central District of California, issued a Consent Decrees and Remedial Action Order to Quemetco directing them to do the following:

1. Eliminate the use of sprinklers in the battery storage area;
2. Contain runoff from the battery storage area, polypropylene chip/hard rubber storage area, reverberatory/electric furnace slag storage area and parked trucks servicing the above areas;
3. Minimize and contain leakage from bins and trucks;
4. Stop placement, treatment, storage, disposal or release of hazardous waste in the surface impoundment;
5. Seal all pavement cracks in the battery storage area, polypropylene chip/hard rubber storage area, scrap lead storage area and reverberatory/electric furnace slag storage area;
6. Install a berm around the battery storage area.

March 18, 1987 - DTSC inspected Quemetco and observed the following violation:

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1. Inadequate waste analysis plan.

July 17, 1987 -

DTSC issued Quemetco a ROV and Schedule for Compliance for the violation observed at the March 18, 1987, inspection.

January 17, 1988 &  
January 18, 1988 -

DTSC inspected Quemetco and observed the following violations:

1. Inadequate waste analysis plan;
2. Inspection log deficiencies;
3. Inadequate training plan;
4. Failure to submit contingency plan to local emergency response agencies;
5. Lack of accumulation dates on containers of hazardous waste;
6. Lack of warning signs posted at entrances to the active hazardous waste areas;
7. Failure to maintain containers of hazardous waste closed.

February 17 &  
February 18, 1988 -

DTSC inspected Quemetco and the following violations were observed:

1. Inadequate waste analysis plan;
2. Inspection log deficiencies;
3. Inadequate training plan;
4. Contingency plan was not submitted to local emergency response agencies;
5. Lack of accumulation dates on sixteen containers of hazardous waste;
6. Lack of warning signs posted at the entrances to active hazardous waste areas in the facility;
7. Sixteen containers of hazardous waste were not maintained closed.

March 4, 1988 -

DTSC issued a ROV citing the violations observed during the February 17/18, 1988 inspection.

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- November 9, 1988 - DTSC inspected Quemetco and no violations were observed.
- February 15 &  
February 20, 1990 - DTSC inspected Quemetco and observed the following violations:
1. Waste piles were not managed to avoid dispersal by the wind;
  2. A run off containment system for the waste piles had not been designed, constructed, operated or maintained;
  3. Waste piles were not protected from run on or precipitation;
  4. Wastes bearing free liquids, filter cake, hard rubber, polypropylene chips and separator bottoms, were placed in waste piles;
  5. The facility was not maintained to minimize the possibility of unplanned, sudden or non-sudden releases of hazardous waste;
  6. Closure plan was not available at the facility;
  7. Two drums of hazardous waste were not maintained closed;
  8. Two drums of hazardous waste were inadequately labeled.
- March 28, 1990 - DTSC issued Quemetco a ROV citing the violations observed in the February 15/20, 1990, inspection.
- August 14, 1990 - EPA sent Quemetco a resolution of disputes concerning the Ground Monitoring Plan (GMP) and Financial Assurance.
- September 7, 1990 - Quemetco submitted a modified closure plan for the surface impoundment.
- September 27, 1990- EPA sent Quemetco a letter specifying the deficiencies in the closure plan.
- December 14, 1990 - Quemetco submitted a revised work plan for the chemical testing and the closure plan.

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- January 18, 1991 - EPA approved a pilot test for closure with modifications.
- January 25, 1991 - DTSC approved phase I of the GMP.
- June 13, 1991 - Quemetco submitted the pilot test data, requested documentation of their waste status and asked for an extension of the 90-day storage area.
- June 13 & 14, 1991- DTSC inspected Quemetco and observed continuing and additional violations.
- June 24, 1991 - DTSC sampled in the vicinity of Quemetco to determine off-site lead contamination.
- September 11, 1991- DTSC issued Quemetco an ROV for the violations observed in the June 13/14, 1991, inspection.
- November 25, 1991 - DTSC referred the enforcement actions against Quemetco to the Attorney General's Office, AG 91/92-007.
- December 6, 20, 23 &  
December 23, 1991 - DTSC completed a lead contamination study in the area surrounding Quemetco.
- July 8 & 29, 1992- DTSC informed the occupants of the areas sampled the results from the December 1991, study.
- February 12, 1992 - EPA wrote Quemetco a letter stating that they were in violation of the Phase I groundwater monitoring plan pursuant to the Consent Decree.
- June 30, 1992 - DTSC inspected Quemetco and observed the following violations:
1. Transporting hazardous waste without a manifest.
- June 23, 1993 - DTSC inspected Quemetco and observed the following violations:

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1. Labels on four containers of hazardous waste did not specify the hazardous properties;
2. Inadequate closure plan;
3. Inadequate waste analysis plan.

August 7, 1993 - DTSC issued an ROV to Quemetco for the violations observed in the June 23, 1993, inspection.

August 7, 1993 - Enforcement actions from the June 30, 1992 and the June 23, 1993, inspections were added to the Attorney General's Office enforcement action, AG 91/92-007.

V. General Description of the Facility:

The Quemetco, Inc. facility is located on 10 acres in the City of Industry on the northeast corner of Salt Lake Avenue and Seventh Avenue. Quemetco has been operating at the site since 1960. Quemetco operates 24 hours per day seven days per week and employs 200 people. All employees receive hazardous waste training.

Quemetco is an active secondary lead smelter. Approximately ninety percent of the accepted feedstock for the smelter is spent automobile and truck batteries, while the remaining ten percent is from lead bearing trash. Quemetco manufactures various sized lead ingots designed to meet the specifications of the customer.

The processes used at Quemetco which produce hazardous waste are polypropylene chip cleaning, furnaces, wastewater treatment plant, battery cracking, soil remediation, equipment maintenance, use of personal protective equipment and furnace rebuilding.

VI. Hazardous Waste Activity Description:

Quemetco's hazardous waste activities include a battery staging area, a battery cracking unit, a polypropylene chip washing system, batch house, reverberatory furnace, an electric arc furnace, an on-site wastewater treatment unit and generator hazardous waste storage areas.

The batteries come into the facility by appointment only. The batteries are shipped on trucks under a bill of lading.

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The trucks are allowed to enter the facility only to have their load weighed and to unload the batteries. Once the batteries are weighed at the scale house, they are either unloaded into the battery storage area or directly to the battery cracking unit. The battery storage area is an uncovered bermed asphalt area.

The first step involving treatment of hazardous waste occurs at the battery cracking unit. The battery cracking unit breaks apart the batteries into small pieces. The casing, posts, grids, etc. are separated in a water float sink tank in which the lighter polypropylene rises to the surface and the heavier metals settles to the bottom. The polypropylene chips are washed and stored inside a truck trailer for transport as hazardous waste. The lead is stored in the batch house prior to being smelted in the furnace. Also at the battery cracking unit, rubber batteries are segregated to be sent through the cracker at a later time. The rubber from these batteries must be manifested off-site as hazardous waste.

Quemetco has two furnaces on site, an electric arc furnace and a reverberatory furnace. The electric arc furnace uses slag exclusively as its primary feedstock. The molten slag from the reverberatory furnace flows directly into the electric arc furnace. The reverberatory furnace uses slag and battery components as its primary feedstock. The furnace produces 5000 pound blocks which are fed into the melting kettles. In the melting kettles, antimony and other alloys are added to produce various grades of lead. From the melting kettles, the lead ingots are poured per the customers specifications.

Any impurities commonly called "drosses" produced in the melting kettles are separated and returned to the furnace for further refining. Impurities resulting from the melting operation in the reverberatory furnace are called slags. After slag is run through the furnace two or three times it is called second run slag and manifested off-site.

The wastewater treatment unit collects approximately 200,000 gallons per day of wastewater from the material separator, polypropylene chip cleaner, truck staging area and daily facility wash down. The wastewater is first neutralized by adding either ferric soda, soda ash and/or caustic soda. Once the wastewater has been neutralized, it goes into one of four one-stage clarifiers then through a sand filter. The sludge from the clarifiers goes through one of two filter presses. The filter press cake is then fed into the

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electric arc furnace. After the wastewater goes through the sand filter, it is sampled and certified before discharge into the sewer system. The allowable lead concentration is 0.18 ppm. The sand from the sand filter is removed every two years and manifested off site as hazardous waste.

Also in the waste water treatment are, scrubber effluent is treated prior to being discharged in the sewer system. The scrubber effluent, composed of undischageable SO<sub>2</sub>, is converted to SO<sub>4</sub>, a dischargeable salt.

The facility maintains the following three types of 90-day generator storage areas throughout the facility:

1. Located next to the maintenance shop is a 275 gallon waste oil tank;
2. Located in the maintenance shop is a solvent waste storage area;
3. Located throughout the facility is personal protective equipment stored in labeled garbage can-type containers.

VII. Observations:

On July 13, 1994, at approximately 0745, Nancy Steele, Maria Kelly and Sylvia Vanderspek arrived at Quemetco, Inc. (Quemetco). Vanderspek informed security that we were with the Department of Toxic Substance Control (DTSC) and would like to see Mr. Finn. The security guard signed us in and directed us to Mr. Finn's office.

Vanderspek informed Mr. Finn that we were there to conduct a compliance evaluation inspection, consisting of a facility walk-through, record review, photographs, sample taking if necessary and we needed his consent to conduct the inspection. Mr. Finn stated "sure" giving consent for the inspection. Vanderspek provided Mr. Finn with a list of the records to be reviewed after completing the walk-through. Vanderspek asked Mr. Finn if he would like duplicates of the photographs and he concurred.

Vanderspek asked Mr. Finn to provide a brief detailed description of Quemetco's operations, including the waste streams generated (see sections V and VI).

A. Facility Walk-Through

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At 0920 hours, we began the facility walk-through with Mr. Finn, Mr. Garcia and Mr. Avila. We began by inspecting the waste oil storage tank located next to the maintenance shop (**Photo 1**). The waste oil storage tank was permanently installed on a concrete pad and contained by a four-inch berm. Vanderspek, Steele and Kelly observed oil spilled inside the containment area. Vanderspek asked why waste oil was spilled inside the containment area. Mr. Garcia replied that the tank had been emptied this morning and a spill had occurred during the transfer of waste from the tank to the truck. An employee was waiting for us to leave so he could clean up the spilled waste oil.

Inside the maintenance shop we put on our respirators. A generator storage area was located inside the maintenance shop and contained three drums of solvent waste (**Photo 2**). One of the labeled drums' accumulation date did not specify the year of accumulation (**See Violation 1**). Outside the maintenance shop was a labeled garbage can used to accumulate personal protective equipment. These containers were located through out the facility. We proceed in to the scale house. All manifests and bill of lading records are maintained in the scale house.

Mr. Finn pointed out the location where waste piles were stored prior to the construction of the batch house. Currently, Quemetco stores low-sulfur coke and steel flux for the arc furnace in this location (**Photo 3**). Vanderspek noticed that they were in the process of fixing a portion of the asphalt surface and Mr. Finn stated that it was a constant process fixing the cracks in the surface. As we were walking towards the battery storage area, an employee was washing down the unbermed asphalt surface area. Mr. Finn indicated that this occurred on a daily basis.

The battery storage area was asphalted and bermed (**Photo 4**). Signs reading "Hazardous Waste Storage Area, Unauthorized Persons Keep Out" were posted in both English and Spanish. A few of the batteries appeared to be corroded and Steele was unable to take a good look at the batteries due to lack of aisle space. Vanderspek, Steele and Kelly proceeded to inspect the battery storage area for asphalt cracks, spills and damaged containers. Vanderspek and Kelly observed spilled acid and oily material in the battery storage area (**Photo 5**) (**See Violation Count 2**). We observed in the battery storage area 24 drums of lead dross acid and 16 drums of lead oxide dust which were not labeled (**Photo 6**). Mr. Finn stated that he would provide us with paperwork regarding the origin of these drums. Vanderspek, Steele and

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Kelly observed two pallets with cracked batteries (**Photos 7 and 8**) {**See Violation Count 3**}.

Mr. Finn pointed out the location of the surface impoundment slated for closure (**Photo 9**). Water from the asphalt surface washdown had accumulated in the surface impoundment. Vanderspek asked Mr. Finn if this was a normal practice to place water in the surface impoundment and he stated that washdown water could be placed in there and pumped out per the consent agreement. Mr. Finn immediately instructed the wastewater treatment operator to pump the water out of the surface impoundment.

At the wastewater treatment unit we temporarily removed our respirators. The wastewater treatment unit processes effluent from the asphalt surface cleaning, polypropylene chip cleaning, trailer drippings, scrubber effluent and material separation. The area was bermed and all the piping is located above ground. Mr. Finn showed us the four single stage clarifiers. The floc attached to the iron bars contained from 15 percent to 60 percent lead. The waste water treatment unit processes and discharges into the POTW approximately 200,000 gallons effluent per day. Also processed in the wastewater treatment unit is the scrubber water. The scrubber water contains a high concentration of SO<sub>2</sub> which cannot be discharged into the POTW. By adding soda, the scrubber effluent is converted to SO<sub>3</sub>. The SO<sub>3</sub> is then oxidized in large tanks to convert it to SO<sub>4</sub>, a dischargeable salt. We put on our respirators again and proceeded to the battery wrecker.

The battery wrecker was not in operation at the moment. However, we were able to observe the wet polypropylene chips going via the conveyor belt being blown into an open truck trailer. Vanderspek, Steele and Kelly observed an additional open truck trailer containing polypropylene chips which was not being filled (**Photo 10**) {**See Count Violation 4**}. The area where the truck trailers were located was bermed and contained effluent from the polypropylene chips filled truck trailers dripping contaminated water. A pump was located in the sloped berm to pump the effluent to the wastewater treatment unit.

We then proceeded to the Busch air scrubber units and the product storage area. The solid waste from the air scrubber units is fed into the reverberatory furnace, while the liquid waste goes to the wastewater treatment unit. The product storage area contained approximately seven million pounds of finished product in various sized ingots.

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As we walked to the refinery, four bags of personnel protection equipment were sitting near the bailer. Mr. Finn stated they usually go directly into the bailer before being manifested off-site, however, the bailer was broken. The refinery was operating as we walked into the room. Five-thousand pound ingots are placed into the melting kettles where they reach a temperature of 1400 degrees fahrenheit. A machine constantly skims dross from the top of these kettles to capture a majority of the impurities. The lead is then poured into the molds and dross is again skimmed off the top manually (**Photo 11**). It takes approximately four minutes from the ingot to turn from a liquid to a solid.

As we walked into the batch house, Mr. Finn explained that the floor is constantly kept moist to minimize air borne lead. The batch house floor has a two inch epoxy coating over a layer of concrete, sand, gravel and a liner to ensure that the lead does not migrate through the floor. There was approximately six and one-half million pounds of slag in the batch house (**Photo 12**). Mr. Finn stated that the slag contained sixty percent lead. In addition, the batch house contained off specification lead product to be refined. Also in the batch house, employees hand dismantled large submarine batteries which are too large to be processed through the battery cracker.

After cleaning our boots before walking out of the batch house, we went to the reverberatory furnace and the electric arc furnace. The reverberatory furnace was operating and Mr. Finn showed us the molten lead inside the furnace (**Photo 13**). We observed the operations of the electric arc furnace from the control room. While we were walking back to the maintenance shop, we walked by the waste oil tank and observed the spill noted earlier had been cleaned. At the maintenance room we removed our personnel protective equipment.

The walk-through was completed at 1150 hours and we broke for lunch. No samples were taken during the walk-through.

B. Record Review

At approximately 1300 hours, we returned to the facility.

At this point, we began our record review and the following records were requested:

1. Part A Application:

The Part A Application was on file and available for review.

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2. Waste Analysis Plan:  
The waste analysis plan was on file and available for review.
3. Contingency Plan:  
The contingency plan was on file. While reviewing the contingency plan, Vanderspek determined that the emergency evacuation route descriptions of actions to be taken by facility personnel were too general to be useful. **{See Violation Count 5}**
4. Financial Requirements:  
DTSC's Financial Responsibility Unit (FRU) reviewed the liability and closure cost financial assurance. The FRU determined that Quemetco did not have adequate financial assurance for closure/post closure costs. **{See Violation Count 6}**
5. Inspection Logs:  
The inspection logs were on file. While reviewing the inspection logs, Vanderspek observed that the time of inspection and date of nature of repair were not recorded on various inspection logs. **{See Violation Count 7}**
6. Personnel Training Records:  
The personnel training records were on file. While reviewing the personnel training records, Kelly observed that the description of the type of training required for each job classification was not available. **{See Violation Count 8}**
7. Manifests:  
The manifests and land disposal restriction (LDR) notices were on file. While reviewing the LDR notices, Steele observed that they did not include the manifest number on the notice. **{See Violation Count 9}**
8. Annual and Biennial Reports:  
The annual and biennial reports were on file and available for review.
9. Waste Minimization Plan:  
The waste minimization plan was on file and available for review.

VIII. Discussion with Management:

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After the record review, the findings of the inspection and the potential violations were reviewed with Mr. Finn. Vanderspek, Steele and Kelly completed the inspection and left the facility at 1530 hours.

IX. Violations:

**COUNT 1:** Quemetco violated Title 22, California Code of Regulations (CCR), section 66262.34 (f) (2) in that on or about July 13, 1994, Quemetco failed to clearly mark the accumulation date on a labeled drum of solvent waste.

**Evidence:** On July 13, 1994, during the walk-through, Kelly observed a labeled 55-gallon drum of solvent waste, D008, which did not include the year in the accumulation date. The accumulation date on the label was listed as "7/12". The drum was located in the maintenance shop next to two other labeled drums.

**COUNT 2:** Quemetco violated Title 22, CCR, section 66265.31 in that on or about July 13, 1994, Quemetco did not maintain and operate the facility to minimize the possibility of an unplanned sudden or non-sudden releases of hazardous waste constituents to the air, soil or surface water which could threaten human health or the environment.

**Evidence:** On July 13, 1994, during the walk-through, Vanderspek and Kelly observed a wet oily-appearing material spill in the battery storage area which appeared to have leaked from the batteries. The spill appears to have been there for quite some time (**See Photo 5**).

**COUNT 3:** Quemetco violated Title 22, CCR, section 66266.81(b)(1) in that on or about July 13, 1994, Quemetco did not store cracked and damaged batteries in a closed container capable of preventing the release of acid and lead.

**Evidence:** On July 13, 1994, during the walk-through, Vanderspek, Steele and Kelly observed two pallets with four cracked batteries in the battery storage area which were not contained (**See Photos 7 and 8**).

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**COUNT 4:** Quemetco violated Title 22, CCR, section 66265.173(a) in that on or about July 13, 1994, Quemetco did not maintain a truck trailer of hazardous waste closed during storage.

Evidence: On July 13, 1994, during the walk-through, Vanderspek, Steele and Kelly observed two open truck trailers storing polypropylene chips. At the time of the inspection, waste was being added to one tractor trailer and waste was not being added to or removed from the other tractor trailer. Vanderspek asked Mr. Finn stated if they normally have two tractor trailers open and he stated that they did not **(See Photo 10)**.

**COUNT 5:** Quemetco violated Title 22, CCR, section 66265.52(f) in that on or about July 13, 1994, Quemetco did not adequately describe the evacuation routes and signals to be used in case of an emergency.

Evidence: On July 13, 1994, during the record review, Vanderspek reviewed the contingency plan and determined that the evacuation route description of actions to be taken by facility personnel were too general. The contingency plan also did not mention type of signals to be used to begin evacuation **(See Attachment 1)**.

**COUNT 6:** Quemetco violated Title 22, CCR, section 66265.143(a)(1) in that on or about July 13, 1994, Quemetco was deficient in their closure assurance.

Evidence: On July 20, 1994, the FRU determined that the closure cost assurance was deficient by \$1,143,567 **(See Attachment 2)**.

**COUNT 7:** Quemetco violated Title 22, CCR, section 66265.15(d) in that on or about July 13, 1994, Quemetco did not specify the time of inspections or date of repair in the inspection logs.

Evidence: On July 13, 1994, during the record review, Vanderspek reviewed the inspection records and observed three inspection records which did not have the time of inspection and three inspection logs which did not specify the date and nature of repair **(See Attachment 3)**.

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**COUNT 8:** Quemetco violated Title 22, CCR, section 66265.16(d)(3) in that on or about July 13, 1994, Quemetco did not specify the type of training required for each job classification.

Evidence: On July 13, 1994, during the record review, Kelly reviewed the training records and was unable to locate or be provided the amount of training required for each job classification. Kelly questioned Mr. Finn regarding this issue and he was unable to locate this information (**See Attachment 4**).

**COUNT 9:** Quemetco violated Title 22, CCR, section 66268.7(1) in that on or about July 13, 1994, Quemetco did not include the manifest numbers on land disposal restriction notices.

Evidence: On July 13, 1994, during the record review, Steele reviewed the manifests and land disposal restriction notices and at least five land disposal restriction notices did not have the manifest number written on them (**See Attachment 5**).

X. Attachments:

1. Evacuation plan, 1 page
2. Financial responsibility review findings, 1 page
3. Inspection logs, 9 pages
4. Personnel training records, 3 pages
5. Land disposal restriction notifications, 5 pages
6. Photos, 7 pages
7. Field Report of Violations, 1 page
8. Interim Status/Generator Inspection Checklist, 21 pages

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XI. Signatures:



Sylvia Vanderspek  
Hazardous Substance Scientist  
Facility Management Branch B

7-29-94  
Date Submitted



James McCammon, Unit Chief  
Surveillance and Enforcement

29 July 1994  
Approval Date

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ATTACHMENTS

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ATTACHMENT 1

## EMERGENCY NOTIFICATION AND ALARM SYSTEM

In the event of an emergency, the in-plant telephone/intercom system will serve as the primary communication medium.

1. The first person discovering an emergency situation must immediately call the main switchboard to report the emergency. Personnel at the switchboard will in turn notify the Emergency Coordinator. (At times when the main switchboard is unmanned, calls will be directed to the guard house. In turn, the guard on duty will notify the Emergency Coordinator.)
2. If the designated Emergency Coordinator cannot be reached, the switchboard operator (or guard) will proceed down the "Emergency Notification List" until a designated alternate Emergency Coordinator is contacted.

If the Emergency Coordinator determines that evacuation is necessary, the order will be communicated to appropriate personnel by use of the in-plant telephone/intercom system. Upon notification, personnel will commence the procedures specified under EVACUATION.

In the event of failure of the telephone/intercom system, information will be passed by word of mouth in the plant. Notification of outside agencies may be accomplished through use of Citizens Band radios installed in the over-the-road tractors or personal vehicles.

### EVACUATION

In the event a total evacuation is ordered, personnel will proceed to the nearest available exit. All exits are designated on the enclosed PLOT PLAN. Individual departments will designate a primary and alternate exit; the locations of these exits will be made known to all employees. (See EDUCATION AND TRAINING.)

After departing the building, all personnel will assemble in the main parking lot. Other evacuation areas may be designated by the emergency coordinator if necessary.

Each supervisor will immediately account for all personnel under his direct supervision. Upon completion of the headcount, the supervisor will communicate the results to the Emergency Coordinator or his alternate.

No person will be permitted to depart the premises without approval of the Emergency Coordinator or his alternate.

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ATTACHMENT 2

## FINANCIAL RESPONSIBILITY REVIEW FINDINGS

TO: SYLVIA VANDERSPEK SEB FPB FMB SMB OTHER \_\_\_\_\_  
 \_\_\_\_\_ SEB FPB FMB SMB OTHER \_\_\_\_\_

FROM: CECILIA ROSANA PHONE: 8-667-2939  
 FINANCIAL RESPONSIBILITY COORDINATOR REGION 1 2 3 4

For the purpose of the financial responsibility review, the results of the evaluation are good for sixty (60) days from the date of this review and are as follows:

## INFORMATION ON FACILITY TO BE REVIEWED:

Name: QUEMETCO, INC. EPA ID No.: CA0066233966

## FINANCIAL ASSURANCE FOR CLOSURE/POST-CLOSURE:

Type of Document: LETTER FROM CFO / CERTIFICATE OF INSURANCE Results: PASS FAIL

Document Amount Closure: \$ 6,250,000 Document Amount Post-closure: \_\_\_\_\_

Closure Cost Estimate: \$ 7,393,567 as of 4/94 Post-closure Cost Estimate: \_\_\_\_\_

Deficiency Closure: \$ 1,143,567 Deficiency Post-closure: \_\_\_\_\_

VIOLATION: See comments

## LIABILITY COVERAGE

Type of Document: LIABILITY CERTIFICATE OF INSURANCE Results: PASS FAIL

Document Amount Sudden: \$1M & \$2M Document Amount Non-Sudden: \_\_\_\_\_

Deficiency Sudden: 0 Deficiency Non-Sudden: \_\_\_\_\_

VIOLATION: \_\_\_\_\_

## COMMENTS

Quemetco submitted a letter from the CFO for closure -  
 \$ 3.4M and Certificate of Insurance for closure - \$ 2.85M.  
 The closure cost submitted in April 1994 is in the  
 amount of \$ 7,393,567 making the closure assurance  
 deficient in the amount of \$ 1,143,567, per section  
 66265.148 of Title 22, CCR.

Cecilia Rosana  
 FR COORDINATOR

7/20/94  
 DATE

[Signature]  
 SENIOR

21 July 1994  
 DATE

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ATTACHMENT 3

SUPERVISOR'S INSPECTION REPORT

CONFIDENTIAL

DEPARTMENT AND NUMBER: VERB

SUPERVISOR: MELVIN DATMAN

*MELVIN DATMAN*

INSTRUCTIONS: Use this checklist as a guide in identifying unsafe acts and conditions existing in your work area. Place a check in the appropriate column next to each item. Then complete the other side of this form.

RECEIVED

APR 25 1991

A. HOUSEKEEPING	YES	NO	N/A	E. ELECTRICAL EQUIPMENT	YES	NO	N/A
1. Work Area Free of Unnecessary Items		✓		1. Electrical Wiring in Good Condition	✓		
2. Trash Containers Emptied Regularly	✓			2. Panels and Switches Enclosed and Accessible	✓		
3. Equipment Stored Neatly in Designated Locations	✓			3. Switches Marked According to Function	✓		
4. Materials Piled/Stacked in Orderly Manner	✓			4. Equipment Grounded	✓		
				5. Minimal Use of Extension Cords, with Necessary Precautions	✓		
B. WALKING/WORKING SURFACES				F. WELDING AND CUTTING			
1. Floors Free of Holes or Uncovered Openings	✓			1. Equipment in Good Repair			✓
2. Slipping or Tripping Hazards Eliminated		✓		2. Oxygen and Fuel Cylinders Stored Separately			✓
3. Stairways and Ladders in Good Condition	✓			3. Cylinders Secured in Upright Position			✓
4. Elevated Platforms in Good Repair, Properly Enclosed, Unobstructed	✓			4. Valves Closed When Cylinder Not in Use			✓
				5. Screens Used to Shield Welding Operations			✓
C. EQUIPMENT AND MACHINERY				G. WORK PRACTICES			
1. Powered Equipment Guarded as Necessary	✓			1. Employees Working Safely	✓		
2. Guards Properly Adjusted	✓			2. Required Protective Equipment Used Properly		✓	
3. Cranes, Hoists, Lift Trucks in Good Condition	✓			3. Company Safety and Health Rules Followed	✓		
4. Lockout Procedures Followed	✓						
5. Hand Tools in Good Condition	✓			H. MISCELLANEOUS			
				1. Environmental Control, Hygiene, and Emergency Equipment in Good Condition; Accessible	✓		
D. FIRE PROTECTION				2. Locker Rooms, Washrooms, Lunch Rooms Maintained in Clean Condition	✓		
1. Required Extinguishers Operable and Accessible	✓						
2. Exits Marked and Accessible	✓						
3. Flammable Materials Properly Stored	✓						

INSTRUCTIONS: Record each unsafe or condition which you observed during the inspection under "Problems Noted." Under "Causes," list the reasons why the act or condition existed. Under "Corrections Made or Suggested," record all actions taken to correct the problem.

PROBLEMS NOTED	CAUSES	CORRECTIONS MADE OR SUGGESTED
A-1 TOO MANY DROSS CHUNKS LEFT IN THE BATCH HOUSE 4-18-94	LAZY EMPLOYEE SHOULD PUT CHUNKS ON PALLETS	I INSTRUCTED MY CREW TO REMOVE ALL CHUNKS FROM BATCH HOUSE
A-1 A STACK OF DROSS BOX COVER LEFT SOUTH EXIT OF THE BATCH HOUSE 4-21-94	THE REFINERY CREW ARE NOT RECOVERING DROSS BOX WHEN EMPTY	I TALK TO AUTHOR AND RALPH ABOUT THIS PROBLEM
B-2 RE-BAR STICKING OUT OF BATCH HOUSE SUMP PUMP RETAINMENT WALL WEST 4-18-94	CONCRETE WALL HAS BEEN SCRAP THIN ON ONE SIDE	THE MAINT. MAN CUT IT OFF 4-18-94
B-2 SLIPPING HAZARD; BATCH SUMP UP AREA MUD ON THE FLOOR 4-19-94	AREA WAS NOT KEPT CLEAN	THIS AREA HAS BEEN CLEAN UP
G-2 ONE OF THE ODD MATERIAL CREW WAS USING THE BALER WITH THE FRONT GATE OPEN 4-22-94	HE WAS NOT THINKING SAFETY FIRST	I STOP HIM AND TALK WITH HIM ABOUT WHAT COULD HAPPEN WITH OUT THE GUARD
FORMAL INSPECTION		
I, SANITARY BAG HOUSE, AUGER #6 GEAR BOX IS LEAKING OIL 4-19-94	GEAR BOX NEED NEW SEALS	MAINT. DEPT. IS AWARE OF THIS PROBLEM FOLLOW UP 4-19-94
D-1 INSPECTED ALL FIRE EXTINGUISHERS IN THE VERB AND REFINERY AREA	ALL GOOD	OK
D-1 FIRE EXTINGUISHER OUT SIDE OF EAST WALK OF THE MAINTENANCE BUILDING PIN IS FULL 4-23-94	I FOUND IT THAT WAY	I TALK TO THE SANITATION DEPT. ABOUT CHANGING IT I DID NOT HAVE A KEY TO THE CAGE 4-23-94

 4-23-94  
 SUPERVISOR DATE

PERVISOR'S INSPECTION REPORT

CONFIDENTIAL

DEPARTMENT  
AND NUMBER:

*Furnace Dept.*

SUPERVISOR:

*Rick Rodriguez*

INSTRUCTIONS: Use this checklist as a guide in identifying unsafe acts and conditions existing in your work area. Place a check in the appropriate column next to each item. Then complete the other side of this form.

RECEIVED

MAY 09 1994

A. HOUSEKEEPING	YES	NO	N/A
1. Work Area Free of Unnecessary Items		✓	
2. Trash Containers Emptied Regularly	✓		
3. Equipment Stored Neatly in Designated Locations	✓		
4. Materials Piled/Stacked in Orderly Manner		✓	
<b>B. WALKING/WORKING SURFACES</b>			
1. Floors Free of Holes or Uncovered Openings	✓		
2. Slipping or Tripping Hazards Eliminated		✓	
3. Stairways and Ladders in Good Condition	✓		
4. Elevated Platforms in Good Repair, Properly Enclosed, Unobstructed		✓	
<b>C. EQUIPMENT AND MACHINERY</b>			
1. Powered Equipment Guarded as Necessary	✓		
2. Guards Properly Adjusted		✓	
3. Cranes, Hoists, Lift Trucks in Good Condition	✓		
4. Lockout Procedures Followed	✓		
5. Hand Tools in Good Condition	✓		
<b>D. FIRE PROTECTION</b>			
1. Required Extinguishers Operable and Accessible	✓		
2. Exits Marked and Accessible	✓		
3. Flammable Materials Properly Stored	✓		

E. ELECTRICAL EQUIPMENT	YES	NO	N/A
1. Electrical Wiring in Good Condition	✓		
2. Panels and Switches Enclosed and Accessible	✓		
3. Switches Marked According to Function	✓		
4. Equipment Grounded	✓		
5. Minimal Use of Extension Cords, with Necessary Precautions	✓		
<b>F. WELDING AND CUTTING</b>			
1. Equipment in Good Repair	✓		
2. Oxygen and Fuel Cylinders Stored Separately	✓		
3. Cylinders Secured in Upright Position	✓		
4. Valves Closed When Cylinder Not in Use	✓		
5. Screens Used to Shield Welding Operations	✓		
<b>G. WORK PRACTICES</b>			
1. Employees Working Safely		✓	
2. Required Protective Equipment Used Properly	✓		
3. Company Safety and Health Rules Followed			✓
<b>H. MISCELLANEOUS</b>			
1. Environmental Control, Hygiene, and Emergency Equipment in Good Condition; Accessible			✓
2. Locker Rooms, Washrooms, Lunch Rooms Maintained in Clean Condition	✓		

**INSTRUCTIONS:** Record each unsafe act or condition which you observed during the inspection under "Problems Noted." Under "Causes," list the reasons why the act or condition existed. Under "Corrections Made or Suggested," record all actions taken to correct the problem.

PROBLEMS NOTED	CAUSES	CORRECTIONS MADE OR SUGGESTED
A-1 A-4 B-3 Boxes filled with fine dust from the Tank augers were left uncovered in the Baghouse Area 5-2	Poor decision by Baghouse employee to finish cleaning lines before moving boxes	Instructed B.H. employee to immediately move boxes to Batch House Counseled employee on importance of this matter 5-2
Reverb smoking too much 5-2	Lines need to be cleaned	Shut down to clean Feed Chute & Crossover 5-2
Bracket assembly for slag caster tail sprockets broke welds resulting in slag-caster to stop & Slag Spill 5-3	Wear & Tear	Shut Furnaces down early for scheduled downtime cleaned up spilled slag 5-3
A-1 Appears that liquid leaked out of NE Batch House door recently leaving large stain by door 5-3	Poor Management of piles in Batch House	Mopped up mess 5-3
B-1 Outside Contractors working in Batch House bringing their manlift in an area too close to where my employees were working 5-4	outside Contractors not paying attention to anything other than their task	After asking contractor to move manlift and he didn't I told him to move manlift & take a break until we were done 5-4
H-1 Reverb Scrubber Blower vibrating. Got worse as shift progressed. 5-5	Broken collar on out-board bearing and wearing down of shaft	Shut down Reverb @ 3:30 am and started work on replacing and relocating out-board bearing 5-5
A-1 A-4 Large amounts of Pebblelime and Borax spilled in Brick Warehouse. 5-5	<u>VERY POOR</u> HOUSEKEEPING!!	Assigned Relief Operator to clean up mess. 5-5
<u>Formal Inspection of Reverb &amp; E.F. Areas on 5-5-94</u>		
H-1 Hole in Heat Sink resulting in Pb being spilled on the floor	Heat sink needs to be repaired or replaced Wear & Tear	Since Reverb went down due to Scrubber Blower problem, took the opportunity to repair Heat Sink 5-5
B-2 Wet fire clay on floor in Electric Furnace Building - Slipping Hazard	When area was washed down on previous shift, it was a <u>poor</u> job	Re-washed down the entire E.F. building floor 5-5
B-4 old pipes and hog rings on catwalk over casting machine	Employees storing them there so they can be fed to EF through north door	Had all materials moved & counseled crew that nothing can be stored on any catwalk
B-2 Too much dust on the ground on Pb side, slag side & north of Kiln	No one is washing these areas down on other shifts	Washed down areas with pressure washer 5-5 and every day
All Fire Extinguishers in Furnace Dept. are in working order.		

Rich Rod 5-5-94  
SUPERVISOR DATE

**CONFIDENTIAL**

PLANT YARD CHECKLIST

I. BATTERY STORAGE AREA

1. Unsealed cracks found in area: YES \_\_\_ NO X

If yes note location: \_\_\_\_\_

2. Accumulation of fluid in area: YES \_\_\_ NO X

3. Are all batteries in battery storage area? YES X NO \_\_\_

II. BATTERY WRECKER PAD

1. Unsealed cracks found in area: YES X NO \_\_\_

If yes note location: NORTH & SOUTH SIDES INCLINE BELT

Needs new flooring around incline belt area. @

III. E.F. SLAG STORAGE & LOADING AREA

1. Unsealed cracks found in area: YES \_\_\_ NO X

If yes note location: \_\_\_\_\_

IV. FURNACE MATERIAL STORAGE AREA

1. Unsealed cracks found in area: YES \_\_\_ NO X

If yes note location: \_\_\_\_\_

2. Is there any material spilled outside the storage area? YES \_\_\_ NO X

If yes note location: \_\_\_\_\_

3. Is there any fluid leaking outside the storage area? YES \_\_\_ NO X

If yes note location: \_\_\_\_\_

*u*

V CRACK SEALING MATERIAL

1. Name of material used to seal cracks:

\_\_\_\_\_

2. Total amount of material used:

\_\_\_\_\_

3. Final daily inventory of material:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VI PLANT WASTE WATER PLUMBING

1. Fluid spillage at scrubber area:

YES \_\_\_\_\_

NO

If yes describe: \_\_\_\_\_

\_\_\_\_\_

2. Scrubber waste water line leaking:

YES \_\_\_\_\_

NO

If yes note location: \_\_\_\_\_

\_\_\_\_\_

3. Fluid spillage at oxide sump:

YES \_\_\_\_\_

NO

If yes describe: \_\_\_\_\_

\_\_\_\_\_

4. Oxide waste water line leaking:

YES \_\_\_\_\_

NO

If yes note location: \_\_\_\_\_

\_\_\_\_\_

5. Fluid spillage at B.W. waste water tanks:

YES \_\_\_\_\_

NO

If yes describe: \_\_\_\_\_

\_\_\_\_\_

6. Battery wrecker area waste water line leaking:

YES \_\_\_\_\_

NO

If yes note location: \_\_\_\_\_

\_\_\_\_\_

VII. TRUCK PARKING

1. Is there any leakage from trailers: YES \_\_\_\_\_ NO X

If yes note location: \_\_\_\_\_

VIII. NAME OF PERSON NOTIFIED OF PROBLEMS: JOE GARCIA

R. GAN  
SIGNATURE

10-29-81  
DATE

SANITATION LEAD MAN  
TITLE

IX. ACTIONS TAKEN TO CORRECT PROBLEMS

- I. \_\_\_\_\_ None Required \_\_\_\_\_
- II. \_\_\_\_\_ None Required \_\_\_\_\_
- III. \_\_\_\_\_ None Required \_\_\_\_\_
- IV. \_\_\_\_\_ None Required \_\_\_\_\_
- V. \_\_\_\_\_ None Required \_\_\_\_\_
- VI. \_\_\_\_\_ None Required \_\_\_\_\_
- VII. \_\_\_\_\_ None Required \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
TITLE

NOTE: This record must be filed and maintained for three years.

**INSPECTION & MAINTENANCE CHECK LIST** **CONFIDENTIAL**  
**FOR SELF-CONTAINED BREATHING APPARATUS SERIAL NO. 93184**  
**LOCATION** ~~SANITARY BUILDING~~ **IDENTIFICATION** \_\_\_\_\_

SCRUBBER CONTROL ROOM

**WEEKLY INSPECTION**

DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED
8/11/92	23 PSI	NO	11/19/92	22 PSI		2/19/93	21 PSI	NO	5-21-93	20 PSI	NO
8/25/92	22 PSI	NO	11/24/92	22 PSI		2/24/93	21 PSI	NO	5-28-93	20 PSI	NO
9-4-92	22 PSI	NO	12/3/92	22 PSI		3/5/93	21 PSI	NO	6-4-93	20 PSI	NO
9-11-92	22 PSI	NO	12/9/92	22 PSI		3/12/93	21 PSI	NO	6-11-93	20 PSI	NO
9-18-92	22 PSI	NO	12/16/92	22 PSI		3/19/93	21 PSI	NO	6-18-93	20 PSI	NO
9-25-92	22 PSI	NO	12/23/92	22 PSI		3/26/93	21 PSI	NO	6-24-93	21 PSI	YES
10-1-92	21 PSI	NO	12/30/92	22 PSI		3/31/93	21 PSI	NO	7-7-93	21 PSI	NO
10-9-92	21 PSI	NO	1/8/93	22 PSI		4-7-93	21 PSI	NO	9-2-93	20 PSI	NO
10-17-92	21 PSI	NO	1/15/93	22 PSI		4-14-93	21 PSI	NO	9-8-93	20 PSI	NO
10-24-92	21 PSI	NO	1/22/93	22 PSI		4-21-93	21 PSI	NO	9-15-93	20 PSI	NO
10-31-92	21 PSI	NO	1/29/93	22 PSI		4-29-93	21 PSI	NO	9-23-93	20 PSI	NO
11-5-92	21 PSI	NO	2/5/93	21 PSI		5-7-93	21 PSI	NO	9-29-93	20 PSI	NO
11/10/92	21 PSI	NO	2/12/93	21 PSI		5-15-93	20 PSI	NO	10-15-93	20 PSI	NO

**MONTHLY INSPECTION**

DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	REGULATOR OK	FACEPIECE & BREATHING TUBE OK	CLEANED AND SANITIZED	ENTIRE APPARATUS OK	REMARKS	INSPECTED BY
8/11/92	23 PSI	NO	YES	YES	YES	YES	SPARE CYLINDERS LOCATED IN SCRUBBER ROOM	JUB
8/25/92	22 PSI	NO	YES	YES	YES	YES	SPARE CYLINDERS (2) SCRUBBER ROOM	JUB
9-4-92	22 PSI	NO	YES	YES	YES	YES	SPARE CYLINDERS IN SCRUBBER ROOM	RONES
10-1-92	22 PSI	NO	YES	YES	YES	YES	SPARE CYLINDERS IN SCRUBBER ROOM	RONES
11-5-92	21 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
12/2/92	22 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
1/8/93	22 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
2/5/93	21 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
3/5/93	21 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
4/11/93	21 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
5-93	21 PSI	NO	YES	YES	YES	YES	SPARES IN SCRUBBER OFFICE ROOM	RONES
6-4-93	20 PSI	NO	YES	YES	YES	YES	CONDITION OK	RONES
7-7-93	21 PSI	YES	YES	YES	YES	YES	CONDITION OK	RONES
9-2-93	20 PSI	NO	YES	YES	YES	YES	OK	JUB

All inspections should be made in accordance with ANST Standard Z88.2 & Z88.5  
 For recommended inspection procedures, see MSA Part No. 462949

FOR SELF-CONTAINED BREATHING APPARATUS SERIAL NO. 93184  
 LOCATION SCRUBBER CONTROL ROOM IDENTIFICATION \_\_\_\_\_

WEEKLY INSPECTION											
DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED
10-7-93	20	No	12-28-93	20	No	3-24-94	20	No			
10-14-93	20	No	1-3-94	20	No						
10-21-93	20	No	1-10-94	20	No						
10-28-93	20	No	1-17-94	20	No						
11-4-93	17	No	1-24-94	20	No						
11-10-93	12	Yes	2-3-94	20	No						
11-17-93	23	No	2-10-94	20	No						
11-24-93	23	No	2-17-94	20	No						
11-31-93	23	No	2-24-94	20	No						
12-2-93	23	No	2-30-94	20	No						
12-9-93	23	No	3-6-94	20	No						
12-14-93	23	No	3-12-94	20	No						
12-21-93	23	No	3-17-94	20	No						

MONTHLY INSPECTION								
DATE INSPECTED	CYLINDER PRESSURE	CYLINDER CHANGED	REGULATOR OK	FACEPIECE & BREATHING TUBE OK	CLEANED AND SANITIZED	ENTIRE APPARATUS OK	REMARKS	INSPECTED BY
10-7-93	20 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
11-4-93	17 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
12-2-93	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
<del>1-3-94</del> 12-9-93	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
2-3-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
3-3-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
4-6-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
5-5-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
6-2-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones
7-7-94	23 PSI	No	Yes	Yes	Yes	Yes	OK CONDITION	Rones

All inspections should be made in accordance with ANSI Standard Z88.2 & Z88.5  
 -For recommended inspection procedures, see MSA Part No. 487445



Quemetco, Inc.  
Inspection Report

ATTACHMENT 4

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EMPLOYEE JOB DESCRIPTIONS

Job Title: OPERATOR  
Department: BATTERY WRECKER  
Area of Plant: BATTERY WRECKER

Respiratory Protection Required: Yes  No   
Potential for Lead Exposure Over PEL: Yes  No   
Potential for Inorganic Arsenic Exposure Over PEL: Yes  No   
Physical Demands of Job Are: Light Duty:   
Normal Duty:

Work Activities and Summary of Job Duties:

The Battery Wrecker Operator's objective is to maintain a continuous flow of raw material feed to the battery wrecker equipment. Other objectives include assisting Helper in the unloading of raw material and feeding the battery wrecker equipment.

1. Locate trailer at Battery Wrecker Dock.
2. General housekeeping duties.
3. Clean out and wash out trailers.
4. Assist in unloading operations.
5. Relieves Leadman as necessary.
6. Monitors plastic discharge volume and changes plastic container.
7. Other tasks as assigned by the Shift Supervisor.

CONFIDENTIAL

EMPLOYEE JOB DESCRIPTIONS

Job Title: MAINTENANCE SUPERVISOR  
Department: MAINTENANCE  
Area of Plant: ALL AREAS OF PLANT.

Respiratory Protection Required: Yes  No   
Potential for Lead Exposure Over PEL: Yes  No   
Potential for Inorganic Arsenic Exposure Over PEL: Yes  No   
Physical Demands of Job Are: Light Duty:   
Normal Duty:

Work Activities and Summary of Job Duties:

1. Receives repair orders for equipment at the plant.
2. Determines efficient methods of repair.
3. Ensures that equipment and material necessary to perform repairs is available.
4. Directs maintenance crew in the repair of the equipment.

employees to safe distances is required if the hazard warrants. All appropriate safety equipment necessary for the type of hazard shall be available and used accordingly.

(a) (7) Training and Instruction

(7) (A) The Quemetco, Inc. facility must comply with the training requirements of 29CFR1910.120, the Federal OSHA standard on Hazardous Waste Operations and Emergency Response, and parallel Cal/OSHA standards for Treatment, Storage and Disposal Facilities. This requires the training of each employee working with hazardous waste or required to respond to emergencies with a minimum of 24 hours of training prior to beginning work and 8 hours annually thereafter. It is the policy of Quemetco, Inc. to provide 24 hours of training prior to beginning work and annually thereafter. Certain employees whose exposure to the work place encompasses only the office environment will be given 8 hours of training prior to beginning work and annually thereafter. Training employees has been in practice since prior to 1978.

(B) (1) All new employees who will work in areas other than the main office will be trained using video format and hands on training according to the outline in Appendix C1 with an annual frequency thereafter according to their month of hire.

(2) All new "office only" personnel will be trained using video format and hands on training according to the outline in Appendix C2 with an annual frequency according to their month of hire.



(C) All employees permanently or temporarily transferred to a job for which the employee has not been trained will receive specific instruction from the newly assigned supervisor on hazards of the new work, hazards in the area of the new work and the safe practices to be used to protect the employee from injury or illness.

(D) All new chemicals, equipment, processes or procedures introduced into the work environment will be reviewed for hazards. Training will be developed for the recognized hazards and implemented before the chemical, equipment or process is used. MSDS's will be reviewed with all involved employees prior to their use of the chemicals. Details of the work procedures for the new equipment or process will be reviewed with each employee involved in their use and any hazards produced by the equipment or process will be reviewed with all employees working with it or around the area of potential exposure. The minimum

Quemetco, Inc.  
Inspection Report

ATTACHMENT 5

1 rash

GENERATOR: Quemetco, Inc. EPA I.D. NUMBER: CAD 06-623-3966  
 WASTE STREAM NUMBER: 07-008-3209 MANIFEST NUMBER: (With Shipment) \_\_\_\_\_  
 WASTE IS:  NON-WASTEWATER \_\_\_\_\_ WASTEWATER (Check One)

EPA HAZARDOUS WASTE CODE(S) \_\_\_\_\_ SUBCATEGORY (IF NOT APPLICABLE, ENTER "N/A") \_\_\_\_\_

D008

(IF ADDITIONAL SPACE IS REQUIRED PLEASE ATTACH ADDITIONAL SHEETS.)

A.  RESTRICTED WASTE MEETS TREATMENT STANDARDS (40 CFR 268.7(a)(2))

The restricted waste identified above meets the treatment standards in 40 CFR 268.41 and/or 268.43 prohibition levels in RCRA Section 3004(d) and can be land disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B.  RESTRICTED WASTE TREATED TO TREATMENT STANDARDS (40 CFR 268.7(b)(5) (i))

The treatment residue, or extract of such residue, of the restricted waste identified above has been tested to assure that the treatment residues or extract meet the applicable treatment standards or prohibitions in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

C.  RESTRICTED WASTE WITH TECHNOLOGY BASED TREATMENT STANDARDS (40 CFR 268.7

(b)(5) (ii))

I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D.  RESTRICTED WASTE SUBJECT TO VARIANCE OR EXTENSION (40 CFR 268.7(a)(3))

The restricted waste identified above is subject to a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a Nationwide Variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. The corresponding treatment standards(s) or prohibitions are promulgated in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available. The waste becomes subject to the Land Disposal Prohibitions on \_\_\_\_\_.

(DATE)

E.  RESTRICTED WASTE SUBJECT TO TREATMENT (40 CFR 268.7(a)(1))

The non-wastewater restricted waste identified above must be treated to the applicable treatment standards promulgated in 40 CFR 268.41 and/or 268.43, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d).

I certify and warrant that the information that appears on this form, and any appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature [Signature] Title V-P Date 5/21/84

GENERATOR: Quemetco, Inc. EPA I.D. NUMBER: CAU 06-623-3966  
 WASTE STREAM NUMBER: 07-012-3211 MANIFEST NUMBER: (With Shipment) \_\_\_\_\_  
 WASTE IS: x NON-WASTEWATER \_\_\_\_\_ WASTEWATER (Check One)

EPA HAZARDOUS WASTE CODE(S) D008 SUBCATEGORY (IF NOT APPLICABLE, ENTER "N/A") \_\_\_\_\_

(IF ADDITIONAL SPACE IS REQUIRED PLEASE ATTACH ADDITIONAL SHEETS.)

A.  RESTRICTED WASTE MEETS TREATMENT STANDARDS (40 CFR 268.7(a)(2))  
 The restricted waste identified above meets the treatment standards in 40 CFR 268.41 and/or 268.43 prohibition levels in RCRA Section 3004(d) and can be land disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B.  RESTRICTED WASTE TREATED TO TREATMENT STANDARDS (40 CFR 268.7(b)(5) (i))  
 The treatment residue, or extract of such residue, of the restricted waste identified above has been tested to assure that the treatment residues or extract meet the applicable treatment standards or prohibitions in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

C.  RESTRICTED WASTE WITH TECHNOLOGY BASED TREATMENT STANDARDS (40 CFR 268.7(b)(5) (ii))

I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D.  RESTRICTED WASTE SUBJECT TO VARIANCE OR EXTENSION (40 CFR 268.7(a)(3))  
 The restricted waste identified above is subject to a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a Nationwide Variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. The corresponding treatment standards(s) or prohibitions are promulgated in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available. The waste becomes subject to the Land Disposal Prohibitions on \_\_\_\_\_ (DATE)

E.  RESTRICTED WASTE SUBJECT TO TREATMENT (40 CFR 268.7(a)(1))  
 The non-wastewater restricted waste identified above must be treated to the applicable treatment standards promulgated in 40 CFR 268.41 and/or 268.43, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d).

I certify and warrant that the information that appears on this form, and any appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature  Title \_\_\_\_\_ Date \_\_\_\_\_

GENERATOR: Quemetco, Inc. EPA I.D. NUMBER: CAD 00-623-3966  
 WASTE STREAM NUMBER: 07-004-1322 MANIFEST NUMBER: (With Shipment) \_\_\_\_\_  
 WASTE IS: x NON-WASTEWATER \_\_\_\_\_ WASTEWATER (Check One)

EPA HAZARDOUS WASTE CODE(S) D008 D007 SUBCATEGORY (IF NOT APPLICABLE, ENTER "N/A") \_\_\_\_\_

(IF ADDITIONAL SPACE IS REQUIRED PLEASE ATTACH ADDITIONAL SHEETS.)

A.  RESTRICTED WASTE MEETS TREATMENT STANDARDS (40 CFR 268.7(a)(2))  
 The restricted waste identified above meets the treatment standards in 40 CFR 268.41 and/or 268.43 prohibition levels in RCRA Section 3004(d) and can be land disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B.  RESTRICTED WASTE TREATED TO TREATMENT STANDARDS (40 CFR 268.7(b)(5) (i))  
 The treatment residue, or extract of such residue, of the restricted waste identified above has been tested to assure that the treatment residues or extract meet the applicable treatment standards or prohibitions in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

C.  RESTRICTED WASTE WITH TECHNOLOGY BASED TREATMENT STANDARDS (40 CFR 268.7(b)(5) (ii))  
 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D.  RESTRICTED WASTE SUBJECT TO VARIANCE OR EXTENSION (40 CFR 268.7(a)(3))  
 The restricted waste identified above is subject to a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a Nationwide Variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. The corresponding treatment standards(s) or prohibitions are promulgated in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available. The waste becomes subject to the Land Disposal Prohibitions on \_\_\_\_\_ (DATE)

E.  RESTRICTED WASTE SUBJECT TO TREATMENT (40 CFR 268.7(a)(1))  
 The non-wastewater restricted waste identified above must be treated to the applicable treatment standards promulgated in 40 CFR 268.41 and/or 268.43, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d).

I certify and warrant that the information that appears on this form, and any appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature  Title Y. P. Date 5/27/94

5012

GENERATOR: Quemetco, Inc. EPA I.D. NUMBER: CAD 00-623-3966  
 WASTE STREAM NUMBER: 07-007-5023 MANIFEST NUMBER: (With Shipment) \_\_\_\_\_  
 WASTE IS:  NON-WASTEWATER \_\_\_\_\_ WASTEWATER (Check One)

EPA HAZARDOUS WASTE CODE(S) D008 SUBCATEGORY (IF NOT APPLICABLE, ENTER "N/A") \_\_\_\_\_

(IF ADDITIONAL SPACE IS REQUIRED PLEASE ATTACH ADDITIONAL SHEETS.)

A.  RESTRICTED WASTE MEETS TREATMENT STANDARDS (40 CFR 268.7(a)(2))  
 The restricted waste identified above meets the treatment standards in 40 CFR 268.41 and/or 268.43 prohibition levels in RCRA Section 3004(d) and can be land disposed without further treatment. I have attached all supporting analytical data, where available.  
 I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B.  RESTRICTED WASTE TREATED TO TREATMENT STANDARDS (40 CFR 268.7(b)(5) (i))  
 The treatment residue, or extract of such residue, of the restricted waste identified above has been tested to assure that the treatment residues or extract meet the applicable treatment standards or prohibitions in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available.  
 I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

C.  RESTRICTED WASTE WITH TECHNOLOGY BASED TREATMENT STANDARDS (40 CFR 268.7(b)(5) (ii))  
 I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D.  RESTRICTED WASTE SUBJECT TO VARIANCE OR EXTENSION (40 CFR 268.7(a)(3))  
 The restricted waste identified above is subject to a case-by-case extension under 40 CFR 268.5, an exemption under 40 CFR 268.6, or a Nationwide Variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. The corresponding treatment standards(s) or prohibitions are promulgated in 40 CFR 268.41 and/or 268.43. I have attached all supporting analytical data, where available. The waste becomes subject to the Land Disposal Prohibitions on \_\_\_\_\_ (DATE)

E.  RESTRICTED WASTE SUBJECT TO TREATMENT (40 CFR 268.7(a)(1))  
 The non-wastewater restricted waste identified above must be treated to the applicable treatment standards promulgated in 40 CFR 268.41 and/or 268.43, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d).

I certify and warrant that the information that appears on this form, and any appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature [Signature] Title V.P. Date 5/21/04

LAND DISPOSAL RESTRICTION FORM

GENERATOR: QUEMETLO

EPA LD. NUMBER: CA066233966

MANIFEST NUMBER: (With Shipment): \_\_\_\_\_

NON-WASTE WATER \_\_\_\_\_ WASTEWATER (Check One)

EPA/CALIFORNIA  
HAZARDOUS WASTE CODES<sup>1</sup>

EPA/CALIFORNIA  
TREATMENT STANDARD  
(if not applicable enter NA)

181  
\_\_\_\_\_  
\_\_\_\_\_

NA  
\_\_\_\_\_  
\_\_\_\_\_

40 CFR Part 268 and 22 CCR 66268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be land disposed. In accordance with the waste analysis and recordkeeping requirements set forth in 40 CFR 268.7 and 22 CCR 66268.7, please indicate how this waste is to be managed to comply with the regulations. This completed and signed form must be submitted with every shipment of waste. In addition, listed waste must now be evaluated and have any applicable characteristic waste codes and treatment standards assigned.

A. [ ] RESTRICTED WASTE MEETS TREATMENT STANDARDS [40 CFR 268.7(a)(2) & 22 CCR 66268.7(a)(2)]

The restricted waste identified above meets the treatment standards in 40 CFR 268.41 and/or 268.43 (and in CCR Title 22, division 4.5, chapter 18, article 4 and article 11) and prohibition levels in 22 CCR 66268.32 or RCRA Section 3004(d) (42 U.S.C. Section 6924 (d)) and can be land disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR part 268 Subpart D (and in CCR Title 22, division 4.5, chapter 18, article 4 and article 11) and all applicable prohibitions set forth in 40 CFR 268.32 (and in CCR Title 22, Section 66268.32) or RCRA Section 3004(d) (42 U.S.C. Section 6924(d)) I believe the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

B. [ ] RESTRICTED WASTE TREATED TO CONCENTRATION BASED TREATMENT STANDARDS [40 CFR 268.7(b)(5)(i) & 22 CCR 66268.7(b)(5)(A)]

The treatment residue, or extract of such residue, of the restricted waste identified above has been tested to assure that the treatment residues or extract meet the applicable treatment standards or prohibitions in 40 CFR 268.41 and/or 268.43 (and in CCR Title 22, division 4.5, chapter 18, article 4 and article 11). I have attached all supporting analytical data, where available.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D (and in article 4 and article 11 of chapter 18, division 4.5, Title 22, CCR), and all applicable prohibitions set forth in 40 CFR 268.32 (and in 22 CCR 66268.32) or RCRA Section 3004(d) (42 U.S.C., section 6924(d)) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

<sup>1</sup> For materials with a California waste code only (Non-RCRA), or materials with box F checked only, this form is only applicable in the State of California.

Quemetco, Inc.  
Inspection Report

ATTACHMENT 6

Quemetco, Inc.  
Inspection Report



PHOTO #1: Taken on July 13, 1994, by Maria Kelly  
View of spill next to waste oil tank.



PHOTO #2: Taken on July 13, 1994, by Maria Kelly  
View of there drums of solvent waste in maintenance shop.

Quemetco, Inc.  
Inspection Report



PHOTO #3: Taken on July 13, 1994, by Maria Kelly  
View of the past waste pile area.



PHOTO #4: Taken on June 13, 1994, by Maria Kelly  
View of battery storage area.

Quemetco, Inc.  
Inspection Report



PHOTO #5: Taken on July 13, 1994, by Maria Kelly  
View of the spill in battery storage area.



PHOTO #6: Taken on July 13, 1994, by Maria Kelly  
View of unlabeled lead dross containers.

Quemetco, Inc.  
Inspection Report



PHOTO #7: Taken on July 13, 1994, by Maria Kelly

View of a broken battery in the battery storage area.



PHOTO #8: Taken on July 13, 1994, by Maria Kelly

View of a pallet of broken batteries in the battery storage area.

Quemetco, Inc.  
Inspection Report



**PHOTO #9:** Taken on July 13, 1994, by Maria Kelly  
View of the surface impoundment.



**PHOTO #10:** Taken on July 13, 1994, by Maria Kelly  
View of the open truck trailer of polypropylene chips.

Quemetco, Inc.  
Inspection Report



**PHOTO #11:** Taken on July 13, 1994, by Maria Kelly  
View of the lead refining area.



**PHOTO #12:** Taken on July 13, 1994, by Maria Kelly  
View of the batch house storage area.

Quemetco, Inc.  
Inspection Report



**PHOTO #13:** Taken on July 13, 1994, by Maria Kelly  
View of the molten lead in the furnace.

Quemetco, Inc.  
Inspection Report

ATTACHMENT 7

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1011 N. GRANDVIEW AVENUE  
LENDALE, CA 91201  
(818) 551-2800



FIELD REPORT OF VIOLATION

Date(s) of Inspection 7-13-93

Company Name QUEMETCO, INC.  
Address 720 S. 17th AVE  
CITY OF INDUSTRY, CA 91748

Representatives Present:

- NANCY STEEL - DTSC
- MARIA KELLY - EPA
- SYLVIA VANDERSPEK - DTSC
- Robert Finn - Quemetco, Inc.

Discussion with Management

- 1) KEEP POLYPROPYLENE TRAILERS CLOSED WHEN NOT ADDING WASTE
- 2) PUT TIME ON INSPECTION
- 3) DATE DUE AND NATURE OF REPAIRS OR OTHER REMEDIAL ACTIONS NOT ALWAYS NOTED
- 4) DOES NOT HAVE A WRITTEN DESCRIPTION OF THE TYPE AND AMOUNT OF INTRODUCTORY AND CONTINUING TRAINING THAT WILL BE GIVEN TO EACH EMPLOYEE
- 5) NO FAILURE TO RETAIN LDR NOTICES ATTACHED TO MANIFESTS
- 6) \* ~~Ensure~~ ENSURE generators supply LDR notices
- 7) NO EVACUATION ROUTE IN CONTINGENCY PLAN
- 8) \* LACK OF AISLE SPACE IN BATTERY STORAGE AREA
- \* ~~on~~ CRACKED BATTERIES NOT CONTAINED

Authorized Company Representative* Name <u>[Signature]</u> Title <u>VP CHIEF OPERATIONS</u> Signature <u>Robert Finn</u> Date <u>7/13/94</u>	Authorized State Agent Name <u>SYLVIA VANDERSPEK</u> Title <u>HSS</u> Signature <u>[Signature]</u> Date <u>7-13-94</u>
--	--

\* Signature of company representative signifies receipt of copy of this form.

Quemetco, Inc.  
Inspection Report

ATTACHMENT 8

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1011 N. GRANDVIEW AVENUE  
ENDALE, CA 91201  
(8) 551-2800

## GENERATOR/INTERIM STATUS INSPECTION CHECKLIST

Facility Name QUEMETCO, INC. ID No. CAD0066233966  
 Facility Address 720 SOUTH 7<sup>th</sup> AVENUE, CITY OF INDUSTRY  
 Date(s) Inspected JULY 13, 1994 Inspected By SILVIA VANDERSPEK

All items listed below are included in the inspection, unless lined out to indicate the item was not evaluated.

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(ISD Checklist 4/05/93)

1



## Current Authorization and Process Status

**INSTRUCTIONS:—** This table is to be completed prior to the inspection based on Fee/RCRIS data bases to note hazardous waste (TSD) processes, current authorization status (Permitted, ISD, variance, etc), and closure status. During the inspection, the processes should be evaluated for actual volume/ capacity used, and changes in closure or operation.

Name of Facility QUOMETCO, INC. Date 7-13-94 Inspected By SYLVIA VANDERSAL

UNIT DESCRIPTION	Drum Storage yard	BATTERY STORAGE AREA	CONTAINMENT BUILDING	SURFACE IMPROVEMENT
Active HW Process	S01-storage in containers	STORAGE OF BATTERIES	STORAGE OF LEAD PILES	No
Current Status	Permitted	ISD	ISD	No
Date Authorization Received	1/15/85	—	—	—
Design Capacity	100 drums, @ 55gal			
Actual operation/ Use Capacity	100 drums	YES		
Years Operated	1985-1991			? → 198
RCRA/State	RCRA	RCRA	RCRA	RCRA
Is Unit Closing	Yes	No	No	YES
Closure Plan Submitted date	10/5/91			
Closure Plan Approved Date	3/1/92			
Closure Certification Submitted Date	No			YES
Closure Certification Approved Date	No			
Post Closure Plan Submitted Date	N/A			
Post Closure Plan Approved Date	N/A			
BOE billed Fees ?	Yes			

**NOTE:**

- o The violations cited below are from California Health and Safety Code, Sections 25100 et seq. and Title 22, California Code of Regulations.
- o Check mark notes a Violation.
- o Sections marked [I] apply to ISD units, [G] apply to Generators, [T] apply to Transporters, [I/G] apply to ISD and Generator activities.
- o RCRIS violation codes are given in parentheses at the end of each violation (e.g. DGS). Codes beginning with the letter D apply to ISD violations; those beginning with the letter G apply to generator violations.

**II: WASTE MINIMIZATION [G] (See Guidance p. 4)**

- 1\_\_ 25244.4 Generator failed to submit a report to the Department at least every two years reporting changes in volume and toxicity achieved through waste reduction.
- 2\_\_ 25244.19 Generated more than 12,000 Kg HW or 12 Kg EHW and failed to conduct a source reduction and evaluation review of their facility and prepare a waste minimization plan.
- 3\_\_ 25244.21 Generator failed to retain current (SB14) review and plan, plan summary, report and report summary at each site and make available for inspection.

**III: ILLEGAL OPERATIONS [I/G]**

Hazardous Waste Determination [G]

- 4\_\_ 66262.11 Failed to determine if waste is hazardous by testing the waste or applying knowledge of characteristics. (GGR)

Identification Number [I/G]

- 5\_\_ 66265.11 No EPA Number to treat, store, dispose, transport or transfer HW. (DGS)
- 6\_\_ 66262.12(a) Generator treated, stored, disposed, transported, or offered for transportation HW without receiving EPA Number (GGR)
- 7\_\_ 66262.12(c) Generator offered HW to transporter or TSDF that had not received an EPA Number (GGR)

Illegal Disposal & Transportation

- 8\_\_ 25189.5(a) Disposed or caused disposal of HW at unauthorized point. (DGS)
- 9\_\_ 25201(a) Disposed HW without a permit or authorization. (DGS)
- 10\_\_ 25163(a) Transported HW or transferred HW to a transporter without valid registration. (GOR)

11\_\_ 66263.23(b) Caused transportation of HW to an unauthorized point. (GOR)

Illegal Storage & Treatment [G]

12\_\_ 25201(a) Storage of on-site HW in tanks or containers greater than 90 days without a permit or authorization. (GOR)

13\_\_ 25201(a) Storage of on-site HW in tanks exceed 5,000 gal/45,000 lb. or aggregate 50,000 gal without permit or authorization. (GOR)

14\_\_ 25201(a) Storage of off-site HW in tanks or containers for any time without permit or authorization. (GOR)

15\_\_ 25201(a) Storage of on-site HW in containers less than 5,000 gal and the aggregate exceeds 50,000 gal (not tanks) without permit or authorization. (GOR)

16\_\_ 25201(a) Storage of HW other than in containers or tanks without permit or authorization. (GOR)

17\_\_ 25201(a) Storage of HW at a transfer facility greater than 144 hours without permit or authorization. (GOR)

18\_\_ 25201(a) Treatment of HW without a permit or authorization. (GOR)

Part A/B of Permit Application [I]

19\_\_ 66265.1(c) Facility failed to file Part A. (DGS)

20\_\_ 66265.1(c)(1) Facility managed HW not specified in Part A. (DGS)

21\_\_ 66265.1(c)(2) Employed processes not described in Part A. (DGS)

22\_\_ 66265.1(c)(3) Exceeded design capacities specified in Part A. (DGS)

23\_\_ 66265.2 Failed to submit a request for changes in the facility to the Department and/or failed to implement the approved changes according to a schedule of compliance [see also section 66270.72]. (DGS)

24\_\_ 66270.10(e)(2) Failed to submit Part B by required deadline. (DPB)

Extremely Hazardous Wastes [I/G]

25\_\_ 67430.1(a) Failed to handle or dispose extremely HW pursuant to Extremely HW Permit issued by the Department. (DOR/GOR)

26\_\_ 67430.1(b) Disposed of EHW without obtaining Extremely Hazardous Waste Disposal Permit from the Department. (GOR)

27\_\_ 67430.1(c) HW disposal site accepted EHW without a copy of the EHW Permit. (DOR)

#### IV. WALKTHROUGH OBSERVATIONS

##### Security [I] (See Guidance p. 8)

- 28\_\_ 66265.14(b) Inadequate security measures at active portion of facility to control unauthorized entry. (DGS)
- 29\_\_ 66265.14(c) Failed to post "Danger Hazardous Waste Area - Unauthorized Personnel Keep Out" sign(s) at each entrance to active portions of the facility. (DGS)
- 30\_\_ 66265.14(c) Posted sign(s) illegible at 25 feet distance and/or not written in English, Spanish and other applicable languages. (DGS)

##### Preparedness and Prevention [I/G] (See Guidance p. 8)

- 31\_\_ 66265.31 Facility not maintained or operated to minimize possibility of fire explosion, or release of HW or HW constituents to air, soil, or surface water which could threaten human health or the environment. (DCP/GOR)
- 32\_\_ 66265.32(a) Internal communications or alarm system not provided. (DPP/GOR)
- 33\_\_ 66265.32(b) A device (i.e. telephone or two-way radio) capable of calling outside emergency help not provided. (DPP/GOR)
- 34\_\_ 66265.32(c) Portable fire extinguishers, fire control equipment, spill control equipment, and/or decontamination equipment not provided. (DCP/GOR)
- 35\_\_ 66265.32(d) Adequate water, foam producing equipment, or automatic sprinklers not provided. (DCP/GOR)
- 36\_\_ 66265.33 Failed to test and maintain all communications or alarm systems, fire protection, spill control, or decontamination equipment. (DPP/GOR)
- 37\_\_ 66265.34 No immediate access to emergency communication and/or alarm system during HW handling. (DPP/GOR)
- 38~~X~~ 66265.35 Failed to maintain adequate aisle space. (DPP/GOR)
- 39\_\_ 66265.37 No arrangements made with police, fire department, emergency response, local hospital, Office of Emergency Service, and/or emergency response contractors. (DPP/GOR)

##### Use and Management of Containers [I/G] (See Guidance p. 7-8)

- 40\_\_ 66265.171 Failed to transfer HW from containers not in good condition or leaking to containers in good condition. (DMC/GOR)

- 41\_\_ 66265.172 Failed to use container or liner that was compatible with HW to be stored or transferred. (DMC/GOR)
- 42\_\_ 66265.173(a) Failed to keep containers of HW closed except when adding or removing HW. (DMC/GOR)
- 43\_\_ 66265.173(b) Handled container of HW in a manner which may cause it to rupture or leak. (DMC/GOR)
- 44\_\_ 66265.174 Failed to inspect areas where containers are stored or transferred at least weekly, looking for leaking containers and deterioration of containers and containment system. (DGS/GOR)
- 45\_\_ 66265.176 Failed to locate ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line. (DMC/GOR)
- 46\_\_ 66265.177(a) Incompatible wastes or wastes and materials were placed in the same container without complying with 66265.17(b). (DMC/GOR)
- 47\_\_ 66265.177(b) Placed HW in unwashed container that previously held incompatible waste or material. (DMC/GOR)
- 48\_\_ 66265.177(c) Container of HW which was incompatible with any other waste or material stored nearby in other containers, tanks, waste piles, or surface impoundments was not separated or protected by a berm or other device. (DMC/GOR)

Pre-Transport Requirements [G] (See Guidance p. 7)

- 49\_\_ 66262.30 Failed to package HW per DOT (49 CFR Parts 173, 178, 179) before offering HW for transportation off-site. (GPT)
- 50\_\_ 66262.31 Failed to label each package of HW per DOT (49 CFR Part 172) before offering HW for transportation off-site. (GPT)
- 51\_\_ 66262.32 Failed to mark each package of HW with shipping name, ID#, ORM designation (label <110 gal) per DOT (49 CFR Part 172) before offering HW for transportation off-site. (GPT)
- 52\_\_ 66262.33 Failed to ensure the transport vehicle is correctly placarded per DOT (49 CFR Part 172, Subpart F) for hazardous materials before offering HW for transportation off-site. (GPT)
- 53\_\_ 66262.34(e)(1) Accumulated HW in containers at point of generation (e.g. satellite accumulation area) beyond quantity or time limits. (GPT)
- 54\_\_ 66262.34(e)(3) Failed to mark container of HW at point of generation (i.e. satellite accumulation area) with date quantity limit reached within 3 days. (GPT)

- 55 ~~55~~ 66262.34(f)(1) Failed to mark accumulation start date on each container and portable tank in the 90-day accumulation area. (GPT)
- 56 66262.34(f)(2) Failed to mark the date 100 kg/1 kg period begins for each container and tank in the 90-day accumulation area. (GPT)
- 57 66262.34(f)(3) Failed to label each container and tank of HW with words "Hazardous Waste". (GPT)
- 58 66262.34(f)(3) Failed to label containers and portable tanks of HW with composition and physical state of HW, hazardous properties, and name and address of generator. (GPT)

Empty Containers [G]

- 59 66261.7(f) Container or inner liner > 5 gal. not marked with date emptied and managed pursuant to 66261.7(e) within one year of date emptied. (GOR)
- 60 66261.7(p) Containers or inner liners of containers containing HW which are not empty are not managed as HW. (GOR)

Tanks [I/G] (See Guidance p.9)

**Existing systems (installed before 7/14/86):**

- 61 66265.191(a) Failed to determine whether tank is leaking or unfit and keep written integrity assessment certified by registered professional engineer for tanks without secondary containment. (DTR/GOR)
- 62 66265.191(b) Assessment failed to determine whether tank system is adequately designed, of sufficient structural strength, and compatible with HW. (DTR/GOR)
- 63 66265.191(d) If found to be leaking or unfit for use, failed to comply with 66265.196. (DTR/GOR)

**New tank systems (installed after 7/14/86):**

- 64 66265.192 Failed to obtain or retain on-site the required written assessment and certification statements for design and installation of new tank systems. (DTR/GOR)
- 65 66265.193 Failed to provide required secondary containment. [refer to guidance document for compliance dates] (DTR/GOR)
- 66 66265.194(a) Placed HW or treatment reagents in tank system which caused the tank, containment system or ancillary equipment to leak, corrode, rupture, or fail. (DTR/GOR)
- 67 66265.194(b) Failed to use controls and practices to prevent spillage and overflows from tank system. (DTR/GOR)

- 68\_\_ 66265.194(b)(3) Failed to maintain sufficient freeboard (60 cm/2 ft) in uncovered tanks to prevent overtopping. (DTR/GOR)
- 69\_\_ 66265.195(a) Failed to conduct daily inspection of tanks for following: discharge control equipment, corrosion, releases, monitoring and leak detection data, construction materials and secondary containment areas, and level of waste in uncovered tanks. (DTR/GOR)
- 70\_\_ 66265.195(b) Failed to inspect cathodic protection systems (if present) and sources of impressed current as appropriate. (DTR/GOR)
- 71\_\_ 66265.195(c) Failed to maintain results of tank inspections in the operating record (ISD only). (DTR)
- 72\_\_ 66265.196 Failed to remove from service immediately a tank system or secondary containment system that had leaked or spilled. (DTR/GOR)
- 73\_\_ 66265.197(a) During closure of tank system, failed to remove or decontaminate all waste residues, contaminated tank system, soils, and manage them as HW. (DTR/GOR)
- 74\_\_ 66265.197(c) When facility closed a tank system that lacked required secondary containment, they failed to include contingent closure and post-closure plans (ISD only). (DTR)
- 75\_\_ 66265.198(a) Stored or treated ignitable or reactive waste in tanks so as to cause the waste to ignite or react. (DTR/GOR)
- 76\_\_ 66265.198(b) Failed to comply with buffer zone requirements for tanks containing ignitable or reactive wastes per NFPA "Flammable and Combustible Liquids Code." (DTR/GOR)
- 77\_\_ 66265.199(a) Stored incompatible wastes in same tank without complying with 66251.17(b). (DTR/GOR)
- 78\_\_ 66265.199(b) Placed HW in non-decontaminated tanks that previously held an incompatible waste or material without complying with 66251.17(b). (DTR/GOR)
- 79\_\_ 66265.200(a) Failed to conduct waste analysis and bench scale tests or obtain appropriate documented information on similar waste before tank system is used to treat or store HW substantially different. (DTR/GOR)

Ignitable, Reactive, or Incompatible Wastes [I]

{This section applies to containers, tanks, waste piles, surface impoundments where ignitable, reactive or incompatible wastes stored, treated, or disposed.}

- 80\_\_ 66265.17(a) Failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. (DGS)

- 81\_\_ 66265.17(a) Ignitable or reactive waste was not separated and protected from sources of ignition or reaction. (DGS)
- 82\_\_ 66265.17(a) Failed to place "No Smoking" signs wherever hazard from ignitable or reactive waste. (DGS)

**NOTE:** The following requirement applies to generators per 66265.177(a) for containers and 66265.199(a)&(b) for tanks.

- 83\_\_ 66265.17(b) Failed to conduct transfer, storage, treatment, or disposal of ignitable or reactive wastes or the mixture or commingling of incompatible wastes and/or materials to prevent:
- \_\_ (1) Generation of extreme heat or pressure, fire or explosion, or violent reaction.
  - \_\_ (2) Production of uncontrolled toxic mists, fumes, dusts or gases to threaten human health or environment.
  - \_\_ (3) Production of uncontrolled flammable fumes or gases to pose risk of fire or explosions.
  - \_\_ (4) Damage to structural integrity of HW containment devices.
  - \_\_ (5) Threat to human health or the environment. (DGS/GOR)
- 84\_\_ 66265.17(c) Failed to document compliance based on literature, trial tests, waste analyses, or similar treatment. (DGS)

Recyclable Materials [I/G] (See Guidance p. 3)

- 85  66266.81(b) Damaged lead acid batteries not properly managed and labelled. (DOR/GOR)
- 86\_\_ 66266.120(a)(3) Accepted > 10 lb. elemental mercury from off-site without a manifest or from registered hauler. (DOR)

Used Oil [I/G] (See Guidance p. 3)

- 87\_\_ 25250.5(a) Disposed of used oil by discharge to sewers, drainage systems, water, incineration, or burning as fuel, or disposal on land without authorization. (DOR/GOR)
- 88\_\_ 25250.5(b) Used Oil, recycled oil, or oil exempt was used as dust suppressant and failed to meet applicable standards. (DOR/GOR)
- 89\_\_ 25250.7 Intentionally contaminated used oil with other hazardous waste, other than small amounts of vehicle fuel. (DOR/GOR)
- 90\_\_ 66266.130(c)(6) Failed to manage used oil separated from used oil filters as HW. (DOR/GOR)

## V. DOCUMENT REVIEW

### Manifest System [G] (See Guidance p. 10)

- 91\_\_ 66262.20(a) Failed to prepare a complete manifest for HW transported or sent off-site. (GMR)
- 92\_\_ 66262.20(b) Failed to designate on the manifest a facility which is authorized to handle the HW. (GMR)
- 93\_\_ 66262.23(a)(1)(2) Manifest not properly completed, signed or dated. (GMR)
- 94\_\_ 66262.23(a)(4) Generator manifest copies not sent to Department within 30 days of each shipment of HW. (GMR)
- 95\_\_ 66262.23(b) Failed to give manifest copies to transporter. (GMR)
- 96\_\_ 25160(b)(3) For out-of-state shipments, failed to submit TSDF manifest to the Department signed by all transporters (except rail transporters) and out-of-state facility operator within 30 days. (GMR)
- 97\_\_ 66262.42(a) Failed to determine the status of HW when generator did not receive facility manifest copy within 35 days. (GRR)
- 98\_\_ 66262.42(b) Exception Report not sent to Department within 45 days. (GRR)
- 99\_\_ 66262.40(a) Failed to keep signed copy of manifest for 3 years. (GRR)
- 100\_\_ 66263.42(e) Generators failed to keep shipping papers or receipt for milkrun operations for 3 years. (GRR)
- 101\_\_ 66266.81(a)(4)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 years. (GRR)
- 102\_\_ 25250.8(b)(3) Generator failed to retain copies of used oil receipts for 3 years. (GRR)
- 103\_\_ 66266.130(c)(5) Failed to keep bill of lading for used oil filters for 3 years. (GRR)

### Manifest System [I] (See Guidance p. 10)

- 104\_\_ 66265.71(a)(1) Failed to sign and date copy of manifest for HW received from off-site. (DMR)
- 105\_\_ 66265.71(a)(2) Failed to note significant discrepancies in the manifest. (DMR)
- 106\_\_ 66265.71(a)(3) Failed to give copy of signed manifest to transporter. (DMR)

- 107\_\_ 66265.71(a)(4)(5) Failed to send copy of manifest to the Department and generator within 30 days. (DMR)
- 108\_\_ 66265.71(a)(6) Failed to retain copy of each manifest for at least 3 years. (DMR)
- 109\_\_ 66266.81(a)(6)(B) Failed to retain copy of manifest or bill of lading for spent lead acid batteries for 3 years. (DMR)
- 110\_\_ 66265.71(b)(1-6) Failed to sign and date shipping paper or manifest from rail or water shipment, submit copies, retain copies, and/or note discrepancies in manifest. (DMR)
- 111\_\_ 66265.72(b) If discrepancy is not resolved within 15 days after receiving waste, failed to submit a letter to the Department. (DMR)
- 112\_\_ 66265.76 Failed to submit unmanifested waste report to the Department within 15 days after receiving the waste from off-site. (DMR)

Land Disposal Restrictions (LDR) [G] (See Guidance p. 11)

- 113\_\_ 66268.7(a) No determination whether waste is restricted from land disposal. (GLB)
- 114  66268.7(a)(1) No notification for LDR waste that fails to meet all applicable treatment standards. (GLB)

**NOTE:** The notification must include the following:

- a. EPA HW Number, or California Waste Code and Non-RCRA HW (see 66268.29 for list of non-RCRA waste types)
- b. corresponding treatment standards or treatment technologies
- c. manifest number associated with the waste shipment
- d. waste analysis data, where available.

- 115\_\_ 66268.7(a)(2) No signed notice and certification for LDR waste requiring further treatment. (GLB)
- 116\_\_ 66268.7(a)(5) Failed to retain on-site determination/waste analysis records. (GLB)
- 117\_\_ 66268.7(a)(6) Failed to retain notifications, certifications, other records for 5 years. (GLB)

Land Disposal Restrictions (LDR) [I] (See Guidance p. 11)

- 118\_\_ 66268.7(b) Failed to test waste according to WAP for LDR. (DLB)
- 119\_\_ 66268.7(b)(4) Failed to send notice with each waste shipment to land disposal facility. (DLB)

- 120\_\_ 66268.7(b)(5) Failed to submit certification with each shipment of waste or treatment residue of restricted waste to land disposal facility. (DLB)
- 121\_\_ 66268.7(b)(6) TSDf failed to comply with notice and certification for waste or treatment residue which will be further managed at different treatment or storage facility. (DLB)
- 122\_\_ 66268.7(c)(1) Land disposal facility failed to keep copies of notice and certification and test waste to assure waste or treatment residues are in compliance with treatment standards and prohibitions. (DLB)
- 123\_\_ 66268.7(c)(2) Land disposal facility failed to test waste or treatment residue according to facility's WAP. (DLB)

Exports of Hazardous Waste [G] (See Guidance p. 12)

- 124\_\_ 66262.52 Exports of HW prohibited without notification of intent to export, consent of receiving country, and EPA Acknowledgement of Consent. (GCS)
- 125\_\_ 66262.53(b) Exporter of Non-RCRA HW fail to notify Department of intended export 4 weeks prior to shipment. (GCS)
- 126\_\_ 66262.54 Exporter failed to comply with special manifest requirements. (GCS)

Recordkeeping and Reporting [G]

- 127\_\_ 66262.40(c) Waste analysis/test records not kept for at least 3 years. (GRR)
- 128\_\_ 66262.41(a) Biennial Report not sent to the Department. (GRR)
- 129\_\_ 66262.40(b) Copy of Biennial Report / Exception Report not retained for 3 years. (GRR)

Recordkeeping and Reporting [I] (See Guidance p. 12, 13)

- 130\_\_ 66265.12(a) Failed to notify the Department at least four weeks in advance of the arrival of HW from a foreign source. (DGS)
- 131\_\_ 66265.12(b) Failed to inform generator in writing that the facility is authorized to receive HW and/or failed to keep a copy of this notice in the operating record. (DGS)
- 132\_\_ 66265.12(c)(1) Failed to notify the new owner or operator of the facility in writing of requirements of Chapter 15 and Chapter 20 of Title 22. (DGS)

- 133\_\_ 66265.73(a) Failed to keep written operating record on-site. (DMR)
- 134\_\_ 66265.73(b) Failed to record all information and maintain operating record until closure of the facility. (DMR)
- 135\_\_ 66265.74(a) Failed to furnish all records and plans upon request. (DMR)
- 136\_\_ 66265.75 Failed to prepare and submit copies of annual report to the Department by March 1 of each year. {Note: for 1992 report keep on-site not submit to Department} (DMR)
- 137\_\_ 66265.75 Annual report lacked all required information. (DMR)
- 138\_\_ 66265.77(a) Failed to report releases, fires, and explosions to the Department within 15 days per 66265.56(j). (DMR)
- 139\_\_ 66265.77(b) Failed to report to the Department ground-water contamination and monitoring data per 66265.93 and 66265.94. (DMR)

Contingency Plan and Emergency Procedures [I/G] (See Guidance p.14)

- 140\_\_ 66265.51(a) No contingency plan. (DCP/GOR)
- 141\_\_ 66265.51(b) Failure to implement contingency plan whenever there is a fire, explosion, or release of HW which could threaten human health or environment. (DCP/GOR)
- 142~~X~~ 66265.52(a) Incomplete contingency plan. (DCP/GOR)
- 143\_\_ 66265.53(a) Contingency plan not maintained on site. (DCP/GOR)
- 144\_\_ 66265.53(b) Contingency plan not submitted to local emergency authorities. (DCP/GOR)
- 145\_\_ 66265.54 Contingency plan not amended as necessary. (DCP/GOR)
- 146\_\_ 66265.55 No emergency coordinator either on premises or on-call at all times. (DCP/GOR)
- 147\_\_ 66265.56 Emergency coordinator failed to immediately implement the emergency procedures. (DCP/GOR)
- 148\_\_ 66265.56(j) Facility failed to note required information in operating log and submit written report to the Department within 15 days. (DCP/GOR)

General Inspection Requirements [I] (See Guidance p. 15)

- 149\_\_ 66265.15(b)(1) Failed to develop and follow inspection schedule. (DGS)

- 150\_\_ 66265.15(b)(2) Failed to keep a copy of the inspection schedule. (DGS)
- 151\_\_ 66265.15(b)(3) Inspection schedule failed to identify appropriate problems to be looked for. (DGS)
- 152 ~~X~~ 66265.15(c) Failed to remedy deteriorating or malfunctioning equipment or structures revealed during inspection. (DGS)
- 153 ~~X~~ 66265.15(d) Failed to record all the required information in the inspection schedule. (DGS)
- 154\_\_ 66265.15(d) Failed to keep the complete inspection records for 3 years. (DGS)

Personnel Training [I/G] (See Guidance p. 16)

- 155\_\_ 66265.16(a)(1) Personnel failed to complete training course to assure compliance with HW requirements. (DGS/GOR)
- 156\_\_ 66265.16(a)(2) Training program was not directed by a person trained in HW procedures and/or not relevant to employees' job duties. (DGS/GOR)
- 157\_\_ 66265.16(a)(3) Training program failed to ensure that facility personnel are able to respond to emergencies. (DGS/GOR)
- 158\_\_ 66265.16(b) Personnel failed to complete the required training program within 6 months or worked in unsupervised positions prior to completing the required training. (DGS/GOR)
- 159\_\_ 66265.16(c) Personnel failed to receive an annual review of their initial training. (DGS/GOR)
- 160 ~~X~~ 66265.16(d) Failed to maintain all the required training documentation on-site. (DGS/GOR)
- 161\_\_ 66265.16(e) Failed to keep training records on current personnel and/or former employees within the last 3 years on-site. (DGS/GOR)

Waste Analysis Plan (WAP) [I] (See Guidance p. 17)

- 162\_\_ 66265.13(a) Failed to obtain detailed waste analyses. (DGS)
- 163\_\_ 66265.13(b) No written WAP. (DGS)
- 164\_\_ 66265.13(b) Written WAP not kept at the facility. (DGS)
- 165\_\_ 66265.13(b) Failed to follow WAP. (DGS)
- 166\_\_ 66265.13(b) WAP was incomplete. (DGS)

WAP for Off-Site Facilities [I]

167\_\_ 66265.13(b)(5) WAP did not specify the generator's waste analyses. (DGS)

168\_\_ 66265.13(b)(6) WAP did not contain methods to be used to meet additional requirements for:

- |   |                                     |
|---|-------------------------------------|
| __ Tanks (66265.198-200)                | __ Liquids in landfills(66265.314)  |
| __ Incinerators (66265.341)             | __ Surface Impoundments (66265.225) |
| __ Waste Piles (66265.252)              | __ Thermal Treatment (66265.375)    |
| __ Land Treatment (66265.273)           | __ Other Treatment (66265.402)      |
| __ Land Disposal Restrictions (66268.7) | (DGS)                               |

169\_\_ 66265.13(c) WAP did not describe procedures to inspect or analyze waste to ensure it matches identity of waste on manifest. (DGS)

170\_\_ 66265.13(c)(1) WAP did not describe the procedures for identifying movement of each HW. (DGS)

171\_\_ 66265.13(c)(2) WAP did not describe sampling methods. (DGS)

Closure Plan [I] (See Guidance p. 18)

172\_\_ 66265.112(a) No written Closure Plan kept on-site. (DCL)

173\_\_ 66265.112(b) Closure Plan incomplete. (DCL)

174\_\_ 66265.112(c) Closure Plan not updated when required. (DCL)

175\_\_ 66265.112(d) Changes to closure plan not submitted to the Department for authorization. (DCL)

176\_\_ 66265.112(d)(1) Failed to submit unapproved closure plan at least 180 days prior to beginning closure of surface impoundment, waste pile, land treatment or landfill unit, or final closure of such unit. (DCL)

177\_\_ 66265.112(d)(1) Failed to submit unapproved closure plan at least 180 days prior to beginning final closure of tanks or containers or incinerator units. (DCL)

178\_\_ 66265.112(d)(1) Facility with approved closure plans failed to notify Department in writing at least 60 days prior to beginning closure of surface impoundments, waste pile, landfill, or land treatment unit, or final closure of facility with such unit. (DCL)

179\_\_ 66265.112(d)(1) Facility with approved closure plan failed to notify the Department in writing at least 45 days prior to beginning final closure of tanks or containers or incinerator units. (DCL)

180\_\_ 66265.112 (d)(3)(A) Failed to submit the closure plan to the Department within 15 days after termination of interim status. (DCL)

Closure Activities [I]

- 181\_\_ 66265.113(a) Within 90 days after receiving final HW or approval of closure plan whichever is later, facility failed to treat, remove, or dispose on-site all HW in accordance with approved closure plan. (DCL)
- 182\_\_ 66265.113(b) Failed to complete partial or final closure according to closure schedule and within 180 days after receipt of final HW or approval of closure plan whichever is later. (DCL)
- 183\_\_ 66265.114 Equipment, structures or contaminated soils not properly disposed or decontaminated. (DCL)
- 184\_\_ 66265.115 Failed to submit certification of closure to the Department within 60 days after completion of closure of each HW surface impoundment, waste pile, land treatment, and landfill unit, or within 60 days of final closure. (DCL)

Post Closure Plan [I] (See Guidance p. 18)

Applies to HW disposal facilities (landfills, surface impoundments, waste piles) where all HW will not be removed during closure. (DCL)

- 185\_\_ 66265.117(b)(1) Failed to conduct post-closure care for each HW management unit for 30 years. (DCL)
- 186\_\_ 66265.117(c)(1) Failed to provide security per 66265.14 during post-closure period. (DCL)
- 187\_\_ 66265.117(d) Unauthorized disturbance of final cover, liner(s), other components of containment system, or the monitoring system. (DCL)
- 188\_\_ 66265.117(e) Failed to follow post-closure plan. (DCL)
- 189\_\_ 66265.118(a) No written Post Closure Plan. (DCL)
- 190\_\_ 66265.118(b) Failed to keep the post-closure plan on-site. (DCL)
- 191\_\_ 66265.118(c) Post Closure Plan incomplete. (DCL)
- 192\_\_ 66265.118(d) Post Closure Plan not amended as required. (DCL)
- 193\_\_ 66265.119(a) Failed to submit within 60 days of certification of closure required post-closure notices. (DCL)
- 194\_\_ 66265.119(c) Failed to request modification to approved post-closure plan prior to removing hazardous waste, residue, liner, or contaminated structures and equipment. (DCL)
- 195\_\_ 66265.120 Failed to submit certification of post-closure completion within 60 days. (DCL)

- 196\_\_ Failed to follow special requirements during post-closure period for:  
 \_\_\_ Surface Impoundments(66265.228(b)) \_\_\_ Tanks (6265.197(c))  
 \_\_\_ Waste Piles (66265.258(b)) \_\_\_ Land Treatment  
 \_\_\_ Landfills (66265.310(e)) \_\_\_ (66265.280(c)&(f)) (DCL)

Financial Responsibility [I]

- 197\_\_ 66265.142(a) Failed to prepare proper written closure cost estimate of all closure activities. (DFR)
- 198\_\_ 66265.142(b) Failed to adjust closure cost estimate for inflation. (DFR)
- 199\_\_ 66265.142(c) Failed to revise closure cost estimate within 30 days after modifying closure plan. (DFR)
- 200\_\_ 66265.142(d) Failed to keep latest closure cost estimate on-site. (DFR)
- 201\_\_ 66265.143 Failed to establish or demonstrate financial assurances for closure of the facility. (DFR)
- 202\_\_ 66265.143 Failed to amend financial assurance mechanism to cover revised closure cost estimate. (DFR)
- 203\_\_ 66265.144(a) Failed to prepare proper written post-closure cost estimate of all post-closure activities. (DFR)
- 204\_\_ 66265.144(b) Failed to adjust post-closure cost estimate for inflation. (DFR)
- 205\_\_ 66265.144(c) Failed to revise post-closure cost estimate within 30 days after modifying closure plan. (DFR)
- 206\_\_ 66265.144(d) Failed to keep latest post-closure cost estimate on-site. (DFR)
- 207\_\_ 66265.145 Failed to establish or demonstrated an appropriate financial assurance mechanism to cover the cost of post-closure care. (DFR)
- 208\_\_ 66265.145 Failed to amend financial assurance mechanism as needed to cover revised post-closure cost estimate. (DFR)
- 209\_\_ 66265.147(a) Failed to demonstrate liability coverage for sudden accidental occurrences of at least \$1 million per occurrence with annual aggregate of at least \$2 million per year per facility. (DFR)
- 210\_\_ 66265.147(b) Disposal facility failed to demonstrate liability coverage for non-sudden accidental occurrences of at least \$3 million per occurrence with annual aggregate of at least \$6 million per year per facility. (DFR)

## VI. Transportation [T]

- 211\_\_ 66263.17(a) Transported HW without receiving Identification Number and registration certificate from the Department. (TMR)
- 212\_\_ 25160(d) Transported HW without a manifest. (TMR)
- 213\_\_ 25163(e) Transported HW in vehicle not inspected by CHP. (TOR)
- 214\_\_ 25163(e) Transported HW in container not packaged per DOT. (TOR)
- 215\_\_ 25166(a) Failed to pay HW transporter registration fees. (TOR)
- 216\_\_ 25168.4 Failed to pay annual inspection fee for vehicles. (TOR)
- 217\_\_ 25169(a) Failed to maintain financial public liability to respond to damages during the course of business operations. (TOR)
- 218\_\_ 25169.2(b) Transported HW in vehicle without certificate. (TOR)
- 219\_\_ 25169.3 Transported HW from abandoned site without complying with all conditions. (TOR)
- 220\_\_ 25186.5(b) Filed incomplete or incorrect disclosure statement. (TOR)
- 221\_\_ 25250.8(b)(1) Failed to prepare a manifest for used oil prior to transfer to another transporter. (TMR)
- 222\_\_ 25250.8(b)(4) Failed to fill out used oil receipts attached to manifests. (TMR)
- 223\_\_ 25250.8(b)(5) Failed to enter the volume of used oil on the manifest at delivery, end of day or change of driver. (TMR)
- 224\_\_ 25250.8(b)(6) Failed to submit the generator copy of used oil manifests to the Department within 30 days of each shipment. (TMR)
- 225\_\_ 25250.23 Transported used oil and not registered as a HW hauler. (TOR)
- 226\_\_ 66263.23(e) Failed to have on the side of each vehicle a firm name or trademark which is legible from 50 ft. (TMR)
- 227\_\_ 66263.23(b) Delivered hazardous waste to an unauthorized facility. (TMR)

**VII. SPECIAL HW UNITS OR ACTIVITIES**

Water Quality Monitoring [I] (See Guidance p. 19)

**NOTE:** This section applies to facilities with surface impoundments, waste piles, land treatment units, or landfills.

- 228\_\_ 66265.91(a)(1) Facility failed to institute a detection monitoring and response program for each regulated unit. (DGW)
- 229\_\_ 66265.91(a)(2) Facility failed to institute an evaluation monitoring and response program when there was statistically significant evidence of a release. (DGW)
- 230\_\_ 66265.91(a)(3) Facility failed to institute an evaluation monitoring and response program when there was significant physical evidence of a release. (DGW)
- 231\_\_ 66265.91(b) Facility failed to develop a water quality sampling and analysis plan (SAP). (DGW)
- Date of SAP, if available \_\_\_\_\_
- 232\_\_ 66265.91(b) Facility failed to submit modifications of the water quality SAP to the Department. (DGW)
- 233\_\_ 66265.91(b) Facility failed to maintain a copy of the SAP on site. (DGW)
- 234\_\_ 66265.97(e)(14) Facility failed to submit graphed monitoring data to the Department annually. (DGW)
- 235\_\_ 66265.97(e)(15) Facility failed to measure water level in each monitoring well at least quarterly. (DGW)
- 236\_\_ 66265.97(e)(17) Facility failed to submit all water quality monitoring data collected to the Department by March 1 of each year. (DGW)
- 237\_\_ 66265.97(e)(17) Facility failed to maintain all water quality monitoring data in the operating record. (DGW)

**Detection Monitoring Program (unit specific for each regulated unit):**

- 238 \_\_\_ 66265.98(g) Facility failed to collect and analyze groundwater samples at least quarterly. (DGW)
- 239 \_\_\_ 66265.98(k)(1) Facility failed to notify the Department within 7 days of determination of statistically significant evidence of a release from the regulated unit. (DGW)
- 240 \_\_\_ 66265.98(l)(5) Facility failed to submit an amended SAP to the Department to establish an appropriate EMP within 90 days after resampling has confirmed that there was a significant release. (DGW)
- 241 \_\_\_ 66265.98(l)(6) Facility failed to submit to the Department an engineering feasibility study for a corrective action program within 180 days of a significant release. (DGW)

If an Evaluation Monitoring Program (EMP) is required:

- 242 \_\_\_ 66265.99(b) Facility failed to submit to the Department an assessment of the nature and extent of the release from a regulated unit. (DGW)
- 243 \_\_\_ 66265.99(e)(8) Facility failed to submit an annual report on the results of the EMP to the Department by March 1. (DGW)

Surface Impoundments [I]

\* Pursuant to HSC 25208, surface impoundments must comply with the requirements of Article 9.5, Chapter 6.5 of the California Health and Safety Code.

- 244\_\_ 66265.221(a) Failed to install a double liner and leachate collection system. (DSI)
- 245\_\_ 66265.221(b) Failed to submit a Part B application. (DSI)
- 246\_\_ 66265.222 Failed to maintain 2 feet freeboard or install an engineer certified overtopping prevention device. (DSI)
- 247\_\_ 66265.223 Failed to have a protective cover for dikes. (DSI)
- 248\_\_ 66265.225(a) Failed to perform the required waste analysis. (DSI)
- 249\_\_ 66265.226(a)(1) Failed to inspect freeboard each operating day. (DSI)
- 250\_\_ 66265.226(a)(2) Failed to inspect surface impoundments for leaks, deterioration and failures at least weekly. (DSI)
- 251\_\_ 66265.230 Incompatible or reactive HW are placed in the same surface impoundment. (DSI)

Waste Piles [I]

- 252\_\_ 66265.251 Failed to provide wind dispersal control. (DWP)
- 253\_\_ 66265.253(a)(1) Failed to place pile on an impermeable base if leachate or run-off is HW. (DWP)
- 253\_\_ 66265.253(a)(2) Failed to construct, operate, and maintain run-on control. (DWP)
- 254\_\_ 66265.253(a)(3) Failed to construct, operate, and maintain run-off control. (DWP)
- 255\_\_ 66265.253(a)(4) Failed to empty collection systems to maintain design capacity. (DWP)
- 256\_\_ 66265.254 Failed to meet requirements for liners and leachate collection systems. (DWP)
- 257\_\_ 66265.257 Failed to comply with requirements for incompatible, reactive or ignitable HW. (DWP)

Land Treatment [I]

- 258\_\_ 66265.272(a) Facility placed in or on a land treatment unit HW that can not be made less hazardous by described methods. (DLT)
- 259\_\_ 66265.272(b) Run-on control system inadequate to keep 25-year storm peak flow off active portion of the facility. (DLT)
- 260\_\_ 66265.272(c) Run-off control system inadequate to collect the volume of a 24-hour, 25-year storm. (DLT)
- 261\_\_ 66265.272(d) Run-on/run-off system not managed to maintain capacity. (DLT)
- 262\_\_ 66265.272(e) Failed to manage the treatment zone to prevent wind dispersal of particulate matter. (DLT)
- 263\_\_ 66265.272(f) New land treatment unit failed to have two or more liners and a leachate collection system as required. (DLT)
- 264\_\_ 66265.272(g) Discharged HW into a land treatment unit which has not been equipped with liners and a leachate collection/removal system. (DLT)
- 265\_\_ 66265.273(a)(1) Failed to determine concentration of Toxicity Characteristic constituents. (DLT)
- 266\_\_ 66265.273(a)(2) Failed to determine concentration of constituents for listed HW per Article 4, Chapter 11. (DLT)
- 267\_\_ 66265.273(b) Operating record failed to include waste analyses required in sections 66265.281 and 66265.282. (DLT)
- 268\_\_ 66265.276 Failed to comply with the notification, testing, land use restrictions and recordkeeping requirements for facilities which grow food chain crops on hazardous waste land treatment units. (DLT)
- 269\_\_ 66265.278 Failed to comply with the requirements for a hazardous waste land treatment vadose zone monitoring program. (DLT)
- 270\_\_ 66265.280 Failed to comply with the additional closure requirements for HW land treatment facilities. (DLT)
- 271\_\_ 66265.281(a) Failed to immediately incorporate ignitable or reactive hazardous waste into the soil or manage it in such a way as to prevent the hazardous waste from igniting or reacting. (DLT)
- 272\_\_ 66265.282 Placed incompatible wastes in the same hazardous waste land treatment unit. (DLT)

Landfills [I]

- 273\_\_ 66265.301(a) Failed to install liners, leachate collection system for new units, replacement units or lateral expansion units. (DLF)
- 274\_\_ 66265.301(b) Failed to notify the Department 60 days prior to accepting waste in a new unit, replacement unit or lateral expansion unit or failed to submit a Part B application within six months of making the above notifications. (DLF)
- 275\_\_ 66265.302(a) Run-on control system inadequate to keep 25-year storm peak flow off active portion of the facility. (DLF)
- 276\_\_ 66265.302(b) Run-off management system inadequate to collect the volume of a 24-hour, 25-year storm. (DLF)
- 277\_\_ 66265.302(c) Run-on/run-off systems not managed to maintain their design capacity. (DLF)
- 278\_\_ 66265.302(d) Failed to manage landfill to prevent wind dispersal of HW. (DLF)
- 279\_\_ 66265.309 Failed to maintain required landfill cell map. (DLF)
- 280\_\_ 66265.312(a) Failed to render ignitable or reactive waste non-ignitable or non-reactive before or after placing the waste in the landfill. (DLF)
- 281\_\_ 66265.312(b) Failed to comply with requirements for disposing of ignitable wastes held in containers. (DLF)
- 282\_\_ 66265.313 Placed incompatible wastes in the same landfill cell. (DLF)
- 283\_\_ 66265.314(a) Placed bulk or noncontainerized liquid HW or HW containing free liquids in the landfill. (DLF)
- 284\_\_ 66265.314(c) Failed to properly demonstrate the absence or presence or free liquids in bulk or containerized HW. (DLF)
- 285\_\_ 66265.314(d) Unauthorized placement of any liquid into a landfill. (DLF)
- 286\_\_ 66265.316 Failed to properly manage labpacks. (DLF)

Thermal Treatment [I]

- 287 — 66265.373 Failed to meet general operating requirements before adding HW. (DTT)
- 288 — 66265.377(a)(1) Failed to monitor temperature and emission control devices every 15 minutes and/or immediately make corrections to maintain appropriate steady state conditions. (DTT)
- 289 — 66265.377(a)(2) Failed to observe the stack plume hourly for normal appearance and/or failed to immediately make any necessary corrections. (DTT)
- 290 — 66265.377(a)(3) Failed to inspect the entire unit daily for leaks, spills, fugitive emissions, and proper functioning of emergency shutdown controls and alarm systems. (DTT)
- 291 — 66265.382 Facility open burned or detonated HW other than waste explosives or military propellants. (DTT)
- 292 — 66265.382 Facility failed to maintain the required distance from the detonation area to the property line for the amount of waste detonated. (DTT)
- 293 — 66265.383 Failed to receive performance certification before thermally treating F020, F021, F022, F023, F026, or F027 waste. (DTT)

Chemical, Physical, and Biological Treatment [I]

- 294\_\_ 66265.401(a) Failed to treat ignitable, reactive, or incompatible HW per 66265.17(b). (DCH)
- 295\_\_ 66265.401(b) Placed HW or treatment reagents in the unit which could cause the equipment to rupture, leak, corrode, or otherwise fail. (DCH)
- 296\_\_ 66265.401(c) Failed to equip a continuously fed unit with an inflow shut-off device. (DCH)
- 297\_\_ 66265.402(b) Failed to either run bench scale test or obtain written documentation on similar treatment of similar waste under similar operating conditions when treating a HW which is substantially different from the waste previously treated. (DCH)
- 298\_\_ 66265.403(a) Failed to conduct inspections of treatment unit each operating day for following: discharge control equipment, monitoring data, and weekly for construction materials to detect corrosion and secondary containment areas for leakage. (DCH)
- 299\_\_ 66265.405(a) Failed to manage ignitable or reactive HW properly. (DCH)
- 300\_\_ 66265.406(a)(b) Placed incompatible wastes or materials in the unit in a way that failed to comply with 66265.17(b). (DCH)

**WOOD PRESERVING**  
**INSPECTION CHECKLIST**

**A. Potential Deletion of HW Code F032 Following Equipment Cleaning and Replacement:**

If generator wishes to delete F032 waste code, then the generator must either clean or replace all equipment that may have come into contact with chlorophenolic formulations or constituents. [See Guidance]

**B. Generator Requirements for Wood Preserving Processing Plants**

- 301\_\_ 262.34(a)(1)(iii) Generator failed to place waste on drip pads that comply with subpart W of 40 CFR part 265 (GOR)
- 302\_\_ 262.34(a)(1)(iii)(A) Failed to maintain records that described procedures followed to ensure that all wastes are removed from the drip pad and the associated collection system at least once every 90 days (GPT)
- 303\_\_ 262.34(a)(1)(iii)(B) Failed to document removal of each waste, including quantity of waste removed from the drip pad, sump, or collection system, date and time of removal (GPT)

**SUBPART W - DRIP PADS**

Drip pads are considered "existing" or "new" as defined in 40 CFR 265.440 (See Guidance)

- 304\_\_ 265.440 (c) [(1) (i) - (iv)]- For infrequent and incidental drippage in the storage yard owner or operator failed to maintain and comply with a written contingency plan that describes how the o/o will respond immediately to the discharge of infrequent and incidental drippage. (See Guidance)

**Existing Drip Pads**

NOTE: Existing Drip pads must comply with §265.443 (except (b)), §265.444 and §265.445.

- 305\_\_ 265.441(a) O/O failed to obtain and keep on file at the facility a written assessment of drip pad integrity updated annually until drip pad complies with §265.443. (See Guidance)
- 306\_\_ 265.441(b) Failed to develop a written plan for upgrading repairing, and modifying the drip pad to meet the requirements of §265.443(b). ([12/24/92 FR P.61504] (See Guidance)
- 307\_\_ 265.441(c) Failed to submit to the Regional Administrator or State Director as-built drawings together with a certification by an independent, qualified, registered professional engineer attesting that the drip pad conforms to the drawings upon completion of all repairs and modifications.

308\_\_ 265.441(d) Failed to comply with the provisions of §265.443(m) or close the drip pad if the drip pad is found to be leaking or unfit for use.

New Drip Pads

309\_\_ 265.442 Owner or operator failed to ensure that the new pads were designed, installed and operated in accordance with one of the following :

310\_\_ 265.442(a) Applicable requirements of §§265.443 (except §265.443(a)(4) [maximum hydraulic conductivity], 265.444 and 265.445  
- or -

311\_\_ 265.442(b) All applicable requirements of §§265.443 (except §265.443(b) [liner, leak detection & collection system]), 265.444 and 265.445.

Design and Operating Requirements for BOTH "existing" and "new" drip pads

(with the exception the "existing pads are not required to comply with 265.443(b)

312\_\_ 265.443(a)(1) Drip pads were not constructed of non-earthen materials, excluding wood and non-structurally supported asphalt

313\_\_ 265.443(a)(2) Drip pad(s) were not sloped to free-drain treated wood drippage, rain and other waters, or solutions of drippage and water or other wastes to the associated collection system.

314\_\_ 265.443 (a)(3) The drip pad did not have a curb or berm around the perimeter.

315\_\_ 265.443(a)(5) Drip pad was not of sufficient structural strength and thickness to prevent failure due to physical contact, climatic conditions, the stress of installation, and the stress of daily operations, e.g.variable and moving loads such as vehicle traffic, movement of wood, etc.

**NOTE: 265.443(a)(4) applies only to existing drip pads and facilities choosing not to install liner and leak detection and collection system:**

316\_\_ 265.443(a)(4)(i) Drip pad was not sealed, coated, or covered with a surface with a hydraulic conductivity of less than or equal to  $1 \times 10^{-7}$  centimeters per second such that the entire surface where drippage occurs or may run across is capable of containing such drippage and mixtures or drippage and precipitation, materials, or other wastes while being routed to an associated collection system.

317\_\_ 265.443(a)(4)(i) Drip pad was not maintained free of cracks and gaps

that could affect its hydraulic conductivity.

- 318 \_\_\_ 265.443(a)(4)(i) Coating material was not compatible with the preservatives that contact the drip pad.
- 319 \_\_\_ 265.443(a)(4)(ii) Owner or operator failed to obtain, keep, and update annually a written assessment of the drip pad which was reviewed and certified by an independent qualified registered professional engineer which documents the extent to which the drip pad meets design and operating standards of 265.443 except for (b).

**NOTE: 265.443(b) applies only to drip pads for which the O/O chooses not to comply with maximum hydraulic conductivity standards**

- 320 \_\_\_ 265.443(b)(1)(i - iii) Failed to have a synthetic liner installed below the drip pad which is constructed of materials that will prevent the waste from being absorbed into the liner and prevent releases during the active life of the facility. (See Guidance)
- 321 \_\_\_ 265.443(b)(2) Failed to have a leakage detection system immediately above the liner. [See Guidance for Leakage Detection requirements (b)(2)(i) - (iii)]
- 322 \_\_\_ 265.443(b)(3) Owner/operator failed to have a leakage collection system immediately above the liner to collect leakage from the drip pad such that it can be removed from below the drip pad. [12/24/92 FR P.61504]
- 323 \_\_\_ 265.443(c) Drip pad was not maintained free of cracks, gaps, corrosion or other deterioration that could cause hazardous waste to be released from pad.
- 324 \_\_\_ 265.443(d) Drip pad and associated collection system was not designed and operated to convey, drain and collect liquid from drippage or precipitation to prevent run-off.

**NOTE: 265.443 (e) and (f) apply only if drip pad is not protected by a structure as described in 265.440(b).**

- 325 \_\_\_ 265.443(e) Owner failed to have a run-on control system capable of preventing flow onto the drip pad during peak discharge from at least a 24-hour 25-year storm unless the system has sufficient excess capacity to contain any run-on.
- 326 \_\_\_ 265.443(f) Owner failed to have a run-off management system to at least the water volume resulting from a 24-hour 25-year storm.
- 327 \_\_\_ 265.443(g) Owner failed to evaluate and obtain a statement from an independent, qualified registered professional engineer certifying that the drip pad meets the design requirements for paragraphs (a) through (f) of this section.

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
(Insert name and address of Cal/EPA Board/Department)

INTERAGENCY REFERRAL

An inspection was made by a representative of this Board/Department on the date and at the location indicated below. During the course of our inspection, the following conditions were noted which your Board/Department or Agency may wish to investigate.

REFERRED TO:

Name of Board/Department or Agency: \_\_\_\_\_

Complete address: \_\_\_\_\_  
\_\_\_\_\_

Telephone number: \_\_\_\_\_

Attention: \_\_\_\_\_

\_\_\_\_\_ Please advise of your disposition of this matter

LOCATION/FACILITY INSPECTED

Facility/owner's name: \_\_\_\_\_

Complete address: \_\_\_\_\_  
\_\_\_\_\_

Telephone number: \_\_\_\_\_

Occupant's name: \_\_\_\_\_

Permit/identification number (e.g., EPA generator ID, wastewater discharge permit, etc.), if available: \_\_\_\_\_

Inspector: \_\_\_\_\_ Telephone number: \_\_\_\_\_

Inspection date: \_\_\_\_\_ Referral date: \_\_\_\_\_

Violations/Conditions noted: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_