

DEPARTMENT OF TOXIC SUBSTANCES CONTROL1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(415) 551-2800INSPECTION REPORTQuemetco Inc.
720 South 7th Avenue
City of Industry, CA 91748

EPA ID # CAD066233966

Inspected by: Guillermo Hernandez
Hazardous Materials Specialist

Date of Inspection: June 23, 1993

Date of Report: August 21, 1993 *leave blank*I. PURPOSE:

To conduct a Compliance Evaluation Inspection of an Interim Status Facility which does treatment of RCRA and non-RCRA waste.

II. REPRESENTATIVES PRESENT:

Quemetco, Inc.:

Mark Vondersaar, Assistant Plant Manager
Alfredo Aviles, Plant Technical

Department of Toxic Substances Control (DTSC):

Guillermo "Memo" Hernandez, Hazardous Materials
Specialist (HMS)
Liang Chiang, Waste Management EngineerIII. OWNER/OPERATOR:

Quemetco Inc., is a subsidiary of Revere Smelting and Refining (RSR) Corporation.

Quemetco Inc.
CAD066233966

June 23, 1993

IV. BACKGROUND:

November 19, 1980
to
March 28, 1990

See August 29, 1991 Inspection Report (See Attachment B).

August 14, 1990
to
September 11, 1991

See August 31, 1992, Inspection Report. (Attachment B,).

June 24, 1991

The Department conducted off-site sampling at Quemetco to determine offsite lead contamination.

December 6, 20 & 23, 1991.

The Department completed a study of lead contamination in the area.

July 8 & 29, 1992

The Department informed the occupants of the areas sampled the results from the December 1991 study.

February 12, 1992

Letter to Quemetco from EPA stating that Quemetco was in violation of Phase I, the groundwater monitoring plan pursuant to the Consent Decree.

June 30, 1992

CEI inspection conducted by the Department.

V. HAZARDOUS WASTE STATUS:

See August 29, 1991 Inspection Report (Attachment B, Page 4). Quemetco's is currently operating under ISD, but is pursuing a Hazardous Waste Facility Permit (HWFP) that will include all hazardous waste management units not previously identified under the ISD. The HWFP will include but is not limited to the wastewater treatment plant, batch house, electric arc and reverbatory furnaces, plastic chips wash system and staging and storage areas.

which sections see note

VI. HAZARDOUS WASTE ACTIVITY DESCRIPTION:

See August 29, 1991 Inspection Report (Attachment B, Pages 4 & 5)

U.S. DEPARTMENT OF JUSTICE
ENVIRONMENTAL PROTECTION DIVISION
WASHINGTON, D.C. 20530

VII. OBSERVATIONS:

We arrived at the facility at approximately 10:00 am and registered with security. We were greeted by Mark Vondersaar Assistant Plant Manager. We were escorted into his office, and joined by Alfredo Aviles. I stated the purpose of our visit and proceeded to request consent to conduct our inspection. I told Vondersaar that the CEI normally involves a facility inspection, a record review and the taking of samples and photographs. Vondersaar granted consent to continue with our inspection.

I asked Vondersaar to identify any new activities that have occurred at the facility since our last site inspection. Vondersaar informed us of the following activities:

- 1) Completion of phase I of the batch house.
- 2) Currently completing phase II of the containment building.
- 3) The removal of the single type scrubber and placement of the dual stage scrubber in the reveratory furnace.
- 4) The electric arc furnace went into operation on May 6, 1993.
- 5) A closure plan for the surface impoundment has been submitted to the Department for approval. Vondersaar added that a notice was placed in the newspaper. He then said that upon completing closure this area will be used as a truck parking lot and for storage of finish goods and chemicals.

Vondersaar also told us that small quantities of slags are being transported to U.S. Ecology in Beatty, Nevada. He stated that the slags are being transported as RCRA hazardous waste and being landfilled. As of May of 1993, slag was no longer being sent to Quemetco's sister facility in Indianapolis. Vondersaar informed us that the polypropylene chips are still being managed in the same manner as discussed in our last inspection.

At approximately 10:45 a.m. we began the walkthrough portion of our inspection.

At the Maintenance area Vondersaar informed us of several operations that are on going in this area. He stated that this area does vehicle maintenance, rebuilding of pumps, fabrication, work orders, and the machine and electrical shop. We observed one 55 gallon drum of waste oil labelled but lacking the information of hazardous characteristic.

We than proceeded to the battery unloading area, Vondersaar informed us that batteries entering the facility are still being hand sorted, put on the conveyor belt manually and crushed using a roller crusher (See Attachment A, Photo # 1).

We than proceeded to the battery staging area, Vondersaar informed us that when batteries are unable to be fed directly to the

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crusher, batteries are staged here until a later date. I informed Vondersaar that I observed that the asphalt covered area had several cracks and that I had a concern with materials leaking onto the soil (See Attachment A, Photo # 2). He stated that a full time staff person goes around every week to repair all the cracks in the facility. He added that asphalt breaks easily due to heavy equipment traffic and that acids are able to break up the concrete. Currently Quemetco is testing a new material to be used as a patch in the scale house and it seems to be holding up well.

We then proceeded to the polypropylene chip area. The chips go to a hammering system than to two dewatering systems than to a blower system where they are blown into a trailer (See Attachment A, Photos # 3 & 4). The chips are stored to dry in trailers. Sample analysis are taken of each trailer to determine if a second washing is deemed necessary. The trailers are stored over a 12 inch pad of concrete underlaid by six feet of asphalt. The water draining from the trailers are sloped towards a drainage system which collects the water and later goes to the waste water treatment system. Vondersaar stated that the system is working well and that the plastic chips are going under a hazardous waste manifest to KW plastics.

Adjacent to this area were three roll-off bins containing used bricks identified as hazardous was labelled but lacked the information of hazardous characteristic.

After a brief visit of the scalehouse and the wastewater treatment plant, we proceeded to the new constructed Batch House.

At the Batch House (See Attachment A, Pictures # 5 & 6) we observed the storage of all the waste piles. Vondersaar informed us that as of May 1993, second run slags are no longer shipped to their sister facility in Indianapolis.

This concluded the walkthrough portion of our inspection.

We then proceeded to go to lunch.

Record Review:

During the records review, we observed the following discrepancies:

- 1) Manifests - the manifests filed in the scale house had no observed violations.
- 2) Waste Analysis Plan (WAP) - is not updated to include all of the current operations (See Attachment D). Quemetco has undergone extensive change in operations, including new construction, but the WAP fails to include them. In addition, the Department has notified Quemetco of the regulatory status

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of the wastes and materials. At a minimum the plan did not specify the following:

- o The parameters for each Hazardous waste will be analyzed and the rationale for the selection of each parameter.
- o The test methods which will be used to test these parameters.
- o Methods to obtain a representative sample.
- o Frequency with which to ensure a representative sample of each of the waste to be analyze.

Upon review the WAP was not specific and needed to include these hazardous wastes:

- a) Wastewater treatment solids
 - b) Battery case materials
 - c) Drosses and slags
 - d) Process wastewater
 - e) Battery acids
 - f) Materials as a result of demolition or construction.
- 3) Closure Plan - is not updated, and fails to include all current operations (See Attachment E). Among some of the changes Quemetco needs to include in the Closure Plan is the batch house, the wastewater treatment plant, furnaces and any other hazardous waste management units as required by the Department.
- 4) Contingency Plan - We recommended that Quemetco include earthquake procedures in the plan.
- 5) Financial Responsibility (FR) - The FR unit noted no violations (See Attachment F).

VIII. VIOLATIONS:

A. Class 1 Violations:

None observed

B. Class 2 Violations:

COUNT 1: Title 22, CCR., Section 66262.34 (f) (3) (B).

On or about June 23, 1993 Quemetco violated Title 22, CCR., Section 66262.34 (f) (3) (B) in that Quemetco did not label or marked four containers containing hazardous waste with statement or statements which call attention to the particular properties of the waste. To wit: Labels on one 55 gallon drum containing waste oil in the maintenance building and three roll-off bins adjacent to the storage area did not include the above mention information.

Evidence: Statements from Aviles identifying the containers as containing hazardous waste.

Witnesses: 1 & 2.

COUNT 2: Title 22, CCR., Section 66265.112 (c).

On or about June 23, 1993, Quemetco violated Title 22, CCR., Section 66265.112 (c), in that Quemetco did not include all the required information in the closure plan. To wit: The closure plan was out of date and did not reflect all current operations, since Quemetco has undergone changes in construction and management of hazardous waste streams and units.

Evidence: Statements form Aviles stating that the closure plan furnish to Chiang and I was the most current. Aviles also stated that a new closure plan is being develop to include all operational and hazardous waste management changes. A review of the closure plan by Chiang and I concluded the above mention deficiencies. Also see copy of Closure Plan enclosed as Attachment E.

Witnesses: Hernandez and Chiang

COUNT 3: Title 22, CCR., Section 66265.13 (b).

On or about June 23, 1993, Quemetco violated Title 22, CCR., Section 66265. 13 (b), in that the WAP is deficient, to wit: The WAP did not include the parameters for each hazardous waste was not analyze; the test methods for each parameter, the sampling and sampling management methods to obtain a representative sample.

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Evidence: Statements from Aviles stating that the WAP furnish to Chiang and I was the most current. Aviles also stated that a new WAP was being develop to include all hazardous waste streams. A review of the WAP by Chiang and I concluded the above mention deficiencies. Also see copy of WAP enclosed as Attachment D.

Witnesses: Hernandez and Chiang

IX. DISCUSSION WITH MANAGEMENT:

During the exit review we discussed the violations noted during the June 23, 1993 inspection. We told Vondersaar and Aviles, that the Department has several enforcement options when seeking compliance for violations. I informed them that the violations noted during the inspection were relatively minor. I issued them a Field Report of Violation (FROV) (See Attachment # G) and informed them that I am seeking immediate compliance.

We handed Vondersaar a copy of the FROV and concluded our inspection.

XIV. SIGNATURES:

Original Signed

Guillermo Hernández
Hazardous Materials Specialist

8/23/93
Date Submitted

Original Signed

Roy Yeaman
Senior Hazardous Materials Specialist

8-3-93
Date Approved

Quemetco Inc.
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ATTACHMENTS:

- A: June 23, 1993, Photographs - three pages.
- B: August 29, 1991 and August 31, 1992, Inspection Report (chronology of events) - four pages.
- C: August 29, 1991, Inspection Report - two pages.
- D: WAP - nine pages.
- E: Closure Plan - three pages
- F: Financial Responsibility Review - two pages.
- G: FROV - four pages.
- H: Response to FROV - two pages.
- I: Checklists - four pages.

ATTACHMENT A

June 23, 1993, Photographs



Photo No.: 1 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of battery conveyor belt, showing the cracks on the asphalt. Photo taken by Chiang.



Photo No.: 2 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of a Battery Staging Area. Photo taken by Chiang.



Photo No.: 3 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of polypropylene chips going from the blower system into the trailers. Photo taken by Chiang.



Photo No.: 4 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of polypropylene chips going from the blower system into the trailers. Photo taken by Chiang.



Photo No.: 5 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of batch house, where the waste piles are stored. Photo taken by Chiang.

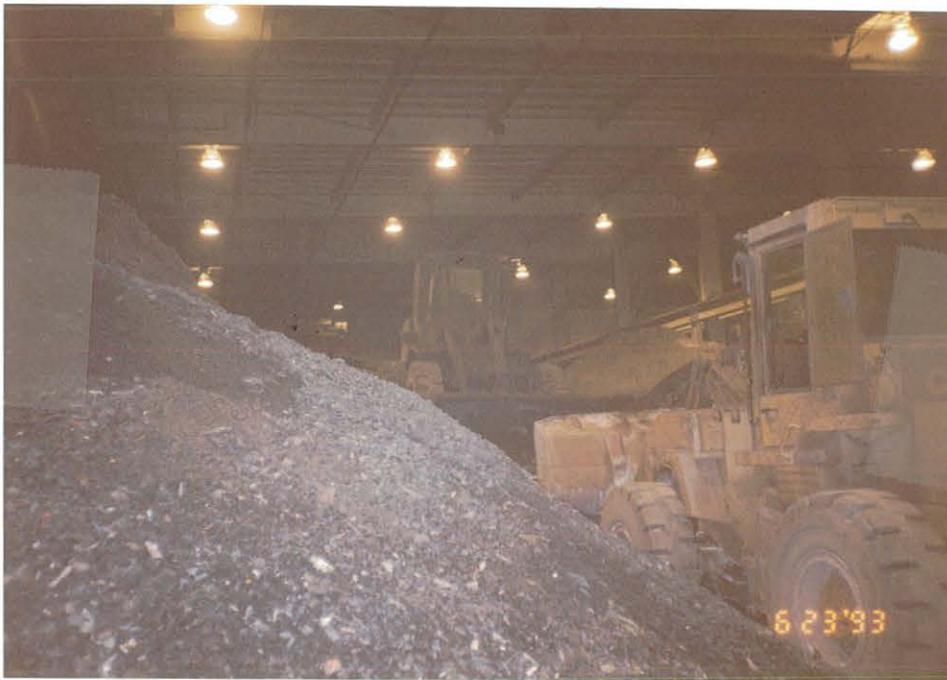


Photo No.: 6 Date: June 23, 1993 Inspector: G. Hernandez

Description Photo of batch house, where waste piles are stored. Photo taken by Chiang.

ATTACHMENT B

August 29, 1991 and August 31, 1992 Inspection Reports

INSPECTION REPORT
Quemetco, Inc.

IV. BACKGROUND:

Quemetco Inc. is operating under an Interim Status Document (ISD) as a treatment, storage and/or disposal facility (TSDF).

- November 19, 1980 Part "A" application filed.
- May 16, 1983 DHS granted Quemetco an ISD for storage and treatment of hazardous waste with the stipulation that groundwater monitoring was to be conducted at the facility.
- November 18, 1984 Notice of Violation (NOV) issued to Quemetco by DHS citing:
1. Non-compliance with groundwater monitoring as noted in their ISD.
 2. Presence of groundwater contamination.
 3. Failure to report significant increases in detected groundwater constituents.
 4. Failure to submit a groundwater assessment.
- November 8, 1985 Quemetco lost authorization from DHS to operate its surface impoundment. Quemetco incorporated above ground storage tanks into its wastewater treatment system to replace the the surface impoundment. The tanks store the wastewater prior to treatment and subsequent discharge to the sewer. The facility is presently undergoing enforcement action with the Environmental Protection Agency (EPA) and DHS concerning groundwater contamination and the closure of the surface impoundment.
- November 8, 1985 Quemetco refiled part "A" reclassifying it's piles from hazardous waste to product.
- March 18, 1987 DHS conducted a compliance evaluation inspection of the Quemetco facility, and a NOV and Schedule for Compliance was issued on July 17, 1987, for not having a waste analysis plan present at the facility.

INSPECTION REPORT
Quemetco, Inc.

85/86-605

12/21/87

On March 18, 1987, Quemetco was issued a Consent Decree from the United States District Court for the Central District of California and a Remedial Action Order. The Decree and Remedial Action order directed Quemetco to:

1. Eliminate use of sprinklers in the battery storage area.
2. Contain runoff from the battery storage area, polypropylene chip and hard rubber storage area, the reverberatory and electric furnace slag storage area, and from parked trucks serving those areas.
3. Take steps to minimize and contain leakage from bins and trucks.
4. Not place, treat, store, dispose, or release hazardous waste into the surface impoundment.
5. Seal all pavement cracks in the battery storage area, polypropylene chip and hard rubber storage area, scrap lead area, and the reverberatory and electric furnace slag storage area.
6. Install a berm around the battery storage area.

February 17 & 18, 1988

DHS conducted a compliance evaluation inspection at the facility.

March 4, 1988

DHS issued a Report of Violation (ROV) citing the following violations:

1. Inadequate waste analysis plan.
2. Inspection log deficiencies.
3. Inadequate training plan.
4. Contingency Plan not submitted to local police departments, hospitals, and state or local emergency response teams that may be called upon to provide emergency services.
5. No visible accumulation start dates on sixteen containers.
6. No signs posted at the entrances to the active portion of the Hazardous waste area.
7. Sixteen containers containing hazardous waste were not covered.

November 9, 1988

DHS conducted an annual compliance evaluation inspection of the facility. No violations were found.

February 15 & 20, 1990

DHS conducted an annual compliance evaluation inspection of the facility.

INSPECTION REPORT
Quemetco, Inc.

March 28, 1990

DHS issued an ROV citing the following violations:

1. Waste piles were not managed to avoid dispersal by wind.
2. Quemetco has not designed, constructed, operated and maintained a run on system for their waste piles.
3. Waste piles were not protected from run on and precipitation.
4. Quemetco placed waste bearing free liquids in the filter cake, hard rubber, polypropylene chip, and separator bottoms in waste piles.
5. Quemetco did not maintain and operate the facility to minimize the possibility of any unplanned, sudden or non-sudden release of hazardous waste.
6. No closure plan available at the facility.
7. Two open drums of hazardous waste.
8. At least two drums were improperly labeled.

V. GENERAL DESCRIPTION OF FACILITY

Quemetco is a secondary lead smelter. Approximately ninety percent of the accepted feedstock is from spent automobile and truck batteries. The remaining ten percent comes from lead bearing trash. In 1990, Quemetco had 210 employees and operated 24 hours a day, seven days a week. In 1989 Quemetco processed 7.2 million batteries and in 1990 processed an average of approximately 28 thousand batteries per day. Presently Quemetco is operating at 70% capacity, due to a slow down in incoming feedstock. Quemetco is approximately 10 acres in size and is located on the northeast corner of Salt Lake Avenue and Seventh Avenue in the City of Industry.

VI. HAZARDOUS WASTE PROCESS:

Quemetco is both a hazardous waste treatment facility and a generator of hazardous waste. It is not permitted to serve as a disposal site. The Part A application indicates that the following hazardous wastes were being handled at the facility:

1. Corrosive Materials (D002)
2. Lead (D008)
3. Emission control dust from lead smelting (K069)

IV. BACKGROUND:

November 19, 1980
to
March 28, 1990

See August 29, 1991 Inspection Report (See Attachment B, Pages 2, 3 & 4).

* August 14, 1990

EPA sent resolution of disputes concerning Ground Monitoring Plan (GMP) and Financial Assurance.

September 7, 1990

Quemetco submitted modified Closure Plan for the inactive surface impoundment.

September 27, 1990

EPA sent Quemetco some modifications to be made on the proposed Closure Plan.

December 14, 1990

Quemetco submitted Revised Workplan for Chemical Testing and Closure Plan.

December 14, 1990

EPA approved phase one of the Groundwater Monitoring Plan.

January 18, 1991

EPA approved Pilot Test for Closure w/modifications.

January 25, 1991

The Department approved phase one of GMP.

June 13, 1991

Quemetco submitted pilot test data and request for waste status document & extension of 90-day storage limit.

June 13, 14, 1991

The Department conducted a Compliance Evaluation Inspection.

September 11, 1991

A Report of Violation was sent to Quemetco citing continuing and additional violations.

V. GENERAL DESCRIPTION OF FACILITY:

See August 29, 1991 Inspection Report (Attachment B, Page 4).

ATTACHMENT C

August 29, 1991, Inspection Report

INSPECTION REPORT
Quemetco, Inc.

Present industrial processes include the cracking of lead acid batteries, sizing and separating of battery parts and the smelting and refining of lead. Scrap pre-treatment is also employed at the facility. Quemetco produces lead for smelting, polypropylene chips for sale, and hard rubber is used as a reducing agent in the furnace.

The first step involving treatment of hazardous waste is the battery/cracker unit in which spent batteries are broken into various sized parts. Parts of casing posts, grids ect., are separated in a water float sink tank with the lighter polypropylene rising to the surface and the heavier metals settling to the bottom. The polypropylene chips are sent to another washer unit and readied for sale. The lead is sent to the furnace for smelting.

Quemetco has two furnaces onsite - an electric arc furnace and a reverberatory furnace. The electric arc furnace uses slag exclusively as its primarily feedstock. According to Finn, "slag can be sold as a product" and as a result the electric arc furnace "has not been used in two years." The reverberatory furnace uses slag and battery components as its primarily feedstock. The furnace produces 5,000 pound blocks which are fed into the melting kettles. In the melting kettles antimony and other alloys are added to produce various types of lead.

Any impurities commonly called "drosses" produced in the melting kettles are separated out 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 was sold to Alco Pacific in 1990, a facility in Mexico. According to Finn, Quemetco is presently sending its second run slag to its sister facility in Indianapolis, Indiana. Impurities from the melting kettles are called drosses. Tin dross as well as slag is shipped for further refining to an electric arc furnace at Quemetco's sister facility in Indianapolis, Indiana.

According to Finn, Quemetco only generates excess hard rubber and refractory material as hazardous waste. This waste is sent under manifest to U.S. Ecology in Beatty, Nevada.

VII. OBSERVATIONS:

June 13, 1991:

Rasmussen, Kou, Smalstig and I arrived at the facility at approximately 9:15 a.m. to conduct an annual compliance evaluation inspection (CEI). We met with Finn and Aviles at the front office. I stated the purpose of our visit and proceeded to request consent to conduct our inspection. I told Finn that the CEI normally involves a facility inspection, a record review and the taking of photographs and samples. I asked if that was okay and Finn stated "yes."

INSPECTION REPORT
Quemetco, Inc.

March 28, 1990

DHS issued an ROV citing the following violations:

1. Waste piles were not managed to avoid dispersal by wind.
2. Quemetco has not designed, constructed, operated and maintained a run on system for their waste piles.
3. Waste piles were not protected from run on and precipitation.
4. Quemetco placed waste bearing free liquids in the filter cake, hard rubber, polypropylene chip, and separator bottoms in waste piles.
5. Quemetco did not maintain and operate the facility to minimize the possibility of any unplanned, sudden or non-sudden release of hazardous waste.
6. No closure plan available at the facility.
7. Two open drums of hazardous waste.
8. At least two drums were improperly labeled.

V. GENERAL DESCRIPTION OF FACILITY

Quemetco is a secondary lead smelter. Approximately ninety percent of the accepted feedstock is from spent automobile and truck batteries. The remaining ten percent comes from lead bearing trash. In 1990, Quemetco had 210 employees and operated 24 hours a day, seven days a week. In 1989 Quemetco processed 7.2 million batteries and in 1990 processed an average of approximately 28 thousand batteries per day. Presently Quemetco is operating at 70% capacity, due to a slow down in incoming feedstock. Quemetco is approximately 10 acres in size and is located on the northeast corner of Salt Lake Avenue and Seventh Avenue in the City of Industry.

VI. HAZARDOUS WASTE PROCESS:

Quemetco is both a hazardous waste treatment facility and a generator of hazardous waste. It is not permitted to serve as a disposal site. The Part A application indicates that the following hazardous wastes were being handled at the facility:

1. Corrosive Materials (D002)
2. Lead (D008)
3. Emission control dust from lead smelting (K069)

ATTACHMENT D

WAP

LABORATORY INVOLVEMENT PROCEDURES -- A
RAW MATERIALS RECEIVED
(WASTE ANALYSIS PLAN)

1. Entrance into sealed trailer vans and railcars, and sampling of containerized materials, require the use of Safety Procedures for Handling Hazardous Materials.
2. Receiving personnel call with notification of receipt of a hazardous waste load of raw materials and description of container contents.
3. Preliminary inspection may take place at the scale or at the shipping/receiving dock.
4. For sampling, raw material procedures outlined in the Raw Materials Receiving Procedures Manual are to be used. The procedures for sample analysis are found in either the Fire Assay Procedure Manual, or following the Plant Quality Control Lab Procedures.
5. All laboratory analysis reports of hazardous waste, either generated or received, must document the Uniform Hazardous Waste Manifest number used in transport of the material.
6. Loads may be rejected based on two criteria (see Rejection of Receipts):
 - a. Disagreement with Receiving Personnel's description of contents compared to Laboratory Personnel's preliminary visual inspection;
 - b. Laboratory analysis of material content compared to contract for receipt description.
7. Laboratory Personnel will notify Plant Manager and Corporate Raw Materials Purchasing of the material analysis.
8. Remainder of the sample unused in the above outlined procedures must be immediately taken to the furnace charge preparation area for processing after a sample is retained for Quality Control reference purposes.

LABORATORY INVOLVEMENT PROCEDURES --- B
GENERATED HAZARDOUS WASTE
(WASTE ANALYSIS PLAN)

1. The following potentially toxic materials when generated by the plant for off-site disposal, must be sampled and analyzed after any major process change and/or at least annually.
 - a. Wastewater treatment solids
 - b. Battery case material
 - c. Used refractory brick
 - d. Electric Arc Furnace slag
 - e. Process wastewater
 - f. Battery water
2. All materials excavated or demolished as a result of construction projects within operational areas of the plant must be sampled and analyzed before disposal.
3. Sampling and Analyses methods must be conducted in accordance with Test Methods For Evaluating Solid Waste - Physical/Chemical Methods, EPA's Publication SW-846 and by approved State methods (CAC Title 22, Division 4, Chapter 30, Article 11).
4. Sampling and analyses reports are to be maintained for at least three (3) years.
 - a. Copies of sampling and analyses reports shall be transmitted to Corporate Environmental Services.
5. The Shipping/Receiving Personnel shall be provided with the necessary analytical information required to complete the Uniform Hazardous Waste Manifest if the material is found to be hazardous waste.

REJECTION OF RECEIPTS

1. Raw materials receipts may be rejected upon either of the following:
 - a. Receipts which are NOT, upon visual inspection, in agreement with either a manifest description and/or the contract for receipt description. This type of rejection occurs prior to the Plant signing for or otherwise accepting the receipt from the vendor, generator, and/or transporter.
 - b. Receipts which are, upon visual inspection, in agreement with both a manifest description and the contract for receipt description, but upon laboratory analyses does not meet either the manifest and/or contract for receipt description. This type of rejection is precipitated by laboratory analyses and the rejection occurs after the Plant has signed for and/or accepted the receipts from the transporter ONLY. The receipts have NOT been accepted in any manner from the vendor and/or generator.
2. Rejections based on visual inspections, where the receipts are a designated hazardous waste, must be detailed in the Uniform Hazardous Waste Manifest using the Discrepancy Indication Space (Blocks 19 and/or 35).
 - a. In the case of partial load rejections the Uniform Hazardous Waste Manifest shall not be signed and/or dated to indicate receipt until after the rejection discrepancy has been entered on the manifest.
 - b. In the case of full load rejections the Uniform Hazardous Waste Manifest shall NOT be signed and/or dated. This action indicates the load has not and is not received by the Plant in any manner.

3. Rejections precipitated by laboratory analyses, where the receipts are designated hazardous wastes, must be transported from the Plant.
 - a. The destination of the materials will be advised by Corporate Raw Materials Purchasing with another Uniform Hazardous Waste Manifest obtained from the vendor and/or generator.
 - b. A readable copy of the original manifest shall be attached to the new manifest.
 - c. The original manifest document number shall be entered on and identified on the new manifest using the Discrepancy Indication Space (Blocks 19 and/or 35).
 - d. The material must be re-containerized if the material was emptied from the original container(s) for sampling. Every effort should be made to re-use the original container(s) if the container(s) are not damaged. After re-containerizing the material the container(s) must not leak or spill, and must be closed. The outside of the container must be as clean as practical and must be stored in the Designated Hazardous Waste Container Storage Area until receiving shipping instructions from Corporate Raw Materials Purchasing.

POTASSIUM BROMATE DETERMINATION OF
ANTIMONY AND ARSENIC
IN GRID METALS AND SLAG

APPARATUS & REAGENTS

1. Potassium bromate, granular, analytical reagent.
2. Potassium bisulfate, powder, analytical reagent.
3. Concentrated hydrochloric acid, reagent grade.
4. Concentrated sulfuric acid, reagent grade.
5. Sodium chloride, reagent grade.
6. Methyl orange indicator.
7. 500 ml narrow mouth Erlenmeyer flask.
8. 400 ml beaker.
9. Number seven (7) - three (3) hole rubber stopper equipped with a thermometer, a relief tube and a distillation tube.

SOLUTIONS

1. Methyl orange indicator: Dissolve 100 milligrams in 100 ml of water.
2. 0.05N potassium bromate solution: Dissolve 1.392 grams per liter. Standardize for both antimony and arsenic to determine factors.

PROCEDURE

1. Weigh a one (1) gram sample (1/2 gram on 2nd run slag) into a narrow mouth Erlenmeyer flask.
2. Add two (2) spoons, approximately 15 grams, of potassium bisulfate (or pyro sulfate) and 20 ml of sulfuric acid to flask.
3. Place on hot plate and heat slowly until dissolved, then to maximum heat.
4. When layer of fumes rise up to the 200 ml mark, fume over burner until fumes are one (1) inch from the top of the flask.
5. Set off hot plate and cool, about 10 minutes.
6. Place in water bath and add exactly 15 ml of distilled water and freeze.
7. When contents of flask are cool, less than 20°C, add two (2) spoons, approximately 10 grams sodium chloride, and 50 ml of hydrochloric acid.
8. Place flask on hot plate for arsenic distillation. Place the rubber stopper in the flask with the distillation tube in a 400 ml beaker containing 150 ml of distilled water.
9. Distill to 105°C, remove from hot plate, and allow to cool.

10. After flask has cooled for approximately 10 minutes, disconnect thermometer and distillation tube and wash down tube.
11. Arsenic: Place stirring bar in beaker and heat to 80-90°C, using a magnetic stirring plate, titrate with the 0.05N potassium bromate with one (1) drop of methyl orange to a colorless solution. Record titration and sample weight.
12. Antimony: To flask, add stirring bar, approximately 25 grams of sodium chloride and dilute to 350 ml with boiling water. Add one drop of methyl orange. Titrate until pink color becomes clear, add one more drop of indicator and titrate until colorless, (a slight greenish color indicates over titration). Record titration and weight.
13. Calculation on both antimony and arsenic:

$$\frac{\text{Titration}}{\text{Weight of sample}} \times \text{factor} = \%$$

TIN IN ANTIMONIAL LEAD

APPARATUS

2 - 500ml Erlenmeyer flasks
2 - ridged watch glasses
2 - Bunsen burners
2 - tripod supports
2 - rubber stoppers
50 ml and 250ml graduated cylinders
Hot Plate

REAGENTS

conc. sulfuric acid
conc. hydrochloric acid
test lead
starch indicator - 1.0gm/100ml distilled water
iodine solution - one 0.1N iodine standard
volumetric ampule/2800ml distilled water
U.S. Standard Reference Material 53e

STANDARDIZATION OF IODINE SOLUTION

1. Weigh out two, 0.500gm samples of Standard Reference Material 53e.
2. Follow procedure below.
3. Calculation:

$$\text{Sn factor} = \frac{\% \text{ Sn X sample weight}}{\text{ml iodine titrated} - 0.2\text{ml}}$$

PROCEDURE

1. Weigh out two, 2.000gm samples into 500ml Erlenmeyer flasks.
2. Add 37.0ml sulfuric acid.
3. Heat over burner until fumes in neck.
4. Fume off sulfurous gases.
5. First air cool, then further in a water bath.
6. Dilute to 200ml with distilled water.
7. Add 1.0gm potassium chlorate. (1 scoop).
8. Dilute to 300ml with conc. hydrochloric acid.
9. Bring to boil and swirl flask to dissolve precipitate.
10. Air cool.
11. Add 20gms pure test lead. (2 scoops).
12. Heat over burner to start reaction.
13. Cover with watch glass and place on hot plate for 15 to 20 minutes.
14. Remove from hot plate and stopper immediately.
15. Cool in cold water bath for 15 minutes.
16. Add 3ml starch indicator.
17. Titrate with standard iodine solution to blue color.
18. Calculation:

$$\% \text{ Sn} = \frac{\text{ml iodine titrated} - 0.2\text{ml X factor}}{\text{sample weight}}$$

Na & Si IN SLAGS

1. Crush Slag.
2. Weigh out 0.5000g of Slag.
3. Place sample in 250ml plastic beaker.
4. Place plastic beaker in 600ml beaker with water to act as a double boiler.
5. In plastic beaker pour 15ml HNO_3 (conc.).
6. Boil for approximately 5 minutes (boiling refers to water in 600ml beaker).
7. Add 15ml of HF to plastic beaker.
8. Boil for 15 to 20 minutes.
9. Add 50ml of D.I. H_2O to plastic beaker.
10. Add 7 1/2g of boric acid.
11. Let dissolve. (Additional water may be needed to completely dissolve the Boric Acid).
12. Remove from heat.
13. Let cool.
14. Filter into plastic 500ml volumetric.
15. Dilute to 500ml mark.
16. Analyze for Na and Si.
17. Dilute solution if needed (usually should not be necessary with 100ppm and 200ppm standards).

PLANT QUALITY CONTROL PROCEDURES

SODIUM PEROXIDE FUSION

1. Weigh out 0.50gm sample.
2. In a Zirconium crucible, add 6-7 grams (1/4 - 1/2 inch) of Sodium Peroxide.
3. Transfer sample to top of Sodium Peroxide bed. Combine sample and sodium peroxide until mixture is homogenous, making sure none of the sample touches the sides or bottom of the crucible.
4. Cover and place in triangle over burner.
5. Heat until mixture is cherry-red. Swirl.
6. Turn off burner and continue to swirl until material solidifies.
7. Cool 1 to 3 minutes.
8. Transfer crucible to a 400ml beaker containing 150ml of distilled water. Cover with a watch glass.
9. When initial reaction subsides, add 70 to 75ml HCl.
10. Wait for reaction to subside. If solution is cloudy, add 25mls Hydro-floro-boto nitric acid solution. IF NICKEL CRUCIBLE IS BEING USED, REMOVE AND RINSE THE CRUCIBLE BEFORE ADDING SOLUTION!
11. If solution remains cloudy, transfer to hot plate and simmer, stirring occasionally until solution clears.
12. Rinse and remove crucible.
13. Air cool.
14. Transfer to a 500ml volumetric flask.
15. Cool in water bath.
16. Dilute to the mark with water.
17. Use to run analysis on AA. Run straight. If any element has an absorbance greater than 10% higher than the highest standard, dilute the sample 1:1 with distilled water (for that element only).

PREPARATION AND NOTES ON STANDARDS

To make a standard, first decide if it is to be used as S_1 , S_2 , or S_3 . Then find the page in the "Misc." section of this book for the element in question. Find the linear working range of the element. S_1 must be within that range. S_2 should be three times S_1 . S_3 should be two times S_2 . To make any standard, add $\frac{x}{10}$ of a 1000ppm standard (where x-ppm of the standard desired), to a 100ml volumetric flask and dilute to the mark. Use Sodium peroxide blank (a fusion as above with no sample added) to dilute if standards will be used for a peroxide analysis. Otherwise, use distilled water (except Ca, see appropriate section in this book). % of element will equal $\frac{x}{10}$.

ATTACHMENT E
Closure Plan

CLOSURE PLAN---RCRA---HAZARDOUS WASTE CONTAINER STORAGE AREA

Plant Name: Quemetco, Inc.
Plant Address: 720 South Seventh Avenue,
City of Industry, California 91749
Plant Location: Same as Plant Address
EPA I.D. Number: CAD 066 233 966
Date Revised: October 11, 1985

Closure Narrative

The units for which this plan is designed, are three (3) paved areas designated as a hazardous waste container storage areas. The materials stored in these areas are containerized. Therefore, closure of the units requires the removal of the containers and the washing clean of the area. Closure or partial closure of the facility is not intended or anticipated.

The approximate time for completing this closure schedule is less than 90 days.

The cost estimate for closing this facility is:

\$NONE

Facility Description

The units are paved areas (approximately 12,000 square feet) designated as areas to store lead bearing materials in containers. The areas are serviced by the Plant run-off/spill control system which is an integral part of the Plant's Clean Water Act permit for discharge of waste waters.

The units for which this plan is designed are not hazardous waste disposal sites. The units are container storage areas for materials of a lead reclamation operation where the major raw materials are lead-acid storage batteries and lead scrap amenable to the Plant's processes. Therefore, the hazards for which this plan is designed to eliminate are from contamination from inorganic heavy metals, particularly lead. Since the Plant produces inherently hazardous products and by-products as a matter of every day operation, disposal of wastes generated during closure are potentially hazardous and would be handled in the same manner as routinely generated hazardous wastes, i.e., location of approved disposal sites, documentation of disposal methods, and techniques/procedures for proper approval are already complete.

The hazard to public health and environment is not increased with the act of closure. The units are entirely within the Plant site which is designed to prevent hazards to public health and environment. These design characteristics remain in place and operational under this closure plan. Upon closure, the units areas will be used in handling materials presenting the same hazardous characteristics as the materials previously stored in the area and designated as hazardous wastes. However, the materials to be subsequently handled are not by definition hazardous waste. Since the waste is to be removed and the area cleaned such that wastes do not remain, then the need for post closure care is eliminated.

Closure Steps, Schedule, Cost Estimates and Inventory Estimate

- I. Notification of intent to close
 - A. EPA Region: IX
 - B. State Agency:
 - (1) California Department of Health Services
 - (2) California Regional Water Quality Control Board

- II. Accomplished under normal Plant Operations prior to closure
 - A. Removal of Containers
 1. Time estimate: Less than 90 days
 2. Description: Materials are recyclable
 3. Method: Recycled on-site and/or sold for off-site recycling
 4. Maximum inventory estimate: 900,000 gallons
 5. Cost estimate: \$ None
 - B. Decontamination of area
 1. Time estimate: one to five (1-5) days
 2. Description: High pressure water washing of area. Wash waters contained, treated, and discharged by on-site Clean Water Act permitted waste water collection/treatment system.
 3. Method: High pressure water washing (Plant wash down) is a normal operation of the Plant and is designated by the EPA as a typical Plant process (see 40 CFR 421).
 4. Cost estimate: \$ None

- III. Notification of Closure Complete
 - A. EPA Region: IX
 - B. State Agency:
 - (1) California Department of Health Services
 - (2) California Regional Water Quality Control Board

ATTACHMENT F

Closure Cost Estimates and Financial Liability

FINANCIAL RESPONSIBILITY REVIEW REQUEST

TO: Cecilia Rosera FROM: Maria Hernandez
 SURVEILLANCE & ENFORCEMENT BRANCH CIRCLE REGION: 1 2 **(3)** 4
 FINANCIAL RESPONSIBILITY COORDINATOR CIRCLE BRANCH: **(SEB)** FPB FMB SMB OTHER _____
 PHONE: 551-2873
 DATE: 6/18/93

INFORMATION ON FACILITY TO BE REVIEWED:

Name: Quemaco Inc.
 EPA ID No.: CAD 066233966 Address: 720 S. Seventh Avenue
City of Industry CA 91748
 Contact: Robert Finn Phone No.: 330-2924
 Planned Inspection Date: 6/21/93 Anticipated Date of Report: _____ Anticipated Permit Action Date: _____
 Closure Cost Estimate (CE): \$2,719,505 Date of CE: 4/13/93
 Post-Closure CE: N/A Date of CE: _____

FACILITY TYPE (Circle all that apply):

Full Permit	Standardized Permit	Permit-By Rule	Conditional Authorization	Conditional Exemption	Generator
(ISD)					
(Treatment)	(Storage)	(Disposal)	(PHHWCF)	(THHWCF)	(Ag Chem Day)
(RCRA)	(Non-RCRA)	(Grant)	(Major)	(Non-Major)	

LIABILITY COVERAGE (Circle all that apply):

Land Disposal	-	\$3,000,000 Per Occurrence/\$6,000,000 Annual Aggregate
Full or Standardized Permit	✓	\$1,000,000 Per Occurrence/\$2,000,000 Annual Aggregate
PBR < 10,000 gallons aqueous waste (AW) or < 100 Kilograms nonaqueous waste (NAW)	-	\$100,000 Per Occurrence/\$200,000 Annual Aggregate
PBR = to or > 10,000 gallons but < 25,000 gallons AW or = to or > 100 kilograms but < 1,000 NAW	-	\$300,000 Per Occurrence/\$600,000 Annual Aggregate
PBR = to or > 25,000 gallons AW or = to or > 1,000 kilograms NAW	-	\$500,000 Per Occurrence/\$1,000,000 Annual Aggregate

PERMIT TYPE/ACTIONS (Circle all that apply):

PERMITS:	New	Renew	Modify	Deny	Revoke	Variance
	Corrective Action					
CLOSURE:	Approve	Deny	Modify			
POST-CLOSURE:	Approve	Deny	Modify			

SURVEILLANCE & ENFORCEMENT ACTION (Circle all that apply):

(CEI) Complaint CME O&M Variance Other _____

ATTACHMENT G
FROV

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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



FIELD REPORT OF VIOLATION

Date(s) of Inspection 6/23/93Company Name QuemetcoAddress 720 S. Seventh AveCity of Industry, CA 91749CA 066 288 966

Representatives Present:

DTSC: Memo Hernandez
 Liang Chiang

Quemetco: Mark Vondersaar
 Alfredo Aviles
 Don Hewitt

Discussion with Management

Walk through:

- A) ONE 55 gallon Drum and three roll-off bins with no chemical characteristics.
- B) Cracks observed in the battery storage area and battery cracking area.

Records:

- A) Waste Analysis Plan - is not updated current operations & fails to include some of the required elements.
- B) Closure Plan - not updated, fails to include all current operations.

Authorized Company Representative*	Authorized State Agent
Name <u>Mark Vondersaar</u>	Name <u>Guillermo "Memo" Hernandez</u>
Title <u>Asst. Plant Mgr.</u>	Title <u>Hazardous Materials Specialist</u>
Signature <u>[Signature]</u> Original Signed _____	Signature <u>[Signature]</u> Original Signed _____
Date <u>6/23/93</u>	Date <u>6/23/93</u>

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

FIELD REPORT OF VIOLATION
CONTINUATION PAGE

Discussion with Management (continued)

- MISC. : 1) Three trailers from Johnson Control,
with several 55 gallon drums of
H. w. Drums were not properly
covered.
- 2) Contingency plan - should consider
Earthquake Emergency.
- 3) Submit to Larry Chiang
any documentation that demonstrates
prevention of emissions resulting
from the excavation of surface
Impoundment.

* Consent received by Mark Vandersaar

Company Representative Initials & Date [Signature] 6/23/93
State Agent Initials & Date [Signature] 6/23/93

FIELD REPORT OF VIOLATION
CONTINUATION PAGE

Discussion with Management (continued)

Company Representative Initials & Date _____ / /
State Agent Initials & Date _____ / /

page _ of _

INSPECTION INFORMATION

During the inspection of your facility made today, violations of hazardous waste statutes and regulations were observed, as described in the attached Field Report of Violations. You must correct the violations immediately, as discussed with the Department staff who conducted the inspection.

The Department took photographs of your facility during its inspection. These photographs are subject to public disclosure under the Public Records Act (Gov. Code § 6250 et seq.). Pursuant to Health and Safety Code section 25185(d), you may request a copy of any photograph of your facility (or you may review the file copy) in order to determine whether trade secret information or facility security would be revealed by the photograph. "Trade secret" is defined in Health and Safety Code section 25173 to include process, tool, mechanism, compound, procedure, production data, or compilation of information, which is not patented, or which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

If you wish to review the photographs in the Department's file, please notify the person who signed the Field Report of Violations within 10 days of the date of the inspection to arrange an appointment. The Department will hold the photographs confidential until this 10-day period expires. If you exercise your right to review the photographs, the Department will hold them confidential for an additional 10 days from the date of your review to allow you time to decide if you wish to assert the trade secret privilege.

If you wish to assert the trade secret privilege after you have reviewed the photographs, you will need to provide specific answers to each of the following questions for each photograph:

1. To what extent is there knowledge of the information conveyed by the photographs outside your business?
2. To what extent is there knowledge of the information conveyed by the photograph by employees and others in your business?
3. To what extent have measures been taken to guard the secrecy of the information?
4. Is the information valuable to competitors? If so, why?
5. Has there been substantial monetary expenditure in the development of the information?
6. Could the information be easily and properly acquired or duplicated by others?

The Department will review this information to determine if the photographs should be treated as trade secrets and notify you accordingly.

The issuance of a Field Report of Violations does not prevent the Department from taking administrative, civil, or criminal action as a result of the violations observed.

ATTACHMENT H
Response to FROV



July 13, 1993

DTSC - REGION 9
RECEIVED

JUL 15 1993

FMB - PERMITTING

Guillermo Hernandez
Hazardous Materials Specialist
California Environmental Protection Agency
Department of Toxic Substances Control
1101 North Grandview
Glendale, CA 91201

Certified Mail # P 555 834 514

RE: Notice of Violation for Inspection of Quemetco, Inc., dated 6/23/93
CAD 066 233 966

Dear Mr. Hernandez:

As per our telephone conversation, please consider this letter and enclosure as Quemetco's response to the above referenced Notice of Violation.

The enclosed letter from Mr. Alfredo Aviles addresses the violations noted as A) and B) under walkthrough.

As to the alleged records violations, Quemetco is in the process of updating the Waste Analysis Plan as part of the resubmittal of the Part B Permit. However, Quemetco is uncertain what the agency is requiring for updating the Closure Plan for all current operations. It is Quemetco's understanding that Closure Plans are required for hazardous waste management units, not manufacturing processes. This issue is being researched and Quemetco requests an extension of 90 days to complete its research and meet with representatives of Cal/EPA before a decision is reached on this issue.

If you have any questions or require additional information, please contact me at (214) 631-6070.

Sincerely,

Original Signed

Gerald A. Dumas
Vice President
Environmental Services
RSR Corporation

GAD/mc

cc: Robert E. Finn
Alfredo Aviles
Quemetco, Inc.

Enclosure

Quemetco, Inc.

DATE: July 8, 1993
TO: Gerald Dumas
FROM: Alfredo Aviles
SUBJECT: DTSC INSPECTION ON 6/23/93

The following steps have been taken towards the abatement of deficiencies found by Mr. Hernandez during his inspection on 6/23/93:

1. Hazardous waste label placed on the 55 gal. drum containing oily rags did not indicate the hazardous characteristic of the waste. This was corrected on 6/23/93 by indicating the "TOXIC" property on the label
2. Cracks observed in the battery storage area have been sealed.
3. We are in the process of obtaining bids to repair concrete erosion in the battery cracking area.
4. The two roll-off boxes containing used bricks had hazardous waste labels which did not indicate the hazardous characteristic of the waste. This was corrected on 6/23/93 by indicating the "TOXIC" property on the label.

If you have any questions, please let me know as soon as possible.

Original Signed

ALFREDO AVILES
PLANT TECHNICAL MANAGER

AA/vjh

cc: Bob Finn

AN RSR CORPORATION

720 South 7th Avenue/P.O. Box 1229/City of Industry, California 91749
Telephone—(818) 330-2294/FAX—(818) 330-2502

ATTACHMENT I

Checklists

DEPARTMENT OF TOXIC SUBSTANCES CONTROL1011 N. GRANDVIEW AVENUE
GLENDALE, CA 91201
(818) 551-2800**GENERATOR/INTERIM STATUS INSPECTION CHECKLIST**

Facility Name Quemetco Inc. ID No. CA0066233966
 Facility Address 720 S. Seventh Ave
 Date(s) Inspected June 23, 1993 Inspected By Guillermo Hernandez

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

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- 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)

- 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__ 66265.15(c) Failed to remedy deteriorating or malfunctioning equipment or structures revealed during inspection. (DGS)
- 153__ 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__ 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~~X~~ 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(c) Changes to approved 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)