



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control



**Gavin Newsom**  
Governor

Meredith Williams, Ph.D.  
Acting Director  
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September 27, 2019

Certified Mail No.: 7018-0680-0000-9827-9447

Mr. Joe Christopher  
Clean Harbors Los Angeles LLC dba Emerald Transformer Los Angeles, LLC  
5756 Alba Street  
Los Angeles, California 90058

### NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT

Dear Mr. Joe Christopher:

**2019 Facility Violations Scoring Procedure (VSP) Score: 20.48**  
**2019 Compliance Tier Assignment: Conditionally Acceptable**

The purpose of this letter is to provide Clean Harbors Los Angeles LLC, CAD050806850, located at 5756 Alba St., Los Angeles, CA 90058 (hereinafter, the "Facility") with a provisional inspection violation score for each compliance inspection that was conducted during the preceding ten (10) year period beginning January 1, 2009, through December 31, 2018, the Facility's 2019 VSP Score, and compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.53, subdivision (b)(2) and section 66271.54, subdivisions (c).<sup>1</sup>

The provisional inspection violation scores for the Facility are provided in the enclosed Inspection Violation Scoring Matrix. A provisional inspection violation score is the sum of the initial score for each Class I violation that occurred during a compliance inspection, and any adjustment to the initial Class I violation score based on repeat violations.<sup>2</sup> (See 22 CCR § 66271.53, subd. (a).) The basis for the score for each Class I violation is also provided in the enclosed Inspection Violation Scoring Matrix.

<sup>1</sup> Pursuant to Senate Bill (SB) 673 (Stats. 2015, chapter 611), the Department of Toxic Substances Control (DTSC) adopted new hazardous waste permitting criteria regulations, which became effective on January 1, 2019. The full text of the hazardous waste permitting criteria regulations is available at [https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT\\_OAL\\_20181023-revised.pdf](https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT_OAL_20181023-revised.pdf). More information regarding SB 673 is available at [https://www.dtsc.ca.gov/HazardousWaste/Permit\\_Roundtables.cfm](https://www.dtsc.ca.gov/HazardousWaste/Permit_Roundtables.cfm).

<sup>2</sup> For purposes of calculating a facility's inspection violation score, DTSC may also consider Class II violations that meet the definition of a Class I violation as specified in CCR, title 22, section 66260.10. (See 22 CCR § 66271.50, subd. (d)(1).)

Based on the provisional inspection violation scores for the Facility for the ten (10) year period beginning January 1, 2009, through December 31, 2018, DTSC has calculated a Facility VSP Score for the Facility of "**20.48**". A Facility VSP Score is the sum of all provisional or final inspection violation scores for each compliance inspection conducted during the preceding ten (10) years, divided by the number of compliance inspections. (See 22 CCR § 66271.54, subd. (a).)

A facility may be assigned to one of three compliance tiers based on its Facility VSP Score:

- "Acceptable." A facility that receives a Facility VSP Score of less than 20 shall be designated as having a Facility VSP Score that is "acceptable". (See 22 CCR § 66271.54, subd. (b)(1).)
- "Conditionally Acceptable." A facility that receives a Facility VSP Score equal to or greater than 20 and less than 40 shall be designated as having a Facility VSP Score that is "conditionally acceptable." Facilities that receive a final compliance tier assignment of "conditionally acceptable" are required to comply with additional requirements outlined in the regulations. (See 22 CCR § 66271.54, subd. (b)(2); 22 CCR § 66271.56.)
- "Unacceptable." A facility that receives a Facility VSP Score equal to or greater than 40 shall be designated as having a Facility VSP Score that is "unacceptable." DTSC is required to initiate permit denial, suspension, or revocation proceedings for facilities that receive a final compliance tier assignment of "unacceptable." (See 22 CCR § 66271.54, subd. (b)(3); 22 CCR § 66271.57.)

As a result of the Facility's VSP Score, DTSC has assigned the Facility to a compliance tier of "**Conditionally Acceptable**". Generally, as discussed further below, a facility's compliance tier assignment becomes final after all provisional inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d).

### **Provisional Inspection Violation Score Disputes and Compliance Tier Assignment Challenges**

An owner or operator of a facility may dispute a provisional inspection score pursuant to CCR, title 22, section 66271.53, subdivision (c) by filing a Provisional Inspection Violation Score Dispute Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>) within sixty (60) calendar days of this notice. All of the following information must be enclosed with the Dispute Document cover letter:

- A statement that describes in detail the factual and legal basis of the dispute and the relief sought;
- Any claimed erroneous facts, assumptions, approaches, or conclusions of law made by DTSC;

- A statement describing in detail any efforts already made by the owner or operator to resolve the dispute with DTSC; and
- Any photographs, documents, or any other material that supports the owner's or operator's position regarding the disputed provisional inspection violation score.

The owner or operator of a facility may request a one-time extension of up to sixty (60) calendar days to submit a Provisional Inspection Violation Score Dispute Extension Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>).

DTSC will issue a written decision, granting or denying, in whole or in part, the relief sought by the owner or operator of a facility disputing a provisional inspection violation score. A provisional inspection violation score will become the final inspection violation score consistent with DTSC's written decision. A provisional inspection violation score will also become the final inspection violation score if the owner or operator of a facility does not file a Dispute Document within sixty (60) calendar days of this notice.

A facility's compliance tier assignment becomes final after all inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d). Final compliance tier assignments of "acceptable" or "conditionally acceptable" are not subject to additional administrative dispute resolution. (See 22 CCR § 66271.54, subds. (e), (f).) However, owners or operators of facilities assigned to a final compliance tier of "unacceptable" may further administratively challenge their final compliance tier assignment under California Code of Regulations, title 22, section 66271.57.

Issuance of this provisional inspection violation score, Facility 2019 VSP Score, and compliance tier assignment do not constitute an enforcement action. If you have any questions regarding this notice, please contact [VSP\\_Info@dtsc.ca.gov](mailto:VSP_Info@dtsc.ca.gov). If you have any questions regarding the dispute process, please contact [VSP\\_Dispute\\_Inbox@dtsc.ca.gov](mailto:VSP_Dispute_Inbox@dtsc.ca.gov).

Sincerely,



Keith Kihara, Chief  
Enforcement and Emergency Response Division

Enclosure(s)

Violation Scoring Matrix  
Proof of Service

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019		etc.)	
Inspection Date:	3/24/2009 CEI & 4/14/2009 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.73(b)	The facility failed to record the location of each HW within the facility and the quantity at each location. On 3/24/2009, facility records indicated that 8,040 gallons had been pumped to Isotainer SECU0910047 (that held PCB-contaminated used oil), which had a maximum capacity of 5,500 gallons. In addition, records showed that Tank V-10 (that held PCB-contaminated oil at levels between 2 and 50 ppm) contained 6,259 gallons on 3/18/2009, while the Pump Record shows only 2,890 gallons had been transferred into Tank V-10 since 3/03/2009.	Moderate	Up to 14,299 gallons of HW was found in violation during two separate instances in 3/2009. The HW in violation was PCB-impacted oil. Potential for harm was moderate due to PCB wastestreams being a known human carcinogen and bioaccumulative in the environment.	Moderate	Only two instances cited in violation for failure to accurately record HW location and quantity show that the requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00
<b>Provisional Inspection Violation Score:</b>													15.00
Inspection Date:	6/10/2010	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
<b>Provisional Inspection Violation Score:</b>													0.00

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021			
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019			
Inspection Date:	10/13/2010 FRR & 10/25/2010 CEI	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.73(b)(2)	The facility failed to record the location of each HW within the facility and the quantity at each location. Tank level of V-4 did not match the facility's Pump Records.	Moderate	Up to 2,170 gallons of non-RCRA HW PCB oil (California Waste Code 261) was found in violation. Tanks V-8 and V-10 are aboveground steel tanks and were used for blending and/or storage of incoming low BTU (British Thermal Units) wastewaters. V-10 is also used to store waste containing <50 mg/l of PCBs, such as mineral oil dielectric fluid which is a non-wastewater. The waste stream and volume of HW presented a moderate potential for harm.	Moderate	Manifests documented that two shipments of PCB oil were received in Tank V-4 between 10/20/2010 and 10/26/2010 for a total volume of 6,330 gallons. However, the Operating Record for Tank V-4 documented that the total volume of wastes received during that time was 8,500 gallons. As a result, the volumes manifested and received in the Operating Record did not match, with a discrepancy of approximately 2,170 gallons. Similar inconsistencies were also noted in the Operating Record in regards to Tanks V-8 and V-10. Because the records for other permitted tanks were not cited in violation, the requirement functioned to some extent.	15	Yes	3/24/2009	25	18.75
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.195(a) and (d)	The facility failed to inspect the overfill controls (i.e. tank high level alarms) and document the same in its Operating Record. Tank V-8 contained waste oil over 85,000 gallons even though the high level alarm was set at 75,000 gallons, indicating that the high level alarm was not functional.	Minimal	10,000 gallons of waste oil exceeded the high level alarm resulting in a liquid top that was 2.3 feet from the tank roof. Minimal potential for harm was due to the wastestream in violation.	Major	The high level alarm, set at 75,000 gallons, was not functioning (light was not on) and the facility failed to inspect and record the data from the overfill controls. The act deviated from the requirement to such an extent that the requirement is completely ignored and none of its provisions are complied with.	15	No	n/a	0	15.00
<b>Provisional Inspection Violation Score:</b>													<b>33.75</b>

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019		etc.)	
Inspection Date:	12/12/2011 CEI & 1/12/2012 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violation:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.73(b)	The facility failed to record the quantity of HW received at each location within the facility.	Minimal	The wastestreams permitted for Tanks V-1, V-2, and V-8 included RCRA and/or non-RCRA wastewaters, oily wastewaters, used oil, oily solvents and solvent contaminated liquids, other organic liquids, sludges, miscellaneous materials, and waste containing <2 mg/L of PCBs. The wastestreams in violation constituted a minimal potential for harm.	Moderate	Tank Activity Sheets for Tank V-1 documented an increase from 4,130, 2,475, 4,026, and 4,833 gallons on 11/11/2011, 11/28/2011, 11/29/2011, and 12/12/2011, respectively, without any Operating Record documentation. On 11/23/2011, 4,218 gallons was pumped out of Tank V-2 at 6:20 AM, but no corresponding activity was noted in the Operating Record. The volume pumped out from Tank V-2 and the volume received at Tank V-8 were also different on dates between 11/15/2011 and 12/13/2011 (2,272 gallons missing for 12 transfers). As the facility maintained Pumping Records, the requirement functioned to some extent, although not all of its important provisions were complied with as there were a number of omissions in the records.	6	Yes	3/24/2009 and 10/25/2010	50	9.00
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.195	The facility failed to inspect the overfill controls (i.e. tank high level alarms) and document the same in its Operating Record. Tank V-10 had a waste oil overfill that caused a spill.	Moderate	Tank V-10 (Incoming wastewater tank) had a maximum permitted storage capacity of 20,000 gallons. The wastestreams permitted in Tank V-10 included RCRA and/or non-RCRA Wastewaters, oily wastewaters, used oil, oily solvents and solvent contaminated liquids, other organic liquids, sludges, miscellaneous materials, and waste containing < 50 mg/L of PCBs. Potential for harm was moderate due to PCB wastestreams being a known human carcinogen and bioaccumulative in the environment.	Major	The high level alarm for Tank V-10, set at 18,800 gallons, failed to prevent overfill and overflow of the tank contents. The inspection report stated that mid-December 2010 Tank V-10 had 18,900 gallons in it when an overflow occurred. The secondary containment was flooded with about 2 feet of rainwater. The Inspection Log indicated that everything in the tank farm had been operating properly, even though the high level alarm was not functioning properly. The function of the requirement was rendered ineffective.	20	Yes	10/25/2010	25	25.00
<b>Provisional Inspection Violation Score:</b>													<b>34.00</b>

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019		etc.)	
Inspection Date:	10/29/2012 CEI & 11/27/2012 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility. In addition, the deviation is a chronic violation observed on three consecutive inspections.	22 CCR 66264.73(b)	The facility failed to accurately cross reference the date of receipt, volume, and storage location of HW received with the corresponding date of receipt, volume, storage location in the Operating Record.	Minimal	The violation focused on the facility's failure to accurately track HW but did not provide information on specific wastestreams and volume of HW in violation. Therefore, a minimal potential for harm was assigned.	Minimal	Drums observed and identified by the DTSC inspector during the facility walkthrough were cross-referenced with the information in the Operating Record and in some cases, the information did not correspond to what was observed during the walkthrough (storage date, location, receipt date, and volume). Therefore, a minimal extent of deviation was assigned.	2	Yes	10/25/2010 and 12/12/2011	50	3.00
<b>Provisional Inspection Violation Score:</b>													3.00
Inspection Date:	10/21/2013 CEI & 10/25/2013 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
<b>Provisional Inspection Violation Score:</b>													0.00
Inspection Date:	4/22/2015 CEI & 4/22/2015 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
<b>Provisional Inspection Violation Score:</b>													0.00

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019			
Inspection Date:	4/26/2016 CEI & 6/6/2016 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility as well as prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a); 22 CCR 66270.30; and HWFP Renewal, effective 1/27/2011, Part V-Special Conditions #1	The facility accepted and stored oil liquids contaminated with PCBs without a permit or grant of authorization from DTSC. Electrical equipment, including transformers, bushings, and capacitors containing oil contaminated with PCBs were stored in the yard from 3/24/2016-4/21/2016.	Moderate	The electrical equipment stored in the yard contained PCB oil greater than 50 ppm (one container had the words "PCB 82 ppm" and another had "53 ppm" written on the outside). No leaks of PCB oil were observed during the inspection. PCBs are known human carcinogens and are bioaccumulative in the environment. The volume of waste in violation was not specified. Therefore, a moderate designation was assigned due to wastestream in violation.	Major	The facility stored HW in an unpermitted area without authorization from DTSC. Electrical equipment containing transformer oil at greater than 50 ppm PCBs was received by the facility and stored in the yard for more than 5 days from the date of receipt. The requirement was completely ignored and none of its provisions were complied with.	20	No	n/a	0	20.00
<b>Provisional Inspection Violation Score:</b>													20.00
Inspection Date:	8/12/2016	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility as well as prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30, HWFP Renewal, effective 1/27/2011, Part V-Special Conditions #1	The facility accepted and stored transformers containing PCB oil in an unpermitted location without a permit or grant of authorization from DTSC.	Moderate	PCBs are known human carcinogens and are bioaccumulative in the environment. PCB concentrations in the oil as well as the volume of wastes in violation were not specified. Therefore, a moderate designation was assigned due to wastestream in violation.	Major	The facility stored HW in an unpermitted area without authorization from DTSC. Several transformers containing transformer oil were observed in the unpermitted yard area. Some of the transformers had not been drained and had been stored in the yard from 7/21/2016 through 8/10/2016. The HW management requirement to store HW in permitted areas was rendered ineffective.	20	Yes	4/26/2016	25	25.00
<b>Provisional Inspection Violation Score:</b>													25.00

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		<a href="#">Link to EnviroStor</a> (Inspection Reports, SOVs, etc.)	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021			
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019			
Inspection Date:	11/10/2016	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FSD												
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a)	The facility stored HW (PCB oil/TSCA waste) without a permit or grant of authorization from DTSC.	Moderate	25-30 gallons of TSCA regulated PCB oil (209 ppm) from a transformer was pumped into the wrong tank. The tank contained approximately 19,000 to 20,000 gallons of used oil with 2-49 ppm PCBs prior to the addition of the TSCA regulated PCB oil. PCBs are known human carcinogens and are bioaccumulative in the environment. Moderate potential for harm designation was assigned due to the wastestream in violation.	Major	25-30 gallons of TSCA regulated PCB oil (209 ppm) from a transformer was pumped into a tank dedicated to the management of 2-49 ppm PCB-contaminated used oil. At the time the material was pumped, the tank contained approximately 19,000 to 20,000 gallons of oil. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	20	Yes	4/26/2016 and 8/12/2016	50	30.00
<b>Provisional Inspection Violation Score:</b>													30.00

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		Link to EnviroStor	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019			
Inspection Date:	4/25/2017 CEI & 6/14/2017 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility as well as prevent releases of HW or constituents to the environment during the active period of facility operation. In addition, the deviation is a chronic violation observed on three consecutive inspections.	HSC 25202(a) and HWFP, Part IV	The facility stored a transformer with HW oil in an unpermitted area, not authorized for storage according to Part IV of the HWFP.	Minimal	One transformer with PCB less than 2 ppm was stored in an unpermitted area. The wastestream in violation presented a minimal potential for harm.	Minimal	One transformer "got lost" according to the facility manager. A transformer with a large bushing was stored between two grey roll-off bins near the emergency exit. This was not a permitted area to store transformers. Only one transformer was cited, so the requirement functioned nearly as intended.	2	Yes	4/26/2016 and 8/12/2016	50	3.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.175 (a) and (b)(1) and HWFP, Part V-Special Conditions #3	The facility failed to repair cracks, gaps, or tears observed in the active portion of the HW area.	Minimal	Four instances were photographed in the Inspection Report, which had the potential to cause downward migration of HW releases into the environment. No information was provided regarding volume and wastestreams in violation resulting in a minimal potential for harm designation.	Major	Four instances were cited. There was a large crack in the corner of the berm nearest to the Alameda Street emergency exit gate. The berm of the containment area was cracked all the way through at the corner, and was approximately 1-inch wide in diameter. There was also a large horizontal crack through the berm near the same location. Additionally, there was a long crack/gap in the concrete in the middle of the yard. The function of the containment requirement was rendered ineffective.	15	No	n/a	0	15.00
<b>Provisional Inspection Violation Score:</b>												<b>18.00</b>	

### Violation Scoring Matrix

Facility Name:		CLEAN HARBORS LOS ANGELES LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		1/27/2011		<a href="#">Link to EnviroStor</a> (Inspection Reports, SOVs, etc.)	
Address:		5756 ALBA STREET, LOS ANGELES, CA 90058		Number of Inspections:		12		Permit Expiration Date:		1/26/2021			
EPA ID:		CAD050806850		Total Number of Violations Scored:		14		Date VSP Completed:		8/13/2019			
Inspection Date:	1/25/2018 CEI & 3/7/2018 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and HWFP, Part IV	The facility stored a TSCA HW in an unpermitted area, not authorized for storage in Part IV of the HWFP.	Moderate	PCB oil is a TSCA waste. PCBs are known human carcinogens and are bioaccumulative in the environment, and thus represented a moderate potential for harm.	Major	TSCA waste was observed stored in the open bed of a truck in the Loading and Unloading Area of the facility. There were two large totes, fifteen 55-gallon drums, twenty-one transformers and three very large transformers. All of the drums had HW and TSCA labels on them. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	20	Yes	4/26/2016, 8/12/2016, and 4/25/2017	100	40.00
Class II Violations:	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66264.73(b)(1) and (2)	The facility failed to record the dates of transfer, treatment, and storage of each HW received, the location of HW within the facility, and the quantity at each location.	Moderate	The volume of the HW in violation was not provided. However, the waste was classified as a "TSCA load" in the inspection report. Therefore, a moderate potential for harm was assigned due to the characteristics of the HW at issue.	Moderate	Operating Records and Inspection Forms used to track HW did not match dates on HW manifests (mostly off by only 1 day). The TSCA load that was stored in the Loading/Unloading Area was loaded approximately two weeks before DTSC's 1/25/2018 walkthrough, but Operating Records showed that it was staged on 12/19/2018. There was no available Operating Record accurately documenting the day the load was actually moved (off by at least two weeks). The requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00
	3	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and prevent releases of HW or constituents to the environment during the active period of facility operation. In addition, the deviation is a chronic violation observed on four consecutive inspections.	HSC 25202(a) and HWFP, Part IV	The facility stored a transformer with HW oil in an unpermitted area, not authorized for storage according to Part IV of the HWFP.	Moderate	One undrained transformer with HW oil (PCB concentration not specified in the oil) was stored in an unpermitted area. PCBs are known human carcinogens and are bioaccumulative in the environment, and thus presented a moderate potential for harm.	Minimal	Other drained transformers (approximately 40 according to manifest tracking forms) were stored in the area. A transformer with more than one foot of transformer oil inside, was stored near the emergency exit gate among the drained transformers that were stored there. One transformer in the drained transformer area was not drained representing a minimal extent of deviation as the requirement functioned nearly as intended.	6	Yes	4/26/2016, 8/12/2016, and 4/25/2017	100	12.00
<b>Provisional Inspection Violation Score:</b>												67.00	

## Violation Scoring Matrix

Facility Name: CLEAN HARBORS LOS ANGELES LLC	10 Year Date Range: 2009-2018	Permit Effective Date: 1/27/2011	<a href="#">Link to EnviroStor</a> (Inspection Reports, SOVs, etc.)
Address: 5756 ALBA STREET, LOS ANGELES, CA 90058	Number of Inspections: 12	Permit Expiration Date: 1/26/2021	
EPA ID: CAD050806850	Total Number of Violations Scored: 14	Date VSP Completed: 8/13/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	1	CEI & FRR	3/24/2009 CEI & 4/14/2009 FRR	15.00
2	0	FRR	6/10/2010	0.00
3	2	CEI & FRR	10/13/2010 FRR & 10/25/2010 CEI	33.75
4	2	CEI & FRR	12/12/2011 CEI & 1/12/2012 FRR	34.00
5	1	CEI & FRR	10/29/2012 CEI & 11/27/2012 FRR	3.00
6	0	CEI & FRR	10/21/2013 CEI & 10/25/2013 FRR	0.00
7	0	CEI & FRR	4/22/2015 CEI & 4/22/2015 FRR	0.00
8	1	CEI & FRR	4/26/2016 CEI & 6/6/2016 FRR	20.00
9	1	CI	8/12/2016	25.00
10	1	FSD	11/10/2016	30.00
11	2	CEI & FRR	4/25/2017 CEI & 6/14/2017 FRR	18.00
12	3	CEI & FRR	1/25/2018 CEI & 3/7/2018 FRR	67.00
Sum of Provisional Inspection Violation Scores				245.75
<b>*FACILITY VSP SCORE</b>				<b>20.48</b>

\*FACILITY VSP SCORE = Sum of Provisional Inspection Violation Scores/Total Number of Inspections conducted in 10 year (calendar) timeframe

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| <p><b>BTU</b> = British Thermal Units</p> <p><b>CCR</b> = California Code of Regulations</p> <p><b>CDI</b> = Case Development Inspection</p> <p><b>CEI</b> = Compliance Evaluation Inspection</p> <p><b>CI</b> = Complaint Investigation</p> <p><b>DTSC</b> = Department of Toxic Substances Control</p> <p><b>EPA ID</b> = Environmental Protection Agency Identification</p> <p><b>FCI</b> = Focused Compliance Inspection</p> <p><b>FRR</b> = Financial Records Review</p> <p><b>FSD</b> = Facility Self Disclosure</p> <p><b>FUI</b> = Follow-Up Inspection</p> <p><b>GAR</b> = Groundwater Audit Report</p> | <p><b>GME</b> = Groundwater Monitoring Evaluation</p> <p><b>HSC</b> = Health and Safety Code</p> <p><b>HW</b> = Hazardous Waste</p> <p><b>HWFP</b> = Hazardous Waste Facility Permit</p> <p><b>n/a</b> = Not Applicable</p> <p><b>NFRR</b> = Non-Financial Record Review</p> <p><b>PCBs</b> = Polychlorinated Biphenyls</p> <p><b>ppm</b> = parts per million</p> <p><b>RCRA</b> = Resource Conservation and Recovery Act</p> <p><b>SOV</b> = Summary of Violations</p> <p><b>VSP</b> = Violations Scoring Procedure</p> |
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## PROOF OF SERVICE

1. I served the NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT on Joe Christopher, Clean Harbors Los Angeles LLC dba Emerald, EPA ID Number CAD050806850.
2. I served Joe Christopher, Clean Harbors Los Angeles LLC dba Emerald, by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9447, return receipt requested, in a sealed envelope addressed to:

Mr. Joe Christopher  
Clean Harbors Los Angeles LLC dba Emerald Transformer Los Angeles, LLC  
5756 Alba Street  
Los Angeles, California 90058

3. My name, business address, and telephone number are:

Alan Korematsu  
Department of Toxic Substances Control  
HWMP, 11<sup>th</sup> Floor  
1001 I Street  
Sacramento, CA 95812-0806  
(916) 323-3706

I declare under penalty of perjury that the foregoing is true and correct and that this declaration of Proof of Service is executed on October 4, 2019 at Sacramento, California.

  
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(Signature)