



## Department of Toxic Substances Control

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September 27, 2019

Certified Mail No.: 7018-0680-0000-9827-9331

Mr. Matthew Clutter  
General Environmental Management of Rancho Cordova LLC dba PSC Environmental Services  
11855 White Rock Road  
Rancho Cordova, California 95742

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

Dear Mr. Matthew Clutter:

**2019 Facility Violations Scoring Procedure (VSP) Score: 99.68**  
**2019 Compliance Tier Assignment: Unacceptable**

The purpose of this letter is to provide GEM of Rancho Cordova LLC dba PSC Environmental Services, CAD980884183, located at 11855 White Rock Rd., Rancho Cordova, CA 95742-6603 (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 "**99.68**". 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 "**Unacceptable**". 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:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018			Permit Issue Date:	4/25/2007			Link to EnviroStor (Inspection Reports, SOVs, etc.)													
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10			Permit Expiration Date:	4/25/2017																
EPA ID:	CAD980884183			Total Number of Violations Scored:	58			Date VSP Completed:	7/18/2019																
Inspection Date:	3/11/2009 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:	1	The deviation from the requirements was significant enough that it could result in a failure to assure adequate financial resources in the case of releases and perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a), HSC 25200.19(c)(3), 22 CCR 66270.30(a), and HWFP 06-SAC-10 Part V, Subsection II	The facility exceeded its permitted facility limit of 82,302 gallons of waste in containers (other than roll-off bins) during operation and also exceeded its HWFP-specified volumes of waste in individual authorized units. The facility also stored HW on transport vehicles which, if unloaded, would exceed the permitted capacity of the operating unit.	Major	Documentation provided on 3/11/2009 indicates the facility had 112,513 gallons of waste in containers onsite (30,211 gallons in excess of the authorized volume). The closure cost estimate and closure funding did not account for the increased capacity. Permit allowed staging and storage of ignitable, corrosive, reactive, and toxic HW. The volume and characteristics of the substances involved presented a major threat to public health and safety or the environment.	Major	Documentation provided on 3/11/2009 indicated the facility had 30,211 gallons in excess of the authorized volume (36.7% was out of compliance). In addition, the facility stored HW on transport vehicles which, if unloaded, would exceed the permitted capacity of the originating unit at the facility. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25.00	No	n/a	0.00	25												
	2	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30(a), and HWFP 06-SAC-10 Operations Plan Section VI(C).	The facility stored HW in the Loading and Unloading Areas overnight without authorization from DTSC on multiple occasions. The facility's Operation Plan specified that HW could not be left in the Loading and Unloading Area, outside of a truck, overnight.	Moderate	While the specific wastestreams in violation were not specified, the facility was permitted to accept ignitable, corrosive, reactive, and toxic wastes. DTSC's inspector "estimated there were about a thousand containers in the loading and Unloading area" at 9:50am on 3/11/2009. This increased the potential for waste to be mismanaged, released to the environment, and/or unaccounted for which presented a moderate threat of harm.	Major	Operations Plan Section VI(C) stated that no waste was to remain outside of a truck in the Unloading and Loading Area overnight. The act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	20.00	No	n/a	0.00	20												

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Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10		Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019				
3	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30(a), and HWFP 06-SAC-10 Operations Plan Section VIII(F)(1).	The facility stored HW in loaded trailers outside the boundary of the permitted facility without authorization from DTSC on multiple occasions. The facility also moved loaded transport vehicles out of the "Loading and Unloading Areas" before the generator or transporter signed the manifest.	Moderate	While the specific wastestreams in violation were not specified, the facility was permitted to accept ignitable, corrosive, reactive, and toxic wastes. Partial loads of HW on at least four trailers, and potentially up to 10 more loads were stored without authorization. The facility signed the manifests for transportation offsite during the inspection. Storage of HW outside the permitted facility increased the potential for waste to be mismanaged, released to the environment, and/or unaccounted for which presented a moderate threat of harm.	Major	Ten trailers containing HW were observed in the parking area during the 3/19/2009 inspection. The trailers were staged usually the night before, due to incinerator facility capacity. The act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	20.00	No	n/a	0.00	20
4	The deviation from the requirement was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25200.19(c)(1)	On numerous occasions, the facility failed to move HW directly between trucks and the authorized units and instead left the HW in the "Loading and Unloading Area" for more than the incidental period of time that is necessary to safely and effectively move the HW between the transport vehicle and the authorized unit. Containers in the "Loading and Unloading Area" were generally sampled, fingerprinted, marked and labeled, and then placed into the appropriate HW management unit for storage.	Moderate	While the specific wastestreams in violation were not specified, the facility was permitted to accept ignitable, corrosive, reactive, and toxic wastes. The facility moved numerous containers from Unit A and possibly some containers from Units B and C into the "Loading and Unloading Area" early in the first shift to provide room for sorting. Failure to move HW to the authorized unit in a timely manner increased the potential for waste to be mismanaged, released to the environment, and/or unaccounted for which presented a moderate threat of harm.	Moderate	Area A was the only area designated for sampling, waiting for analyses, marking and labeling. The "Loading and Unloading Area" was for temporary storage of HW for incidental periods of time. The act of non-incident storage deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	15.00	No	n/a	0.00	15

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Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:	10		Permit Expiration Date:	4/25/2017						
EPA ID:	CAD980884183		Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019						
	5	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.177(c)	The facility stored a drum labeled as "oxidizer" on a wooden pallet without secondary containment in Unit C while facility staff were consolidating flammable HW nearby.	Moderate	There are no berms in Unit C where the drums were consolidated. One drum of "oxidizer" was closed and labeled and an unknown volume of flammable HW was consolidated. Mixing of an oxidizer with a flammable HW could result in an explosion or dangerous reaction. The volume and characteristic of the substance involved presented a moderate threat of harm.	Minimal	Only one drum was noted in the Inspection Report as being outside of secondary containment, so the act deviated from the requirement, but the requirement functioned nearly as intended, but not as well as if all provisions had been met.	6.00	No	n/a	0.00	6
<b>Provisional Inspection Violation Score:</b>												86.00	
Inspection Date:	3/8/2011 CEI & 6/17/2011 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 result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.31 and 22 CCR 66264.177(a)	The facility failed to operate and maintain the facility in a manner to prevent the possibility of explosion or unplanned release of HW. The facility improperly combined soluble organics with approximately 22 gallons of nitric acid, which are incompatible wastes, in a drum. This caused a violent and uncontrolled reaction that caused an explosion that launched the drum 15 feet into the air in Area C of the facility, which sprayed hot concentrated acid throughout most of the Repackaging Area and released vapors and HW to the surrounding environment.	Major	An explosion from mixing approximately 25 gallons of nitric acid with water soluble organics resulted in release of vapors and HW. Accidental mixing of incompatible HW caused fire, explosion, or other violent reaction that released toxic materials threaten human health (including workers) or the environment, also creating toxic vapors, gases, or container failures, which resulted in the release of corrosive waste.	Major	The facility placed incompatible wastes in the same container without taking sufficient precautions to prevent accidental ignition or reaction. On 3/8/2011, a drum of nitric acid exploded and the drum was launched 15 feet into the air in Area C spraying hot concentrated acid and releasing vapors into the surrounding environment. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25.00	No	n/a	0.00	25
Class II Violations:	2	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66264.17(b), and 22 CCR 66270.30(a)	The facility failed to have compatibility testing performed in the laboratory and failed to obtain written approval by the laboratory chemist prior to bulking wastes in Area C, as required by Sections V.D.1 and V.G.1 of the facility's Operation Plan. Instead, a modified compatibility test was performed in Unit C as wastes were bulked. Wastes were already mixed in a 55-gallon drum when the chemical reaction took place in the compatibility test.	Moderate	The modified compatibility test consisted of a bucket test where a small quantity from each container was poured into a 5-gallon bucket and mixed to see if it reacted. Approximately 3 gallons of a nitric acid and soluble organics mixture took approximately 20 minutes to react. An employee described gold-colored smoke with a red flame. The potential for harm is classified as moderate because a release occurred potentially resulting in exposure to employees and the environment.	Moderate	The facility performed some form of compatibility testing; therefore, while the act deviated from the requirement, the requirement functioned to some extent, although not all of its important provisions were complied with.	15.00	No	n/a	0.00	15
<b>Provisional Inspection Violation Score:</b>												40.00	

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Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10			Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58			Date VSP Completed:	7/18/2019				
Inspection Date:	8/4/2011	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:	FCI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.31 and 22 CCR 66264.177(a)	The facility failed to operate and maintain the facility in a manner to prevent the possibility of a fire or unplanned release of HW. The facility improperly consolidated oxidizing pool chemicals into a 55-gallon drum while conducting a consolidation operation in Area C. This caused the drum to catch fire and emit a "yellowish green gas/smoke."	Major	One consolidation drum of pool chemicals burned on 8/2/2011 as incompatible wastes were placed in the same container without taking sufficient precautions to prevent accidental ignition or reaction. The drum emitted a yellowish green smoke before catching on fire, burning, and consuming four additional drums of HW. The mismanagement of HW resulted in a release, which constituted a major threat to on-site workers, offsite public, and the environment.	Major	As a result of the facility's consolidation of oxidizing pool chemicals, including chlorine tablets, in a plastic drum, a fire was ignited. The fire burned and consumed four drums of HW. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25.00	Yes	3/8/2011	25.00	31.25
	2	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66264.177(c) and 22 CCR 66270.30(a)	The facility stored incompatible wastes near or next to each other on at least six separate incidents. The wastes included oxidizers and flammables, cyanides, acids, and spontaneously combustible material and corrosives, next to each other in Area C of the facility without appropriately being separated by means of a dike, berm, wall, or other device.	Major	Each of the 8 tanks in violation had a maximum storage capacity of 7,000 gallons and the permitted wastes in these tanks included non-chlorinated hydrocarbon solvent waste, 2-methyl-2-pyrrolidone, and isopropyl alcohol. Storing incompatible wastes next to each other without a means of separation could result in an explosion and/or potential release resulting in a major threat to human health and the environment.	Major	Six separate instances of storage of incompatible wastes were observed during the inspection. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	No	n/a	0.00	25
	3	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.35	The facility failed to maintain adequate aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in that several drums were stored in front of the eyewash and safety shower obstructing access to its use.	Minimal	Trash barrels were placed in front of the safety shower/eye wash in Unit C obstructing access to its use. Inadequate aisle space preventing personnel from easily accessing emergency response and spill control equipment presented a minimal threat to public health and safety as the equipment was still usable and functioning.	Minimal	The eye wash station was required to have an unobstructed pathway of at least 30 inches at all times. The barrels were moved immediately during the inspection to correct the violation. The act deviated in a minor way from the requirement.	2.00	No	n/a	0.00	2
	4	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.177(b)	The facility failed to use clean containers for the storage of HW.	Moderate	DTSC staff observed waste residuals in at least four 5-gallon buckets, two 55-gallon drums, and "cubic yard bins" used to hold various containers or for compatibility testing. As a consolidation facility, waste added to an unwashed container could potentially be incompatible with any residue left in the container resulting in a moderate potential for harm to human health and the environment.	Moderate	Not all empty HW containers contained residuals. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	15.00	No	n/a	0.00	15

### Violation Scoring Matrix

Facility Name:		GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO		10 Year Date Range:		2009-2018		Permit Issue Date:		4/25/2007		<a href="#">Link to EnviroStor</a> (Inspection Reports, SOVs, etc.)	
Address:		11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:		10		Permit Expiration Date:		4/25/2017			
EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019			
	5	The deviation from the requirements was significant enough that it could result in a failure to perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a), 22 CCR 66270.30(a), and HWFP 06-SAC 10 Part VI	The facility failed to notify DTSC within 24 hours of a release of HW. The facility did not notify DTSC within 24 hours of discovery of new releases from a fire that occurred at the facility on 8/2/2011.	Major	The facility had a release of HW into the air when four 55-gallon drums of waste caught fire during waste consolidation and were allowed to burn themselves out. There was significant potential for employee injury and exposure to hazardous chemical releases. DTSC cannot respond if not made aware of the incident in a timely manner.	Major	The facility did not notify DTSC within 24 hours of the release. The act deviated from the requirement to such an extent that the requirement was completely ignored.	25.00	No	n/a	0.00	25
<b>Provisional Inspection Violation Score:</b>												<b>98.25</b>	

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EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019			
Inspection Date:	3/25/2013 CEI & 5/15/2013 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:	1	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.31 and 22 CCR 66264.177(a)	The facility failed to operate and maintain the facility in a manner to prevent the possibility of a fire or unplanned release of HW.	Major	The facility consolidated HW solids (from 25 drums) and trash (2,893 pounds) into a roll-off bin. Several days later, 10 additional drums were consolidated into the same roll-off bin. The next day the contents of the roll-off bin began to smolder and resulted in a fire which burned for five hours and released smoke and potentially toxic constituents and ash into the environment. The mismanagement of HW resulted in a release, which constituted a major threat to on-site workers, off-site public, and the environment.	Major	The fire was caused by an exothermic reaction that occurred from mixing incompatible wastes. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	Yes	3/8/2011 & 8/4/2011	50.00	37.5
	2	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.177(b)	The facility failed to utilize clean containers for the storage of HW.	Minimal	Containers (hoppers) holding HW should be cleaned after use in order to prevent mixing of incompatible waste that could result in harmful reactions/releases. As a consolidation facility, waste added to an unwashed container could potentially be incompatible with any small volumes of residue left in the container resulting in a minimal potential for harm to human health and the environment.	Moderate	Not all empty hoppers used for HW consolidation contained residuals. The operator stated that absorbent was used to absorb free liquids in the hoppers but "the hoppers should be cleaned." The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	8/4/2011	25.00	7.5
	3	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation as well as perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16	The facility failed to properly train facility personnel and maintain training documents and records.	Major	The facility's HW training did not include recognition of incompatible and reactive chemicals. If not provided and adequately documented, the lack of training could result in potential releases of HW to the environment and actual fires such as those that occurred at the facility in the past. The facility had a documented history of releases due to mixing of incompatible wastestreams, and the lack of training in identifying and managing incompatible wastestreams presented a major potential for harm to human health, safety, and the environment.	Moderate	Training was not adequately documented by the facility. Based on the documentation provided, the facility failed to provide evidence of HW training describing how incompatible and reactive chemicals are identified was provided to staff. All elements of training had been provided except for identification of reactive chemicals and storage of universal waste. The requirement functioned to some extent.	20.00	No	n/a	0.00	20

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Address:		11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:		10		Permit Expiration Date:		4/25/2017			
EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019			
Class II Violations:	4	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation as well as perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility failed to comply with a condition in Part B of the HWFP in that the facility failed to notify DTSC of maintenance being performed in Area B and the relocation of containers outside of Area B (to Area A and the "Loading and Unloading Area").	Minimal	Flammable, corrosive, and toxic wastes were temporarily being stored in the "Loading and Unloading Area." Hazard classes were segregated, but did not have protective measures including visqueen and sandbags. The limited duration of the improper storage presented a minimal threat of harm.	Major	During the inspection, one storage cell was being repaired. DTSC was not notified of this repair. In addition, the facility did not construct the required temporary storage cells with sandbags and visqueen in order to separate the ignitable and corrosive wastes. The requirement was completely ignored and none of its provisions were complied with.	15.00	No	n/a	0.00	15

### Violation Scoring Matrix

Facility Name:		GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO		10 Year Date Range:		2009-2018		Permit Issue Date:		4/25/2007		Link to EnviroStor (Inspection Reports, SOVs, etc.)											
Address:		11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:		10		Permit Expiration Date:		4/25/2017													
EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019													
Inspection Date:	3/18/2014 CEI & 4/8/2014 FRR	Class I Justification		Citation		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 result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation as well as assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility failed to operate Area A according to Section V(I)(D) of the HWFP Part B in that eleven HW containers were stored in Area A longer than 10 days.	Minimal	Eight 55-gallon drums and three 5-gallon containers (maximum 455 gallons) were found in violation. One HW label identified diazinon and another label identified methylene diisocyanate prepolymer. All containers were closed and represented a low potential for harm.	Moderate	On 3/18/2014, eleven containers with accumulation dates ranging from 1/8/2014 to 3/7/2014 were stored longer than the allowable 10 days. Eleven containers out of the total number of containers stored in Area A were stored over 10 days. Therefore, the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	No	n/a	0.00	6										
	2	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation as well as perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16	The facility failed to properly train facility personnel and maintain adequate training documents and records.	Major	If training was not provided and adequately documented, this could have resulted in mismanagement, potential exposure(s), potential releases of HW to the environment, and an inability for staff to perform safe clean up and corrective action operations. The facility had a documented history of releases due to mixing of incompatible wastestreams, and the lack of training in identifying and managing incompatible wastestreams presented a major potential for harm to human health, safety, and the environment	Moderate	The facility failed to provide training related to chemical compatibility and storage, chemical identification and classification, chemical segregation, and 40 hour HAZWOPER training for nine employees. The requirement functioned to some extent as employees had multiple other documented and required trainings.	20.00	Yes	3/25/2013	25.00	25										
<b>Provisional Inspection Violation Score:</b>																					<b>31.00</b>		

### Violation Scoring Matrix

Facility Name:		GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO		10 Year Date Range:		2009-2018		Permit Issue Date:		4/25/2007		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:		10		Permit Expiration Date:		4/25/2017			
EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019			
Inspection Date:	5/6/2015 FCI & 6/18/2015 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:	FCI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30(a), 22 CCR 66262.17(b), and 22 CCR 66264.177(c)	The facility failed to separate containers of incompatible wastes by a dike, berm, wall or other device, in Areas A and B of the facility.	Major	At least five instances of 5-gallon containers of incompatible wastes were stored together and cited during the inspection. Incompatible wastes such as organic peroxides and oxidizers from corrosives and inorganic acids from organic acids were stored together. Storage of incompatible wastes increased the potential for violent reactions, HW releases, and fires.	Major	The facility failed to separate containers of incompatible wastes. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25.00	Yes	3/25/2013	25.00	31.25
	2	The deviation from the requirement was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.17(a)	The facility failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. DTSC staff observed two containers of organic peroxide stored on a pallet that included a drum of Flammable Liquid in Area A. DTSC staff also observed five other instances of incompatible HW stored in Cell #2, Area B.	Major	HWs were required to be separated and protected from sources of ignition and reaction in Areas A and B. Failure to take adequate precautions could result in a potential release or fire.	Moderate	The facility took some precautions to prevent ignition such as having containers closed and on separate pallets. Therefore, while the act deviated from the requirement, the requirement functioned to some extent, although not all of its important provisions were complied with.	20.00	No	n/a	0.00	20
	3	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25189(a), HSC 25189.2(a), HSC 25202(a), and 22 CCR 66270.30(a)	The facility made false statements and/or misrepresentations on HW labels, when it affixed outbound labels over waste receipt check-in labels. These labels consequently misstated the accumulation start date(s).	Minimal	The HW stream observed in violation was drums with lead acid batteries (Automotive Type), and the potential threat to human health and the environment was low.	Major	Misstating the accumulation start date by covering it with an outbound label deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	15.00	No	n/a	0.00	15
	4	The deviation from the requirements was significant enough that it could result in a failure to perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16 and 2013 Imminent and Substantial Endangerment Determination and Enforcement (ISE) Order Sections 4.2.2 and 4.3	The facility failed to properly train facility personnel and maintain training documents and records, as three employees failed to take part in an annual review of the initial training.	Moderate	If training is not provided and adequately documented, this could result in mismanagement, potential exposure(s), potential releases of HW to the environment, and an inability for staff to perform safe clean up and corrective action operations.	Moderate	Three employees (out of 14 reviewed) failed to take part in an annual review of the initial training. A portion of the total training was delayed for the three employees. Therefore, requirement functioned to some extent, although not all of its important provisions were complied with.	15.00	Yes	3/25/2013 and 3/18/2014	50.00	22.5

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018		Permit Issue Date:	4/25/2007			Link to EnviroStor (Inspection Reports, SOVs, etc.)		
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10		Permit Expiration Date:	4/25/2017					
EPA ID:	CAD980884183			Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019					
Class I Violations:	5	The deviation from the requirements was significant enough that it could result in a failure to assure adequate financial resources to pay for facility closure.	22 CCR 66264.112(b)(3)	Failure to properly and accurately complete the facility Closure Plan. The facility failed to provide in the Closure Plan an estimate of the maximum inventory of every HW ever on site over the active life of the facility and a detailed description of the methods to be used during partial and final closure, including, but not limited to methods for removing, transporting, treating, storing or disposing of all HW.	Moderate	The failure to include this information in the Closure Plan could result in the facility not having adequate funding for facility closure. The facility was permitted to accept ignitable, corrosive, reactive, and toxic wastes. This violation increased the potential for waste to be mismanaged, released to the environment, and/or unaccounted for which presented a moderate threat of harm.	Moderate	The facility failed to provide an accurate estimate of the total inventory of HW onsite over the active life of the facility and failed to accurately detail the methods to be used during partial and final facility closure in the Closure Plan. In addition, roll off bins in Area D were not accounted for. The requirement functioned to some extent, although not all of its important provisions were complied with.	15.00	No	n/a	0.00	15
	6	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility improperly stored incompatible wastes within the same storage cell in Area B. In Cell #2, containers of organic peroxide were stored next to inorganic acids, and acidic organic acids were stored near or next to oxidizers. In addition, inorganic acids and organic acids were stored in the same cell in Area B	Moderate	Storing incompatible wastes next to each other without a means of separation could result in an explosion and/or potential release resulting in a significant threat to human health and the environment. However, since the volume of HW in violation was not specified, a moderate potential for harm was assigned due to the wastestreams.	Major	The facility failed to separate incompatible HW as required by the permit and the function of the requirement was rendered ineffective because some of its provisions were not complied with.	20.00	Yes	8/4/2011	25.00	25
	7	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility improperly stored HW in containers for more than 10 days in Area A of the facility. Area A is a temporary storage area for receiving, inspecting, repackaging, and preparation of containerized waste for shipping.	Minimal	The volume (3 Gaylord Boxes) and type (automotive lead acid batteries) of HW in violation presented a low potential for harm.	Moderate	Other HW stored in Area A did not exceed the 10-day storage requirement at the time of the inspection. The act deviated from the requirement, but the requirement functioned to some extent.	6.00	Yes	3/18/2014	25.00	7.5
Class II Violations:	8	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility was not authorized to bulk HW in Areas A and B. DTSC staff observed numerous drums containing either used oil or antifreeze processed by the facility being stored in Area A and bulked into a tanker truck. DTSC staff was informed by facility personnel of the unauthorized bulking activity.	Minimal	The facility improperly bulked 14 containers of used oil and 14 containers of antifreeze into a tanker truck. HW type in violation represented a low potential for harm.	Major	No HW bulking was allowed in Areas A and B. DTSC did not observe bulking, but was informed of this occurrence by the facility employees. The act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	15.00	No	n/a	0.00	15
<b>Provisional Inspection Violation Score:</b>												151.25	

### Violation Scoring Matrix

Facility Name:		GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO		10 Year Date Range:		2009-2018		Permit Issue Date:		4/25/2007		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:		10		Permit Expiration Date:		4/25/2017			
EPA ID:		CAD980884183		Total Number of Violations Scored:		58		Date VSP Completed:		7/18/2019			
Inspection Date:	5/10/2016 CEI & 9/29/2016 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 result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201, HSC 25202, HSC 25189.5(c) and (d), and 22 CCR 66264.31	Failure to maintain and operate in a manner that minimizes the possibility of a fire, explosion, or any unplanned release of HW.	Minimal	HW was being emptied into a 20 yard roll-off bin and tan/brown colored dust was released into the air and dispersed beyond the facility fence line at Area D. Area D was permitted to store ignitable and toxic waste in roll off bins. The facility provided information stating that "The waste being transferred had resulted from facility repackaging and consolidation activities, including soiled personal protective equipment and absorbent" and represented a minimal threat to human health and the environment.	Moderate	HW transfers in other locations at the facility in Area D that resulted in air releases were not noted at the time of the inspection. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	3/25/2013 is within the last three prior inspections.	25.00	7.5
	2	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201, HSC 25202, HSC 25189.5(c) and (d), 22 CCR 66264.31, and 22 CCR 66264.175(b)(5) and (6)	Failure to maintain and operate in a manner that minimizes the possibility of a fire, explosion, or any unplanned release of HW.	Minimal	The facility failed to operate Area B containment systems to remove spilled waste. Area B was permitted to store ignitable and combustible liquids, corrosives, reactives, and toxic wastestreams. The containment sumps in Area B contained spilled or leaked waste. The facility provided a statement that identified the liquid was "rainwater" and therefore the small amount of spilled waste, or rainwater, presented a minimal potential for harm.	Moderate	Other containment systems in Area B were not reported to be leaking at the time of the inspection. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	3/25/2013 is within the last three prior inspections.	25.00	7.5
	3	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25201, HSC 25202, HSC 25189.5(c) and (d), and 22 CCR 66264.31	Failure to maintain and operate in a manner that minimizes the possibility of a fire, explosion, or any unplanned release of HW.	Minimal	Area D was permitted to store ignitable and toxic waste streams in storage bins. Spilled solid HW in Area D during transfer into a 20-yard roll off bin was tracked throughout the facility by equipment. The facility provided information stating that "The waste being transferred had resulted from facility repackaging and consolidation activities, including soiled personal protective equipment and absorbent" and represented a minimal threat to human health and the environment.	Moderate	No additional HW spill(s) were noted in Area D at the time of the inspection. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	3/25/2013 is within the last three prior inspections.	25.00	7.5
	4	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30(a), and 22 CCR 66264.177(c)	Failure to separate multiple containers of incompatible HW without proper separation.	Major	Three instances: (1) two containers of Class 1.4 Explosive Waste was stored next to drums of Class 8 Corrosive Waste in the Loading and Unloading Area, (2) one drum of Class 4.2 Solid Waste was stored on a pallet on top of a drum of Class 8 Corrosive Waste in Area A, and (3) Containers of oxidizers, corrosives, flammable liquids and solids were stored near and next to each other on a trailer in the Loading and Unloading Area. Such storage practices could lead to a violent chemical reaction and possible injury and/or release.	Major	The facility failed to separate multiple containers of incompatible HW in at least three instances in the "Loading and Unloading Area" and in Area A, including placing many incompatibles in a truck without proper separation. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25.00	Yes	5/6/2015	25.00	31.25

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018			Permit Issue Date:	4/25/2007			Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10			Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58			Date VSP Completed:	7/18/2019				
5	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and to perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16 and 2013 ISE Order Section 4.2.2 and 4.3	Failure to properly train facility personnel and maintain training documents and records.	Moderate	If training was not provided and adequately documented, this could result in mismanagement, potential exposure(s), potential releases of HW to the environment, and an inability for staff to perform safe clean up and corrective action operations.	Major	Ten (10) employees failed to complete timely annual or initial training, up to 128 days late. Multiple employees did not receive all trainings in the required timeframe. As a result, the requirement was rendered ineffective because some of its provisions were not complied with.	20.00	Yes	3/18/2014, 5/6/2015 and 3/25/2013 because it is within the last three inspections	100.00	40	
6	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66264.175(b)(1), and 22 CCR 66270.30(a)	Failure to properly maintain resin coating and fix cracks in the "Loading and Unloading Area" and in Area D.	Minimal	Cracked concrete on the surface of the "Loading and Unloading Area" and in Area D could result in potential migration of contaminants through the cover and into the subsurface soil and groundwater. The cracks, gaps, and deteriorated epoxy repairs photographed in the inspection report appeared small and surficial in nature resulting in a minimal potential for harm designation.	Moderate	Multiple cracks were observed that had not been fixed (no action was taken to repair or seal the cracks with a chemical resistant coating as required by permit) despite having been noted in the facility Inspection Logs. However, no cracks were identified during the inspection in other areas. Therefore, the requirement functioned to some extent.	6.00	No	n/a	0.00	6	
7	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	Improper storage of HW in Area A and Loading and Unloading Area for longer than 10 days.	Moderate	404 pounds of waste flammable liquids (waste codes 214, D001, D035, U213, and U161), 9 pounds of waste aerosols (waste codes 214, D001, D002, D035, U080, and U002), and 51 pounds of non-RCRA HW liquid (waste code 331) were stored in the "Loading and Unloading Area" in excess of the 10 day limit (Manifest 001269977 PSC). The amount and type of waste involved presented a moderate threat to public health or safety or the environment.	Minimal	Facility stored HW containers in Area A and the "Loading and Unloading Area" for one day longer than the requisite 10 days (11 days). The requirement functioned nearly as intended, but not as well as if all provisions had been met.	6.00	Yes	3/18/2014 and 5/6/2015	50.00	9	

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018		Permit Issue Date:	4/25/2007		Link to EnviroStor (Inspection Reports, SOVs, etc.)		
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10		Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019				
8	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	Improper storage of HW in Area A and Loading and Unloading Area for longer than 10 days.	Minimal	Two containers of automobile lead acid batteries were stored in Area A and presented a low potential for harm.	Moderate	One container of batteries was stored for 22 days and the other was stored for 28 days. Therefore, the requirement functioned nearly as intended, but not as well as if all provisions had been met.	6.00	Yes	3/18/2014 and 5/6/2015	50.00	9
9	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a), 22 CCR 66270.30(a), and 22 CCR 66261.7(f)	Failure to mark empty containers to identify them as empty.	Minimal	Two empty 100-gallon totes were observed with no "empty" label and empty date. The volume of waste in violation represented a low potential for harm.	Minimal	Other empty containers onsite were observed to be labeled correctly. Therefore, the requirement functioned nearly as intended, but not as well as if all provisions had been met.	2.00	No	n/a	0.00	2
10	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.171 and 22 CCR 66264.173(b)	Failure to properly manage HW containers.	Minimal	Facility stored HW in three significantly dented or deformed 5-gallon plastic containers in Area B and the Unloading and Loading Area. The small volume of HW contained in the dented containers represented a minimal threat to human health and the environment.	Minimal	Out of all the containers observed during the inspection, only three containers are noted in the Inspection Report as dented or deformed. The requirement functioned nearly as intended, but not as well as if all provisions had been met.	2.00	No	n/a	0.00	2
11	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.173(a)	Failure to properly close HW containers.	Minimal	Three containers holding HW were observed in violation in Area D: two containers were open and the other was not closed properly. In addition, two 20-yard roll-off bins had tarps that did not cover the whole bin, and the tarps were constructed of a mesh that could have resulted in a release of the contents to the environment.	Minimal	Out of all the containers observed during the inspection, only five containers were identified in the Inspection Report as improperly closed. Therefore, the requirement functioned nearly as intended, but not as well as if all provisions had been met.	2.00	No	n/a	0.00	2

### Violation Scoring Matrix

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Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10		Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019				
12	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and 22 CCR 66270.30(a)	Unauthorized acceptance of HW destined for other facilities.	Minimal	Two instances of unauthorized acceptance were identified: (1) One drum marked "Hold 5/9/16 Fernley Direct" placed in the "Loading and Unloading Area" destined for Fernley, Nevada and was held overnight in Area A; (2) Four 55-gallon drums destined for Filter Recycling in Rialto CA were observed in Area A. The low volume of waste involved presented a minimal threat to public health and safety or the environment.	Major	The HW was not destined for the current facility. The waste was stored in Area A, which the permit specified as exclusively for drums being received by the facility or prepared for outgoing shipment. The requirement was completely ignored and none of its provisions were complied with.	15.00	No	n/a	0.00	15
13	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and 22 CCR 66270.30(a)	Failure to provide acceptance dates on containers of HW.	Minimal	Approximately 20 drums in Area A and Area C lacked inspection dates which represented a low potential for harm.	Minimal	The facility failed to provide a tracking label with a date of acceptance within 24 hours of receipt. The requirement functioned nearly as intended, but not as well as if all provisions had been met.	2.00	No	n/a	0.00	2
<b>Provisional Inspection Violation Score:</b>											140.75	

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO		10 Year Date Range:	2009-2018		Permit Issue Date:	4/25/2007		Link to EnviroStor (Inspection Reports, SOVs, etc.)				
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742		Number of Inspections:	10		Permit Expiration Date:	4/25/2017						
EPA ID:	CAD980884183		Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019						
Inspection Date:	6/27/2017	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:	FCI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could result in a failure to assure that HWs are destined for and delivered to an authorized HW facility.	HSC 25202(a), 22 CCR 66270.30(a), and 22 CCR 66261.7(f)	The facility failed to mark approximately 200 empty containers and identify them as empty.	Minimal	The facility did not label approximately 200 empty drums located behind the facility. The low volume of HW in the empty drums cited in violation represented a low potential for harm.	Major	Approximately 200 drums were not labeled empty with an empty date and discovered outside of the facility property. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	15.00	Yes	5/10/2016	25.00	18.75
	2	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility stored HW in excess of the ten days allowed under the transfer facility exemption without a permit or other grant of authorization from DTSC. The facility stored three containers of corrosive waste in Area A in excess of 10 days.	Minimal	Three containers holding HW (kept closed) were in Area A for longer than 10 days and dated 6/13/17, 3/28/17, and 6/16/17, respectively. Waste streams identified on the HW labels were lab packed waste corrosive liquid, acidic, inorganic waste. The three at issue closed, labeled, and lab-packed containers present a low potential for harm.	Moderate	Three closed HW containers were found in violation of the 10-day storage requirement at the facility during the inspection. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions are complied with.	6.00	Yes	5/10/2016, 3/18/2014 & 5/6/2015	100.00	12
	3	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility failed to mark containers (five boxes and two buckets of Class 1.4 HW) with acceptance dates.	Minimal	Six containers (5 boxes and 1 bucket) of Class 1.4 Explosive HW in Area B Cell #6 did not have waste acceptance/accumulation start dates. The amount of waste at issue presented a low potential for harm, as the containers were closed and in good condition.	Minimal	Six containers out of the total number of containers onsite were discovered without facility acceptance dates. The requirement functioned nearly as intended, but not as well as if all provisions had been met.	2.00	Yes	5/10/2016	25.00	2.5
Class II Violations:	4	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30(a), and 2013 ISE Order Section 4.2.1.	The facility bulked waste in Area C without written authorization by the facility chemist.	Moderate	Facility management or the facility chemist failed to approve of the intent to bulk waste and failed to use the appropriate process form. Bulking of incompatible wastes without appropriate approval could result in ignition, fire, and potential releases.	Moderate	Compatibility testing was performed, but the wrong form was used and no facility chemist signoff was obtained. The form was submitted as a review procedure that would ensure proper oversight for bulking and consolidation of waste. This was a violation of the corrective action procedures approved by the ISE Order. The requirement functioned to some extent since compatibility testing was performed.	15.00	No	n/a	0.00	15
												48.25	

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018			Permit Issue Date:	4/25/2007			Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10			Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58			Date VSP Completed:	7/18/2019				
Inspection Date:	10/25/2017	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 result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66262.11(a)	On 8/7/2017, a fire occurred at the facility when HW (naphthalene) was poured onto paper and the paper ignited. The fire was controlled, in part, by use of an absorbent. The facility failed to make a HW determination for the materials set on fire or those used in the cleanup of the fire.	Minimal	The facility's failure to make a determination could have led to HW having been disposed improperly. However, since the volume and the characteristics of the HW in violation were not provided, a minimal designation for potential for harm was assigned.	Major	The facility did not conduct a HW determination. The act deviated from the requirement to such an extent that the function of the requirement was completely ignored and none of its provisions were complied with.	15.00	No	n/a	0.00	15
	2	The deviation from the requirement was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66264.56(g)	On 8/7/2017, the facility's Emergency Coordinator failed to provide for the treatment, storage, or disposal of any material that caused the fire. The facility could not account for the disposition of the materials that caused the fire.	Minimal	The facility did not provide for the treatment, storage, or disposal of any material that caused the fire. Since the volume and the characteristics of the HW in violation were not provided, a minimal designation for potential for harm was assigned.	Major	The facility could not account for the disposition of the materials that caused the fire. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	15.00	No	n/a	0.00	15
	3	The deviation from the requirements was significant enough that it could result in a failure to perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a), 22 CCR 66270.30(a), and HWFP Part B Sections X(1)(3)(a)(3)(4), and (8) and Attachment X-2	The facility failed to comply with the following actions in the event of a fire, as required by the Emergency Action and Contingency Plan in its HWFP: (1) evacuation; (2) employee notification to his/her supervisor; (3) notification to the Emergency Coordinator and General Manager by the supervisor; (4) placement of debris and materials used in the clean-up of the fire, which are presumed to be HW, in proper containers, labeled, and managed appropriately; and (5) verbal notification to DTSC.	Moderate	A fire onsite was controlled, in part, by use of an adsorbent, and the facility failed to make a HW determination for the materials set on fire or those used in the cleanup of the fire. The owner or operator did not account for the disposition of the materials caused by the fire. By not following the required Emergency Action and Contingency Plan, designed to minimize potential for harm in case of a release, there was a moderate threat to public health and safety.	Major	The facility failed to satisfy most of the requirements of its Emergency Action and Contingency Plan. As a result, the requirement was rendered ineffective because some of its provisions were not complied with.	20.00	No	n/a	0.00	20
	4	The deviation from the requirements was significant enough that it could result in a failure to perform emergency clean-up operation or other corrective action for releases.	22 CCR 66264.16 and 2013 ISE Order Sections 4.2.2 and 4.3	The facility failed to properly train facility personnel and/or maintain training documents and records.	Major	A supervisor at the facility left five employees unsupervised and two employees started a fire by lighting paper mixed with an ignitable HW with a lighter. Training was not provided and adequately documented, and resulted in mismanagement, employee exposure, a release of HW to the environment, and an inability for staff to perform appropriate corrective action operations.	Major	Training records indicated that a supervisor for employees bulking waste in Area C, failed to complete eight hours of HAZWOPER Training. Annual Refresher Training for HW Generator Training was not provided to multiple facility employees, and Chemical Compatibility and Injury/Illness Prevention Plan was not provided to three employees. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	Yes	5/6/2015, 5/10/2016	50.00	37.5

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Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10		Permit Expiration Date:	4/25/2017				
EPA ID:	CAD980884183			Total Number of Violations Scored:	58		Date VSP Completed:	7/18/2019				
5	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.17(a) and 22 CCR 66264.31	The facility failed to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and operate and maintain the facility in a manner to minimize the possibility of a fire or release of HW or HW constituents.	Major	The facility's employees intentionally poured an ignitable HW onto paper and lit the paper on fire with a lighter in Area C where other employees were also consolidating HW and where ignitable HW was located. When the ignitable HW was handled, the facility failed to take the necessary precautions to prevent a fire resulting in a major threat to public health and the environment.	Major	The facility's employees intentionally poured an ignitable HW onto paper and lit the paper on fire. The act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	25.00	Yes	5/10/2016	25.00	31.25
6	The deviation from the requirements was significant enough that it could result in a failure to perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a) and 22 CCR 66270.30(a)	The facility failed to notify DTSC of a new release of HW within 24 hours.	Major	Without timely notification, it was not possible for DTSC to assess the nature and extent of the incident/release or other environmental harm.	Moderate	The facility failed to notify DTSC within 24 hours of discovery of new releases from the fire that occurred on 8/7/2017. DTSC was notified by the facility three days later on 8/10/2017. The requirement functioned to some extent as DTSC was eventually notified, but not within the required timeframe.	20.00	No	n/a	0.00	20
7	The deviation from the requirements was significant enough that it could result in a failure to assure adequate financial resources to pay for facility closure.	22 CCR 66270.40(a) and (b)(2), and 22 CCR 66270.42.5(c)(1)	The facility failed to follow permit transfer and ownership change requirements.	Major	Stericycle acquired ownership and/or operational control of the facility without complying with the procedures of a Class 1* Permit Modification and without prior written approval from DTSC. The potential exists for the facility to have had inadequate financial resources, and liability insurance to pay for facility closure without DTSC's verification of the same.	Major	DTSC received no revised permit application and no written agreement was entered into and submitted to DTSC containing a specific date for transfer of permit responsibility, coverage, and liability. As a result, the facility did not demonstrate compliance with the financial requirements during and after the ownership and/or operational change, and the function of the requirement was rendered ineffective.	25.00	No	n/a	0.00	25
<b>Provisional Inspection Violation Score:</b>											<b>163.75</b>	

### Violation Scoring Matrix

Facility Name:	GENERAL ENVIRONMENTAL MANAGEMENT OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO			10 Year Date Range:	2009-2018			Permit Issue Date:	4/25/2007			Link to EnviroStor (Inspection Reports, SOVs, etc.)		
Address:	11855 WHITE ROCK RD, RANCHO CORDOVA, CA 95742			Number of Inspections:	10			Permit Expiration Date:	4/25/2017					
EPA ID:	CAD980884183			Total Number of Violations Scored:	58			Date VSP Completed:	7/18/2019					
Inspection Date:	6/25/2018 CEI & 6/28/2018 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 result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a), 22 CCR 66261.7, 22 CCR 66270.30, and HWFP Part B Section VIII(E)(2)	The facility failed to mark empty containers that once held HW with the date(s) the containers were emptied.	Minimal	The facility failed to mark approximately 20-40 empty containers that once held HW with the date(s) the containers became empty. Empty labels were in place but not completed. The containers were lined up along the facility boundary next to Area D.	Moderate	The facility had empty labels on the drums, but no date indicating when the drum was emptied on the label. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	5/10/2016 and 6/27/2017	50.00	9	
	2	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202(a), 22 CCR 66270.30, 22 CCR 66262.34(f)(3), 22 CCR 66266.80(a), and HWFP Part B Section VIII(D)(1)(f)(2)	The facility failed to correctly label multiple containers of HW.	Minimal	The facility failed to correctly label (1) two 55-gallon drums in Area B Cell 2 containing "Automotive Type" batteries as HW, were improperly labeled as Universal Waste, (2) one 55-gallon drum of DOT Class 3 Flammable Wastes (formaldehyde solution) in Area B Cell 4 was improperly labeled as a Class 6 and Class 8 DOT Hazardous Material. Failure to properly label containers of HW can lead to possible injury or release cause by mishandling of the waste.	Moderate	The incorrect labels had some of the required identifying information on it. Other wastes not at issue in the violation were labeled correctly. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	Yes	6/27/2017	25.00	7.5	
	3	The deviation from the requirements was significant enough that it could result in a failure to 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 Part B Section V(G)(3)	The facility stored one 55-gallon drum of DOT Class 6 Liquid HW (Barium Sulfate and Insulin) in Area B Cell 5. The facility's HWFP did not authorize the facility to store such HW in this area.	Minimal	The sign posted in this storage cell prohibited the storage of Class 6 Liquid HW in the cell. Storage of one drum of HW in an unauthorized area represented a minimal potential for harm to public health and safety and the environment.	Moderate	Accidental mixing of incompatibles could potentially result in a reaction producing heat or fire. One drum of HW was identified as being in violation. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	6.00	No	n/a	0.00	6	
	4	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30, 22 CCR 66264.177(c), and HWFP Part B Section V(G)(4)	The facility stored incompatible wastes inside Area C and incompatible waste without proper segregation in Area B cells. The facility's HWFP did not authorize the facility to store incompatible HW in the same area without proper segregation.	Major	Three instances of storage of incompatible wastes in Area C and four instances in Area B were observed during the inspection. Forty-five (45) separate instances were identified on the facility's Daily Logs from January through June 2018. Storing incompatible wastes next to each other without a means of separation could result in an explosion and/or potential release resulting in a major threat to human health and safety and the environment.	Major	Due to the large number of instances, the act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	Yes	5/10/2016 is 3 inspections prior.	25.00	31.25	

### Violation Scoring Matrix

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5	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30, 22 CCR 66264.177(c), HWFP Part B Section V(C)(10), and 2013 ISE Order Section 4.2.1	The facility bulked HW on 139 separate instances from January 2018 through June 2018 without using the DTSC-approved form found in its HWFP.	Major	As a result of the 2011 explosion and 2011 and 2013 fires, the facility was required to use the DTSC-approved form prior to conducting any activity involving consolidation or bulking. The form was designed to prevent such future releases. The facility's failure to use the proper form could have resulted in a high potential for harm if another explosion, fire, or other release were to have occurred.	Moderate	The facility used the incorrect form. However, the form it did use listed some of the information required on the DTSC-approved form. The act deviated from the requirement, but the requirement functioned to some extent, although not all of its important provisions were complied with.	20.00	No	n/a	25.00	25
6	The deviation from the requirements was significant enough that it could result in a failure to assure that HW are destined for and delivered to an authorized HW facility and to 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 Part B Section VIII(E)(1)(b) and VI(D)	The facility stored HW in excess of ten days allowed under the transfer facility exemption without a permit or other grant of authorization from DTSC.	Minimal	As evidenced on the facility's Daily Logs, the facility stored containers in excess of the 10-day storage limit on 47 separate days from January through June 2018. Given there were no documented releases associated with the HW storage, a minimal potential for harm to public health and the environment was assigned.	Major	Due to the number of instances, the act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	15.00	Yes	5/10/2016 and 6/27/2017	50.00	22.5
7	The deviation from the requirements was significant enough that it could result in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a), 22 CCR 66270.30, HWFP Part B Section V(C)(10), and 2013 ISE Order Section 4.2.1	The facility bulked HW on 139 separate instances without first obtaining the facility management's or the facility chemist's written approval.	Major	Bulking of HW occurred on 139 separate instances from January through June 2018 without using the DTSC-approved form (Container Process Form). By not receiving the required approvals for HW bulking, a major threat to public health and safety and the environment could result from an explosion and/or release caused by potential mixing of incompatible HW streams.	Major	Due to the number of instances, the act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	Yes	6/27/2017	25.00	31.25
8	The deviation from the requirements was significant enough that it could result in a failure to 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 Part B Section VI II-12	The facility bulked organic HW on 42 separate instances without the use of the organic scrubber as indicated in the facility's Daily Inspection Logs from January 2018 through June 2018, as the organic scrubber system in Area C was inoperable.	Major	Bulking of HW occurred on 42 separate instances from January through June 2018 without using the organic scrubber. The organic scrubber system in Area C was inoperable. HW bulking without the required organic scrubber resulted in a major threat to public health and safety and the environment as the resulting organic vapors generated from bulking were not captured by the scrubber and removed.	Major	Due to the number of instances, the act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	25.00	No	n/a	0.00	25
<b>Provisional Inspection Violation Score:</b>											157.50	

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FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	5	CEI & FRR	3/11/2009 CEI & 4/14/2009 FRR	86.00
2	2	CEI & FRR	3/8/2011 CEI & 6/17/2011 FRR	40.00
3	5	FCI	8/4/2011	98.25
4	4	CEI & FRR	3/25/2013 CEI & 5/15/2013 FRR	80.00
5	2	CEI & FRR	3/18/2014 CEI & 4/8/2014 FRR	31.00
6	8	FCI & FRR	5/6/2015 FCI & 6/18/2015 FRR	151.25
7	13	CEI & FRR	5/10/2016 CEI & 9/29/2016 FRR	140.75
8	4	FCI	6/27/2017	48.25
9	7	FSD	10/25/2017	163.75
10	8	CEI & FRR	6/25/2018 CEI & 6/28/2018 FRR	157.50
Sum of Provisional Inspection Violation Scores				996.75
<b>*FACILITY VSP SCORE</b>				<b>99.68</b>

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

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

## 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 Matthew Clutter, General Environmental Management of Rancho Cordova LLC dba PSC Environmental Services., EPA ID Number CAD980884183.
2. I served Matthew Clutter, General Environmental Management of Rancho Cordova LLC dba PSC Environmental Services, by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9331, return receipt requested, in a sealed envelope addressed to:

Mr. Matthew Clutter  
General Environmental Management of Rancho Cordova LLC dba PSC Environmental Services  
11855 White Rock Road  
Rancho Cordova, California 95742

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.

  
\_\_\_\_\_  
(Signature)