



Department of Toxic Substances Control

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September 27, 2019

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Mr. David Thaete
Phibro-Tech Inc.
8851 Dice Road
Santa Fe Springs, California 90670

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

Dear Mr. David Thaete:

2019 Facility Violations Scoring Procedure (VSP) Score: 31.13
2019 Compliance Tier Assignment: Conditionally Acceptable

The purpose of this letter is to provide Phibro-Tech Inc., CAD008488025, located at 8851 Dice Rd., Santa Fe Springs, California 90670 (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).¹

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.² (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.

¹ 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. More information regarding SB 673 is available at https://www.dtsc.ca.gov/HazardousWaste/Permit_Roundtables.cfm.

² 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 "31.13". 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. If you have any questions regarding the dispute process, please contact 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:	PHIBRO-TECH INC			10 Year Date Range:	2009 - 2018			Permit Issue Date:	7/29/1991			Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:	8851 DICE RD SANTA FE SPRINGS, CA 90670			Number of Inspections:	17			Permit Expiration Date:	7/29/1996				
EPA ID:	CAD008488025			Total Number of Violations Scored:	29			Date VSP Completed:	2/13/2019				
Inspection Date:	5/29/2009	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:	FUI												
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
Provisional Inspection Violation Score:													0.00
Inspection Date:	6/16/2010	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
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs,	
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019		etc.)	
Inspection Date:	3/1/2011 CEI & 7/11/2012 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:	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.	22 CCR 66270.30 and HWFP IIIc1(a)	The facility illegally stored HW drums for 41 days over the 1 year allowable storage period.	Minimal	Two 55-gallon drums containing corrosive liquid were securely covered and stored in a permitted storage area with secondary containment. The characteristics and amount of the substance involved presented a minimal threat.	Minimal	The facility had a total capacity of 2,145 55-gallon drums. At the time of the inspection, two 55 gallon drums were observed to be stored longer than one year (41 days over the 1-year period). The act deviated in a minor way from the requirement and the requirement functioned nearly as intended, but not as well as if all provisions had been met.	2	No	n/a	0.00	2
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW and/or constituents to the environment during the active or post-closure period of facility operation.	HSC 25202(a)	The facility illegally stored HW (spent etchants) in Tank S-3 without a permit or other authorization from DTSC.	Moderate	The facility stored copper sulfate in one aboveground unpermitted storage tank. The tank had a capacity of 12,000 gallons and was located in a permitted area. The tank had no certified tank assessment per Attachment 7 of the Inspection Report, so the integrity of the tank could not be determined.	Major	The facility did not have a permit to store HW in Tank S-3 and did not attempt to obtain a DTSC permit modification to allow for its use. The act deviated from the requirement to such an extent that the function of the HW management requirement was rendered ineffective.	20	No	n/a	0.00	20
	3	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.	HSC 25202(a)	The facility conducted treatment not authorized by its HWFP. There were two instances of illegal treatment: (1) waste sludge treated in a dry basin; (2) HW treatment in two filter presses.	Major	Sludge in a tarp covered 12'x3' dry basin contained corrosive and metal waste. Sludge treatment was conducted via manual separation using a 55-gallon drum. Chromium and copper were found above TTLC levels. Filter presses: copper, nickel and cadmium exceeded TTLC regulatory limit, and cadmium above TCLP. The characteristics and amount of the substances involved presented a major threat to public health and safety or the environment.	Major	The facility's HWFP did not allow for this treatment of HW and the facility did not attempt to obtain a permit modification to authorize this treatment. Unauthorized HW treatment in a non-permitted unit constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	25	No	n/a	0.00	25
	4	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.	22 CCR 66264.112(d)(1)	The facility failed to notify DTSC prior to closing two tanks (F-2 and F-12).	Minimal	There were no documented releases of HW from tanks F-2 or F-12. Per Attachment 7, tank F-12 had a 1,700 gallon capacity. Tanks F-2 and F-12 were empty and no longer in use.	Major	The facility did not notify DTSC prior to closure and ignored the regulatory requirement to do so in both instances. The facility's act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0.00	15
Provisional Inspection Violation Score:												62.00	

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019			
Inspection Date:	5/16/2012 CEI & 7/11/2012 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:	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.	HSC 25202(a)	The facility illegally treated HW liquid in unpermitted Tank C-40.	Moderate	Tank C-40, in a permitted area, was used for unauthorized treatment of HW. The settling tank had a capacity of 3,800 gallons. Samples indicated the tank contained copper metal above the 2,500 milligrams per kilogram regulatory limit and had a pH of more than 12.5. The characteristics and amount of the substance involved presented a moderate threat.	Major	The facility's HWFP did not allow for this treatment of HW and the facility did not attempt to obtain a permit modification to authorize this treatment. Tank C-40 was not a permitted tank. Unauthorized HW treatment in a unpermitted unit constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	20	Yes	3/1/2011	25.00	25
	Provisional Inspection Violation Score:												
Inspection Date:	5/28/2013 CEI & 6/19/2013 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 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 or post closure period of facility operation.	HSC 25202(a)	The facility illegally transferred or offloaded manifested HW from a tanker truck into plastic totes on a roadway that was not authorized by DTSC. The road was located outside and north of ERS-1. After transferring the HW liquids into totes, the facility would then store the waste in ERS-1 for up to a year prior to treatment.	Minimal	The HW was transferred from a tanker truck into plastic totes in an unauthorized area (roadway). The volume and characteristics of the HW in violation were not provided therefore resulting in a minimal potential for harm determination.	Major	Transfer was done in non-permitted area and there was no attempt by facility to modify its permit to allow for transfer in this location for 30 years. The requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0.00	15
	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 or post closure period of facility operation or and/or assure early detection of such releases.	22 CCR 66270.30	The facility failed to conduct tank assessments for Tank W-1 and W-2. In addition, the 2013 tank assessments were incomplete as the facility failed to inspect the interior surfaces and tank bottoms.	Moderate	Tank assessments verify tank integrity. Failure to obtain tank assessments within the specified time limits increased the possibility of an unexpected release to the environment. The tanks stored wastewater as part of the wastewater treatment system. The tanks were used to adjust the pH concentration and had secondary containment. The two tanks each had a capacity of 30,000 gallons. The volume and characteristics of the HW in violation presented a moderate threat.	Major	Tanks W-1 and W-2 were not assessed for 9 years; a 2013 assessment was incomplete as the interior surface and the tank bottoms were not inspected. The permit requires re-certification every three years and the facility missed two cycles for two instances. The requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0.00	20
Provisional Inspection Violation Score:													35.00

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019			
Inspection Date:	1/27/2014	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:	FUI												
Class I Violations:	1	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 or post closure period of facility operation or and/or assure early detection of such releases.	22 CCR 66264.191(b), (e); 22 CCR 66264.193(c)(3), (e)(1)(B), and (f) and 66270.30	Failed to comply with tank assessment requirements for Tanks W-1 and W-2. The facility failed to provide documentation of the structural support or proper anchoring of the tanks and associated pipings, structural stability calculations, spill prevention equipment, secondary containment leak tests, and secondary containment capacity calculations.	Moderate	Tank assessments verify tank integrity. Failure to obtain tank assessments within the specified time limits increased the possibility of an unexpected release to the environment. A majority of HW liquid in the Wastewater Treatment System went into Tanks W-1 and W-2, which had inadequate tank assessments.	Moderate	The facility's 2013 tank assessment was only partially satisfactory as it was missing a number of regulatory requirements. The tank assessment requirement functioned to some extent, but not all important provisions were complied with.	15	Yes	5/28/2013	25.00	18.75
Provisional Inspection Violation Score:													18.75
Inspection Date:	4/23/2014	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 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 or post closure period of facility operation.	HSC 25202(a)	The facility illegally treated HW not authorized by its 1991 HWFP, when it used and operated a filter press in Area S to treat HW.	Moderate	The facility conducted unauthorized treatment in a permitted area. Copper Carbonate slurry was generated from an authorized treatment unit and moved to an unauthorized filter press to remove precipitated metals (28,000 mg/kg copper; TTLC 2,500). Copper Carbonate is a skin irritant and toxic to aquatic life. Samples exceeded the TTLC levels for Copper by more than 10x the TTLC threshold.	Major	The facility's HWFP did not allow for this HW treatment and the facility did not attempt to obtain a permit modification to allow for this treatment. Unauthorized HW treatment in an unpermitted unit constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	20	Yes	5/16/2012 (CEI)	25.00	25
Provisional Inspection Violation Score:													25.00

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996			
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019			
Inspection Date:	4/28/2014	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 & GAR												
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
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(4)	The facility failed to maintain the integrity of groundwater monitoring wells to prevent the wells from acting as a conduit for contaminant transport.	Moderate	Failure to maintain integrity of groundwater monitoring wells increased the potential for the well to act as a conduit for downward contaminant migration and could have resulted in enhanced contaminant release to the environment.	Minimal	On 4/28/2015, two out of 35 groundwater monitoring wells (MW-04 and MW-09) were observed to have compromised well casings and could be moved from side to side without significant effort. The requirement functioned nearly as intended but not as well as if all provisions had been met.	6	No	n/a	0.00	6
	2	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(6)	The facility failed to maintain integrity of groundwater monitoring wells to prevent entry of contaminants for the surface to the unsaturated zone and/or groundwater aquifers beneath the facility and to prevent contamination of samples.	Moderate	Failure to maintain integrity of groundwater monitoring wells increased the potential for the well to act as a conduit for downward contaminant migration and could have resulted in enhanced contaminant release to the environment.	Major	On 4/28/2015, 25 out of 35 groundwater monitoring wells had one or more of the following: worn out or missing well fault gasket seals, missing or broken bolts, damaged well caps, and/or improperly installed or non-functional looking well caps. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0.00	20
	3	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(7)	The facility failed to redevelop the monitoring wells to enable collection of representative groundwater samples, as 8 out of 35 monitoring wells had significant discrepancies between the constructed total depth to the bottom of the wells and the measured depth to the bottom of the wells, indicating that silt accumulated at the bottom of the wells, blocking the well screen and interfering with the collection of representative samples in wells MW-01D, MW-04, MW-05, MW-06D, MW-07, MW-08, MW-17S, and MW-24D.	Moderate	Failure to maintain and prevent silt accumulation at the bottom of wells and blocking the well screen could have prevented collection of a representative ground water sample. The failure to adequately maintain the monitoring well called into question the integrity of the groundwater sampling results.	Moderate	Eight out of 35 wells had significant discrepancies between as-built total well depth and the measured bottom of the well indicating silt accumulation in the well itself. The act deviated from the requirement, but the requirement functioned to some extent.	15	n/a	n/a	0.00	15
Provisional Inspection Violation Score:													41.00
Inspection Date:	1/28/2015	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:	FUI												
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
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019			
Inspection Date:	6/29/2015 CEI & 11/16/2016 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 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 and/or perform emergency clean-up operations or other corrective action for releases.	22 CCR 66264.35	The facility failed to maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in two separate areas of the facility: (1) the area located west of the permitted storage unit ERS1 and east of Tank J-3 and (2) adjacent and north of Tank C-9. The available aisle space was very limited or non-existent and there was not enough room for DTSC inspectors to walk down the aisle to inspect the containers in these areas.	Moderate	In an emergency or if there was a release, it would be difficult to access a spill due to inadequate aisle spacing. Several of the HW containers were open, which increased the risk of issues/spills between the inadequately spaced containers.	Moderate	Two of the areas observed had inadequate aisle spacing. The facility's compliance with the aisle space requirements functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0.00	15
	2	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.	22 CCR 66264.73(b)(1)-(2)	The facility failed to record the location of each HW container within the facility and the quantity of HW at each location. On two instances, inspectors observed at least 200 containers of acidic and alkaline HW outside the permitted storage unit, ERS2. Instead, these containers were located to the east and to the south of ERS2. However, the facility's Container Location Inventory Record indicated that the location of all waste received was either in permitted unit ERS2 or ERS1. In addition, inspectors observed containers of HW located adjacent to Tank C-9, but the facility's Container Location Inventory Record listed those containers as located within ERS2.	Major	Approximately 200 containers of acid and alkaline wastes were stored in an unpermitted area with no secondary containment. HW stored in undocumented locations resulted in mismanagement and illegal storage.	Moderate	200 containers were not properly tracked. However, the facility properly tracked other HW containers on site, so the requirement functioned to some extent.	20	No	n/a	0.00	20
	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.	22 CCR 66270.30 and HWFP Part III, Special Conditions, Page 15, Section 2	On multiple occasions, the facility stored HW in areas not authorized by its HWFP. On or about 6/29/2015, the facility stored approximately 200 containers containing HW outside of the permitted storage unit ERS-2. On or about 8/18/2015, the facility stored approximately 24 55-gallon containers of HW outside the permitted storage unit ERS-2. On 8/18/2015 and 9/23/2015, the facility stored HW in roll off bins and super sacks of HW copper filter cake north of the laboratory. On 9/23/2015, inspectors observed HW in a cabinet located on the first floor of the laboratory.	Major	Numerous containers of acid and alkaline waste were stored in unpermitted areas. Improper storage of incompatible wastes could cause potential harm to human health or the environment. In addition, no secondary containment was present in this unpermitted area.	Major	The facility did not have a permit to store HW in these area, nor did it attempt to obtain a permit modification to store these incompatible wastes together in the unpermitted area. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25

Violation Scoring Matrix

Facility Name:	PHIBRO-TECH INC			10 Year Date Range:	2009 - 2018			Permit Issue Date:	7/29/1991			Link to EnviroStar	
Address:	8851 DICE RD SANTA FE SPRINGS, CA 90670			Number of Inspections:	17			Permit Expiration Date:	7/29/1996			(Inspection Reports, SOVs,	
EPA ID:	CAD008488025			Total Number of Violations Scored:	29			Date VSP Completed:	2/13/2019			etc.)	
4	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 or post closure period of facility operation.	HSC 25202(a); 22 CCR 66270.30, 66264.177(c); and HWFP, Part III, Section F3	On multiple occasions, the facility illegally stored incompatible HW without a berm, wall, or dike to separate the wastes: (1) on 6/29/2015, the facility stored one 275-gallon tot of acidic HW, two 55-gallon containers of acidic HW, and one 5-gallon container of acidic HW next to several containers of alkaline HW; (2) on 6/30/2015, the facility stored the same 5-gallon container of acidic HW next to several containers of alkaline HW; (3) on 7/15/2015, the facility stored two 55-gallon containers of acidic HW next to several containers of alkaline HW; and (4) on 8/21/2015, the facility stored one 55-gallon container of alkaline HW next to several containers of acidic HW.	Major	Wastes involved were: sulfuric acid, nitric acid, and sodium hypochlorite in liquid form. Volumes ranged from 55 to 275 gallons. The incompatible wastes were stored without a berm, wall, or dike to separate the wastes. In addition, no secondary containment was present, representing a high potential to create a reaction involving heat or fire that could cause injury to workers and harm to the environment.	Major	Multiple instances of storage of incompatible wastes were observed over the course of the multi-day inspection in various locations at the facility. The violation deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25	
5	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.	HSC 25189.2(a)	The facility made multiple false representations in its Operating Record and Inspection Reports: (1) on or about 6/30/2015, the facility falsely represented in its Container Location Inventory Record that 200 containers of HW were being stored within permitted storage unit ERS1 or ERS2; (2) on or about 8/18/2015, the facility falsely represented in its Container Location Inventory Record that containers of HW were being stored within permitted storage unit ERS2; (3) on or about 8/18/2014, the facility incorrectly stated that in its Enviro Ware Tracking History Record that the date and time when a container of HW is removed from storage, processed and destroyed was identical; and (4) in its RCRA Daily Inspection Reports, the facility stated for the permitted storage unit ERS2, all containers were stored within the permitted unit, when DTSC inspectors observed at least 300 containers of HW outside the permitted unit.	Major	Approximately 200 containers of acid and alkaline waste were stored in an unpermitted area without secondary containment. HW stored in unknown locations resulted in mismanagement and illegal storage. The falsified records did not document the incompatible storage which resulted in a high potential to create a reaction involving heat or fire that could cause human injury and harm to the environment.	Major	The facility falsified the Operating Record on multiple occasions, which caused inaccurate information to be documented. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25	
6	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 and/or perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a); 22 CCR 66270.30; HWFP	The facility conducted the following HW management activities that were not authorized by its HWFP: (1) used the Laboratory Pump; (2) used the Main Pump/Pan, also known as the Main Transfer Pump; (3) used and operated the Ammonia Scrubber System Tanks C-1 through C-3 as a treatment system; (4) used and operated a filter press in Area F to treat HW; (5) used and operated a filter press in Area S to treat HW; (6) used and operated a copper oxide centrifuge for HW treatment; (7) used and operated a portable filter press in Area S to treat HW; and (8) used and operated Tank C-40 for HW treatment.	Moderate	Wastes at issue: laboratory waste, copper carbonate, and unknown HW. Multiple processes were cited for unauthorized managing/treating HW around the facility. Tank C40 was not approved for treatment and may not have been designed for reactions that might occur during treatment. An open unit can potentially expose and harm workers. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Major	The facility was using multiple unpermitted systems without first obtaining a permit modification allowing for such use. Unauthorized HW management in unpermitted units constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	20	Yes	4/23/2014	25.00	25	

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor		
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs,		
EPA ID: CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019		etc.)		
7	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.	HSC 25202; 22 CCR 66270.30; 22 CCR 66264.31; and HWFP Section III.G(6)(a)	The facility failed to maintain and operate the facility to minimize the possibility of a release of HW, as: (1) copper carbonate was observed on the ground next to the hopper bins located in Areas S; (2) a fire in the facility baghouse dryer resulted from filter bags catching on fire due to high temperature; (3) cracks and gaps were observed in the facility's Truck Loading/Unloading Area; and (4) solid pieces of HW were observed on the pavement east of the S-Area and west of the Dryer Room.	Moderate	Wastes at issue: copper carbonate, baghouse dust, and copper and lead above TTLC threshold levels. Inspectors observed copper carbonate, above TTLC limits for copper, on the ground next to hopper bins in a permitted area with no secondary containment. Lead and copper above TTLC limits were found in cracks of the asphalt in two separate locations of the facility. A faulty thermal switch resulted in a baghouse fire that could have harmed employees, the public, and the environment.	Major	Inspectors observed multiple instances of the facility's inability to minimize the possibility of a release throughout the facility and across multiple waste streams. The function of the requirement was rendered ineffective.	20	No	n/a	0.00	20
8	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 or post closure period of facility operation.	22 CCR 66264.175(b)(1)	The facility failed to provide a containment system free of cracks or gaps, as inspectors observed: (1) containers of HW being stored on the asphalt surface located to the east and south of permitted storage unit ERS2, which was cracked and uncoated, exposing the soil beneath, and (2) one roll-off bin of HW copper filter cake stored on the asphalt located north of the laboratory, which was cracked and uncoated, exposing the subsurface below.	Moderate	Inspectors observed large volumes of containerized HW stored on asphalt surface that was cracked and uncoated. Lead and copper above TTLC limits were found in cracks of the asphalt in the unpermitted area. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Major	The permitted storage area contained cracks and was not coated, which allowed HW to come into contact with the soil beneath. A second non-permitted area also contained cracks in the asphalt where HW was being improperly stored. The HW management requirement for containment free of gaps and cracks was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0.00	20
9	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and/or delivered to an authorized HW facility. Waste type represents a significant threat to human health or safety.	HSC 25202	The facility failed to comply with conditions of its HWFP by performing the following HW management activities that were not authorized: (1) on 7/16/2015, the facility stored and treated cyanide HW prior to satisfying conditions set forth in its HWFP, Section IA and Section II; (2) on 7/16/2015, the facility stored three 275 gallon totes of cyanide HW in ERS2; and (3) on 9/9/2015, the facility treated cyanide HW in Tank J-2.	Major	Three 275-gallon totes of HW were observed in the permitted storage area. The facility was treating cyanide HW in Tank J-2 (a tank not authorized to treat cyanide). Cyanide is highly toxic. The volume and characteristics of the substances involved presented a major threat to public health, safety, and the environment.	Moderate	The facility was authorized to treat or store cyanide HW, but only if it satisfied conditions set forth in its HWFP which had not been met at the time of the inspection. While the activity was allowed by the facility's HWFP, specific permit criteria were not met for multiple instances noted. The requirement functioned to some extent, although not all of its important provisions were complied with.	20	Yes	4/23/2014	25.00	25
10	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.	22 CCR 66262.11	The facility failed to make a HW determination for the following: (1) on 8/18/2015 and 9/23/2015, 6 super sacks and one roll-off bin of copper filter cake was observed being managed as excludable recyclable material, even though the facility was formally notified by DTSC on 7/8/2015, that it must manage copper filter cake as HW; (2) on 9/23/2015, a 5-gallon bucket containing honey-colored sludge waste, with no label, was observed under a sink in the laboratory. The sludge was tested and met the HW characteristic of corrosivity.	Moderate	Waste at issue: (1) six super sacks and one roll off bin of copper filter cake; (2) 5-gallon bucket of honey colored sludge waste with pH of 1 that meets the HW characteristic of corrosivity. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Moderate	Copper filter cake was labeled as ERM, resulting in improper management. One 5 gallon bucket was stored in an open container with no label under the laboratory sink. Failure to conduct a HW determination in these two instances resulted in the waste being improperly managed / handled by the facility. The requirement functioned to some extent as other wastes in the area were managed correctly.	15	No	n/a	0.00	15

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC		10 Year Date Range: 2009 - 2018		Permit Issue Date: 7/29/1991		Permit Expiration Date: 7/29/1996		Date VSP Completed: 2/13/2019		Link to EnviroStor (Inspection Reports, SOVs, etc.)			
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections: 17		Total Number of Violations Scored: 29									
EPA ID: CAD008488025													
11	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.	HSC 25160 and 22 CCR 66262.20	The facility shipped HW copper filter cake without a HW manifest, without completing any of the required manifests, or providing any manifest to DTSC.	Moderate	The facility shipped HW copper filter cake without a HW manifest on multiple occasions. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Major	As noted in the previous violation, by failing to conduct a HW determination, the facility improperly characterized the copper filter cake as ERM and overlooked the requirement to use a manifest during shipment, as the copper filter cake was a HW. As a result, the function of the requirement was rendered ineffective.	20	No	n/a	0.00	20	
Provisional Inspection Violation Score:											235.00		
Inspection Date:	8/7/2015	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:	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
Provisional Inspection Violation Score:											0.00		
Inspection Date:	12/8/2015	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:	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
Provisional Inspection Violation Score:											0.00		

Violation Scoring Matrix

Facility Name:		PHIBRO-TECH INC		10 Year Date Range:		2009 - 2018		Permit Issue Date:		7/29/1991		Link to EnviroStor	
Address:		8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections:		17		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs,	
EPA ID:		CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		2/13/2019		etc.)	
Inspection Date:	12/15/2015	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:	FUI												
Class I Violations:	1	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 or post closure period of facility operation.	HSC 25202; 22 CCR 66270.30; 22 CCR 66264.31; and HWFP Section III.G(6)(a)	The facility failed to maintain and operate facility to minimize the possibility of fire, exposure or release of HW or HW constituents to the air, soil or surface water which could threaten human health or the environment.	Minimal	Inspectors observed copper carbonate on the pavement in permitted Area S behind hopper bins, which contained copper carbonate. Concentration levels and volume of HW in violation were not provided.	Minimal	Unknown practices by the facility led to the release of HW onto the pavement. As a result, a minimal extent of deviation is assigned.	2	Yes	6/29/2015	25.00	2.5
	2	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 or post closure period of facility operation.	22 CCR 66262.11	The facility failed to make a HW determination.	Minimal	Inspectors observed one full roll-off bin of copper filter cake adjacent to Tanks W5 and W6 that was improperly labeled as Excluded Recyclable Material. HW concentration levels for copper were not provided, and the waste cited in violation was solid, resulting in a minimal threat to human health and the environment.	Minimal	It is unknown what steps the facility took, if any, to make a HW determination. As a result, a minimal extent of deviation is assigned.	2	Yes	6/29/2015	25.00	2.5
	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.	HSC 25202 and 22 CCR 66270.30	The facility stored HW in an unauthorized area.	Minimal	Inspectors observed one roll off bin containing copper filter cake in an unpermitted area adjacent to Tanks W5 and W6. HW concentration levels for copper were not provided, and the waste cited in violation was solid, resulting in a minimal threat to human health and the environment.	Major	The permit did not authorize storage of HW copper filter cake in this area. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	15	Yes	6/29/2015	25.00	18.75

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC		10 Year Date Range: 2009 - 2018		Permit Issue Date: 7/29/1991		Permit Expiration Date: 7/29/1996		Date VSP Completed: 2/13/2019		Link to EnviroStor (Inspection Reports, SOVs, etc.)			
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670		Number of Inspections: 17		Total Number of Violations Scored: 29									
EPA ID: CAD008488025													
4	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.	HSC 25202 and 22 CCR 66270.30(a)	The facility failed to comply with the conditions of its HWFP by performing activities not authorized by its HWFP.	Minimal	Multiple instances for multiple process listed: (1) Main Pump. (2) Ammonia Scrubber System Tanks C1, C2 and C3. (3) Filter Press in F Area. (4) Filter Press in S Area and (5) Copper Oxide Centrifuge. Most of the instances cited were for unpermitted ancillary equipment which presented a minimal threat to human health and the environment.	Major	Multiple instances of unauthorized management activities throughout the facility. The act deviated from the requirement to such an extent that the requirement was rendered ineffective.	15	Yes	6/29/2015	25.00	18.75	
Provisional Inspection Violation Score:											42.50		
Inspection Date:	5/1/2017	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:	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
Provisional Inspection Violation Score:											0.00		
Inspection Date:	6/30/2017 CEI & 8/30/2017 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
Provisional Inspection Violation Score:											0.00		
Inspection Date:	10/9/2018	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 requirement was significant enough that it could have resulted in a failure to assure that proper closure and post closure activities will be undertaken.	HSC 25202; HWFP Modified Part V.(E)(7)(Pond 1 Closure Status Report); and 22 CCR 66265.113(a)(6)	The facility failed to implement closure of Pond 1, as required by its HWFP.	Moderate	Pond 1 was a surface impoundment that was not closed and housed wastewater treatment Tanks WW1 and WW2. The facility sampled around Pond 1. The Pond was empty and was used as secondary containment for the tanks. HW included wastewater containing inorganic constituents such as ammonia, lead, zinc, cadmium, copper, chromium, iron, nickel, and arsenic. The dimensions of the historic pond are approximately 35x36x3 feet.	Major	Pond 1 Closure Plan Approval modification decision was reinstated effective 9/20/2017 for implementation by the facility. According to the schedule, closure of Pond 1 was to begin by 3/20/2018 and closure was required no later than 9/20/2018. As of the date of the inspection, closure of Pond 1 had not begun. 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	No	n/a	0.00	20
Provisional Inspection Violation Score:											20.00		
Inspection Date:	12/21/2018	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:	1	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 66264.143(b)(6); 22 CCR 66264.143(b)(7); 22 CCR 66265.143(b)(6); and 22 CCR 66265.143(b)(7)	The facility's closure cost mechanism (Financial Guarantee Bond & Standby Trust) was underfunded.	Major	With inadequate financial assurance for closure in excess of \$1.6 million, if the site was to close, the public would be responsible for paying the deficiency. Such a deficiency in financial assurance directly impacts the ability to respond to events that impact human health or the environment.	Major	The facility's underfunded financial assurance for closure was such that it rendered the requirement of having coverage ineffective as it would not be sufficient to cover closure costs.	25.00	No	n/a	0.00	25
Provisional Inspection Violation Score:											25.00		

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC	10 Year Date Range: 2009 - 2018	Permit Issue Date: 7/29/1991	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670	Number of Inspections: 17	Permit Expiration Date: 7/29/1996	
EPA ID: CAD008488025	Total Number of Violations Scored: 29	Date VSP Completed: 2/13/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	0	FUI	5/29/2009	0.00
2	0	FRR	6/16/2010	0.00
3	4	CEI & FRR	3/1/2011 CEI & 7/11/2012 FRR	62.00
4	1	CEI & FRR	5/16/2012 CEI & 7/11/2012 FRR	25.00
5	2	CEI & FRR	5/28/2013 CEI & 6/19/2013 FRR	35.00
6	1	FUI	1/27/2014	18.75
7	1	FCI	4/23/2014	25.00
8	3	FCI & GAR	4/28/2014	41.00
9	0	FUI	1/28/2015	0.00
10	11	CEI & FRR	6/29/2015 CEI & 11/16/2016 FRR	235.00
11	0	FCI	8/7/2015	0.00
12	0	FCI	12/8/2015	0.00
13	4	FUI	12/15/2015	42.50
14	0	FCI	5/1/2017	0.00
15	0	CEI & FRR	6/30/2017 CEI & 8/30/2017 FRR	0.00
16	1	FCI	10/9/2018	20.00
17	1	FRR	12/21/2018	25.00
Sum of Provisional Inspection Violation Scores				529.25
*FACILITY VSP SCORE				31.13

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

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| <ul style="list-style-type: none"> CCR = California Code of Regulations CDI = Case Development Inspection CEI = Compliance Evaluation Inspection CI = Complaint Investigation DTSC = Department of Toxic Substances Control EPA ID= Environmental Protection Agency Identification FCI = Focused Compliance Inspection FRR = Financial Records Review FUI = Follow-Up Inspection ERM = Excluded Recyclable Materials | <ul style="list-style-type: none"> GAR = Groundwater Audit Report GME = Groundwater Monitoring Evaluation HSC = Health and Safety Code HW = Hazardous Waste HWFP = Hazardous Waste Facility Permit mg/kg = Milligram per Kilogram n/a = Not Applicable NFRR = Non-Financial Record Review RCRA = Resource Conservation and Recovery Act SOV = Summary of Violations TTLIC = Total Threshold Limit Concentration VSP= Violations Scoring Procedure |
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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 David Thaete, Phibro- Tech Inc., EPA ID Number CAD008488025.
2. I served David Thaete, Phibro- Tech Inc., by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9828-0030, return receipt requested, in a sealed envelope addressed to:

Mr. David Thaete
Phibro-Tech Inc.
8851 Dice Road
Santa Fe Springs, California 90670

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

Alan Korematsu
Department of Toxic Substances Control
HWMP, 11th Floor
1001 I Street
Sacramento, California 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)