



Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
700 Heinz Avenue
Berkeley, California 94710

Gavin Newsom
Governor

September 24, 2020

Certified Mail No.: 7018 0360 0001 9460 7655
Return receipt requested

Dorothy Harley
Rho-Chem, LLC
425 Isis Avenue
Inglewood, California 90301

NOTICE OF AMENDED PROVISIONAL INSPECTION VIOLATION SCORES AND 2019 FACILITY VIOLATIONS SCORING PROCEDURE SCORE

Dear Ms. Harley:

2019 Amended Facility Violations Scoring Procedure (VSP) Score: 43.16
2019 Compliance Tier Assignment: Unacceptable

The purpose of this letter is to amend the Provisional Inspection Violation Scores and 2019 Facility Violations Scoring Procedure (VSP) Score issued on September 27, 2019 to Rho-Chem, LLC, CAD008364432, located at 425 Isis Avenue, Inglewood, California 90301 (hereinafter, the "Facility"). This amendment is based on the Department of Toxic Substances Control's (DTSC) assessment and scoring of (1) the January 9, 2020 Consent Order (Docket Number HWCA20187423), which affected the violations in the February 29, 2016 inspection, and (2) the September 28, 2016 Facility Self-Disclosure inspection, which was not previously included in the 2019 Facility VSP Score. As a result of this amendment, the Facility's 2019 Facility VSP Score is now 43.16, and its 2019 Compliance Tier Assignment remains Unacceptable.

The updated Violation Scoring Matrix containing the amended Provisional Inspection Violation Score and Facility VSP Score is enclosed. 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.¹ (See 22 CCR § 66271.53, subd. (a).) The basis for the score for each Class I violation is also provided in the enclosed Violation Scoring Matrix.

Provisional Inspection Violation Score Disputes

The Facility may dispute this amended inspection score pursuant to CCR, title 22, section 66271.53, subdivision (c) by filing a Provisional Inspection Violation Score Dispute Document

¹ 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).)

Dorothy Harley
Rho-Chem, LLC
September 24, 2020
Page 2

(template available at <https://dtsc.ca.gov/violations-scoring-procedure/>) within sixty (60) calendar days of this notice.

Based upon DTSC's records, the Facility filed a Dispute Document regarding its 2019 Facility VSP Score on December 4, 2019. **The VSP Dispute Officer's review of this Dispute Document is on hold pending issuance of this amended inspection score.** Within sixty (60) calendar days of this notice, the Facility can either:

- (1) Submit a new Dispute Document that would supersede the one previously submitted on December 4, 2019, pursuant to CCR, title 22, section 66271.53;
- (2) Opt to not submit a new Dispute Document and instead request the Dispute Officer continue its review of the previously submitted Dispute Document; or
- (3) Opt to withdraw the previous Dispute Document and not file a new Dispute Document.

If the Facility takes no action in response to this notice, after 60 calendar days of this notice, the Dispute Officer will resume its review of the Facility's previously filed Dispute Document.

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,



Maria Soria
Acting Division Chief
Enforcement and Emergency Response Division

Enclosure(s)

Amended Violation Scoring Matrix

Dorothy Harley
Rho-Chem, LLC
September 24, 2020
Page 3

BCC (E-Copy ONLY):

Ms. Maria Salomon
Maria.Salomon@dtsc.ca.gov
Enforcement and Emergency Response Division

Ms. Denise Tsuji
Denise.Tsuji@dtsc.ca.gov
Enforcement and Emergency Response Division

Ms. Maria Soria
Maria.Soria@dtsc.ca.gov
Enforcement and Emergency Response Division

Mr. Alfredo Rios
Alfredo.Rios@dtsc.ca.gov
Enforcement and Emergency Response Division

Ms. Evelina Rayas
Evelina.Rayas@dtsc.ca.gov
Enforcement and Emergency Response Division

Mr. Wayne Lorentzen, Branch Chief
Wayne.Lorentzen@dtsc.ca.gov
Permitting Division, Sacramento

Ms. Lori Koch, Branch Chief
Lori.Koch@dtsc.ca.gov
Permitting Division, Berkeley

William Beckman
William.Beckman@dtsc.ca.gov
Cleanup Program (Dispute Resolution Official)

Bruce La Belle
Bruce.LaBelle@dtsc.ca.gov
Environmental Chemistry Lab (Dispute Resolution Official)

Mr. Chris Cho, Assistant Chief Counsel
Chris.Cho@dtsc.ca.gov
Office of Legal Counsel

Ms. Brooke Selzer, Attorney III Specialist
Brooke.Selzer@dtsc.ca.gov
Office of Legal Counsel

Dorothy Harley
Rho-Chem, LLC
September 24, 2020
Page 4

Jay Cross, Attorney III Specialist
Jay.Cross@dtsc.ca.gov
Office of Legal Counsel

Leah White, Attorney
Leah.White@dtsc.ca.gov
Office of Legal Counsel

(DO NOT INCLUDE BCC ON LETTER)

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018			
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020			
Inspection Date:	3/3/2009 FRR & 3/24/2009 CEI	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:													0.00
Inspection Date:	9/29/2010 FRR & 10/26/2010 CEI	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:													0.00
Inspection Date:	1/30/2012 CEI & 9/11/2012 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 prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.177(c)	The facility illegally stored several incompatible HW containers identified as containing acids (18 drums) and alkalines (24 drums) in Area F without a dike, berm, barrier or other device separating the incompatible wastes.	Major	Eighteen (18) 55-gallon drums containing waste acid and twenty-four (24) 55-gallon drums containing alkaline waste were stored in Area F not separated by a barrier which had the potential to result in significant adverse chemical reactions generating heat, explosions, potential releases to the environment, and/or potential exposures to facility workers if any of the containers began to leak.	Major	Palletized drums of alkaline and acid wastes were double-stacked adjacent to each other without any physical barrier separating them. 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	No	n/a	0	25.00
Class I Violations:	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a)	The facility stored numerous HW containers in an unpermitted storage area. The facility illegally stored containers in a staging area adjacent to Area H for 1-3 days while it repaired the cracks on the floor in permitted Area A.	Minimal	Storage of HW in an unpermitted area without secondary containment had the potential to result in accidental releases to the environment and exposure to facility workers. Since wastestreams and volume of wastes in violation were not specified, a minimal potential for harm was assessed.	Moderate	HW was stored in an unpermitted area without secondary containment from 1-3 days due to the temporary repair of the permitted Storage Area. The HW management requirement functioned to some extent, although not all of its provisions were met during the period in which temporary repairs occurred at the permitted Storage Area.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:													31.00

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)		
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018				
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020				
Inspection Date:	3/21/2012		Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CI													
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.17(a)	The facility failed to separate incompatible wastes prior to disposal in a roll-off bin, which caused a reaction of ignitable/reactive wastes. The facility manager stated that some of the "Kodak Kits" may not have been completely drained or may have had residual liquid remaining in them (oxidizers, bases, and acids) and were disposed in the container along with various "production trash" such as wood, plastic, paper, oil adsorbent, and non-RCRA debris and may have caused the exothermic reaction.	Major	During DTSC's investigation of a fire incident reported at the facility, the facility manager explained the fire/smoke may have been caused by an exothermic reaction and was limited to one 40-yard bin/container, which was "about two-thirds full" located in permitted Area H. The fire resulted in a higher potential for exposure and/or injury to humans and a release to the environment.	Major	The function of the HW management requirement was rendered ineffective as the facility failed to separate incompatible wastes prior to disposal.	25	No	n/a	0	25.00	
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.31	The facility failed to maintain and operate its facility in a manner that minimized the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of HW or hazardous constituents. The facility manager stated that some of the "Kodak Kits" may not have been completely drained or may have had residual liquid remaining in them (oxidizers, bases, and acids) and were disposed in the container along with various "production trash" such as wood, plastic, paper, oil adsorbent, and non-RCRA debris which may have caused the exothermic reaction.	Major	The facility manager explained the fire/smoke may have been caused by an exothermic reaction and was limited to one 40-yard bin/container, which was "about two-thirds full" located in permitted Area H. The fire resulted in a higher potential for exposure and/or injury to humans and a release to the environment.	Major	The function of the HW management requirement was rendered ineffective as the facility failed to separate incompatible wastes prior to disposal, which led to a fire.	25	No	n/a	0	25.00	
	3	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a)	The facility varied from the requirement of the Interim Permit by disposing HW container(s) that were not completely empty. The facility manager stated that some of the "Kodak Kits" may not have been completely drained or may have had residual liquid remaining in them (oxidizers, bases, and acids) and were disposed in the container along with various "production trash" such as wood, plastic, paper, oil adsorbent, and non-RCRA debris which may have caused the exothermic reaction.	Major	The facility manager explained the fire/smoke may have been caused by an exothermic reaction and was limited to one 40-yard bin/container, which was "about two-thirds full" located in permitted Area H. The fire resulted in a higher potential for exposure and/or injury to humans and a release to the environment.	Moderate	The HW management requirement functioned to some extent, although not all of its provisions were not complied with as only some of the containers may not have been completely drained.	20	No	n/a	0	20.00	
Provisional Inspection Violation Score:										70.00				

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018			
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020			
Inspection Date:	4/30/2013 FRR & 5/21/2013 CEI	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to perform emergency clean-up operation or other corrective action for releases and prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202, 22 CCR 66270.30, and HWFP, page 17	The facility illegally stored unauthorized capacity containers in permitted Storage Areas F and G-2, as two 275 gallon totes were improperly stored in Area F and seven 275 gallon totes were improperly stored in Area G-2. These areas were only permitted to store containers 55 gallons or smaller.	Minimal	Wastestreams in violation included potassium hydroxide sodium hydroxide liquids, methylene chloride/tetrachloroethylene, silver, polymers, gasoline/diesel/fuel, and cadmium/lead. The at issue containers were stored in a permitted storage area with HW labels, although the volume exceeded the capacity limitations in the HWFP. Because the waste was in proper containers, stored in authorized areas and only exceeded storage limits by 6.0% to 8.3%, the potential for harm was minimal.	Minimal	Volume of HW in violation represents 8.3% of the total permitted storage capacity for Area F and 6.0% of Area G. Five of the seven totes in violation were generated by the facility. The wastes in violation were stored in a permitted area allowed to store those waste streams, other wastes were correctly stored in 55-gallon drums, and the drums were correctly and adequately labeled in secondary containment. The requirement functioned nearly as intended, but not as well as if all provisions had been met.	2	No	n/a	0	2.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202, 22 CCR 66270.30, and HWFP, page 17	The facility illegally stored HW in unauthorized areas, as 46 containers of HW were improperly stored on the south side of Area F Building and one container of HW was stored in the Loading/Unloading Area.	Moderate	Area F HW Storage Area is identified in the facility permit as a unit authorized for storage of corrosive wastes, oxidizers, and batteries in 55-gallon or smaller containers or cubic-yard boxes. Between 3/2012 and 5/2012, unauthorized storage of 47 containers of HW outside of permitted storage areas increased the potential for releases to the environment.	Major	HW storage in unpermitted areas deviated from the requirement to such an extent that the function of the HW management requirement was rendered ineffective.	20	Yes	1/30/2012	25	25.00
	3	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 66264.177, and HWFP, page 18	The facility stored incompatible wastes without separating the containers by means of a dike, berm, wall, or other device. The facility stored one 15-gallon drum containing alkaline HW (pH of 12.7) adjacent to and on top of 55-gallon containers holding acidic HW.	Moderate	The deviation had the potential to result in significant adverse chemical reactions generating heat, explosions, potential releases to the environment, and potential exposures to employees. However, because only two containers were at issue in this violation, the relatively low volume of waste resulted in a moderate potential for harm.	Major	One drum of alkaline waste was observed next to acidic waste without any physical barrier separating them. The act deviated from the requirement to such an extent that the function of the HW management requirement was rendered ineffective.	20	Yes	1/30/2012	25	25.00
Provisional Inspection Violation Score:												52.00	

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018			
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020			
Inspection Date:	2/29/2016 CEI & 5/10/2016 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.	HSC 25202(a), Part IV Permitted Units and Activities 1. Unit Name: Area A, Drum Yard authorized RCRA Waste Codes and California Waste Codes HWFP Table 2	The facility stored HW in Hazardous Waste Storage Area A which was not authorized for such HW storage.	Major	At least 17 drums or boxes in Area A, contained HW not authorized to be stored in those locations. D001 flammable waste was identified in Area A, which is not allowed because this area is within 50 feet of the facility property boundary and any fire that might occur would have an increased potential to spread off-site and injure the public. The designation was major due to the volume (17 drums) and type of hazardous waste (flammable) cited in violation as well as proximity to the general public.	Major	Storage of D001 flammable waste in Area A was not authorized for those wastestreams. The designation was major because the act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	Yes	1/30/2012 and 4/30/2013	50	37.50
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.147(f)	The facility held ignitable waste in an unauthorized area less than 50 feet away from the property line, which was not authorized in the permit. At least 17 drums or boxes of ignitable HW were identified in Area A during the inspection. The following containers/pallets were observed at the facility: 14 55-gallon drums, two large boxes, five pallets containing drums, and four pallets of boxes.	Major	Unauthorized ignitable HW storage less than 50 feet from the property line has a major potential to impact human health and the environment in the case of accidental release.	Major	The facility stored 17 containers of ignitable waste in Area A, which was not authorized to manage ignitable HW. The act deviated from the requirement to such an extent that the function of the HW management requirement was rendered ineffective.	25	No	n/a	0	25.00
	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.	22 CCR 66264.73(b)(2)	The facility's Operating Record did not provide the location of each HW stored at the facility and the quantity at each location, as multiple drums were located in places other than what was documented in the facility's Operating Record.	Minimal	Inaccurate tracking of HW stored at the facility increased the potential for harm to human health and the environment by increasing the likelihood of waste misplacement, loss, and/or mismanagement. The designation was minimal due to lack of information about the specific volume and waste stream(s) cited in violation.	Moderate	DTSC determined that select HW drums observed in Areas A, F, G, and J differed from the drum locations identified in the Operating Record. The requirement functioned to some extent, although not all of its important provisions were complied with.	6	No	n/a	0	6.00
	4	The deviation from the requirement was significant enough that it could have resulted in a failure to assure adequate financial resources to pay for facility closure and/or perform emergency clean-up operation or other corrective action for releases.	22 CCR 66270.42(b), 66270.42.5(d)(1), Appendix 1, Item G(2)	The facility failed to follow the procedures outlined for a Class II Permit Modification. The facility did not obtain authorization from DTSC prior to removing a Glass 35-gallon Re-Boiler from the Batch Distillation System. The facility replaced a portion of a permitted hazardous waste treatment unit without prior DTSC authorization. To wit: the facility replaced the Area E-BD, Batch Distillation System's boiler with a steam generator without applying for or receiving an appropriate permit modification.	Minimal	A 35-gallon Re-Boiler was removed without prior authorization from DTSC. A steam generator was going to be installed as a replacement and was not yet installed at the time of the inspection. Inadequate notification to DTSC may have resulted in improper management and disposal of equipment. The designation was minimal due to lack of information about the specific volume and waste stream(s) cited in violation.	Major	Prior DTSC authorization was not requested or received. The requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0	15.00

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)		
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018				
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020				
	5	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of hazardous waste or constituents to the environment during the active period of facility operation. Failure to notify and receive approval from DTSC prior to closure implementation could result in an unauthorized release from potentially contaminated equipment that may not be adequately characterized and cleaned prior to disposal.	22 CCR 66264.113	The facility failed to complete closure activities in accordance with an approved closure plan and obtain certification by a professional engineer regarding the closure of a permitted unit "Area C FC Fractionation Column".	Minimal	The Fractionation Column was used to increase the purity of previously recycled solvent. According to the facility manager, Rho-Chem stopped using the unit years ago and it had been closed by their engineer but they did not notify DTSC that they have closed the unit. The designation was minimal due to the volume of hazardous waste was the residual remaining in the unit and low threat of exposure to facility personnel.	Major	Prior DTSC authorization was not requested or received. The requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0	15.00	
	6	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of hazardous waste or constituents to the environment during the active period of facility operation. Failure to notify and receive approval from DTSC prior to closure implementation could result in an unauthorized release from potentially contaminated equipment that may not be adequately characterized and cleaned prior to disposal.	22 CCR 66264.113	The facility failed to complete closure activities in accordance with an approved closure plan and obtain certification by a professional engineer regarding the closure of a permitted unit "Area E-TFE, Thin Film Evaporator".	Minimal	The Thin Film Evaporator was used to increase the purity of previously recycled solvent. According to the facility manager, Rho-Chem stopped using the unit years ago and it had been closed by their engineer but they did not notify DTSC that they have closed the unit. The designation was minimal due to the volume of hazardous waste was the residual remaining in the unit and low threat of exposure to facility personnel.	Major	Prior DTSC authorization was not requested or received. The requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0	15.00	
												Provisional Inspection Violation Score:		113.50
Inspection Date:	9/28/2016***	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score	
Inspection Type:	FSD													

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018			
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020			
Class I Violations:	1	The violation was a deviation from the requirements 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 to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202(a), and HWFP Waste Analysis Plan section C.2.3.2(a)	Illegal storage and treatment of HW in an unauthorized unit.	Major	The facility treated approximately 8,000 gallons of Polychlorinated Biphenyl (PCB)-contaminated waste oil in Tank 35. The laboratory test results from samples collected from the 50-gallon waste oil and two tanker trucks revealed PCB concentration above the 5 part per million regulatory limit. PCBs are bioaccumulative and have been demonstrated to cause a variety of adverse health effects. PCBs have been shown to cause cancer in animals as well as a number of serious non-cancer health effects in animals, including: effects on the immune system, reproductive system, nervous system, endocrine system and other health effects. A major potential for harm was assessed due to the large volume and PCB content associated with the waste in violation.	Major	The facility received two 55-gallon drums of HW (one contained 50 gallons of waste oil and the other contained 200 pounds of solid-organic waste) which were sampled and found to contain PCBs. In violation of protocol and without authorization, the drums were emptied into an 8,000 gallon above-ground tank (Tank 35). The tank contents were then transferred into two tanker trucks and sampled for PCBs after transport to a sister "Avalon Site" in Texas. The tankers were sampled at the Avalon Site and found to contain 49.7 and 1.7 parts per million (ppm) PCBs, respectively. Prior DTSC authorization for storage and treatment of HW with PCBs was not requested or received. The function of the requirement was rendered ineffective resulting in a major deviation designation.	25	No	n/a	0	25.00
	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 66264.13(b); and HWFP Waste Analysis Plan section C.2.2.2(a)	Failure to follow the Waste Analysis Plan.	Moderate	The facility accepted and stored 50 gallons of PCB-contaminated waste oil with concentration above its regulatory concentration limit of 5 ppm prior to obtaining its laboratory test results. PCBs are bioaccumulative and have been demonstrated to cause a variety of adverse health effects. PCBs have been shown to cause cancer in animals as well as a number of serious non-cancer health effects in animals, including: effects on the immune system, reproductive system, nervous system, endocrine system and other health effects. A moderate potential for harm was assessed due to the low volume of HW cited balanced with the potentially high concentration of PCB-impacted HW associated with the waste in violation.	Moderate	The single instance was documented and confirmed in the FSD and associated 11/28/2016 DTSC Inspection Report. The Inspection Report also states that "There were no violations or similar violations within the past three (3) years". Therefore, the requirement functioned to some extent, although not all of its provisions were complied with, supporting a moderate extent of deviation.	15	No	n/a	0	15.00
	Class I Violation rescinded:	xx	n/a	HSC 25202(a)	Illegal treatment in an unauthorized unit.	n/a	The facility treated HW in a filter unit located in Area A without an authorization from DTSC.	n/a	Incoming HW goes through the filter unit to separate HW liquid from the solid debris. The HW liquid goes to a designated storage and treatment tank. The solid debris is transferred into a 55-gallon drum and sent to an offsite incinerator under a HW manifest.	0	No	n/a	0
Provisional Inspection Violation Score:												40.00	

Violation Scoring Matrix

Facility Name:		RHO-CHEM, LLC		10 Year Date Range:		2009-2018		Permit Effective Date:		8/28/2008		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		425 ISIS AVENUE, INGLEWOOD, CA 90301		Number of Inspections:		8		Permit Expiration Date:		8/27/2018			
EPA ID:		CAD008364432		Total Number of Violations Scored:		18		Date VSP Completed:		9/22/2020			
Inspection Date:	2/15/2018 CEI & 3/8/2018 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 violation was a deviation from the requirements 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 to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202, 22 CCR 66270.42, and Appendix 1, Item G(2)	The facility failed to follow the procedures outlined for a Class II Permit Modification. The facility removed the following HW management units without obtaining prior authorization from DTSC: Area E-TFE, Thin Film Evaporator; Area E-BD, Batch Distillation System; Area C-FC, Fractionation Column System; and Tanks 30, 31, and 68.	Major	The facility removed the following HW management units without receiving prior authorization: Area E-TFE, Thin Film Evaporator; Area E-BD, Batch Distillation System; Area C-FC, Fractionation Column System; and Tanks 30, 31, and 68. Inadequate closure notification of multiple units to DTSC may have resulted in improper decontamination, management, and disposal of closed units (as well as the associated HW generated from the closure) representing a major potential for harm to public health and the environment.	Major	Prior DTSC authorization was not requested or received for any of the at issue units. Tanks 30 and 31 had stored HW previously. The requirement was completely ignored and none of its provisions were complied with.	25	Yes	2/29/2016	25	31.25
	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's Operating Record did not provide the location of each HW stored at the facility, as multiple drums were located in places other than what was documented in the Operating Record.	Minimal	Eight instances of inaccurate HW tracking stored at the facility in the Operating Record increased the potential for harm to human health and the environment by increasing the likelihood of waste misplacement, loss, and/or mismanagement. While the facility's main wastestreams include HW solvents, the specific volume and wastestreams in violation were not provided resulting in a minimal designation for potential for harm.	Moderate	The inspector noted eight instances where the location of the container observed during the inspection did not correspond to the facility's Location Document in the Operating Record. The requirement functioned to some extent, although not all of its provisions were complied with.	6	Yes	2/29/2016	25	7.50
Provisional Inspection Violation Score:												38.75	

Violation Scoring Matrix

Facility Name:	RHO-CHEM, LLC	10 Year Date Range:	2009-2018	Permit Effective Date:	8/28/2008	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address:	425 ISIS AVENUE, INGLEWOOD, CA 90301	Number of Inspections:	8	Permit Expiration Date:	8/27/2018	
EPA ID:	CAD008364432	Total Number of Violations Scored:	18	Date VSP Completed:	9/22/2020	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	0	CEI & FRR	3/3/2009 FRR & 3/24/2009 CEI	0.00
2	0	CEI & FRR	9/29/2010 FRR & 10/26/2010 CEI	0.00
3	2	CEI & FRR	1/30/2012 CEI & 9/11/2012 FRR	31.00
4	3	CI	3/21/2012	70.00
5	3	CEI & FRR	4/30/2013 FRR & 5/21/2013 CEI	52.00
6	6	CEI & FRR	2/29/2016 CEI & 5/10/2016 FRR**	113.50
7	2	FSD	9/28/2016***	40.00
8	2	CEI & FRR	2/15/2018 CEI & 3/8/2018 FRR	38.75
Sum of Provisional Inspection Violation Scores				345.25
*FACILITY VSP SCORE				43.16

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

** A 1/9/2020 Consent Order was executed after the 2019 Facility VSP Score was issued and impacted the 2/29/2016 inspection score. This matrix has been updated to be consistent with the 1/9/2020 Consent Order.

***The 9/28/2016 FSD was not originally included in the 2019 Facility VSP Score and has been incorporated.

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

FSD = Facility Self Disclosure

FUI = Follow-Up Inspection

GAR = Groundwater Audit Report

GME = Groundwater Monitoring Evaluation

HSC = Health and Safety Code

HW = Hazardous Waste

HWFP = Hazardous Waste Facility Permit

n/a = Not Applicable

NFRR = Non-Financial Record Review

RCRA = Resource Conservation and Recovery Act

SOV = Summary of Violations

VSP = Violations Scoring Procedure