



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control



Gavin Newsom
Governor

Meredith Williams, Ph.D.
Acting Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806

September 27, 2019

Certified Mail No.: 7018-0680-0000-9827-9966

Mr. Sam Barket
Safety-Kleen of California, Inc.
16604 South San Pedro Street
Carson, California 90746

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

Dear Mr. Sam Barket:

2019 Facility Violations Scoring Procedure (VSP) Score: 10.05
2019 Compliance Tier Assignment: Acceptable

The purpose of this letter is to provide Safety-Kleen of California, Inc., CAD981696420, located at 16604 South San Pedro St., Carson, CA 90746 (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 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 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 **"10.05"**. 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 **"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.

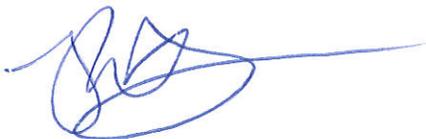
The owner or operator of a facility may request a one-time extension of up to sixty (60) calendar days to submit a Provisional Inspection Violation Score Dispute Extension Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>).

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:		10 Year Date Range:		2009-2018		Permit Effective Date:		8/5/2009		Link to EnviroStor			
Address:		Number of Inspections:		11		Permit Expiration Date:		8/4/2019		(Inspection Reports, SOVs,			
EPA ID:		Total Number of Violations Scored:		12		Date VSP Completed:		6/27/2019		etc.)			
Inspection Date:	1/25/2010	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:	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	0.00
Provisional Inspection Violation Score:													0.00
Inspection Date:	3/16/2011	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI												
Class I Violations:	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:	8/25/2011	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	HSC 25201(a)	The facility, as a transporter of HW, stored HW in excess of the ten days allowed under the transfer facility exemption without a permit or other grant of authorization from DTSC.	Moderate	Approximately 1,000 pounds of ignitable waste (petroleum distillates and oxidizing solids), 2,900 gallons of used oil, 634 gallons of used antifreeze, 372 gallons of oily water, 175 gallons of nitric acid, 275 gallons of salt rinse, and 50 gallons of trichloroethylene were found in violation from manifests in years 2010 and 2011. The volume and characteristics of the substances involved presented a moderate potential for harm to human health and safety and the environment.	Minimal	Eight manifests from years 2010 and 2011 were found exceeding the 10-day exempt transfer facility holding time ranging from 2 to 21 days (oxidizing solid) in exceedance. Because no additional manifests were cited, the requirement functioned nearly as intended.	6	No	n/a	0	6.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66264.73(b)(1)	The facility failed to record in its Operating Log a description and the quantity of each HW received, and the methods and dates of its transfer, treatment, storage or disposal at the facility. Specifically, the facility failed to record the date and time of the transfer of the HW when it certified material as recycled oil. In addition, the facility failed to record in its Operating Log the quantity and the dates of transfer of the HW from containers to a tank truck or a receiving truck.	Minimal	The facility's permitted wastestreams were waste oil, lubricating oil, and waste antifreeze. While the specific volume in violation was not provided the characteristics of waste oil in violation presented a minimal potential for harm to human health and safety and the environment.	Moderate	The facility failed to record in its Operating Log the quantity and the dates of transfer of the HW from containers (e.g. drummed wastes) to a tanker truck or a receiving tank. Certified recycled oil quantity was often tracked using bills of lading, so the requirement functioned to some extent.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:													12.00
Inspection Date:	3/26/2012	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:	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	0.00
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name:		10 Year Date Range:		2009-2018		Permit Effective Date:		8/5/2009		Link to EnviroStor			
Address:		Number of Inspections:		11		Permit Expiration Date:		8/4/2019		(Inspection Reports, SOVs, etc.)			
EPA ID:		Total Number of Violations Scored:		12		Date VSP Completed:		6/27/2019					
Inspection Date:	12/27/2012 CEI & 1/24/2013 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 II 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.	22 CCR 66264.52(d) and (3) and 22 CCR 66264.54(d)	The facility failed to amend its Contingency Plan to reflect emergency coordinator changes.	Moderate	Failure to have current employees listed as emergency coordinators has the potential to increase harm to public health and the environment in case of an accidental release of HW.	Major	Two employees were listed as the assigned emergency coordinators in the Contingency Plan during the inspection, and neither of these two people were employed by the facility at that time. The function of the HW management requirement was rendered ineffective.	20	No	n/a	0	20.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25201(a)	The facility, as a transporter of HW, stored HW in excess of the ten days allowed under the transfer facility exemption without a permit or other grant of authorization from DTSC.	Moderate	Approximately 15 pounds of ignitable waste (acetylene, oxidizing solids), 6,500 gallons of used oil, 450 gallons of used antifreeze, 10,975 gallons of oily water, 166 gallons of corrosive liquid, 40 pounds of broken light tubes, and 300 pounds of petroleum hydrocarbon debris were found in violation from manifests in 2012. The volume and characteristics of the substances involved presented a moderate potential for harm.	Minimal	Fourteen manifests from 2012 were found exceeding the 10-day exempt transfer facility holding time ranging from 1 to 21 days in exceedance. Fourteen manifests in violation compared to the very large number of manifests this facility processed in 2012 demonstrated the requirement functioned nearly as intended.	6	Yes	8/25/2011	25	7.50
	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 66262.20(a)	The facility, as a transporter of HW, failed to fill out HW manifests accurately, in that the pickup and delivery dates of HW were not recorded accurately.	Minimal	Inaccurate HW pickup and delivery dates was a paperwork violation and demonstrated inaccurate HW waste tracking. A total of 10,535 gallons and 6,400 pounds of wastes were cited in violation recorded on six separate manifests. However, the wastestreams in violation included used oil, waste antifreeze, charcoal sand, and oily water which represented a minimal potential for harm to public health and the environment.	Minimal	The pickup and delivery dates recorded on the manifests appeared in error for six manifests in 2012. Manifest corrections should have been provided to DTSC. Six manifests in violation compared to the thousands of manifests this facility processed in 2012 demonstrated the requirement functioned nearly as intended.	2	No	n/a	0	2.00
Provisional Inspection Violation Score:													29.50
Inspection Date:	5/23/2013	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	0.00
Provisional Inspection Violation Score:													0.00
Inspection Date:	4/22/2014 CEI & 7/18/2014 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name:		10 Year Date Range:		2009-2018		Permit Effective Date:		8/5/2009		Link to EnviroStor			
Address:		Number of Inspections:		11		Permit Expiration Date:		8/4/2019		(Inspection Reports, SOVs,			
EPA ID:		Total Number of Violations Scored:		12		Date VSP Completed:		6/27/2019		etc.)			
Inspection Date:	4/7/2016 CEI & 4/27/2016 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:	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:	2/23/2017 FCI/CEI & 6/28/2017 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:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility and/or to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a)	The facility stored used oil in Tanks 8 and 9, which were designated in the facility's HWFP to only store recycled oil that met the purity standards set forth in Table 8 of the Permit.	Minimal	The facility representative stated that there was a total of approximately 1,000 gallons of recycled oil in Tanks 8 and 9 on the date of the inspection. However, the available documentation demonstrated that used oil, instead of permitted recycled oil, was pumped and stored in Tanks 8 and 9. The used oil wastestream in violation represented a minimal potential for harm.	Major	Storage of used oil in tanks permitted to only store recycled oil meeting purity standards identified in the permit rendered the function of the requirement ineffective.	15	No	n/a	0	15.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66264.73(b)(1)	The facility's Operating Record was inaccurate, as the amount of used oil that was recorded did not match the amount that was pumped into the tanks and also noted on the Daily Log/Unloading Transfer Sheet. In many instances, the amount was off by at least 100 gallons of used oil.	Minimal	An inaccurate operating record had the potential to result in HWs being lost or mismanaged. Used oil wastestream in violation represented a minimal potential for harm to public health and the environment.	Major	The Operating Record for the month of 8/2016 identified at least 65 instances where the quantity of the used oil designated on the manifest was different than the amount of oil the facility actually received. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	15	No	n/a	0	15.00
	3	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 6264.72(a) and (b)	The facility failed to ensure that the quantity of used oil designated on the manifest as received was not significantly different from the quantity of used oil that it actually received.	Minimal	Inaccurate HW quantities reported on manifests had the potential to result in HWs being lost or mismanaged. Used oil wastestream in violation represented a minimal potential for harm to public health and the environment.	Moderate	In 8/2016, twenty-four shipments out of 74 total (32%) had a discrepancy of 10% or more between what was designated on the manifest and what was actually received by the Facility. With approximately 1 out of every 3 loads in violation with significant discrepancies, the function of the requirement was rendered ineffective because some of its provisions were not complied with.	6	No	n/a	0	6.00

Violation Scoring Matrix

Facility Name:		SAFETY-KLEEN OF CALIFORNIA INC- CARSON		10 Year Date Range:		2009-2018		Permit Effective Date:		8/5/2009		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		16604 SAN PEDRO STREET, CARSON, CA 90746		Number of Inspections:		11		Permit Expiration Date:		8/4/2019			
EPA ID:		CAD981696420		Total Number of Violations Scored:		12		Date VSP Completed:		6/27/2019			
	4	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66264.72(c)	The facility failed to attempt to reconcile the waste discrepancy between the quantity of used oil designated on the manifest and the amount of oil actually received. In addition, the facility failed to submit a letter to DTSC describing the discrepancies with copies of each at issue manifest when the manifest was not resolved by the generator within 15 days after receipt of the used oil.	Minimal	Inaccurate HW quantities reported on manifests had the potential to result in HWs being lost or mismanaged. Used oil wastestream in violation represented a minimal potential for harm to public health and the environment.	Major	No attempt was made by the facility to reconcile the volume discrepancies and no letter had been received by DTSC describing the discrepancies. The HW management requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0	15.00
Provisional Inspection Violation Score:													51.00
Inspection Date:	4/18/2018 CEI & 4/30/2018 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure adequate financial resources in the case of releases.	HSC 25202(a) and HWFP, Part IV, Unit #4	The facility stored HW (used oil and antifreeze) in excess of its maximum storage capacity. The facility exceeded its permitted storage capacity in Tanks 3, 5, 9 and Loading/Unloading Area.	Minimal	Exceedance of the maximum permitted HW storage capacity could potentially result in an increased threat of HW release, loss, or mismanagement. Used oil wastestream in violation represented a minimal potential for harm to human health and the environment.	Moderate	Nine instances total: 7/11/16 Tank 3 (2,381 gallons or 24%) used oil exceedance, 7/14/16 Tank 5 (1,766 gallons or 18%) antifreeze exceedance, 8/30/16 Tank 9 (5,013 gallons or 47%) used oil exceedance, and six occasions between 4/29/16 and 8/30/16 in the Loading/Unloading Area exceeded its 25,400-gallon used oil storage capacity by 1,563 (6%) to 4,203 (16%) gallons. Since other dates were not cited, it appeared that the requirement functioned to some extent.	6	No	n/a	0	6.00
	2	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.191(a) and (c)(1) and HWFP, Part IV, Unit-Specific Special Condition #7	The facility failed to meet the tank assessment requirements for nine out of its ten Aboveground Tanks and failed to submit tank certifications five years from the previous certifications dated 9/8/2012.	Minimal	The ten tanks were permitted to store used oil, waste antifreeze, non-RCRA wastewater, or recycled oil and ranged in storage capacities from 4,621 gallons to 11,587 gallons (with a total permitted storage capacity of 92,492 gallons). The permitted wastestreams represented a minimal potential for harm to human health and the environment.	Moderate	While inspections for Tanks 1 through 10 were performed on 4/21/2015, the inspections were inadequate in that the tanks were not reviewed and certified by an independent, qualified professional engineer registered in California. The requisite certified tank assessments were also overdue by over seven months at the time of the inspection. The requirement functioned to some extent, although not all of its important provisions were complied with.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:													12.00

Violation Scoring Matrix

Facility Name:		10 Year Date Range:		2009-2018		Permit Effective Date:		8/5/2009		Link to EnviroStor (Inspection Reports, SOVs, etc.)			
Address:		Number of Inspections:		11		Permit Expiration Date:		8/4/2019					
EPA ID:		Total Number of Violations Scored:		12		Date VSP Completed:		6/27/2019					
Inspection Date:	11/20/2018 CEI & 11/26/2018 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:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66264.73	The facility failed to keep a written Operating Record at the facility and maintain the Operating Record until closure of the facility.	Minimal	Onsite tanks were permitted to store used oil, waste antifreeze, non-RCRA wastewater, or recycled oil and ranged in storage capacities from 4,621 to 11,587 gallons (with a total permitted storage capacity of 92,492 gallons). The facility stopped receiving waste in September 2016. The tanks were cleaned out in May and June 2018. The permitted wastestreams represented a minimal potential for harm.	Moderate	The most recent Tracking Logs available were dated 2/6/2018. The facility was able to provide a copy of the Outbound Compliance Report showing all of the HW and non-HW that were transferred offsite in 2018. Copies of manifests and bills of ladings showed that HW was removed from tanks and transferred offsite in June and October 2018. The requirement functioned to some extent.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:												6.00	

Violation Scoring Matrix

Facility Name: SAFETY-KLEEN OF CALIFORNIA INC- CARSON	10 Year Date Range: 2009-2018	Permit Effective Date: 8/5/2009	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address: 16604 SAN PEDRO STREET, CARSON, CA 90746	Number of Inspections: 11	Permit Expiration Date: 8/4/2019	
EPA ID: CAD981696420	Total Number of Violations Scored: 12	Date VSP Completed: 6/27/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	0	FCI	1/25/2010	0.00
2	0	FCI	3/16/2011	0.00
3	2	CEI	8/25/2011	12.00
4	0	FCI	3/26/2012	0.00
5	3	CEI & FRR	12/27/2012 CEI & 1/24/2013 FRR	29.50
6	0	FCI	5/23/2013	0.00
7	0	CEI & FRR	4/22/2014 CEI & 7/18/2014 FRR	0.00
8	0	CEI & FRR	4/7/2016 CEI & 4/27/2016 FRR	0.00
9	4	CEI & FRR	2/23/2017 FCI/CEI & 6/28/2017 FRR	51.00
10	2	CEI & FRR	4/18/2018 CEI & 4/30/2018 FRR	12.00
11	1	CEI & FRR	11/20/2018 CEI & 11/26/2018 FRR	6.00
Sum of Provisional Inspection Violation Scores				110.50
*FACILITY VSP SCORE				10.05

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

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|--|---|
| 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 |
|--|---|

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 Sam Barket, Safety-Kleen of California Inc., EPA ID Number CAD981696420.
2. I served Sam Barket, Safety-Kleen of California Inc., by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9966, return receipt requested, in a sealed envelope addressed to:

Mr. Sam Barket
Safety-Kleen of California, Inc.
16604 South San Pedro Street
Carson, California 90746

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)