



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control



Gavin Newsom
Governor

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September 27, 2019

Certified Mail No.: 7018-0680-0000-9827-9782

Mr. Kenneth Oldmixon
US Ecology Vernon Inc.
5375 South Boyle Ave.
Vernon, California 90058

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

Dear Mr. Kenneth Oldmixon:

2019 Facility Violations Scoring Procedure (VSP) Score: 13.09
2019 Compliance Tier Assignment: Acceptable

The purpose of this letter is to provide US Ecology Vernon Inc., CAD097030993, located at 5375 South Boyle Ave., Vernon, CA 90058 (hereinafter, the "Facility") with a provisional inspection violation score for each compliance inspection that was conducted during the preceding ten (10) year period beginning January 1, 2009, through December 31, 2018, the Facility's 2019 VSP Score, and compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.53, subdivision (b)(2) and section 66271.54, subdivisions (c).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 "**13.09**". 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.

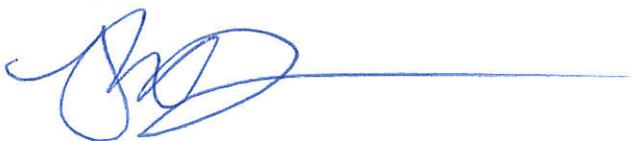
The owner or operator of a facility may request a one-time extension of up to sixty (60) calendar days to submit a Provisional Inspection Violation Score Dispute Extension Document (template available at <https://dtsc.ca.gov/violations-scoring-procedure/>).

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:		US ECOLOGY VERNON INC		10 Year Date Range:		2009-2018		Permit Effective Date:		7/23/2017		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		5375 S BOYLE AVENUE, LOS ANGELES, CA 90058		Number of Inspections:		11		Permit Expiration Date:		7/22/2027			
EPA ID:		CAD097030993		Total Number of Violations Scored:		11		Date VSP Completed:		8/15/2019			
Inspection Date:	4/28/2009 CEI & 5/19/2009 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a)	The facility stored HW in an area not authorized by its HWFP. The facility stored a roll-off bin of HW in the walkway by the Filter Press Area.	Moderate	Twenty cubic yards of spent activated carbon and wastewater treatment sludge (F006, F012, F019, D007, D008, 352) were found in violation. The characteristics and volume of the listed RCRA HW in violation presented a moderate threat to public health and the environment.	Moderate	One roll-off bin was cited in violation. No other waste at the facility was cited in violation, demonstrating that the requirement functioned to some extent.	15	No	n/a	0	15.00
Provisional Inspection Violation Score:													15.00
Inspection Date:	10/20/2009	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:	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:		US ECOLOGY VERNON INC		10 Year Date Range:		2009-2018		Permit Effective Date:		7/23/2017		Link to EnviroStor	
Address:		5375 S BOYLE AVENUE, LOS ANGELES, CA 90058		Number of Inspections:		11		Permit Expiration Date:		7/22/2027		(Inspection Reports, SOVs,	
EPA ID:		CAD097030993		Total Number of Violations Scored:		11		Date VSP Completed:		8/15/2019		etc.)	
Inspection Date:	10/6/2010 CEI & 7/26/2010 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66264.15(d)	The facility failed to include in its Inspection Log the date and nature of any repairs or other remedial actions. There was no mention of overpacking a dented 55-gallon drum in the Inspection Log. Inspection Log noted that a leaking pump inlet flange crack was "not leaking right now," the next day the log stated "fixed ok," however there was no prior mention in the records of when the leaking pump inlet flange crack was first observed. The Weekly Safety Shower and Eyewash Station Inspection Records noted that the shower handle needed to be replaced for 6 months and a broken eyewash bowl was noted, but the logs also noted these items as marked as "OK," which was inconsistent as there was no entry regarding repairs.	Moderate	One 55-gallon drum was cited (HW in violation was not identified), a leaking pump inlet flange crack, and the safety shower and eyewash station inspection records from 5/2010-12/2010 were cited in violation. Incomplete Inspection Logs have the potential to delay timely responses for repairs and cleanup actions for possible HW releases, as well as having the potential to increase the risk of a release and/or injury to employees. The facility handled wastewater, wastes with less than 10 ppm cyanide, sludges, and solids, which presented a moderate threat to human health and the environment.	Moderate	Three separate instances were cited in this violation. One of the instances (weekly safety shower and eyewash station inspection records) occurred repeatedly throughout a six month period. The Inspection Logs and documentation provided demonstrate that the HW management requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00
	2	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.15(c)	The facility failed to remedy deteriorated or malfunctioning equipment on a schedule that ensured the problem did not lead to an environmental or human health hazard. The facility's safety shower and eyewash station were noted as having defects, yet were not remedied.	Moderate	Failure to repair safety equipment in a timely manner represented a moderate threat to human health and safety and the environment. The facility handled wastewater, wastes with less than 10 ppm cyanide, sludges, and solids, which presented a moderate threat to human health and safety and the environment.	Moderate	Copies of safety shower and eyewash station Inspection Logs from 3/2010-10/2010 (6 months) showed missing eyewash eyelet cover, broken shower handle, missing/broken bowl and no pressure in 1 of 4 eyewash eyelets. The Inspection Logs also noted that these items were marked with "OK," yet no remedy had been implemented to correct the problem. Other shower and eyewash stations were not cited in violation demonstrating that the requirement functioned to some extent.	15	n/a	n/a	0	15.00
Provisional Inspection Violation Score:													30.00
Inspection Date:	10/25/2011 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	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:	6/26/2012 CEI & 7/3/2012 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name:		US ECOLOGY VERNON INC		10 Year Date Range:		2009-2018		Permit Effective Date:		7/23/2017		Link to EnviroStor	
Address:		5375 S BOYLE AVENUE, LOS ANGELES, CA 90058		Number of Inspections:		11		Permit Expiration Date:		7/22/2027		(Inspection Reports, SOVs, etc.)	
EPA ID:		CAD097030993		Total Number of Violations Scored:		11		Date VSP Completed:		8/15/2019			
Inspection Date:	5/20/2013 CEI & 5/22/2013 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66264.13	The facility failed to follow its Waste Analysis Plan in that no organic vapor screening was conducted for the organic wastes received (acetone/methylene chloride and oily wastes). In addition, no records demonstrated that the compatibility was conducted except bulk addition to Tank 19.	Moderate	Waste Analysis Plans allow operators to tailor their waste analysis procedures to the type of waste and techniques that the facility uses to manage the waste safely and to comply with technical requirements of the regulations. Failure to follow a Waste Analysis Plan can lead to improper and unsafe waste management practices. Acetone/methylene chloride and oily wastes were cited in violation and represented a moderate threat to human health and safety and the environment.	Moderate	The majority of the organic wastes were not tested for flashpoint, nor screened by Flame Ionization Detector (FID). Also the compatibility/reactivity test was not performed in most cases. The requirement functioned to some extent, as other required elements of the Waste Analysis Plan were not cited in violation.	15	No	n/a	0	15.00
	2	The deviation from the requirements was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	HSC 25202(a) and HWFP, Attachment A, Section III.D.	The facility stored HW in unpermitted Tank PT-03 at the Primary Off-Loading Area.	Moderate	Because the waste was stored in an unpermitted tank, there was a potential for inadequate safeguards in place to prevent release(s). Tank PT-03 had over 2,500 gallons of acid waste awaiting laboratory analysis. The volume and wastestream cited in violation presented a moderate threat to human health and safety and the environment due to the corrosivity of the waste if a release occurred.	Major	HW generated at the laboratory had been stored in a tank, which was not authorized by DTSC, and was transferred to the Treatment Unit through an unauthorized piping system. The function of the requirement was rendered ineffective as the facility completely failed to follow its HWFP with respect to storage in an unpermitted tank.	20	No	n/a	0	20.00
	3	The deviation from the requirements was significant enough that it could have resulted in the failure to assure that HW were destined for and delivered to an authorized HW facility.	22 CCR 66264.73(b)	The facility failed to record the location of each HW within the facility and the quantity at each location. Container D185218-1 observed at the Bulk Storage Areas was not listed on the container inventory. In addition, the quantity at each location was not properly recorded, as the level in Tank 19 had a 2,748 gallon increase between 4/3/2013 and 4/9/2013, but there was no pumping activity for the tank according to the operating records. A similar issue was reported with respect to Tanks 60 through 63.	Minimal	Tank 19 was an acid wastewater blending tank with a permitted operating capacity of 70,000 gallons. Tanks 60 through 63 were connected in a series and were permitted to store organic wastewater with permitted capacities of 18,500 gallons each. The wastestream in violation in container D185218-1 was not specified. A minimal potential for harm was assessed due to the characteristics of the wastewater cited in violation.	Moderate	One container and the volume in five tanks (out of approximately 75 onsite permitted tanks) was cited in violation. Cumulatively Tank 60 through 63 had 3,245 gallons increasing from 4/8/2013 to 4/9/2013, but the Shift Report treated 10,000 gallons from these four tanks, and only 9,521 gallons were added to Tank 63. There was a 3,724 gallon increase without additional records. The facility's other tanks were not cited in violation demonstrating the requirement functioned to some extent.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:													41.00

Violation Scoring Matrix

Facility Name:		US ECOLOGY VERNON INC			10 Year Date Range:		2009-2018		Permit Effective Date:		7/23/2017		Link to EnviroStor	
Address:		5375 S BOYLE AVENUE, LOS ANGELES, CA 90058			Number of Inspections:		11		Permit Expiration Date:		7/22/2027		(Inspection Reports, SOVs,	
EPA ID:		CAD097030993			Total Number of Violations Scored:		11		Date VSP Completed:		8/15/2019		etc.)	
Inspection Date:	6/25/2014 CEI & 10/16/2014 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	
Inspection Date:	6/15/2015 CEI & 9/10/2015 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score	
Inspection Type:	CEI & FRR													
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in the failure to assure that HW were destined for and delivered to an authorized HW facility.	HSC 25202(a), 22 CCR 66270.30, and HWFP, Special Condition B3(g)	The facility accepted and stored nine 55-gallon containers of radioactive waste (above background level) without authorization from DTSC.	Major	The nine 55-gallon containers of "above background level" radioactive waste in violation were stored in the facility's RCRA HW Storage Area. The radioactive waste containers included: three drums (843 pounds) of Nimonic dust, CA Code 352; three drums (2,400 pounds) sandblast grit, CA Code 162; and three drums (1,900 pounds) Buffing Media, CA Code 352. The Ludlum reading near the containers was 16-18 Microrems per hour (µR/hr) and 40-45 µR/hr on some of the containers. A major potential for harm was assessed due to the characteristic and volume of the substances at issue (5,143 pounds).	Major	Inspectors observed containers labelled as "Reject - Do not use" and "Rad Above Background Level." The containers were received from off-site generators a few months prior (Manifests 014432061JJK, 014064202JJK, 014065230JJK, and 014065324JJK). The facility stated that the transporter refused to return the HW to the generators. The facility is prohibited from accepting and storing radioactive waste above background level. The HW management requirement was completely ignored.	25	No	n/a	0	25.00	
Provisional Inspection Violation Score:													25.00	

Violation Scoring Matrix

Facility Name:		US ECOLOGY VERNON INC		10 Year Date Range:		2009-2018		Permit Effective Date:		7/23/2017		Link to EnviroStor	
Address:		5375 S BOYLE AVENUE, LOS ANGELES, CA 90058		Number of Inspections:		11		Permit Expiration Date:		7/22/2027		(Inspection Reports, SOVs,	
EPA ID:		CAD097030993		Total Number of Violations Scored:		11		Date VSP Completed:		8/15/2019		etc.)	
Inspection Date:	6/1/2016 CEI & 7/28/2016 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 the 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)	The facility illegally treated filter press plates in two acid dip containers without authorization from DTSC.	Moderate	The facility utilized two tanks to clean used filter press plates with hydrochloric acid without authorization. The aboveground acid tanks were rectangular with an open top, each with a capacity of approximately 500 gallons. Hydrochloric acid is corrosive to the eyes, skin, and mucous membranes and may cause eye, nose, and respiratory tract irritation and inflammation. The wastestream and volume in violation represented a moderate threat to human health.	Moderate	Every six months, batch plates from each filter press (containing 50 plates each) were hoisted and dipped into the acid tanks. Spent acid generated from these tanks went to Tank 20 for treatment. The authorized filter presses were components of the permitted treatment activities. However, the maintenance process itself (dipping of plates in acid) was not authorized. No other treatments were cited in violation demonstrating the requirement functioned to some extent.	15	No	n/a	0	15.00
	2	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66264.191	The facility failed to conduct tank assessments for Emergency Overflow Tanks 28 and 30 in 2010 and 2015.	Minimal	Tank 28 was a 5,800 gallon capacity acid waste water emergency overflow tank. Tank 30 was a 5,800 gallon capacity alkaline waste water emergency overflow tank. Since the emergency standby tanks were rarely utilized, the deviation presented a minimal threat to human health and safety and the environment.	Moderate	The facility representative stated that there were no records of these tanks being assessed or certified. Two tanks out of over 70 tanks at the facility were cited in violation, demonstrating that the requirement functioned to some extent.	6	No	n/a	0	6.00
	3	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66264.191	The facility failed to conduct tank assessments for Treatment Tanks 31B and 31C in 2009 and 2014.	Minimal	Tanks 31B and 31C treated wastewater containing cyanide, oxidizers, and chrome. Two years after the last tank certification, in 2002, the tanks became inactive. Each had a capacity of 2,000 gallons. The threat to human health and safety and the environment was minimal.	Moderate	The facility representative stated that these tanks were last assessed and certified on 3/26/2004 (over seven years overdue). However, these tanks were inactive since 2002, and were also two of over 70 total permitted tanks at the facility. These factors demonstrated that the requirement functioned to some extent.	6	No	n/a	0	6.00

Violation Scoring Matrix

Facility Name:	US ECOLOGY VERNON INC			10 Year Date Range:	2009-2018			Permit Effective Date:	7/23/2017			Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:	5375 S BOYLE AVENUE, LOS ANGELES, CA 90058			Number of Inspections:	11			Permit Expiration Date:	7/22/2027				
EPA ID:	CAD097030993			Total Number of Violations Scored:	11			Date VSP Completed:	8/15/2019				
	4	The deviation from the requirement was significant enough that it could have resulted in the failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or assure early detection of such releases.	22 CCR 66264.194(b)	The facility failed to use appropriate controls and practices to prevent spills, releases, or overflows from its tank or containment system. Tanks 39 and 40 were observed to have significant corrosions on the surface, which the facility indicated was from splashing of wastewater from a small trough entering these tanks.	Minimal	Tanks 39 and 40 were open batch treatment tanks containing clarified water with operating capacities of 11,000 gallons each. The wastestream in violation presented a minimal potential threat to human health and safety and the environment.	Moderate	Tanks 39 and 40 showed significant corrosion on the surface which indicated signs of spills, release, or overflow of wastewater repeatedly. The overflowing of the estimated 250 gallons was contained in the secondary containment demonstrating that the requirement functioned to some extent.	6	No	n/a	0	6.00
Provisional Inspection Violation Score:													33.00
Inspection Date:	6/26/2017 CEI & 7/6/2017 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00
Provisional Inspection Violation Score:													0.00
Inspection Date:	12/27/2017 CEI & 1/9/2018 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
Provisional Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name: US ECOLOGY VERNON INC	10 Year Date Range: 2009-2018	Permit Effective Date: 7/23/2017	Link to EnviroStor (Inspection Reports, SOVs, etc.)
Address: 5375 S BOYLE AVENUE, LOS ANGELES, CA 90058	Number of Inspections: 11	Permit Expiration Date: 7/22/2027	
EPA ID: CAD097030993	Total Number of Violations Scored: 11	Date VSP Completed: 8/15/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	1	CEI & FRR	4/28/2009 CEI & 5/19/2009 FRR	15.00
2	0	FRR	10/20/2009	0.00
3	2	CEI & FRR	10/6/2010 CEI & 7/26/2010 FRR	30.00
4	0	FRR	10/25/2011 FRR	0.00
5	0	CEI & FRR	6/26/2012 CEI & 7/3/2012 FRR	0.00
6	3	CEI & FRR	5/20/2013 CEI & 5/22/2013 FRR	41.00
7	0	CEI & FRR	6/25/2014 CEI & 10/16/2014 FRR	0.00
8	1	CEI & FRR	6/15/2015 CEI & 9/10/2015 FRR	25.00
9	4	CEI & FRR	6/1/2016 CEI & 7/28/2016 FRR	33.00
10	0	CEI & FRR	6/26/2017 CEI & 7/6/2017 FRR	0.00
11	0	CEI & FRR	12/27/2017 CEI & 1/9/2018 FRR	0.00
Sum of Provisional Inspection Violation Scores				144.00
*FACILITY VSP SCORE				13.09

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

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| <p>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
 FID = Flame Ionization Detector
 FRR = Financial Records Review
 FSD = Facility Self Disclosure
 FUI = Follow-Up Inspection</p> | <p>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
 µR/hr = Microrems per hour
 VSP = Violations Scoring Procedure</p> |
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PROOF OF SERVICE

1. I served the NOTICE OF PROVISIONAL INSPECTION VIOLATION SCORES, 2019 FACILITY VIOLATION SCORING PROCEDURE SCORE, AND 2019 COMPLIANCE TIER ASSIGNMENT on Kenneth Oldmixon, US Ecology Vernon Inc., EPA ID Number CAD097030993.
2. I served Kenneth Oldmixon, US Ecology Vernon Inc., by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9782, return receipt requested, in a sealed envelope addressed to:

Mr. Kenneth Oldmixon
US Ecology Vernon Inc.
5375 South Boyle Ave.
Vernon, California 90058

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)