



**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.: 7018-0680-0000-9827-9775

Mr. Shafiqul Alam  
Veolia ES Technical Solutions LLC Azusa  
1704 West 1st Street  
Azusa, California 91702

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

Dear Mr. Shafiqul Alam:

**2019 Facility Violations Scoring Procedure (VSP) Score: 13.92**  
**2019 Compliance Tier Assignment: Acceptable**

The purpose of this letter is to provide Veolia ES Technical Solutions LLC Azusa, CAD008302903, located at 1704 West First St., Azusa, CA 91702 (hereinafter, the "Facility") with a provisional inspection violation score for each compliance inspection that was conducted during the preceding ten (10) year period beginning January 1, 2009, through December 31, 2018, the Facility's 2019 VSP Score, and compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.53, subdivision (b)(2) and section 66271.54, subdivisions (c).<sup>1</sup>

The provisional inspection violation scores for the Facility are provided in the enclosed Inspection Violation Scoring Matrix. A provisional inspection violation score is the sum of the initial score for each Class I violation that occurred during a compliance inspection, and any adjustment to the initial Class I violation score based on repeat violations.<sup>2</sup> (See 22 CCR § 66271.53, subd. (a).) The basis for the score for each Class I violation is also provided in the enclosed Inspection Violation Scoring Matrix.

<sup>1</sup> Pursuant to Senate Bill (SB) 673 (Stats. 2015, chapter 611), the Department of Toxic Substances Control (DTSC) adopted new hazardous waste permitting criteria regulations, which became effective on January 1, 2019. The full text of the hazardous waste permitting criteria regulations is available at [https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT\\_OAL\\_20181023-revised.pdf](https://www.dtsc.ca.gov/LawsRegsPolicies/Regs/upload/18-DTSC-SB-673-Reg-TEXT_OAL_20181023-revised.pdf). More information regarding SB 673 is available at [https://www.dtsc.ca.gov/HazardousWaste/Permit\\_Roundtables.cfm](https://www.dtsc.ca.gov/HazardousWaste/Permit_Roundtables.cfm).

<sup>2</sup> For purposes of calculating a facility's inspection violation score, DTSC may also consider Class II violations that meet the definition of a Class I violation as specified in CCR, title 22, section 66260.10. (See 22 CCR § 66271.50, subd. (d)(1).)

Based on the provisional inspection violation scores for the Facility for the ten (10) year period beginning January 1, 2009, through December 31, 2018, DTSC has calculated a Facility VSP Score for the Facility of "**13.92**". 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](mailto:VSP_Info@dtsc.ca.gov). If you have any questions regarding the dispute process, please contact [VSP\\_Dispute\\_Inbox@dtsc.ca.gov](mailto:VSP_Dispute_Inbox@dtsc.ca.gov).

Sincerely,



Keith Kihara, Chief  
Enforcement and Emergency Response Division

Enclosure(s)

Violation Scoring Matrix  
Proof of Service

### Violation Scoring Matrix

Facility Name:		VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor	
Address:		1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702		Number of Inspections:		15		Permit Expiration Date:		3/31/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD008302903		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019		etc.)	
Inspection Date:	3/3/2009	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:	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
<b>Provisional Inspection Violation Score:</b>													0.00
Inspection Date:	12/8/2009 CEI & 12/10/2009 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:	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
<b>Provisional Inspection Violation Score:</b>													0.00
Inspection Date:	4/21/2010	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
<b>Provisional Inspection Violation Score:</b>													0.00
Inspection Date:	4/12/2011 CEI & 3/17/2011 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	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
<b>Class II Violations:</b>	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202(a) and HWFP, Attachment A, Part IV, Section 11	On two occasions, the facility stored HW in Tank 105 in excess of the maximum capacity permitted for the tank.	Minimal	Tank 105 had a maximum permitted storage/treatment capacity of 24,000 gallons and was permitted to store organic liquid wastes and supplemental fuel. The potential for harm was classified as minimal due to the characteristics of the substance involved.	Moderate	Up to 25,000 gallons was recorded on 4/12/2011 and the high-level alarm was not activated on 4/10/2011 when the estimated volume was 23,975 gallons. Because no other tanks were cited in violation, the requirement functioned to some extent.	6	No	n/a	0	6.00

### Violation Scoring Matrix

Facility Name:		VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor	
Address:		1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702		Number of Inspections:		15		Permit Expiration Date:		3/31/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD008302903		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019		etc.)	
	2	The deviation from the requirement 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)	The facility failed to record the location of each HW within the facility, the methods and dates of transfer, and the quantity at each location.	Moderate	Tank 105 had a maximum permitted storage / treatment capacity of 24,000 gallons and was permitted to store organic liquid wastes and supplemental fuel. Tanks TS-02 and TS-08 had 15,000 gallon permitted operating capacities and could store "all allowable liquid wastes" according to the permit including solvent wastes. Tank R-20 (receiving tank) operating capacity was not readily available. The potential for harm was classified as moderate due to wastestreams allowed at the facility and volume of waste in violation.	Moderate	On 4/13/2011, transfer records showed that Tank 105, with a volume of 15,252 gallons, had a 1,503 gallon transfer increase followed by a 974 gallon transfer increase, but showed a final volume of 16,226 gallons, resulting in a disparity of 1,503 gallons. On 4/10/2011 at 2:00 pm, Tank R-20 had 774 gallons in it, however at 5:00 pm, 1,464 gallons were transferred from R-20 to Tank TS-02. The 690 gallon increase had no supporting documentation. On 4/12/2011, at 1:15 pm, R-20 contained 725 gallons and by 2:00 pm had a volume decrease to 662 gallons with no documentation. On 4/14/2011, the volume in TS-08 was 5 feet/ 344 gallons at 2:00 am, and at 7:10 pm the volume increased to 8 feet/ 1,358 gallons without any documentation. The facility also did not provide the row location of each drum on the drum pad in the operating record. The requirement functioned to some extent as some tracking information was available, but accuracy and specific location details were missing.	15	No	n/a	0	15.00
<b>Provisional Inspection Violation Score:</b>													21.00
Inspection Date:	6/12/2012 CEI & 9/10/2012 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
Class II Violations:	1	The deviation from the requirement 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)	The facility failed to record the location of each HW within the facility and the quantity at each location. The Operating Record did not accurately reflect that there were 56 cubic yard boxes, 16 totes, and 3 pallets in the Non-flammable Waste Area at the Drum Pad AA2.	Minimal	The HW in violation was listed as non-flammable and observed in the Non-flammable Waste Area. The specific volume and other characteristics of the HW in violation were not available, so a minimal potential for harm was assessed.	Moderate	The inventory count for AA2 DN Area on 6/12/2012, incorrectly listed 53 cubic yard boxes, 7 totes, and 49 pallets. In addition, the container quantity for the Roll-off Bin Pad did not match with the Operating Record. The requirement functioned to some extent as some tracking information was available, though inaccurate.	6	Yes	4/12/2011	25	7.50
<b>Provisional Inspection Violation Score:</b>													7.50
Inspection Date:	8/16/2012	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:	FCL / E-Waste												
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
<b>Provisional Inspection Violation Score:</b>													0.00

### Violation Scoring Matrix

Facility Name:		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor		Adjusted Score	
Address:		Number of Inspections:		15		Permit Expiration Date:		3/31/2021		(Inspection Reports, SOVs,		Adjusted Score	
EPA ID:		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019		etc.)		Adjusted Score	
Inspection Date:	Inspection Type:	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
5/20/2013 FRR & 6/18/2013 CEI	CEI & FRR	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
<b>Provisional Inspection Violation Score:</b>													0.00
8/13/2013	FCI / E-Waste	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
<b>Provisional Inspection Violation Score:</b>													0.00
10/3/2013	FSD	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
<b>Provisional Inspection Violation Score:</b>													0.00
4/7/2014 CEI & 8/27/2014 FRR	CEI & FRR	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
<b>Class II Violations:</b>	1	The deviation from the requirement 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)	The facility failed to record the location of each HW at the facility and the quantity at each location. The inventory count for Drum Pad AA2 did not match the Inventory Record in the Operating Record.	Minimal	A portion of the waste in violation was listed as non-flammable and observed in the non-flammable waste area. The waste in the non-flammable area presented a minimal potential for harm. The specific volume and other characteristics of the HW in violation, at the drum pad AA2 DN, were not available.	Moderate	There were 18 cubic yard boxes, 42 totes, and 13 pallets in the non-flammable waste area at the Drum Pad (AA2). However, the inventory count for AA2 DN Area on 4/7/2014 showed 30 cubic yard boxes, 45 totes, and 11 pallets. Also, the container quantity (seven cubic yard boxes, 25 55-gallon containers, and one 30-gallon container) in the Roll-Off Bin Area (AC23) did not match the Inventory Record in the Operating Record (one 5-gallon bucket, 36 55-gallon containers). The requirement functioned to some extent as some tracking information was available, but was inaccurate, and only two out of 18 total storage areas were cited.	6	Yes	4/12/2011 and 6/12/2012	50	9.00
<b>Provisional Inspection Violation Score:</b>													9.00
10/30/2014	FCI	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
<b>Provisional Inspection Violation Score:</b>													0.00

### Violation Scoring Matrix

Facility Name:		VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor	
Address:		1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702		Number of Inspections:		15		Permit Expiration Date:		3/31/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD008302903		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019		etc.)	
Inspection Date:	4/28/2015 FCI/CEI, 5/26/2015 FRR & 9/8/2015 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:	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 a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and assure early detection of such releases.	HWFP, Attachment A, Part IV	The facility treated, stored, and otherwise managed HW in an unpermitted unit not specified in its HWFP. Tanks 65, 66, and 67, were illegally used to store HW "intermediate waste."	Major	Each at issue tank had an operating capacity of 2,000 gallons. Tank 65 and 66 contained a methylene chloride intermediate or based product (combustible), and Tank 67 contained fuel run-off (flammable) but was still a waste as it needed further reclamation. Methylene Chloride is a potential carcinogen and fuel run-off also contained benzene, a known human carcinogen. A major potential for harm was assessed due to the volume and characteristics of the substances involved.	Major	Non-permitted Tanks 65, 66, and 67 were used to store "intermediate" HW (treated HW that was not a final product). The facility explained that the tanks received distilled material from the distillation/thin film evaporation unit. Management of HW in unpermitted tanks rendered the HW management requirement ineffective.	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 and assure early detection of such releases.	HSC 25202(a)	The facility did not comply with its HWFP when it stored HW in unauthorized tanks (Tanks 65-67).	Major	Each tank had an operating capacity of 2,000 gallons. Tank 65 and 66 contained a methylene chloride intermediate or based product (combustible), and Tank 67 contained fuel run-off (flammable) but was still a waste as it needed further reclamation. Methylene Chloride is a potential carcinogen and fuel run-off also contained benzene, a known human carcinogen. A major potential for harm was assessed due to the volume and characteristics of the substances involved.	Major	Non-permitted Tanks 65, 66, and 67 were used to store "intermediate" HW (treated HW that was not a final product). Storage of HW in unpermitted tanks rendered the HW management requirement ineffective.	25	No	n/a	0	25.00
<b>Provisional Inspection Violation Score:</b>												50.00	

### Violation Scoring Matrix

Facility Name:		10 Year Date Range:			2009-2018		Permit Effective Date:		3/31/2011			Link to EnviroStor	
Address:		Number of Inspections:			15		Permit Expiration Date:		3/31/2021			(Inspection Reports, SOVs, etc.)	
EPA ID:		Total Number of Violations Scored:			16		Date VSP Completed:		8/6/2019				
Inspection Date:	6/24/2016 CEI & 7/26/2016 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and assure early detection of such releases.	HSC 25202; 22 CCR 66270.30; and HWFP dated 3/31/2011, Part III, General Conditions, page 8, Section 2.a. Effect of Permit	The facility stored HW in four unauthorized areas: Ten Day Area, area south of the Forklift Pad of Unit AA1 (Loading/Unloading Dock), area north of Unit AA1 (Loading/Unloading Dock), and Unit AB21 Blind Sump.	Minimal	Corrosive wastes were identified in the Unit AB21 Blind Sump. The volume of the corrosive waste in violation was not specified. The volume and characteristics of the other wastes in violation were not specified, resulting in a minimal potential for harm designation.	Major	HW was stored in four different unauthorized areas during the time periods of 3/2016, 4/2016, 7/19/2016, and 9/28/2016. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	15	Yes	4/28/2015	25	18.75
	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 dated 3/31/2011, Part IV, Permitted Units and Activities, page 19, Section a. Unit Specific Special Conditions for Unit AC-2 Storage and Processing Unit 1	The facility failed to stack containers holding HW no more than two high within Unit AC2, as some units were triple stacked.	Moderate	Waste flammable liquids and corrosive wastes were observed in violation (mostly stored in 5 gallon containers). Others were cardboard containers holding solids. The potential for harm that could have resulted if there were a spill of these wastes presented a moderate degree of harm.	Moderate	At least seven instances involving up to approximately 13 pallets of waste documented triple stacking of wastes in the inspection report (typically one 55-gallon container on the bottom with smaller 5-gallon containers on top). The act deviated from the requirement, but the requirement functioned to some extent.	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 prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202; 22 CCR 66270.30; and HWFP dated 3/31/2011, Part III, General Conditions, page 8, Section 2.a. Effect of Permit; 22 CCR 66264.31	The facility failed to maintain and operate the facility in a manner that would minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of HW or HW constituents to the air, soil, or surface water which could threaten human health and safety and the environment. The following were observed: (1) container of HW tilted precariously to the side; (2) containers of HW with exterior contamination; and (3) a sample taken in the Drainage Area located next to the northwest corner of the permitted Unit AC-2 showed lead and zinc above the STLC, which met the characteristic of toxicity.	Moderate	One container with three gallons of waste flammable liquids (dichloromethane silver) was observed tilted precariously. A Drainage Area sample found lead at 23 mg/L and zinc at 430 mg/L, meeting the HW characteristic for toxicity (volume of waste in violation was not specified). A moderate potential for harm was assigned due to the toxic characteristics of the waste found in violation.	Moderate	At least four containers were at issue in this violation. Other containers in permitted areas were not cited in the violation demonstrating that the requirement functioned to some extent.	15	No	n/a	0	15.00

### Violation Scoring Matrix

Facility Name:		VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor (Inspection Reports, SOVs, etc.)	
Address:		1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702		Number of Inspections:		15		Permit Expiration Date:		3/31/2021			
EPA ID:		CAD008302903		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019			
4	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.	HSC 25202; 22 CCR 66270.30; and HWFP dated 3/31/2011, Part IV, Permitted Units and Activities, Unit AB20 Unit-Specific Special Conditions, Page 81, Section b, 22 CCR 66264.35	The facility did not maintain a minimum 30" of aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in Unit AB 20.	Minimal	Inadequate aisle space between HW containers has the potential to limit access to emergency response personnel in case of a fire, explosion, or any unplanned sudden or non-sudden release(s). There was insufficient room for emergency personnel or equipment to access the drums in case of an emergency.	Minimal	At least two instances of inadequate aisle space was documented in Unit AB 20. Only one unit out of numerous HW storage units at the facility was cited in this violation demonstrating that the requirement functioned nearly as intended.	2	No	n/a	0	2.00	
5	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 66264.193	The facility failed to provide secondary containment systems free of cracks and gaps. The following were observed: (1) portions of secondary containment system walls were broken off; (2) secondary containment system was breached with a crack that was observed to run completely through the containment wall; and (3) secondary containment system flooring was damaged with pieces missing and coating peeling.	Minimal	Inadequate secondary containment has the potential to allow downward migration of HW release(s) into the environment. The secondary containment was breached with a crack that was observed to run completely through the containment wall. However, no information was available regarding specific wastestreams and potential volume in the containment areas. Therefore, a minimal potential for harm was assigned.	Moderate	With portions of the secondary containment walls broken off and a crack that was observed to run completely through the containment wall, the requirement functioned to some extent, although not all of its important provisions were complied with as many of the cracks observed were small in size.	6	No	n/a	0	6.00	
6	The deviation from the requirements was significant enough that it could have resulted in a failure to assure early detection of releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202 and HWFP Part III, General Conditions, page 8, Section 2.a. Effect of Permit, 22 CCR 66264.15	The facility failed to follow its written Inspection Schedule and/or remedy any deterioration or malfunction of equipment or structures noted in its inspections.	Minimal	Repairs to secondary containment were not noted or adequately addressed. Because the facility did not follow its written Inspection Schedule with regards to documenting and remediating damage to its secondary containment structures, the secondary containment systems continued to be used without undergoing repair. No information was available regarding specific wastestreams and volume in violation. Therefore, a minimal potential for harm was assigned.	Moderate	The facility made no mention of damage to the secondary containment system in the Inspection Log nor did it mention any repairs that should have been made. The Inspection Log for 9/30/2016 was incomplete. The HW management requirement functioned to some extent in that Inspection Logs were completed, but important information was missing, so not all of the provisions of the requirement were met.	6	No	n/a	0	6.00	
7	The deviation from the requirement was significant enough that it could have resulted in a failure to assure early detection of releases of HW or constituents to the environment during the active period of facility operation.	HSC 25189.2(a)	The facility made false representations in its inspection reports.	Minimal	The facility made no mention of damage to its secondary containment system in its daily/weekly Inspection Checklist. False representations of both the damage and remediation of the secondary containment structures and any dates of remedial repairs made were cited, and the secondary systems continued to be used whether or not they had been repaired increasing the potential for release to occur. The type of HW and quantity in violation were not presented in the inspection report. Hence, the potential for harm was assigned as minimal.	Moderate	The facility performed daily/weekly inspections but did not document the damage or the dates of repairs/remedial actions associated with the secondary containment systems. There were three separate instances of damaged secondary containment systems, despite the inspection logs stating they were acceptable. A moderate extent of deviation was assessed because some parts of the inspection logs/reports were accurate.	6	No	n/a	0	6.00	

### Violation Scoring Matrix

Facility Name:		VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA		10 Year Date Range:		2009-2018		Permit Effective Date:		3/31/2011		Link to EnviroStor	
Address:		1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702		Number of Inspections:		15		Permit Expiration Date:		3/31/2021		(Inspection Reports, SOVs,	
EPA ID:		CAD008302903		Total Number of Violations Scored:		16		Date VSP Completed:		8/6/2019		etc.)	
	8	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.	HSC 25202 and HWFP Part III, General Conditions, page 8, Section 2.a. Effect of Permit, 22 CCR 66264.16(a)(2) and (c)	The facility's personnel did not take part in an annual review of the initial training of HW management procedures, including Contingency Plan implementation, as required.	Moderate	Inadequate training could potentially result in staff inappropriately handling and mismanaging HW as well as hindering emergency response actions in case of accidental release(s). The lack of training for nine staff represented a moderate threat to human health and safety and the environment based on the permitted hazardous wastestreams.	Moderate	Nine employees were cited as not having adequate training, and included the two primary Emergency Coordinators, as well as the alternate Emergency Coordinator. These individuals did not take part in the annual review of the initial training of HW management procedures (including Contingency Plan implementation). Some employee training was provided to staff and documented, demonstrating that the requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00
<b>Provisional Inspection Violation Score:</b>													83.75
Inspection Date:	6/23/2017 CEI & 8/22/2017 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
Class II 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 6264.31	The facility failed to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of HW or HW constituents in that a dark brown powder like "sediment" was found near the south end of the facility. The sampling indicated HW levels of lead.	Moderate	Soluble lead was discovered at 11.5 mg/L in the dark brown sediment sample meeting the HW criteria for toxicity. The waste was finely divided and represented an inhalation hazard. The volume of waste in violation was not specified. Exposure to lead is linked with harmful effects on many organs and bodily functions of both humans (developmental delays in children) and animals. A moderate potential for harm was assigned due to the characteristics of the HW found in violation.	Moderate	The brown powder-like sediment was found accumulated in corner areas or areas where pallets and heavy equipment were stored, and in areas that were not being frequently swept by the facility. The requirement functioned to some extent as other areas of the facility were not cited in violation.	15	Yes	6/24/2016	25	18.75
<b>Provisional Inspection Violation Score:</b>													18.75
Inspection Date:	3/14/2018 CEI & 4/3/2018 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 Violation:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to assure early detection of releases of HW or constituents to the environment during the active period of facility operation.	22 CCR 66264.15(d) and 22 CCR 66264.174	The facility failed to inspect and record the inspection of HW Units AB-20, AB-21, and AA-4.	Moderate	Maximum storage capacities (in gallons) for each unit were 59,400 for AB20, 12,155 for AB21, and 73,690 for AA-4. Permitted waste types included organic solids, solvents and mixtures, aqueous organic wastes and mixtures, inorganic solids, solutions and mixtures or aqueous inorganic wastes and mixtures. Failure to inspect these units increased the potential of a release and decreased the ability to prevent early detection of HW releases and represented a moderate potential for harm.	Moderate	The facility did not have any inspection records for containers stored at Production, Process, and Storage Unit 1 - South (AB-20), Unit 2 - North (AB-21), and Storage and Processing Unit 2 (Frac Bay) (AA-4). The facility did not inspect the HW management units, but did inspect the Drum Storage Unit, the PCB cabinet, the Rosa Pad, the Laboratory, the Maintenance Shipping Unit, and the Production Processing Unit demonstrating that the requirement functioned to some extent.	15	Yes	6/24/2016	25	18.75
<b>Provisional Inspection Violation Score:</b>													18.75

## Violation Scoring Matrix

Facility Name:	VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA	10 Year Date Range:	2009-2018	Permit Effective Date:	3/31/2011	<a href="#">Link to EnviroStor</a> (Inspection Reports, SOVs, etc.)
Address:	1704 WEST 1ST STREET, AZUSA, CALIFORNIA 91702	Number of Inspections:	15	Permit Expiration Date:	3/31/2021	
EPA ID:	CAD008302903	Total Number of Violations Scored:	16	Date VSP Completed:	8/6/2019	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Provisional Inspection Violation Score
1	0	FCI	3/3/2009	0.00
2	0	CEI & FRR	12/8/2009 CEI & 12/10/2009 FRR	0.00
3	0	FCI	4/21/2010	0.00
4	2	CEI & FRR	4/12/2011 CEI & 3/17/2011 FRR	21.00
5	1	CEI & FRR	6/12/2012 CEI & 9/10/2012 FRR	7.50
6	0	FCI / E-Waste	8/16/2012	0.00
7	0	CEI & FRR	5/20/2013 FRR & 6/18/2013 CEI	0.00
8	0	FCI / E-Waste	8/13/2013	0.00
9	0	FSD	10/3/2013	0.00
10	1	CEI & FRR	4/7/2014 CEI & 8/27/2014 FRR	9.00
11	0	FCI	10/30/2014	0.00
12	2	CEI & FRR	4/28/2015 FCI/CEI, 5/26/2015 FRR & 9/8/2015 FRR	50.00
13	8	CEI & FRR	6/24/2016 CEI & 7/26/2016 FRR	83.75
14	1	CEI & FRR	6/23/2017 CEI & 8/22/2017 FRR	18.75
15	1	CEI & FRR	3/14/2018 CEI & 4/3/2018 FRR	18.75
Sum of Provisional Inspection Violation Scores				208.75
<b>*FACILITY VSP SCORE</b>				<b>13.92</b>

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

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

## 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 Shafiqul Alam, Veolia ES Technical Solutions LLC Azusa, EPA ID Number CAD008302903.
2. I served Shafiqul Alam, Veolia ES Technical Solutions LLC Azusa, by mailing a copy of the aforementioned document via Certified Mail, Receipt No. 7018-0680-0000-9827-9775, return receipt requested, in a sealed envelope addressed to:

Mr. Shafiqul Alam  
Veolia ES Technical Solutions LLC Azusa  
1704 West 1st Street  
Azusa, California 91702

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

Alan Korematsu  
Department of Toxic Substances Control  
HWMP, 11<sup>th</sup> Floor  
1001 I Street  
Sacramento, 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)