

HAZARDOUS WASTE TIERED PERMIT AUDIT CHECKLIST

PERMIT BY RULE

This document has been prepared to assist operators of facilities that treat hazardous waste on-site in performing self-audits for compliance with Permit By Rule (PBR) Tiered Permit requirements. It is not all-inclusive. The requirements listed have been **briefly** described. The complete text of Health and Safety Code (H&SC) is available on the Internet at www.leginfo.ca.gov/calaw.html. Title 22 of the California Code of Regulations (CCR) is available on the Internet at www.calregs.com.

Requirements

Audit Date: _____

Item No.	OK	N/A	Regulatory Citation	
1.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.2(c) 67450.13(b)	<p>Notification - The generator shall complete and submit a notification to the local Certified Unified Program Agency (CUPA) and the Department of Toxic Substances Control (DTSC) at least 60 days before start of treatment operation. This includes the following properly completed documents:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Unified Program Consolidated Form: Business Activities page; <input type="checkbox"/> Unified Program Consolidated Form: Business Owner/Operator Identification page; <input type="checkbox"/> Unified Program Consolidated Form: Onsite Hazardous Waste Treatment Notification - Facility Page; <input type="checkbox"/> Unified Program Consolidated Forms: Onsite Hazardous Waste Treatment Notification - Unit Page and attachments; <input type="checkbox"/> Unified Program Consolidated Form: Certification of Financial Assurance for PBR and CA Onsite Treaters; <input type="checkbox"/> Documentation that the facility operator has notified the property owner of the operation of the fixed treatment unit (FTU); <input type="checkbox"/> Corrective action documentation required by CCR §66450.7.
2.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(1) 67450.3(c)(2)	<p>PBR Notification Resubmittal - The notification and all related documentation must be submitted to the CUPA and DTSC annually or whenever there is a change to the information in the most recent notification.</p>
3.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(6)	<p>On-Site Generation - All wastes treated must have been generated on-site.</p>
4.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(4)	<p>Eligible Wastes and Processes - Types of waste and treatment methods must be appropriate for the PBR tier.</p>
5.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.7	<p>Corrective Action - Corrective action must be implemented as necessary for all releases of hazardous waste or constituents regardless of the time the waste was placed in the unit.</p>
6.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(7)	<p>Marking - The exterior of each treatment unit must be marked with:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The name of the person/facility (i.e. legal entity) that owns the tank/unit; <input type="checkbox"/> The facility's EPA ID number; <input type="checkbox"/> The tank/unit's individual serial number.
7.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 66265.14 as referenced by 67450.3(c)(9)(A)	<p>Security - For facilities where any unknowing and/or unauthorized entry could cause injury or a violation, the following must be provided:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A 24-hour surveillance system which continuously monitors and controls entry onto the facility or artificial/natural barrier with a means to control entry onto the facility. <input type="checkbox"/> Signs stating, "DANGER HAZARDOUS WASTE AREA - UNAUTHORIZED PERSONNEL KEEP OUT," or equivalent.

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Item No.	OK	N/A	Regulatory Citation	
8.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 66264.175 as referenced by 67450.3(c)(9)	<p>Secondary Containment - For containers with free liquids and certain RCRA listed wastes, secondary containment is required. Secondary containment must:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Be free of leaks and/or cracks; <input type="checkbox"/> Not react with any stored material; <input type="checkbox"/> Be of sufficient capacity to contain precipitation from at least a 24-hour, 25-year storm, plus 10% of the aggregate volume of all containers or the volume of the largest container, whichever is greater; <input type="checkbox"/> Protect containers from contact with accumulated liquid. <input type="checkbox"/> The facility must submit a written statement signed by an independent qualified professional engineer indicating that the secondary containment is designed and constructed accordingly. <p><i>(Exception: Containers with solid hazardous waste do need secondary containment if containers are protected from accumulated liquid.)</i></p>
9.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(5)	<p>Management of Effluent/Residuals - Treatment residuals must be managed properly.</p>
10.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 66265.15 as referenced by 67450.3(c)(9)(A)	<p>Inspection Schedule and Log - The following inspection requirements must be met:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The generator must develop and implement a written inspection schedule for monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment. It must indicate: <ul style="list-style-type: none"> <input type="checkbox"/> Types of problems to be looked for (e.g. inoperative pumps, etc.); <input type="checkbox"/> Frequency of inspection. <input type="checkbox"/> Inspection records must include: <ul style="list-style-type: none"> <input type="checkbox"/> Date and time of the inspection; <input type="checkbox"/> Name of the inspector; <input type="checkbox"/> Observations made during the inspection; <input type="checkbox"/> Date and nature of any repairs or remedial action. <input type="checkbox"/> Inspection records must be retained for a period of three (3) years.
11.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 66265.13(b) as referenced by 67450.3(c)(9)(A)	<p>Waste Analysis Plan - A written waste analysis plan must be developed and implemented. At a minimum, the plan must contain the following information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Parameters to be analyzed and rationale for selection of those parameters; <input type="checkbox"/> Test methods to be used in the analyses, <input type="checkbox"/> sampling methods to be used to obtain a representative sample; <input type="checkbox"/> Frequency of analysis.
12.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.3(c)(8) 66265.73(b) as referenced by 67450.3(c)(9)(D)	<p>PBR Record Keeping - The following records must be maintained onsite:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Waste Analysis Plan; <input type="checkbox"/> Written Inspection Schedule; <input type="checkbox"/> Training Documents; <input type="checkbox"/> Contingency Plan; <input type="checkbox"/> Copy of the most recent notification; <input type="checkbox"/> Copy of the most recent acknowledgment received from DTSC; <input type="checkbox"/> Copy of all permits required for the operation of the treatment unit (e.g. from BAAQMD, POTW, etc.); <input type="checkbox"/> Closure Plan. <input type="checkbox"/> Corrective Action documentation (e.g. investigations, cleanup, abatement, etc.); <input type="checkbox"/> Documentation of any convictions, judgments, settlements, or orders by any local, state, or federal agency concerning the operation of the facility within the last 3 years. <p><i>(Continued on Next Page)</i></p>

(PBR Record Keeping - Continued)

The following operating records must be kept until closure of the facility:

- Description and quantity of hazardous waste received and the method(s) and date(s) of its transfer, treatment, or disposal at the facility;
- Records and results of waste analyses;
- Reports and details of incidents requiring Contingency Plan implementation.

13. CCR
67450.13

Financial Assurance - Financial assurance for closure of treatment units must be provided as follows:

- The facility must prepare a written estimate of the cost of closing the unit;
- The closure cost estimate must be adjusted for inflation by March 1 of each year;
- The closure cost estimate must be revised whenever a change occurs that increases the cost of closure
- Financial assurance for closure for each treatment unit must be obtained through one or more of the following methods:
 - Closure trust fund;
 - Surety bond guaranteeing payment into a closure trust fund;
 - Closure letter of credit;
 - Closure insurance;
 - Financial test and corporate guarantee for closure;
 - Alternative financial mechanism for closure costs;
 - Self-Certification, if the closure cost estimate is less than \$10,000.
- A copy of the latest closure cost estimate and adjusted estimate must be maintained at the facility during the operating life of the facility.

14. H&SC
25200.14(b)(1)

Phase I Assessment - The owner/operator of the facility must complete and file a Phase I environmental assessment within 1 year of receiving the permit. Any update must be filed during the next regular reporting period.

(Exceptions: This requirement does not apply to a facilities which conducted or are conducting a site assessment in accordance with an order issued by a state or federal law enforcement agency, or conducted an assessment for other purposes within 3 years prior to the submittal date.)

15. H&SC
25202.9

Waste Minimization Certification - The generator must prepare an annual hazardous waste minimization certification which states that a program has been established to reduce the quantity or toxicity of hazardous waste to a degree that is economically feasible, and that waste treatment, storage, and disposal is performed in accordance with that program.

16. CCR
67450.3(c)(11)

Closure - Closure of treatment units must be managed as follows:

- The facility must have a written closure plan which includes:
 - A description of how and when each unit will be closed;
 - An estimate of maximum inventory of waste in storage and in treatment at any time during the operation of the unit;
 - Procedures for decontamination of equipment;
 - Expected year of closure;
 - Estimated time required to close each unit.
- All hazardous waste must be removed within 90 days after last waste treatment.
- All closure activities must be completed within 180 days after treating the final volume of hazardous waste.
- The CUPA and DTSC must be notified at least 15 days prior to completion of closure.
- After completion of closure, a certification signed by the owner or operator and by an independent professional engineer must be submitted to DTSC.