

# Checklist Summary of Violations for Tiered Permitting (Page 1 of 2)

FACILITY ID#:	SPECIALIST:	INSPECTION DATE:
DBA/FACILITY NAME:		ADDRESS:



**Instructions:**

1. Violations summarized on this checklist are further denoted on the **Notice To Comply**. Violations of items in bold & italics require immediate corrective action.
2. **Corrective action must be demonstrated with proof of compliance within 35 days** by completion & submission of the *Corrective Action Statement* on the back of this checklist.
3. For information on normally required corrective action, compliance requirements & legal citations, refer to your **Notice To Comply** and/or the *ECD Tiered Permitting Inspection Compliance Handbook*.


Facility status is evaluated for each item on this Checklist as follows: C= Compliance V= Violation N/A= Not Applicable RV= Repeat Violation

Violation Code	Requirement	Facility Status			
		C	V	N/A	RV
<b>All Tiers</b>					
TP00	Authorized treatment of hazardous wastes (Permit required for PBR). {CE: CHSC 25201.5; CA: CHSC 25200.3; PBR: 22CCR 67450.1}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP01	On-site Hazardous Waste Treatment Notification Pages (Facility, Unit & Appropriate Treatment Process Pages) complete, accurate and on file with ECD. {CE: CHSC 25201.5(d)(7) & 25201.14(c)(1); CA: CHSC 25200.3(e)(1); PBR: 22CCR 67450.2(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP02	All treated hazardous wastes are generated on-site. {CE: CHSC 25201.5(d)(1); CA: CHSC 25200.3; PBR: 22CCR 67450.3(c)(6)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP03	Number of tanks / containers / treatment processes is correct for each treatment unit. {CE: CHSC 25201.5(d)(1); CA: CHSC 25200.3; PBR: 22CCR 67450.3(c)(6)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP04	Estimated Notification Form monthly treatment volume is appropriate for the indicated tier(s). {CE: CHSC 25201.5(d)(1); CA: CHSC 25200.3; PBR: 22CCR 67450.3(c)(6)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP05	Waste identification / type / treatment method is appropriate for the tier(s) indicated. {CE: CHSC 25201.5; CA: CHSC 25200.3; PBR: 22CCR 67450.1}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP06	Number of on-site treatment units is the same as the number notified. {CE: CHSC 25201.5(d)(7) & 25201.14(c)(1); CA: CHSC 25200.3(e)(1); PBR: 22CCR 67450.2(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP07	Annual waste minimization certification completed outlining waste minimization program (as economically feasible) and stating that treatment is in accordance with waste minimization program. {CHSC 25202.9}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP08	Residuals management information adequate and noted correctly on Notification Form. {CHSC 25200.3(b) & 22CCR 67450.3}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP09	Indicated basis for NOT needing a Federal permit on Notification Form is correct. {CE: CHSC 25201.5(d)(7) & 25201.14(c)(1); CA: CHSC 25200.3(e)(1); PBR: 22CCR 67450.2(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP10	Site map/plot plan adequately shows location of all regulated treatment units. {19CCR 2729.2}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP11	Facility has submitted a process diagram for treatment process(es). {requested}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
<b>CE only</b>					
TP20	<b>GESW only:</b> Treatment is in accordance with all conditions imposed by certification to this tier. {22CCR 67450.20}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP21	<b>CEL only:</b> Waste sampling/analysis records available for oil water separators demonstrating no contaminated groundwater, gasoline or diesel-contaminated water is treated in system. {CHSC 25201.14(c)(3)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
<b>CE or CA</b>					
TP30	Maintains on-site a written inspection schedule for containers & tanks. {CE: CHSC 25201.5(d) & CA: CHSC 25200.3(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP31	Maintains on-site a log of inspections conducted for 3 years (CE) or 5 years (CA). {CE: CHSC 25201.5(d) & CA: CHSC 25200.3(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP32	Meets all POTW industrial waste discharge requirements, as applicable, and maintains records of such (records required for 5 years for CA tier). {CE: CHSC 25201.5(d) & CA: CHSC 25200.3(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP33	Closure of treatment unit includes removal or decontamination of equipment, waste residues, containment systems, soils and structures. {CE: CHSC 25201.5(d) & CA: CHSC 25200.3(g)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP34	Notification is made to CUPA & DTSC after treatment unit closure requirements are met. {CE: CHSC 25201.14(c) & CA: CHSC 25200.3(g)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP35	Each treatment unit has WRITTEN operating instructions and records of the dates, volumes, types of wastes treated and methods for residuals management for each unit. Records are kept for 3 years (CE tier) or 5 years (CA tier). {CE: CHSC 25201.5; 25201.14 & CA: CHSC 25200.3(c)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>

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	<p><b>Instructions:</b></p> <ol style="list-style-type: none"> <li>4. Violations summarized on this checklist are further denoted on the <b>Notice To Comply</b>. Violations of items in bold &amp; italics require <u>immediate</u> corrective action.</li> <li>5. <b>Corrective action must be demonstrated with proof of compliance within 35 days</b> by completion &amp; submission of the <b>Corrective Action Statement</b> on the back of this checklist.</li> <li>6. For information on normally required corrective action, compliance requirements &amp; legal citations, refer to your <b>Notice To Comply</b> and/or the <i>ECD Tiered Permitting Inspection Compliance Handbook</i>.</li> </ol>
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Violation Code	Requirement	Facility Status			
		C	V	N/A	RV
<b>CA only</b>					
TP40	Monthly volume of waste treated is less than or equal to 5,000 gallons or 45,000 pounds excluding dilute aqueous waste or oily waste. {CHSC 25200.3(b)(1)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP41	All treatment occurs in tanks or containers (primary containment). {CHSC 25200.3(b)(2)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
<b>CA or PBR only</b>					
TP50	Secondary containment is provided that is compatible with stored waste, free of cracks & leaks, protects containers from contact with accumulated liquid, and has sufficient capacity (24 hour/25 year storm precipitation plus 10% volume of all containers or 10% largest container volume, whichever is greater). {22CCR 66264.175; CHSC 25200.3(c)(4); 22CCR 67450.3(c)(9)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP51	Security is provided via 24 hour controlled entry & warning signs for facilities where unauthorized or unknowing entry could cause injury or violation. {22CCR 66265.14; CHSC 25200.3(c)(1); 22CCR 67450.3(c)(9)(A)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP52	Phase I site assessment completed & filed within one year of permit. {CHSC 25200.3(c)(3); CHSC 25200.14(b)(1)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP53	Financial assurance filed by March 1 (and updated annually by March 1) showing each unit's estimated closure costs. Appropriate mechanism utilized (i.e. trust fund, surety bond, insurance, self-certification) for estimated closure costs. {22CCR 67450.13}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
<b>PBR only</b>					
TP60	PBR Notification Form is renewed / filed annually or sooner if significant changes occur. {22CCR 67450.3(c)(1) & (c)(2)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP61	Facility has submitted a written statement signed by an independent, qualified professional engineer that the secondary containment meets design requirements of TP50. {22CCR 66264.175 & 22CCR 67450.3(c)(9)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP62	Exterior of each treatment unit is marked with facility EPA ID number, an individual serial number and name of the owner/operator. {22CCR 67450.3(c)(7)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP63	Written inspection schedule exists for operating equipment including safety, emergency & security devices specifying problems checked for and frequency of inspection. {22CCR 66265.15 & 22CCR 67450.3(c)(9)(A)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP64	Records of equipment inspections note date, name of inspector, observations and specifics of any repairs or corrective action. {22CCR 66265.15 & 22CCR 67450.3(c)(9)(A)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP65	Inspection records are kept for 3 years. {22CCR 66265.15 & 22CCR 67450.3(c)(9)(A)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP66	Written waste analysis plan exists specifying parameters of analysis, testing methods, frequency of analysis and sampling methods to obtain a representative sample. {22CCR 66265.13(b) & 22CCR 67450.3(c)(9)(A)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP67	Facility has a written closure plan specifying how & when each unit will be closed, equipment decontamination procedures, expected year of closure, estimated time required to close each unit. {22CCR 67450.3(c)(11)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP68	All unauthorized / accidental releases to the environment from on-site treatment units (excluding spills contained within containment systems) in last 3 years have been reported to CUPA & DTSC.	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP69	All hazardous waste is removed within 90 days of last treatment. {22CCR 67450.3(c)(11)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP70	All closure activities are completed within 180 days after final treatment. {22CCR 67450.3(c)(11)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>
TP71	Upon completion of closure, certification is submitted to DTSC that has been signed by the owner/operator and an independent professional engineer. {22CCR 67450.3(c)(11)}	<input type="checkbox"/>	<input type="radio"/>	<input type="checkbox"/>	<input type="radio"/>