

AGENCY  
 Certified Unified Program Agency (CUPA)  
 Address, City, California ZIP  
 Telephone: (xxx) xxx-xxxx Fax: (xxx) xxx-xxxx

## HAZARDOUS WASTE GENERATOR INSPECTION REPORT - A

Facility Name \_\_\_\_\_ Date \_\_\_\_\_

Site Address \_\_\_\_\_ Time In \_\_\_\_\_ Time Out \_\_\_\_\_

Owner/Operator \_\_\_\_\_ Phone \_\_\_\_\_ Misc. \_\_\_\_\_

<u>Type of Inspection</u>	<u>Inspection Consolidation</u>	<u>EPA ID #</u>
Routine	Combined Routine Inspection	
Complaint	Integrated or Multi-Media Inspection	<u>CUPA Facility ID#</u>
Other _____		

**CONSENT TO INSPECT GRANTED BY (Name / Title):** \_\_\_\_\_

Inspection may involve obtaining photographs, review and copying of records, and determination of compliance with hazardous waste handling requirements.

I - Class I Violation, II - Class II Violation, M - Minor Violation

Page \_\_\_\_\_ of \_\_\_\_\_

I	II	M	Code	HAZARDOUS WASTE REQUIREMENTS	Y	N	N/A	COMMENTS/NOTES/DOCUMENT(S) REVIEWED MISSING INFORMATION/ UNRESOLVED ISSUES
<b>Recordkeeping/documentation</b>								
			GR01	Generator has an EPA ID number				
			GR02	Hazardous waste determination made for all wastes				
				Analysis Generator Knowledge				
			GR03	Contingency plan information posted near phone				
			GR04	Facility personnel demonstrate training/awareness				
			GR05	Manifests/Consolidated Manifest receipts complete				
			GR06	A legible copy of manifest mailed to DTSC				
			GR07	TSDF signed copy of manifest available w/in 35 days of waste shipment. Exception Report submitted				
			GR08	Bills of Lading/receipts available				
			GR09	LDRs available and complete				
			GR10	Onsite recycling reported using UPCF				
<b>Container/tank management</b>								
			GC01	Containers are in good condition				
			GC02	Containers are closed except when adding/removing				
			GC03	Empty containers are empty				
			GC04	Containers inspected weekly				
			GC05	Tanks inspected daily				
			GC06	Satellite containers at or near point of generation				
			GC07	Satellite containers under control of operator				
			GC08	One container per wastestream at satellite area				
			GC09	Exclude recyclable materials stored in accordance with local ordinance/hazardous materials codes				
<b>Accumulation Time Limits</b>								
			GA01	Waste is accumulated not more than 90/180/270				
			GA02	Satellite wastes accumulated for less than 1 year				
			GA03	Empty containers managed within one year				
			GA04	Universal waste accumulated less than one year				
			GA05	Used oil filters offsite within 180 (1 year if <1 ton)				
			GA06	Pb-acid batteries offsite within 180 (1 yr. if < 1 ton)				
<b>Labeling/Marking</b>								
			GL01	Containers are properly labeled				
			GL02	Satellite containers have 2 <sup>nd</sup> ASD marked once full				
			GL03	Excluded recyclable materials marked properly				
			GL04	Universal waste container properly labeled				
			GL05	Used oil filters marked "drained used oil filters"				
			GL06	Date written on spent lead-acid batteries				
			GL07	"Used Oil" marked on all used oil tanks/containers				
			GL08	Tank marked with "haz waste", contents, start date				
			GL09	Empty containers marked with date emptied				
<b>Treatment, Transport and Disposal/Other</b>								
			GT01	Have permit/authorization to do treatment				Print and sign in this box for receipt of this report. Signature does not imply agreement with findings, only receipt of report.
			GT02	Waste sent with authorized transport (gen. eligible)				
			GD01	Waste disposed of to authorized point/party				
			GH01	Failed to properly handle appliance wastes				

**POST INSPECTION INSTRUCTIONS:**

- Refer to the back of this inspection report for regulatory citations and corrective actions
- Correct the violation(s) noted above by \_\_\_\_\_
- Within 5 days of correcting all of the violations, sign and return a copy of this page to:  
 CUPA, address, city, CA, zip; ATTN: \_\_\_\_\_

\_\_\_\_\_  
 Signature (that all violations have been corrected as noted)

\_\_\_\_\_  
 Date

CODE	Description of violation [Regulatory/statutory citation] <i>Corrective actions to be taken for minor violations (marked in the "M" column on front)</i>
GR01	The facility failed to obtain an EPA ID number [Title 22, CCR, 66262.12] <i>For a California EPA ID # contact the Department of Toxic Substances Control at 1-800-618-6942. For a EPA ID # call 415-495-8895. Write the number in the space marked "EPA ID # _____" on the front of this page.</i>
GR02	The facility failed to make a waste determination for the _____ noted in the [Title 22, CCR, 66262.11] <i>Make a determination of the waste based on your knowledge (you can use MSDS or other documents for help) or have the waste sampled and sent to a state certified laboratory for analysis. If sampling is conducted tell the lab to analyze for _____</i>
GR03	The facility did not have the name and phone number of the emergency coordinator, the location of fire extinguishers and spill control equipment, or the fire department telephone number posted next to the telephone. [Title 22, CCR, 66262.34(d)(2)] <i>Prepare and post the above information next to a phone.</i>
GR04	Facility personnel did not demonstrate that they were familiar with proper waste handling procedures due to [Title 22, CCR, 66262.34(d)(2)] <i>Provide training to personnel regarding _____</i>
GR05	The facility failed to properly complete a hazardous waste manifest. Manifest # _____ was missing [Title 22, CCR, 66262.23(a)(1)]. <i>Correct the information on the manifest in Box(es) _____, initial and date. Submit a letter to DTSC, GISS;; P.O. Box 806 Flr1-1; Sacramento, CA 95812-0806 stating the manifest #, the ship date, your EPA ID #, the Box # and correction made and your signature. (Correction for more than one manifest may be included in the same letter)</i>
GR06	Facility failed to submit a copy of the manifest to DTSC within 30 days of shipment. [Title 22, CCR, 66262.23(a)(4)] New manifests do not have "mail to" address on the form any longer. Requirement to submit to State still exists. Copies (photocopy or original after TSDF copy is received) should be sent to DTSC Generator Manifests, P.O. Box 400, Sacramento, CA 95812-0400. No proof of submission is required. Inspectors may look at HWTS to determine if copies have been received (look for "Y" in the "Paired" column to start), but be aware that data entry to HWTS may lag by up to 6 months.
GR07	TSDF copies should be received within 35 days of shipment. If not, generators should contact TSDF to determine status. If copy not received within 45 days (or 60 days for <100kg/month), an exception report should be submitted to DTSC. [Title 22, CCR, 66262.42].
GR08	The facility failed to have copies of receipts for the removal of _____ [HSC 25160.2-Consolidated manifests/ 66266.81(a)(6)(B)-lead acid batteries/66266.130- oil filters] <i>The facility shall contact _____ and request copies of receipts between _____ &amp; _____</i>
GR09	The facility failed to complete or maintain a Land Disposal Restriction notification for manifest # _____ [Title 22, CCR, 66262.34(a)(4)] <i>The facility shall determine if its waste is subject to LDR requirements, and if so, ensure that a LDR is prepared and submitted with each shipment of waste.</i>
GR10	The facility did not submit a recycling report [HSC 25143.10] <i>The facility shall complete and submit the UPCF form "Recyclable Materials Report". The form can be found at <a href="http://www.calepa.ca.gov/publications/title27/default.htm">www.calepa.ca.gov/publications/title27/default.htm</a> (Hwfrecyc.pdf)</i>
GC01	The facility failed to maintain containers holding hazardous waste in good condition. The container of _____ was [Title 22, CCR, 66262.34(a)(1)(A)] <i>The contents of the container of _____ shall immediately be transferred to a container in good condition</i>
GC02	The facility failed to keep containers closed except when adding/removing waste. The container of _____ was observed open [Title 22, CCR, 66262.34(a)(1)(A)]. <i>The facility shall immediately close all containers and ensure that containers remain closed except when adding or removing waste.</i>
GC03	The facility is handling contaminated containers as empty when they are not. A container of _____ was noted as not meeting the definition of empty. [Title 22, CCR, 66261.7] <i>The facility shall mark the container as hazardous waste or consolidate the contents of the _____ container with a like waste and immediately label the emptied container with the words "empty" and the date.</i>
GC04	The facility could not demonstrate that containers were being inspected weekly. [Title 22, CCR, 66262.34(a)(1)(A)] <i>The facility shall develop and implement a plan that ensures that all containers holding waste are inspected weekly</i>
GC05	The facility could not demonstrate that tanks were being inspected daily. [Title 22, CCR, 66262.34(a)(1)(A)] <i>The facility shall keep a log showing that tanks holding waste are inspected daily.</i>
GC06	Containers utilizing satellite accumulation rules were not at or near the point of generation. [Title 22, CCR, 66262.34(e)(1)(A)] <i>The facility shall move the container holding _____ to a location that is at or near the point of generation or shall ensure that the waste is removed within 90/180/270 days of first drop of waste being added. (if the facility generates less than 100 kg, the clock does not start until 100 kg. are generated)</i>
GC07	Containers utilizing satellite accumulation rules were not under the control of an operator. [Title 22, CCR, 66262.34(e)(1)(A)] <i>The facility shall ensure that an operator is at or near the point of accumulation or shall ensure that the waste is removed within 90/180/270 days of first drop of waste being added</i>
GC08	The facility kept more than one satellite container of _____ at a satellite accumulation area. [Title 22, CCR, 66262.34(e)(1)] <i>The facility shall immediately remove all but one container from the accumulation area or shall demonstrate that it is not practical or safe to do such.</i>
GC09	The facility stored excluded recyclable materials not in accordance with local ordinance/fire code/hazardous materials codes [HSC 25143.9(c)] <i>The facility shall return to code by _____</i>
GA01	The facility accumulated waste for greater than allowed time limits (Storage without a permit). A container of _____ had an start date of _____ marked on it. [Title 22, CCR, 66262.34(a)] <i>The facility shall immediately arrange for the removal of the waste, and shall supply a copy of the manifest or bill or lading demonstrating removal within _____ days.</i>
GA02	The facility held satellite accumulation wastes for greater than one year. [Title 22, CCR, 66262.34(e)(1)(B)] <i>See GA01 above for corrections.</i>
GA03	The facility failed to properly handle contaminated containers within 1 year. [Title 22, CCR, 66261.7(f)] <i>See GA01 above for corrections.</i>
GA04	The facility held universal wastes for greater than one year. [Title 22, CCR, 66273.15(a) or 66273.35(a)] <i>See GA01 above for corrections.</i>
GA05	The facility held drained used oil filters for greater than 180 days/one year. [Title 22, CCR, 66266.130(c)(4)] <i>See GA01 above for corrections.</i>
GA06	The facility held lead acid batteries for greater than 180 days/one year. [Title 22, CCR, 66268.81(a)(6)] <i>See GA01 above for corrections.</i>
GL01	The facility failed to properly label all containers. Containers, contents and missing information are noted on the front of this page. [Title 22, CCR, 66262.34(f)] <i>The facility shall clearly mark all containers with the following: 1) the words "Hazardous waste", 2) composition and physical state, 3) hazard property, 4) name and address of the generator, and 5) accumulation start date.</i>
GL02	The facility failed to mark the date the container was moved from the satellite accumulation area [Title 22, CCR, 66262.34(e)(1)(B)] <i>The facility shall mark all satellite accumulation with the date waste is first added as well as the date the container is full.</i>
GL03	The facility failed to mark tanks/container(s) of excluded recyclable materials properly [HSC 25143.9(a)] <i>The tanks/containers of materials shall be clearly marked with the words "Excluded recyclable material" instead of "hazardous waste".</i>
GL04	The facility failed to mark a container of universal waste properly. [Title 22, CCR, 66273.14 for SQH or 66273.34 for LQH]. <i>The facility shall immediately mark all containers holding universal waste with the words "Universal Waste- _____"</i>
GL05	The facility failed to mark a container of drained used oil filters with the words "drained used oil filters". [Title 22, CCR, 66266.130(c)(3)] <i>The facility shall mark all filter containers with the words "drained used oil filters".</i>
GL06	The facility failed to mark the date on which the battery was received. [Title 22, CCR, 66266.81(a)(6)(D)] <i>The facility shall y mark the date on each battery.</i>
GL07	The facility failed to mark a tank/container of used oil destined for recycling with the words "used oil" [HSC 25143.9(a)] <i>Clearly mark all tanks and containers with the words "used oil".</i>
GL08	The facility failed to mark the tank of _____ with the _____. [Title 22, CCR, 66234(f)] <i>The facility shall clearly mark the tank with _____</i>
GL09	The facility failed to mark contaminated containers with the date emptied. [Title 22, CCR, 66261.7(f)] <i>Clearly mark all containers with the date emptied.</i>
GH01	The facility failed to remove _____ from an appliance prior to crushing, baling, shredding, sawing or disposing of the appliance [HSC 25212(a)]. <i>The facility must submit to DTSC an application to be certified as a "Certified Appliance Recycler"</i>
GT01	The facility failed to obtain a permit or other authorization for treatment of hazardous waste. [HSC 25189.5(d)]
GT02	The facility failed to use a registered transporter/used a transporter or consolidated waste when they were not eligible [HSC 25165(a)/25160]
GD01	The facility disposed of hazardous waste at an unauthorized point. [HSC 25189.5(a)]

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## GENERATOR INSPECTION OBSERVATIONS PAGE

Facility Name	ID #	Date
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## Waste generation

Wastestream/waste code	Monthly Quantity	Transporter/disposition	Wastestream/waste code	Monthly Quantity	Transporter/disposition

## Accumulation Areas

Satellite

90/180/270 days

Other

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## Onsite Recycling

Wastestream	Monthly Quantity	Exemption/Exclusion/Use/Reuse	Wastestream	Monthly Quantity	Exemption/Exclusion/Use/Reuse

Certified Appliance Recycler that removes/handles

ف Mercury Switches    ف PCB Capacitors    ف Mercury Thermostats    ف Sodium Azide Canisters    ف CFC refrigerants

### General Facility Observations

[illegible]

## Guide to violations and violation codes found on back of the inspection report

100 kg ≈ 27 gallons liquid ≈ 220 lbs. solid; 1000kg ≈ 270 gallons liquid ≈ 2200 lbs. solid

Code	Regulation, description, guidance
GR01	<b>Facility failed to get and EPA ID #.</b> All generators (except silver only) must have an EPA ID #. If a facility generates more than 100 kg of RCRA waste in any month they need a Federal EPA ID, otherwise they need a California EPA ID.
GR02	<b>Facility failed to make a waste determination.</b> Facilities must make waste determinations for all wastes. They can apply generator knowledge, but it must be based on knowledge of the waste or process. Guidance can be given regarding lab testing, indicating test methods or generic test names (e.g. fish bioassay or CAM-17 WET or pH) and certified labs for use.
GR03	<b>Incomplete contingency plan info.</b> Facilities that generate less than 1000 kg/month may post the following information by the phone in place of generating a contingency plan: 1) emergency contact name and phone number, 2) fire department phone number, and 3) location of extinguishers and spill equipment.
GR04	<b>Personnel not adequately trained.</b> Facilities that generate less than 1000 kg/month only have to demonstrate that staff are familiar with waste handling procedures, not prepare a written training program or records of completion. Systemic problems with labeling, open containers or other waste handling procedures may be reason to use this citation.
GR05	<b>Failure to complete the manifest/incomplete consolidated manifest receipt.</b> Generators are responsible for Boxes 1-3 & 5-15. Consolidated Manifest receipts must include the following information: Facility Name, EPA ID number, type and quantity of waste, receiving facility name and address, manifest number, transporters name, signatures of generator and transporter
GR06	<b>Facility failed to submit manifest copy.</b> Each manifest contains 6 copies, two of which must be returned to DTSC (one by the generator). The generator now needs to photocopy their original manifest and send it to DTSC-GISS, P.O. Box 400, Sacramento, CA 95812-0400. Inspectors may only confirm this is being done by asking the facility if it has been done.
GR07	<b>Failed to submit exception report.</b> Facilities need to notify DTSC when they don't get a copy of the manifest back from the TSDf within 45 days of shipment. Within 60 days of this date, the report should be sent to DTSC.
GR08	<b>No copies of bills-of-lading/receipts.</b> Many wastes (oil filters, antifreeze, oil/water sludges, oily solids, brake fluid, paint related waste, photo solutions, hydroxide sludges, PERC, asbestos, ink, lab packs from K-12 schools, fuel filters) can be shipped under consolidated manifests or (lead-acid batteries and universal wastes) bills of lading. Transporters must leave a receipt with the generator at pick up of these wastes. The receipts need to be kept 3 years.
GR09	<b>No LDR.</b> LDR notifications must go with all RCRA wastes. Look for LDRs for each waste with a federal waste code in Box 13 of the manifest. LDRs should show what the waste (or code) is and the minimum treatment standard
GR10	<b>Failed to submit a recycling report.</b> Facilities that recycle more than 100 kg of waste for re-use onsite have to fill out the report form. Onsite recycling includes reuse of wastewater in plating baths, antifreeze recycling units, and re-circulating solvent sinks. Facilities may need help determining which exemption applies to them when filing the form.
GC01	<b>Containers in poor condition.</b> Containers holding waste should be free of severe rust, major dents and not leaking
GC02	<b>Containers not closed.</b> Containers must be kept closed unless adding or removing waste.
GC03	<b>Empty containers not empty.</b> Empty containers must not have a steady stream of liquid escape when inverted or solids must be scraped clear as much as practical. Empty containers may still have some waste in them after emptying from settling of residues-ensure the facility took measures to make the container empty (i.e. inverted it over new drum)
GC04	<b>Not inspecting containers weekly.</b> While inspections are required, logs are not required to be kept. Look for signs that containers aren't being inspected such as improper labeling, open containers or containers in poor condition.
GC05	<b>Tanks not inspected daily.</b> Written tank inspection logs are not required. Only applies to operating days (day tank is being used). Tank inspections should include condition of containment (including dryness), spill control, and corrosion.
GC06	<b>Claiming satellite, but not at or near point of generation.</b> Inspectors discretion for definition of "at or near". Wastes not at or near don't qualify for 1-year satellite accumulation rule, must be held to 90/180/270 day accumulation times.
GC07	<b>Satellite: Not under control of operator.</b> Containers should be able to receive regular attention from a human being.
GC08	<b>More than one container per wastestream.</b> Satellite accumulation rules allow only one container, up to 55 gallons in size, per satellite area <b>for each waste stream</b> unless it can be shown that it is not practical or safe.
GC09	<b>Excluded recyclable material storage.</b> These wastes are excluded, and not subject to Title 22 storage or accumulation rules, they are materials. Use fire code and local ordinance to govern storage (i.e. containment, occupancy segregation) unless no local ordinance exists, then default to Title 22 tank regs.

GA01	<b>Accumulation greater than time limits (Storage without a permit).</b> If the facility generates >100 kg/mo. (total waste), clock starts with first drop. If the facility generates <1000 kg/mo.(total) <b>AND</b> never has >6000 kg onsite <b>AND</b> ships >200 miles they get 270 days to accumulate. If generating <1000 kg/mo. (total) <b>AND</b> never has >6000 kg onsite they get 180 days. If generating >1000 kg/mo. (total), they get 90 days to accumulate. If <100 kg/mo., get 180/270 days from the time they reach the 100 kg total waste. If > 1 kg./mo. of Acutely/Extremely hazardous, treat like >1000 kg. of "regular" waste.
GA02	<b>Satellite accumulation for greater than one year.</b> Satellite wastes can be held for one year from first drop <b>OR</b> 90/180/270 days from time container is full, whichever comes first.
GA03	<b>"Empty" containers held greater than one year.</b> Empty containers should be sent offsite for scrap value, reconditioning , reuse or refill if greater than 5 gallons. Those ≤5 gallons may be disposed of to a solid waste facility (with the trash).
GA04	<b>Universal waste greater than one year.</b> Universal wastes (fluorescent light tubes, non lead-acid batteries, mercury switches from thermostats, aerosol cans and intact CRTs) may be stored onsite for up to one year.
GA05	<b>Oil filters greater than 180 days/1yr.</b> A facility can hold up to one ton (≈4 drums of crushed or 8 drums of uncrushed) of filters for one year. If the one ton limit is reached, the filters should be sent off within 180 days of the date the first filter was added to each container.
GA06	<b>Lead-acid batteries greater than 180 days/1 year.</b> A facility can hold up to one ton (≈65 batteries) of batteries for one year. If the one ton limit is reached the batteries should be sent off within 180 days of the date on the first battery collected.
GL01	<b>Labeling.</b> The facility shall clearly mark all containers with the following: 1) the words "Hazardous waste", 2) composition and physical state, 3) hazard property (e.g. toxic), 4) name and address of the generator, and 5) accumulation start date.
GL02	<b>Marking satellite full date.</b> Once a satellite container is full, it is subject to the 90/180/270 day or 1 yr. ceiling, which ever comes first. The "full date" indicates the beginning of this time period, while the "original date" is used for the 1 yr. limit.
GL03	<b>Marking "excluded recyclable materials".</b> Recyclable materials do not have to put the same information on containers or tanks as wastes. During accumulation of materials containers need to be marked with the words "excluded recyclable materials" in place of "hazardous waste". All other labeling requirements remain. If the material is being sent offsite, the materials (DOT) labeling and placarding must be followed.
GL04	<b>Marking Universal Waste.</b> Universal waste containers must be marked "Universal Waste - (type)" OR " Waste (type)" OR "used (type)". (Type) is Batteries, mercury thermostats, lamps, aerosol cans. CRTs can be marked "CRTs" or "CRT glass"
GL05	<b>Oil Filter marking.</b> Filters must be marked with the words "Drained Used Oil Filters" and the date the first filter is added to the container.
GL06	<b>Lead Acid Battery marking.</b> Each battery must be marked with the date it is received or determined to no longer be usable. Damaged batteries must have the date written on the outside of the container holding the damaged battery.
GL07	<b>Used oil marking.</b> All tanks and containers that hold used oil destined for offsite recycling must be marked with the words "used oil". Used Oil containers do not have to have the physical state or hazardous properties marked on them.
GL08	<b>"Empty" container marking.</b> Contaminated containers that are empty (see GC03) must be marked with the date they are emptied unless being sent for refilling. ( <i>All other packaging or product information should be removed or obscured.</i> )
GL09	<b>Tanks properly labeled.</b> Tanks must be marked with the words "Hazardous Waste", the contents of the tank, and the accumulation start date.
GH01	<b>Uncertified appliance recycler.</b> Businesses must be certified by DTSC before removing PCB Capacitors, mercury switches, CFCs, oil, or sodium azide canisters from major appliances. Each item <b>MUST</b> be removed prior to baling, crushing, shredding, etc. Appliances may be sent by an unregistered location to a certified recycler with first being processed. Once removed, all removed items must be handled as Hazardous Wastes.
GT01	<b>Illegal Treatment.</b> A permit or authorization (PBR/CA/CE) is needed to treat hazardous waste. Treatment is defined as: method, technique or process that changes the physical, chemical or biological character or composition or a waste <b>AND</b> causes the waste become non- or less hazardous. Many activities have been specifically exempted from this: (1) adding absorbent that changes only the physical state of the waste, (2) dilution that does not result in a less hazardous waste, (3) mixing like wastes for consolidation prior to offsite shipment, and (4) without adding heat, chemicals or pressure (a) sieving or filtering liquids to remove solid fractions, (b) phase separation during accumulation, or (c) evaporation of water.
GT02	<b>Failed to use registered transporter/used consolidated manifest when not eligible.</b> Consolidated transporters need to have registered with DTSC. List of registered transporters can be found at 916-255-4368 or at <a href="http://www.dtsc.ca.gov/database/Transporters/Trans000.cfm">http://www.dtsc.ca.gov/database/Transporters/Trans000.cfm</a> . The facility must generate <1000 kg./mo. total waste (excluding used oil) to be eligible.
GD01	<b>Illegal disposal.</b> Hazardous wastes must be sent to an authorized treatment, storage or disposal facility. Application of wastes to land is prohibited.