

Hazardous Waste 101 & Common Violations

Presented by: Sarah Yacoub, Sr. HMS

June 2022

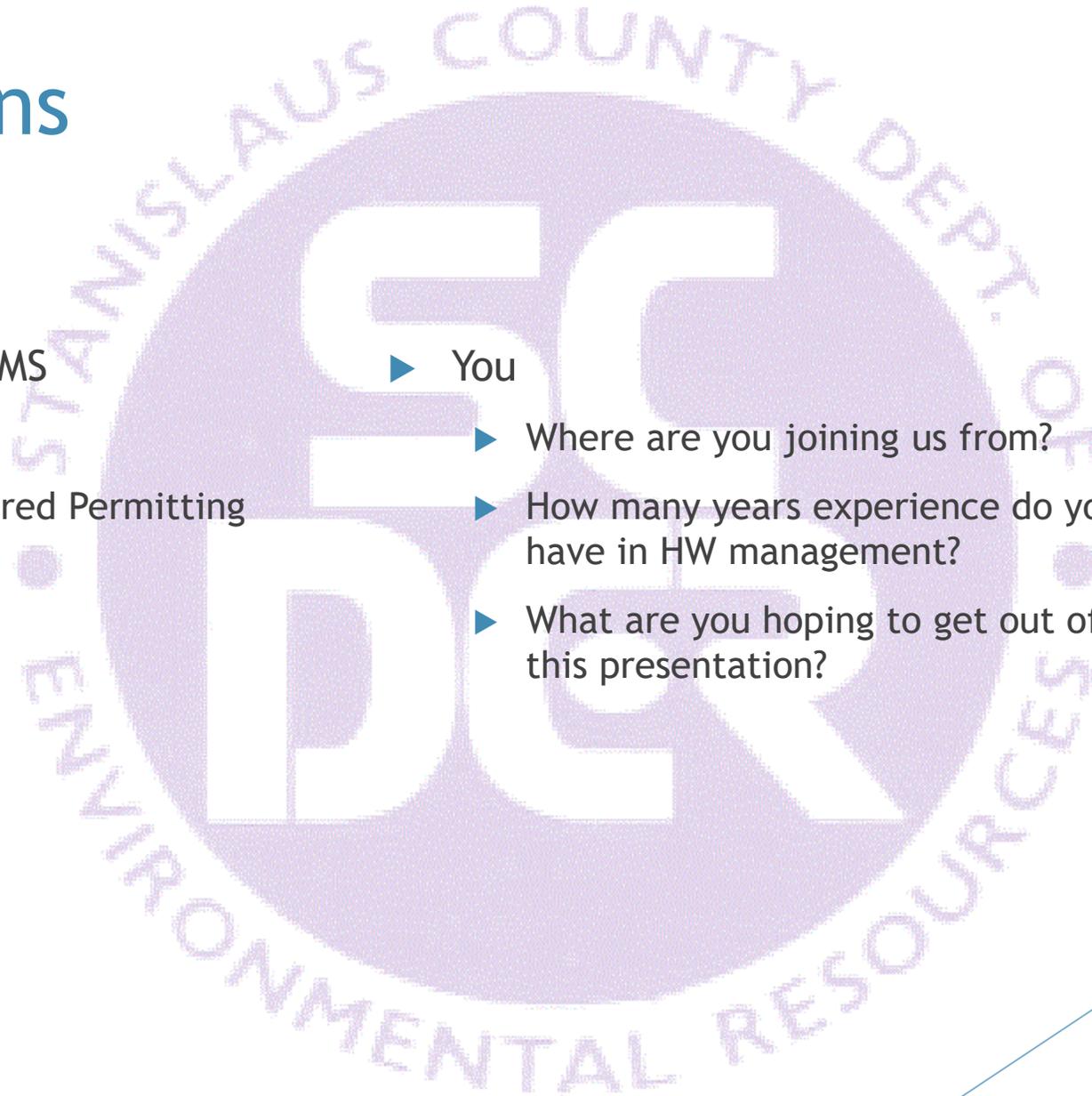
Areas to be Covered

- ▶ Hazardous Waste Laws & Regulations
- ▶ Definition of a Waste
- ▶ Hazardous Waste Classification
- ▶ Generator Status Requirements
- ▶ Storage Handling Requirements
- ▶ Container Management
- ▶ Contingency Plan & Employee Training
- ▶ Transportation, Disposal and Recordkeeping
- ▶ Common Hazardous Waste Violations



Introductions

- ▶ Sarah Yacoub, Sr. HMS
 - ▶ 7 years
 - ▶ HMBP, HWG & Tiered Permitting
 - ▶ Farms
 - ▶ Area Plan
- ▶ You
 - ▶ Where are you joining us from?
 - ▶ How many years experience do you have in HW management?
 - ▶ What are you hoping to get out of this presentation?



Hazardous Waste Laws & Regulations: Statute vs Regulation

- ▶ **Dual Governing Agencies:**
- ▶ **Statute is law, regulation is the directive to follow the law**
- ▶ **Federal:** US Environmental Protection Agency (EPA)
- ▶ *Statute:* Resource Conservation and Recovery Act (RCRA), 1976
- ▶ *Regulation:* Title 40, Code of Federal Regulations (40 CFR)
- ▶ **State:** CA Department of Toxic Substances Control (DTSC)
- ▶ *Statute:* California Health and Safety Code, Chapter 6.5 (law) (HSC)
- ▶ *Regulation:* California Code of Regulations, Title 22 (22 CCR)
- ▶ **Local:** Certified Unified Program Agencies (CUPAs)
- ▶ HSC Ch. 6.11 and Title 27, Title 27 CCR (27 CCR)

Federal Generator Improvement Rule (GIR)

- ▶ Revisions to 40 CFR § 262, hazardous waste generator regulations
- ▶ DTSC is required to adopt provisions within the rule that are more stringent
- ▶ Not effective in CA, **YET**
- ▶ For more information:
 - ▶ <https://dtsc.ca.gov/generator-improvements-rule/>

What Is a “Waste”

- ▶ The term “waste” means a **discarded** material in any form (solid, liquid, or gas) (HSC § 25124)
 - ▶ Discarded means relinquished by:
 - ▶ Disposal (to the land), burned, or incinerated (22 CCR 66261.2)
 - ▶ Accumulated/stored/treated before being disposed, burned, or incinerated
 - ▶ A material is a waste if it poses a threat to human health, or the environment, considered inherently waste-like:
 - ▶ **Mislabeled**/inadequately labeled and not corrected within **10 days** after discovery
 - ▶ Packaged in a deteriorated or damaged container and not corrected within **96 hours** of discovery

Is it a *Hazardous Waste*?

- ▶ A waste with properties that make it potentially dangerous or harmful to human health or the environment due to its quantity, concentration, or physical/chemical characteristics. These materials can be liquids, solids or gaseous
- ▶ These materials can be the by-products of manufacturing processes, discarded used materials, or discarded unused commercial products



Hazardous Waste in California

Important to know when conducting hazardous waste determination

- Waste will either be listed or will exhibit a characteristic

RCRA (Federally Regulated)

Listed Wastes

- ▶ F (Spent)
- ▶ K (Spent)
- ▶ P (Unspent)
- ▶ U (Unspent)

Characteristic Wastes

- ▶ Ignitable (D001)
- ▶ Corrosive (D002)
- ▶ Reactive (D003)
- ▶ Toxic (D004-D043)

Non-RCRA (Not Federally Regulated)

Presumptive Wastes

- ▶ Common Name
- ▶ Chemical Constituent

Characteristic Wastes

- ▶ Ignitable
- ▶ Corrosive
- ▶ Reactive
- ▶ Toxic

RCRA Listed Wastes

- ▶ **F:** Multi-use or nonspecific wastes
 - ▶ Spent solvents F001-F005, Metal finishing wastes (cyanides)
 - ▶ **K:** Waste from specific industries or specific sources
 - ▶ Wastewater sludges, organic chemical production, petroleum refining
 - ▶ **P:** Acutely hazardous, unused/off-spec chemicals
 - ▶ Nicotine, Warfarin, Acrolein
 - ▶ **U:** Pure, commercial grade, unused or off-spec chemicals
 - ▶ Benzene, Acetone, Formaldehyde, MEK
- Spent
- Unspent

Four Characteristics of Hazardous Waste

▶ Ignitability

- ▶ Has a flash point less than 140°F; is an oxidizer

▶ Corrosivity

- ▶ Liquids or solids that have a pH ≤ 2 or ≥ 12.5

▶ Reactivity

- ▶ Unstable and/or produces toxic gases when mixed with water
- ▶ Reacts violently with water
- ▶ Normally unstable and readily undergo violent change without detonating

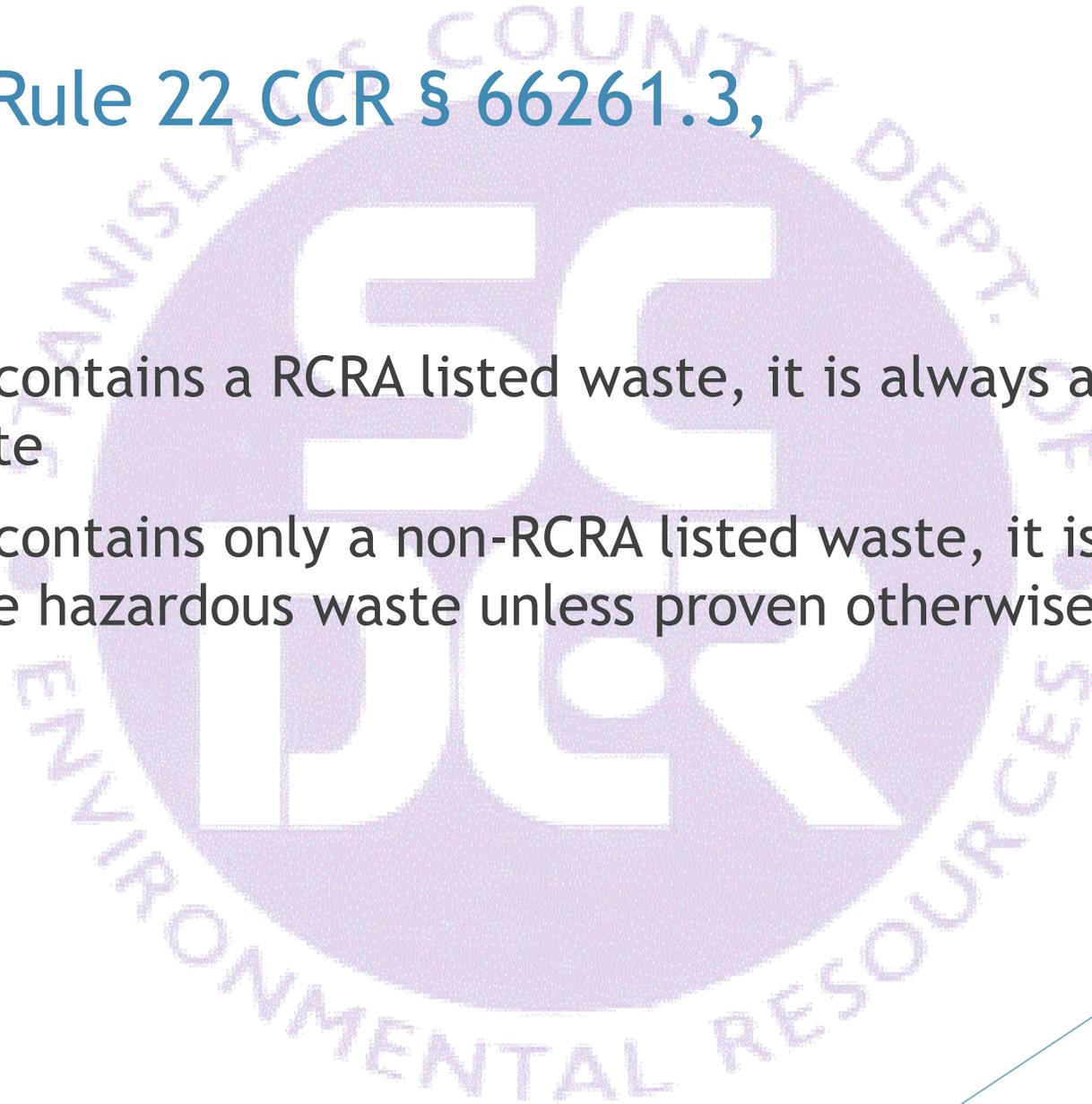
▶ Toxicity

- ▶ Has potential, when eaten, inhaled, or touched to harm humans or the environment



The Mixture Rule 22 CCR § 66261.3, §66261.30

- ▶ If the mixture contains a RCRA listed waste, it is always a hazardous waste
- ▶ If the mixture contains only a non-RCRA listed waste, it is presumed to be hazardous waste unless proven otherwise (lab analysis)



California Waste Codes

- ▶ Restricted Waste 700–800 (banned from landfill without treatment)
- ▶ Inorganics 100–199 (metal dust, alkaline solution with metals, etc.)
- ▶ Organics 200–300 (waste oil, latex waste, pesticides, etc.)
- ▶ Sludge's 400–499 (degreasing sludge, paint sludge, etc.)
- ▶ Miscellaneous 500–600 (lab waste chemicals, etc.)

CALIFORNIA WASTE CODES

California Restricted Wastes – Use First, if applicable		Sludge	
711	Liquids with cyanides > 1000 mg/l	411	Alum and gypsum sludge
721	Liquids with arsenic > 500 mg/l	421	Lime sludge
722	Liquids with cadmium > 100 mg/l	431	Phosphate sludge
723	Liquids with chromium (VI) > 500 mg/l	441	Sulfur sludge
724	Liquids with lead > 500 mg/l	451	Degreasing sludge
725	Liquids with mercury > 20 mg/l	461	Paint sludge
726	Liquids with nickel > 134 mg/l	471	Paper sludge/pulp
727	Liquids with selenium > 100 mg/l	481	Tetraethyl lead sludge
728	Liquids with thallium > 130 mg/l	491	Unspecified sludge waste
731	Liquids with polychlorinated biphenyls > 50 mg/l	Miscellaneous	
741	Liquids with halogenated organic compounds > 1000 mg/l	511	Empty pesticide containers 30 gallons or more
751	Solids or sludge with halogenated organic comp. ≥ 1000 mg/kg	512	Other empty containers 30 gallons or more
791	Liquids with pH < 2	513	Empty containers less than 30 gallons
792	Liquids with pH < 2 with metals	521	Drilling mud
801	Waste potentially containing dioxins	531	Chemical toilet waste
CALIFORNIA NON-RESTRICTED WASTES		541	Photochemicals / photo processing waste
Inorganics		551	Photochemical waste chemicals

Hazardous Waste Determination 22 CCR §66262.11

- ▶ Generators should consider the following:
 - ▶ Is it a waste? 22 CCR § 66261.2
 - ▶ Is it a hazardous waste? 22 CCR § 66261.3
 - ▶ Is it being treated? HSC § 25123.5
 - ▶ Are there any exclusions/exemptions? 22 CCR § 66261.4
- ▶ Determinations can be made by:
 - ▶ Having a representative sample of the waste analytically tested
 - ▶ By applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used

It is the generators responsibility to make the determination



Hazardous Waste Generator Requirements

EPA Identification Numbers, 22 CCR § 66262.12

- ▶ All California generators must have an ID Number
 - Cradle to Grave
- ▶ One ID Number (state or federal) for each business and location
 - **Federal:** issued to generators of more than 100 kg of RCRA hazardous waste and/or 1 kg of acutely hazardous waste per calendar month
 - **State:** issued to generators of less than 100 kg of RCRA hazardous waste and/or 1 kg of RCRA acutely hazardous waste per month, **and any amount of a non-RCRA hazardous waste**
- ▶ U.S. EPA or California ID Number depends on total waste and quantity of RCRA waste generated monthly
 - State (CAC, CAL, CAE, CAH)
 - Federal (CAR, CAD, CAT, CA)

Hazardous Waste ID Number Verification Questionnaire (eVQ) CA HSC § 25205.15-.16

- In order to maintain the “Active” status of an EPA ID number, generators must complete the eVQ annually
- The eVQ and fees assessment are required by the CA HSC § 25205.15 and 25205.16
- The eVQ runs in annual cycles and typically opens in the months of July-August
- The eVQ is due 30 days from when the HWG receives the first email notification
- If an EPA ID number has been inactive for over a year, the HWG must re-file the DTSC Form 1358*

- Good resource for eVQ:
<https://dtsc.ca.gov/hazardous-waste-id-number-verification-questionnaire/>

Hazardous Waste Generator 22 CCR § 66260.10

- ▶ What is a generator?
 - ▶ Any person, by site, whose act or process produces a hazardous waste, or who causes it to be subject to regulation as a hazardous waste
- ▶ This includes any facility that stores, accumulates, produces, treats, recycles, handles, transports or disposes of a hazardous waste.



Determining Generator Status

Quantity of HW Generated in a month	CA Status ^{1, 2}	Federal Status ^{1, 2, 3}
< 100 kg/month	CESQG (VSQG)	CESQG (VSQG)
100 kg to < 1,000 kg/month	SQG	SQG
≥1,000 kg/month	LQG	LQG

1. All hazardous wastes except those specifically excluded by law or regulation (e.g. drained used oil filters, UW) are counted towards a generator's status. DTSC Counting Instructions: <https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/05/Counting-Purpose-Chart.pdf>
 2. It is possible for a generator's status to change from month to month
 3. Only RCRA waste is counted towards a generator's federal status
- RCRA LQG: ≥1,000 kg of RCRA regulated hazardous waste in a calendar month (only RCRA waste is counted)
 - **When determining HWG status, counts wastes pre-treatment!**



100 kg ~ 27 gal ~ 220 lbs.

1000 kg ~ 270 gal ~ 2,200 lbs.

Permitted Accumulation Times

- ▶ Storage time is based on the quantity of hazardous waste generated and stored; from start accumulation date = first drop of waste

LQG	90 days
SQG	180 days or 270 days if shipped ≥ 200 miles; max: 6000 kg onsite
CESQG	No time limit until 100 kg is reached (then same limits as SQG); max:1000 kg onsite

Hazardous Waste Accumulation Areas

- ▶ Located in secure area with access controlled
- ▶ Post warning sign “Danger Hazardous Waste Accumulation Area - Unauthorized Personnel Keep Out”
- ▶ Emergency Equipment
 - ▶ Shower/Eye Wash Stations
 - ▶ Fire Extinguishers
- ▶ Spill Control Equipment



Satellite Accumulation 22 CCR § 66262.34(e)

- ▶ Satellite accumulation occurs at or near where waste is generated - requirements apply to hazardous waste (not universal wastes)
- ▶ Must be under the direct control of operator at all times:
 - Line of sight; and/or
 - Access to container under control of operator
 - All individuals (operators) with access/control must be trained



Satellite Accumulation 22 CCR § 66262.34(e)

- ▶ Maximum 55 gal per waste stream, per area; 1 quart of acutely hazardous waste
- ▶ HW must be accumulated in containers **not tanks**
- ▶ Must be clearly marked “satellite” accumulation and meet standard HW labeling requirements
- ▶ Within **3 days** after reaching the maximum storage quantity, a new accumulation date must be marked on the container and the container is moved to “90 day” accumulation area and labeled with the date the 55 gal. limit is reached (= start of 90 day accumulation period)
- ▶ Waste is removed offsite within the specified accumulation time limit (90/180/270 days) from the date 55 gal is reached; **not to exceed 1 year**

Storing Accumulated Hazardous Waste too Long

22 CCR § 66262.34

- ▶ Failure to send hazardous waste offsite for storage, treatment, or disposal within accumulation time limits facility is operating as a Treatment, Storage, Disposal Facility (TSDF) without a permit.
- ▶ Minimum Class II violation due to clear economic advantage

VIOLATION

Common Violations Related to Hazardous Waste Generator Requirements

- ▶ Failure to obtain/maintain an active EPA ID number
- ▶ Failure to properly maintain the hazardous waste storage area
- ▶ Failure to manage/dispose of hazardous waste by specified timeframe (180 days after 220 pounds is reached/180 days, 90 days)

Container Management

Container 22 CCR § 66260.10

- ▶ Any device that is open or closed, and **portable**, in which material can be stored, handled, treated, transported, recycled or disposed of



Tank 22 CCR § 66260.10

- ▶ A **stationary** device, designed to contain an accumulation of hazardous waste constructed primarily of non-earthen materials (e.g. wood, concrete, steel, plastic) which provide structural support
 - ▶ *Not intended to be moved while in use*
- ▶ “Tank System” means the tank itself and **all attached piping and ancillary equipment**



Container Requirements

- ▶ Hazardous waste container must be:
 - ▶ Compatible with the waste stored inside (22 CCR § 66265.172)
 - ▶ Properly labeled (22 CFR § 66262.34(f))
 - ▶ Kept closed with tight fitting lids when waste is not being added to or removed from it
 - ▶ Maintained in good condition to prevent rupture/leakage (22 CCR § 66265.171)
 - ▶ Inspected weekly
 - ▶ Stored to provide adequate aisle space
 - ▶ Stored separately from incompatibles

Hazardous Waste Tank/Container Labeling

22 CCR § 66262.34(f)

- ▶ Must Include:
 - ▶ The words “Hazardous Waste”
 - ▶ Generator’s name and address
 - ▶ Accumulation start date (date first drop of waste is added)
 - ▶ Contents
 - ▶ Physical state
 - ▶ Hazardous properties

HAZARDOUS WASTE
STATE AND FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES

GENERATOR INFORMATION:
NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ MANIFEST DOCUMENT NO. _____
EPA WASTE NO. _____ CA WASTE NO. _____ ACCUMULATION START DATE _____
CONTENTS, COMPOSITION: _____

PHYSICAL STATE: [] SOLID [] LIQUID | **HAZARDOUS PROPERTIES:** [] FLAMMABLE [] TOXIC [] CORROSIVE [] REACTIVE [] OTHER

[_____]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
HANDLE WITH CARE!

1992 Lab Safety Supply Inc., Janesville, WI 53547 Reorder No. 20548

Labels must be legible, visible and in good condition!

Closed Containers

- ▶ Hazardous waste containers must be kept closed during transfer and storage, except when adding or removing waste
- ▶ **Remember:** an open funnel is not a closed lid



Container Integrity

- ▶ If a container holding a hazardous waste is not in good condition (i.e. rusting, leaks, structural defects) the generator must transfer the waste to a container in good condition

**Needs to be repackaged
within 96 hours**



Container Inspections

- ▶ Hazardous waste containers used for storage shall be inspected **at least weekly**
- ▶ Weekly container inspections are not required to be documented
- ▶ Inspecting for:
 - ▶ Is the area free of debris, spills, leaks?
 - ▶ Are container tops free of spillage?
 - ▶ Are all containers in good condition?
 - ▶ Are all containers properly closed?
 - ▶ Are the labels properly filled out and legible?
 - ▶ Have wastes been disposed of within the permitted accumulation time?
 - ▶ Is there adequate aisle space?
 - ▶ Are incompatibles stored separately?



Tank Inspections

- ▶ Hazardous waste tanks should be inspected **at least weekly for CESQG or SQG & daily for LQG**
- ▶ Daily tank inspection for LQG are **required to be documented**
- ▶ **Higher risk potential = higher standards for management**
- ▶ LQG Hazardous Waste tank systems require a Tank Integrity Assessment every 5 years by an independent PE for LQG
- ▶ May also require:
 - ▶ Secondary containment
 - ▶ Leak detection

Common Violations Related to Container Management Requirements

- ▶ Incomplete label or unlabeled hazardous waste container
- ▶ Open container
- ▶ Failure to conduct required weekly/daily inspections





Contingency Plans & Employee Training Requirements

Training Plan Elements 22 CCR § 66265.16

- ▶ CESQG & SQG: Basic training required.
 - ▶ All generators must ensure all employees are thoroughly familiar **with proper waste handling & emergency procedures, relevant to their responsibilities** during normal facility operations and emergencies.
 - ▶ Training documentation not required unless otherwise specified by the CUPA inspector (egregious or recalcitrant violator)
 - ▶ Annual training is a BMP



LQG Training Requirements 22 CCR § 66265.16

- ▶ New Requirements Established 10/2018
- ▶ Must comply with the requirements of section 22 CCR 66265.16
 - **Written plan required**
 - HW Job Titles
 - Description of each job title/duties
 - Name of employee at each job tittle
 - Frequency of training
 - Documentation of initial (**within 6 months of hire**) and **annual** emergency response training
- ▶ Employees must successfully complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management

LQG Training Requirements 22 CCR § 66265.16

- ▶ § 66265.16(a)(4), *new requirements established 10/2018*
- ▶ In addition to the annual training requirements,
- ▶ Effective 7/1/2019 the training program must also be designed to ensure the following, every 24 months:
 - ▶ General awareness training
 - ▶ The owner/operator shall ensure all facility personnel successfully complete training that provides a description of the facility, and an overview of the facility and facility operations, including but not limited to:
 - ▶ Security and safety considerations; and
- ▶ Function-specific job training
 - ▶ The owner/operator shall ensure all facility personnel who are involved with hazardous waste management activities successfully complete training concerning the requirements and any relevant hazardous waste procedures applicable to job tasks and functions performed by the employee

LQG Employee Training Recordkeeping

- ▶ Training records on current personnel must be documented and kept until the business closes
- ▶ Training records on former employees must be kept for at least three years



Contingency Plan 22 CCR § 66265.50 - 66265.56

- ▶ A contingency plan is a written plan that has **emergency procedures designed to minimize hazards** to human health and the environment
- ▶ Aids emergency responders with providing aid to any hazardous materials related incident
- ▶ All hazardous waste generators are responsible to plan for emergencies at their business & must have a contingency plan



CESQG, SQG Contingency Plan Requirements

- ▶ Basic Plan only
- ▶ Must post info near a phone
- ▶ Name, number of emergency coordinator
- ▶ Location of emergency equipment
- ▶ 911 or local fire department number
- ▶ At all times, there must be at least one employee either on the premises or on call available to respond to an emergency
- ▶ BMP is to be prepared, consider using available template
 - ▶ Emergency Procedures

LQG Contingency Plan Requirements

22 CCR § 66265.50

- ▶ Higher risk potential = higher standards for management
- ▶ LQGs must complete a **full** contingency plan
- ▶ Contents of the Plan:
 - ▶ Description of actions in response to fires, explosions or sudden release of hazardous waste
 - ▶ Arrangements with local emergency responders
 - ▶ Names and phone numbers of all persons acting as emergency coordinators
 - ▶ A list of all emergency equipment and communications in the event of a sudden release or fire
 - ▶ An evacuation plan for all facility personnel
 - ▶ Phone numbers for OES, 911, and local CUPA



<https://calepa.ca.gov/wp-content/uploads/sites/6/2017/05/CUPA-Documents-eTemplates-Contingency.pdf>

Common Violations Related to Contingency Plan/Employee Training

- ▶ Failure for LQG's to maintain complete Employee Training Plan
- ▶ Failure for LQG's maintain previous three years employee training records
- ▶ Failure to maintain required Contingency Plan information onsite

Transportation, Disposal & Recordkeeping Requirements

Hazardous Waste Tracking- The Manifest

22 CCR § 66263.42 & HSC §25160.2

- ▶ Federal and State law requires hazardous waste to be tracked from cradle to grave
- ▶ **Generator's responsibility** to ensure the manifest is complete and accurate
- ▶ Same applies to Consolidated Manifests and Bill of Lading for Non-RCRA hazardous waste
 - ▶ Used Oil
 - ▶ Waste Antifreeze
 - ▶ Parts washer solvents
- ▶ Hazardous waste disposal records shall be maintained for minimum of **previous three years**
- ▶ **6/30/18, e-manifest requirements went into effect in all states**

Please print or type. (Form designed for use on 8 1/2" (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number 2. Page 1 of 3 3. Emergency Response Phone 4. Manifest Tracking Number

5. Generator's Name and Mailing Address Generator's Site Address (if different from mailing address)

Generator's Phone

6. Transporter 1 Company Name U.S. EPA ID Number

7. Transporter 2 Company Name U.S. EPA ID Number

8. Designated Facility Name and Site Address U.S. EPA ID Number

Facility's Phone:

No. and Packing Group (if any)	9. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number)	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			1	2	3
1								
2								
3								
4								

14. Special Handling Instructions and Additional Information

15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/identified, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. I export shipment and I am the Primary Exporter. I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator/Officer's Printed/Typed Name Signature Month Day Year

16. International Shipments Export to U.S. Export from U.S. Port of entry/exit: Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name Signature Month Day Year

Transporter 2 Printed/Typed Name Signature Month Day Year

18. Discrepancy

18a. Discrepancy Indication (Circle one) Quantity Type Residue Partial Rejection Full Rejection

18b. Alternate Facility (or Generator) Manifest Reference Number U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Center or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a. Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Generator Recordkeeping Requirements

▶ **Generators of HW must keep:**

- ▶ Copies of Hazardous Waste manifests for the last three years.
- ▶ Documentation used to make the waste determination i.e. laboratory analysis, SDS sheets etc.
- ▶ Employee training records for hazardous waste (LQGs)
- ▶ Biennial reports if RCRA LQG; kept for three years
- ▶ SB14 Source Reduction reports (some LQGs >12,000 Kg per year)
- ▶ Inspection records of hazardous waste tanks (LQGs)
- ▶ HW Tank PE assessment and certification records (LQGs)

Biennial Reporting & Source Reduction (SB 14)

Biennial Reporting:

- ▶ Applies to RCRA LQGs only (>1000 kg/month of HW or >1 kg/month acutely HW) and TSDFs
- ▶ Does not include Non-RCRA waste
- ▶ Due March 1 of every even numbered year, for the previous year
- ▶ Report is submitted to DTSC
- ▶ **Failure to submit a report to DTSC is considered a Class I violation**

Source Reduction Reporting (SB 14):

- ▶ Applies when generating more than 12,000 kg (26,400 lbs/3,100 gal/13.2 tons) of HW or > kg of acutely HW in a year
- ▶ Due every 4 years, includes:
 - ▶ Source Reduction Evaluation Review and Plan
 - ▶ Hazardous Waste Management Performance Report (Performance Report)
 - ▶ Summary Progress Report (SPR)
- ▶ Only the SPR is submitted to DTSC, all other elements are maintained on site for inspection

Common Violations Related to Recordkeeping Requirements

- ▶ Failure of owner/operator to maintain previous three years disposal documentation
- ▶ Failure of the owner/operator to ensure that manifests are properly completed:
 - ▶ Correct EPA ID number
 - ▶ Correct address
 - ▶ Correct waste codes and amounts

Questions?;?;

- ▶ Contact Information:
- ▶ Sarah Yacoub
- ▶ Email: syacoub@envres.org
- ▶ Direct: (209) 525-6705
- ▶ Cell: (209) 232-9220

