

# HAZARDOUS WASTE TIERED PERMIT AUDIT CHECKLIST CONDITIONAL AUTHORIZATION

This document has been prepared to assist operators of facilities that treat hazardous waste on-site in performing self-audits for compliance with Conditional Authorization (CA) 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](http://www.leginfo.ca.gov/calaw.html). Title 22 of the California Code of Regulations (CCR) is available on the Internet at [www.calregs.com](http://www.calregs.com).

## Requirements

**Audit Date:** \_\_\_\_\_

Item No.	OK	N/A	Regulatory Citation	
1.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(e)(1) CCR 67450.13(b)	<p><b>Notification</b> - 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"> <li><input type="checkbox"/> Unified Program Consolidated Form: Business Activities page;</li> <li><input type="checkbox"/> Unified Program Consolidated Form: Business Owner/Operator Identification page;</li> <li><input type="checkbox"/> Unified Program Consolidated Form: Onsite Hazardous Waste Treatment Notification - Facility Page;</li> <li><input type="checkbox"/> Unified Program Consolidated Forms: Onsite Hazardous Waste Treatment Notification - Unit Page and attachments;</li> <li><input type="checkbox"/> Unified Program Consolidated Form: Certification of Financial Assurance for PBR and CA Onsite Treaters.</li> </ul>
2.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(k)	<p><b>Notification Changes Reported</b> - An amended notification must be submitted to the CUPA and DTSC within 30 days of any change in operation that necessitates revision.</p>
3.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(c)(8)	<p><b>On-Site Generation</b> - All wastes treated must have been generated on-site.</p>
4.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(a)	<p><b>Eligible Wastes and Processes</b> - Types of waste and treatment methods must be appropriate for the CA tier.</p>
5.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(b)(1)	<p><b>Volume Limit</b> - Volume of hazardous waste treated must not exceed 5,000 gallons or 45,000 pounds, whichever is less, per month except for dilute aqueous waste and oily waste.</p>
6.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(b)(2)	<p><b>Primary Containment</b> - All waste treatment must be done in tanks or containers.</p>
7.	<input type="checkbox"/>	<input type="checkbox"/>	22 CCR 66264.175(a),(b) as referenced by H&SC 25200.3(c)(4)	<p><b>Secondary Containment</b> - Secondary containment is required. It must:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Be free of leaks and/or cracks;</li> <li><input type="checkbox"/> Not react with any stored material;</li> <li><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;</li> <li><input type="checkbox"/> Protect containers from contact with accumulated liquid.</li> </ul>
8.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(b)(4) 25200.3(b)(5)	<p><b>Management of Effluent/Residuals</b> - Treatment residuals must be managed properly. Treatment processes must not result in emissions or releases other than those allowed by appropriate agencies (i.e. BAAQMD, POTW, etc.).</p>

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9.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 66265.14 as referenced by H&SC 25200.3(c)(1)	<p><b>Security</b> - 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"> <li><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.</li> <li><input type="checkbox"/> Signs stating, "DANGER HAZARDOUS WASTE AREA - UNAUTHORIZED PERSONNEL KEEP OUT," or equivalent.</li> </ul>
10.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(c)(6) 25200.3(c)(7)	<p><b>Operating Instructions and Record</b> - The generator must prepare and maintain onsite for a period of five (5) years:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Written operating instructions that include directions on: <ul style="list-style-type: none"> <li><input type="checkbox"/> How to operate the treatment unit(s) and carry out waste treatment;</li> <li><input type="checkbox"/> How to recognize potential and actual process upsets and respond to them;</li> <li><input type="checkbox"/> When to implement the Contingency Plan;</li> <li><input type="checkbox"/> How to determine if the treatment has been effective;</li> <li><input type="checkbox"/> How to manage residuals of waste treatment.</li> </ul> </li> <li><input type="checkbox"/> A record of dates, amounts, and types of wastes treated.</li> </ul>
11.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(c)(5) 25200.3(c)(7)	<p><b>Inspection Schedule and Log</b> - The generator must prepare and maintain onsite for a period of five (5) years:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A written inspection schedule;</li> <li><input type="checkbox"/> A log of inspections conducted.</li> </ul>
12.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(c)(7)	<p><b>Wastewater Discharge Records</b> - The generator must maintain onsite for a period of five (5) years adequate records to demonstrate compliance with:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Applicable pretreatment standards;</li> <li><input type="checkbox"/> Industrial wastewater discharge requirements issued by the local POTW.</li> </ul>
13.	<input type="checkbox"/>	<input type="checkbox"/>	CCR 67450.13	<p><b>Financial Assurance</b> - Financial assurance must be provided as follows:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The facility must prepare a written estimate of the cost of closing the unit;</li> <li><input type="checkbox"/> The closure cost estimate must be adjusted for inflation by March 1 of each year;</li> <li><input type="checkbox"/> The closure cost estimate must be revised whenever a change occurs that increases the cost of closure</li> <li><input type="checkbox"/> Financial assurance for closure for each treatment unit must be obtained through one or more of the following methods: <ul style="list-style-type: none"> <li><input type="checkbox"/> Closure trust fund;</li> <li><input type="checkbox"/> Surety bond guaranteeing payment into a closure trust fund;</li> <li><input type="checkbox"/> Closure letter of credit;</li> <li><input type="checkbox"/> Closure insurance;</li> <li><input type="checkbox"/> Financial test and corporate guarantee for closure;</li> <li><input type="checkbox"/> Alternative financial mechanism for closure costs;</li> <li><input type="checkbox"/> Self-Certification, if the closure cost estimate is less than \$10,000.</li> </ul> </li> <li><input type="checkbox"/> A copy of the latest closure cost estimate and adjusted estimate must be maintained at the facility during the operating life of the facility.</li> </ul>
14.	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.14(b)(1) as referenced by 25200.3(c)(3)	<p><b>Phase I Assessment</b> - 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.</p>

*(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.)*

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<b>15.</b>	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25202.9 as referenced by 25200.3(c)(2)

**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.

<b>16.</b>	<input type="checkbox"/>	<input type="checkbox"/>	H&SC 25200.3(g)
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**Closure** - Upon terminating operation of the treatment unit, the generator must:

- Remove or decontaminate equipment, waste residues, containment systems, soils and structures in accordance with the local fire agency;
- Submit a notification to the CUPA and DTSC after all closure requirements are met.