



RCRA LQG Compliance Data

For Industry, Regulators, and the Public

Presented by

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www.calcupa.org



Objectives

- Why is data important?
- How is it organized?
- What's my role?
- How do I see it?

What can I do with the data?

➤ Public:

- What's going on in my neighborhood?
- Who should I do business with?

➤ Industry:

- Am I compliance (historical violations and open violations)?

➤ Regulators:

- What are programs are my facilities subject to comply with?
- Are my facilities due for an inspection?
- What should I look for during my next inspection?
- Are my facilities in compliance?

Handler ID Numbers

| Data system | How Handler ID is assigned |
|---|--|
| USEPA RCRAinfo | Sites that generate >100kg/month of RCRA hazardous waste must apply for a Handler ID number through RCRAinfo. |
| DTSC Hazardous Waste Tracking System (HWTS) | <p>Sites that generate any amount of non-RCRA hazardous waste and \leq100kg/month of RCRA hazardous waste should email DTSC Form 1358 to idnumber@dtsc.ca.gov.</p> <p>In California, both RCRAinfo handler ID numbers and California handler ID numbers are assigned by DTSC staff and are tracked in DTSC's Hazardous Waste Tracking System.</p> |

Data Flow: Local, State, Federal

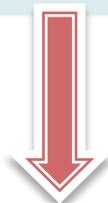
Some **CUPAs** use a local data management system and electronically flow Compliance Monitoring and Enforcement (CME) data to CERS, otherwise CME data is directly entered into CERS.



CERS uploads CME data to RCRAinfo **1st of every month** for all CME actions (mid-2016 was first flow of all data 10/1/2011 or newer).



DTSC uploads CME data from Envirostor to RCRAinfo **15th of every month**.



EPA R9 inspectors add their inspections, violations and enforcement actions directly to RCRAinfo.



RCRAinfo compliance information uploaded to ECHO.epa.gov.



Regulated entities report errors or misrepresentations of compliance status back to EPA through ECHO or contacting us directly.



What flows from CERS to RCRAinfo?

CUPA RCRA compliance data has been flowing to RCRAinfo since 2011. Prior to 2011 it was hand-entered by DTSC staff.

Early flows were less validated and therefore may have contained errors especially with Handler ID data.

EPA R9, DTSC and CalEPA have more work to do to resolve historic data errors.

Regulators also have current data issues to resolve.

CUPA inspection numbers only

| Dates | CERS unique sites (RCRA IDs) inspected (sites) | RCRA LQG Inspections in CERS (count) | CUPA inspected in RCRAinfo (sites) | CUPA inspections in RCRAinfo (count) |
|------------------|--|--------------------------------------|------------------------------------|--------------------------------------|
| 7/1/15-6/30/2016 | 749 | 1370 | 510 | 752 |
| 7/1/16-6/30/2017 | 827 | 1450 | 520 | 707 |
| 7/1/17-6/30/2018 | 890 | 1415 | 591 | 876 |

Invalid data or less data = less accountability



Reality or Incorrect Data

- ECHO.epa.gov currently shows **193** California facilities currently in noncompliance with RCRA for **3 or more years**.
 - How many of these facilities actually have unresolved violations?
 - How many of these facilities are in compliance, but have data errors?



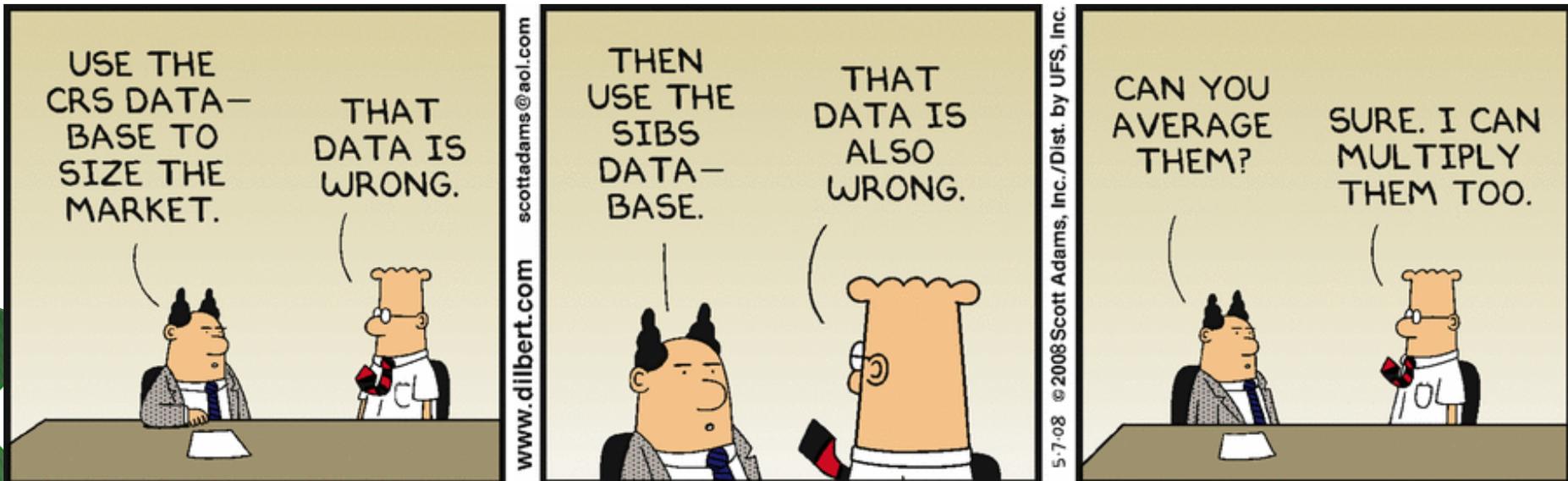
Unresolved Violations

- Violation data is inaccurate and the facility is in compliance
 - Data transfer issue (especially historical data transfers)
 - Regulator never entered the Return to Compliance (RTC) data
- Violation data is accurate...
 - Facility did not RTC and the regulator did not enforce the violation

Regulators have been told that a site's compliance status in ECHO may be used to evaluate insurance and property transactions, as well as potential business partners. Data errors may adversely impact those businesses.

CERS to RCRAinfo Data Validation

- Handler ID starts with "CA" and is 12 characters in length.
- Handler ID is found in the HWTS database.
- Inspections type is RCRALQG.
- Violations are a RCRA Violation, associated with a HWLQG inspection, and violation program is a RCRALQG.

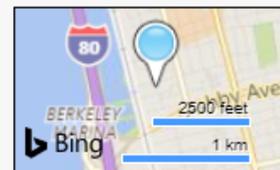




Site Identification

Facility Name
Kevins Hazwaste biz
Business Site Address
700 Heinz Ave
Berkeley, CA 94710
County: Alameda

CERS ID
10168406
EPA ID Number
CAR000030114



Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive local inventory reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70? [?](#)

Yes

Underground Storage Tank(s) (UST)

Does your facility own or operate underground storage tanks? [?](#)

Yes

Hazardous Waste

Does your Facility...

Does your facility generate Hazardous Waste? [?](#)

Yes

If yes, provide an EPA Identification Number (EPA ID).

Does your facility treat hazardous waste on-site? [?](#)

Yes

Is your facility's treatment subject to financial assurance requirements (for Permit by Rule or Conditional Authorization)? [?](#)

Yes

Does your facility consolidate hazardous waste generated at a remote site? [?](#)

Yes

If yes, provide an EPA Identification Number (EPA ID).

Does your facility need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site? [?](#)

Yes

Does your facility generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of RCRA (federally-regulated) hazardous waste, or generate in any single calendar month, or accumulate at any time, 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate or accumulate at any time more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste. Do not check this if you only generate non-RCRA waste. [?](#)

Yes

If yes, provide an EPA Identification Number (EPA ID), file Biennial Report ([EPA Form 8700-13A/B](#)), and satisfy requirements for RCRA Large Quantity Generator.

Is your facility a Household Hazardous Waste (HHW) Collection site? [?](#)

Yes

If yes, see CUPA for required forms.

Does your facility generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of RCRA (federally-regulated) hazardous waste, or generate in any single calendar month, or accumulate at any time, 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate or accumulate at any time more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste. Do not check this if you only generate non-RCRA waste.



if yes, provide an EPA Identification Number (EPA ID), file Biennial Report (EPA Form 8700-13A/B), and satisfy requirements for RCRA Large Quantity Generator.

Verified in HWTS

Inspection Details

Facility [REDACTED]
 Date 5/21/2015
 Program **Hazardous Waste Generator**
 Type Routine
 Data Status Approved

Violation Type Definition

Type Number 303834
 Name **Small Quantity Generator: Emergency Equipment Maintenance**
 Citations 22 CFR 12.66262-34(d)(2); 40 CFR 1.265.33
 Program Hazardous Waste Generator
 Category Operations/Maintenance

Violation Description

Failure of the facility to test and maintain all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment.

Violation Details

| Class | Minor | Do | Comment |
|--------------------|---------|----------------------|--|
| Violation Date | 5/20/15 | Actual RTC Qualifier | OBSERVATION: Facility failed to test and maintain emergency shower/eye wash equipment in Building Q141. CORRECTIVE ACTION: Facility is to immediately test and maintain the emergency shower/eye wash equipment located in Building Q141 and submit verification of compliance to the CUPA within 30 days. |
| Scheduled RTC Date | 6/20/15 | Actual RTC Date | |
| | | | |

(This inspection and violation will not transfer to the ECHO database)



Violation Library and Generator Status

<https://cersbusiness.calepa.ca.gov/Public/Violations>

- “HWG” Violations: RCRA SQG, Non-RCRA SQG, Non-RCRA LQG.
- “RCRALQG” Violations: RCRA LQG.
- Additional HW Violation Programs: “HHW”, “Tiered Permitting”.

| Violation Type | Hazardous Waste Generator | RCRA LQG |
|---|---------------------------|----------|
| Abandonment/Illegal Disposal/Unauthorized Treatment | 9 | 8 |
| Administration/Documentation | 34 | 31 |
| Operations/Maintenance | 57 | 42 |
| Release/Leaks/Spills | 5 | 5 |
| Training | 5 | 4 |
| Totals | 110 | 90 |

Violation Library and Generator Status

| Violation Program | Violation Category | Violation Number | RCRA Violation Type | RCRA Violation Name | Description | Citations |
|-------------------|--------------------|------------------|---------------------|-----------------------------|-------------------------------|------------------|
| RCRALQG | Administ | 3110011 | 262.C | RCRA: Contingency Plan | Failure to include all of the | 22 CCR 12 66262 |
| RCRALQG | Administ | 3110013 | 262.C | RCRA: New Hazardous | Failure to obtain and | 22 CCR 15 66265 |
| RCRALQG | Administ | 3110014 | 262.C | RCRA: New Tank | Failure to include all | 22 CCR 12 66262 |
| RCRALQG | Administ | 3110015 | 262.C | RCRA: Hazardous Waste | Failure to obtain CUPA | 22 CCR 12 66262 |
| RCRALQG | Administ | 3110017 | | Consolidated Manifest | Failure of a generator of | HSC 6.5 25160.2 |
| RCRALQG | Administ | 3110018 | | Used Oil Certification Form | Failure to record in an | HSC 6.5 25250.1, |

What can CUPAs do?

- Make sure sites with RCRA waste have accurate RCRA IDs in their CERS profile.
- Research your jurisdiction on ECHO.epa.gov.
- Request from EPA (CalEPA or EPA R9) the current list of sites that have unresolved violations.
- QA CERS LQG universe data, especially RCRA IDs, with ECHO.epa.gov and/or HWTS.
- Request a CERS update that validates facility data against HWTS and RCRAinfo ID and site information.

What can Industry do?

- Research your site on ECHO.epa.gov. Search by RCRA ID and then by address.
 - Multiple RCRA IDs at your location.
- Compare that data to your CERS profile:
 - Is CME data consistent with reality?
- If you do not already have one, obtain a user account on RCRAinfo for the ID numbers used by your site(s).

Bright Side of the Data

- Facilities are being regulated.
- Violations are being resolved.
- Days to resolve violations is decreasing.
- The data is getting better!

| RCRAinfo Violation data for California, 2015-2018 | | | | | | |
|---|---------------|-------------------------------|----------------------------|-------------------------------|----------------|------------|
| Agency | Calendar Year | Violations found and resolved | Average of Days to Resolve | Open violations as of 2/15/19 | sum violations | % resolved |
| CUPAs | 2015 | 366 | 100 | 42 | 408 | 90% |
| CUPAs | 2016 | 520 | 115 | 100 | 620 | 84% |
| CUPAs | 2017 | 475 | 104 | 67 | 542 | 88% |
| CUPAs | 2018 | 487 | 53 | 162 | 649 | 75% |
| CA DTSC | 2015 | 274 | 153 | 14 | 288 | 95% |
| CA DTSC | 2016 | 293 | 96 | 40 | 333 | 88% |
| CA DTSC | 2017 | 307 | 49 | 21 | 328 | 94% |
| CA DTSC | 2018 | 192 | 26 | 42 | 234 | 82% |
| EPA R9 | 2015 | 83 | 142 | 3 | 86 | 97% |
| EPA R9 | 2016 | 36 | 40 | 15 | 51 | 71% |
| EPA R9 | 2017 | 35 | 94 | 26 | 61 | 57% |
| EPA R9 | 2018 | 12 | 29 | 25 | 37 | 32% |
| | Total | 3080 | 91 | 557 | 3637 | 85% |

siteportal.calepa.ca.gov Demonstration

Navigation icons: Home, Settings, Search, Download, Bookmarks, Info, Eye.

Search By Keyword

SEARCH RESULTS (297,720)

GETTING STARTED

To find the site you are looking for, you can:

Use the Search Bar

Enter any identifying information into the search bar above, and both the Results list and the map will populate with any relevant results. This is a general search and will return results for each word in the search bar.

OR

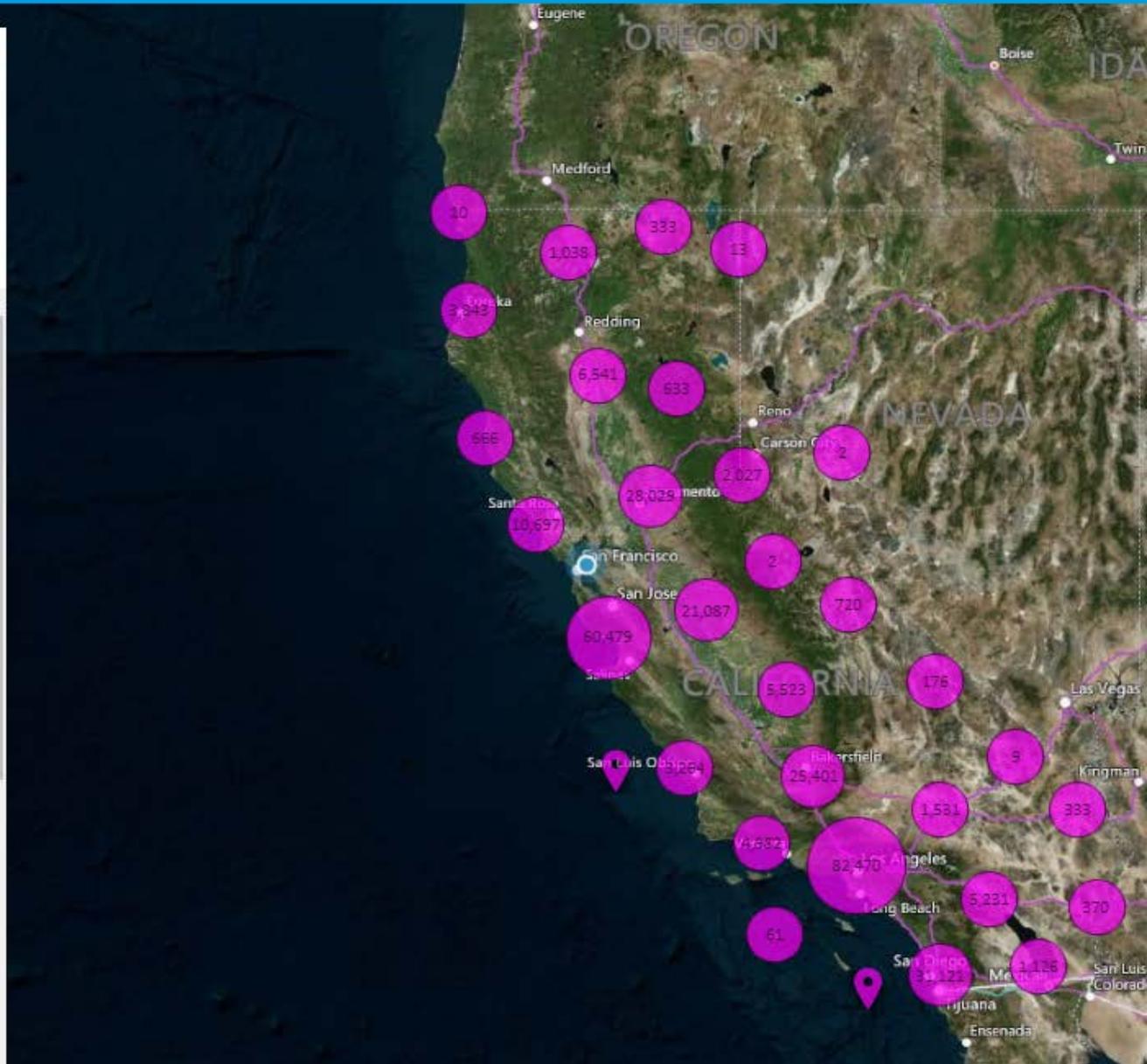
Manipulate the Map

Focus in on a specific location using a mouse and the zoom tools or click on a bubble and the map will zoom to the location.

ADDITIONAL HELP

Simple Search

Enter any text into the keyword search. The results are based on each word. Using quotes does not create a phrase.





Search By Keyword



185 sites found

NATIONAL CAR RENTAL PAC.

711 W KATELLA AVE
ANAHEIM CA 92802

PARADISE PIER ENHANCEMENTS

1515 S HARBOR DRIVE
ANAHEIM CA 92803

SHERATON PARK ANAHEIM

1855 S HARBOR BLVD
ANAHEIM CA 92802



7-ELEVEN INC. STORE #29057

611 W KATELLA AVE
ANAHEIM CA 92802



DISNEYLAND RESORT

1313 S. HARBOR BLVD.
ANAHEIM CA 92803



DISNEYLAND RESORT

1313 S. HARBOR BLVD.
ANAHEIM CA 92803



[SHOW MORE INFORMATION >](#)



REGULATORY PROGRAMS

- Chemical Storage Facilities
- Hazardous Waste Generator**
- RCRA LQ HW Generator**
- Underground Storage Tank

Verified in HWTS

EVALUATIONS

| | |
|--------------------------------|----|
| Evaluations With Violations | 9 |
| Evaluations Without Violations | 20 |

VIOLATIONS

| | |
|-------|----|
| Total | 21 |
|-------|----|

COMPLIANCE

| | |
|-------|---|
| Total | 0 |
|-------|---|



EVALUATIONS

| | |
|--------------------------------|----|
| Evaluations With Violations | 9 |
| Evaluations Without Violations | 20 |

VIOLATIONS

Total

EVALUATIONS WITH VIOLATIONS (9)

| | Date | Program | Type |
|---|------------|--|--|
| + | 04/25/2018 | UST - Underground Storage Tank (UST) | Other, not routine, done by local agency |
| + | 01/18/2018 | HMRRP - Hazardous Materials Release Response Plans (HMRRP) | Routine done by local agency |
| + | 01/18/2018 | HW - Hazardous Waste Generator | Routine done by local agency |
| + | 01/12/2018 | UST - Underground Storage Tank (UST) | Routine done by local agency |
| + | 02/10/2016 | HMRRP - Hazardous Materials Release Response Plans (HMRRP) | Routine done by local agency |

5 rows ▾

< Page: 1 of 2 >

1 -

EVALUATIONS WITHOUT VIOLATIONS (20)

| | Date | Program | Type |
|---|------------|--|--|
| + | 12/20/2018 | UST - Underground Storage Tank (UST) | Other, not routine, done by local agency |
| + | 07/19/2018 | UST - Underground Storage Tank (UST) | Other, not routine, done by local agency |
| + | 01/18/2018 | APSA - Aboveground Petroleum Storage Act (APSA) | Routine done by local agency |
| + | 01/18/2018 | HWLQG - Hazardous Waste RCRA Large Quantity Generator (RCRA LQG) | Routine done by local agency |
| + | 01/18/2018 | HWRcycler - Hazardous Waste Recycler | Routine done by local agency |

5 rows ▾

< Page: 1 of 4 >

1 - 5

| | Determination Date | Program |
|---|--------------------|---|
| + | 04/25/2018 | UST - Underground Storage Tank (UST) |
| + | 01/18/2018 | HMRRP - Hazardous Materials Release Response Plans (HMRRP) - Failure to complete and electronically submit hazardous material inventory information for all reportable hazardous materials on site at or above reportable quantities. |
| - | 01/18/2018 | HW - Hazardous Waste Generator |

NOTES

Returned to compliance on 01/18/2018.

CITATIONS

22 CCR 16 66266.130: California Code of Regulations, Title 22, Chapter 16, Section(s) ~~66266.130~~
HSC 6.5 25250.22: California Health and Safety Code, Chapter 6.5, Section(s) 25250.22

| | | |
|---|------------|--------------------------------|
| - | 01/18/2018 | HW - Hazardous Waste Generator |
|---|------------|--------------------------------|

NOTES

Returned to compliance on 01/18/2018.

CITATIONS

22 CCR 12 66262.34(d)(2): California Code of Regulations, Title 22, Chapter 12, Section(s) ~~66262.34(d)(2)~~
40 CFR 1 262.34(d)(2): U.S. Code of Federal Regulations, Title 40, Chapter 1, Section(s) 262.34(d)(2)
40 CFR 1 265.173: U.S. Code of Federal Regulations, Title 40, Chapter 1, Section(s) 265.173

ECHO.epa.gov Demonstration



Sites can be searched by multiple parameters:

- RCRA ID
- Name (full or partial)
- Address (full or partial)
- City/County, or Zip

Advanced parameters allow search to be filtered on RCRA compliance status

Results can be returned in a data set or on a map

Developers: Advanced data services available for RCRA, see <https://echo.epa.gov/tools/web-services/facility-search-hazardous-waste#/>



Quick Search



Search Options



Analyze Trends

Quick Search

Search By

Location

Facility Name/ID

Enter facility name or ID

Search

[More Search Options](#)

Search Type

Choose a Search Type

- All Data
- All Data
- Air
- Water
- Hazardous Waste
- Drinking Water

Geographic Location

[View More](#)

EPA Region

All Regions

City

State

- All States
- AK - Alaska
- AL - Alabama

ZIP Code

Add More

County

Select a State

Near US-Mexico Border

Any Yes No

Indian Country/Tribal Land

FRS Tribal Land Code

Any Yes No

On or Near Spatial Tribal Boundary

No Restrictions

Tribes

Find Facilities That Match

Any Tribal Options
 All Tribal Options



Facility Characteristics

[View More](#)

Facility Name (Separate multiple names with a semicolon ';')

Find Facility Name(s) That:

Contains Each Term

Add More

Facility ID Number

SIC Code 2-digit selection

All SIC Codes

Add More

SIC Code (Use to enter 3 or 4-digit codes)

[SIC Code Lookup](#)

NAICS Code

Enter 2, 3, 4, 5, or 6-digit

NAICS codes

Add More

Find NAICS Code By Keyword

Enforcement and Compliance Summary

| Statute | Insp (5 Years) | Date of Last Inspection | Compliance Status | Qtrs with NC (of 12) | Qtrs with Significant Violation | Informal Enforcement Actions (5 years) |
|---------|----------------|-------------------------|-------------------|----------------------|---------------------------------|--|
| RCRA | 2 | 01/18/2018 | No Violation | 0 | 0 | -- |

Enforcement and Compliance

Compliance Monitoring History (5 years)



| Statute | Source ID | System | Inspection Type | Lead Agency | Date | Finding | Report Error |
|---------|--------------|--------|--|-------------|------------|---|---|
| RCRA | CAD027828250 | RCR | COMPLIANCE EVALUATION INSPECTION ON-SITE | State | 01/18/2018 | No Violations Or Compliance Issues Were Found |  |
| RCRA | CAD027828250 | RCR | COMPLIANCE EVALUATION INSPECTION ON-SITE | State | 02/10/2016 | Violations Or Compliance Issues Were Found |  |

Entries in italics are not considered inspections in official counts.



You are here [Home](#) » Detailed Facility Report

Detailed Facility Report

[+ Expand All](#) [- Collapse All](#)

[Report Violation](#) [Report a General Error](#) [Data Dictionary](#) [Print](#) [Help](#)

Facility Summary

Facility/System Characteristics

Enforcement and Compliance

Filter Enforcement and Compliance Information



Include all statutes (default) Restrict information to:
 CAA Only (0) CWA Only (0) RCRA Only (0)
 SDWA Only (0)

Compliance Monitoring History (5 years)

| Statute | Source ID | System | Inspection Type | Lead Agency | Date | Finding | Report Error |
|--------------------------|-----------|--------|-----------------|-------------|------|---------|--------------|
| No data records returned | | | | | | | |

Entries in italics are not considered inspections in official counts.

Compliance Summary Data

| Statute | Source ID | Current SNC/HPV | Description | Current As Of | Qtrs in NC (of 12) | Report Error |
|---------|--------------|-----------------|-------------|---------------|--------------------|--------------|
| RCRA | CA0000589762 | No | | 01/06/2018 | 12 | |

Any member of the public (including co-regulators) may click on either of these two report error links to relay a complaint about this data to EPA.

RCRA compliance errors for California sites are sent to California regulators for follow-up.

Contact Information

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