

TIER PERMITTING SUBMITTAL ON CERS Malay Trivedi, LACoFD, HMS III

TU-B1 Tuesday 2/27/24



About myself

Malay Trivedi Los Angeles County Fire HMS III

- 25 years in Environmental and Public Health Sector
 - Los Angeles County-Environmental Health 15yrs
 - » Conducting inspection of restaurant, housing, recreational waters, food manufacturing establishments
 - » Plan Check, strike team,
 - Los Angeles County-Fire Dept-10yrs
 - » CUPA WORLD-HM, HW, TP, APSA



About myself

- Last 3 years, I was tasked with reviewing Tier Permitting(TP) submittal on California Environmental Reporting System (CERS)
- HMBP & TP

Stepping up to the plate...





REVIEWING TIERED PERMITTING SUBMITTALS ON CERS

What this presentation will NOT cover:

• This is NOT a detail presentation on how to do a TP inspection in the field. This presentation will NOT cover type of treatment, recycling, exclusion, is it a waste, point of generation, etc.



REVIEWING TIERED PERMITTING SUBMITTALS ON CERS

What this presentation will cover:

This is an introductory course walking you through TP submission on CERS.

- 1. TP Overview-Basic
- 2. TP CERS Submittal-In Detail
- 3. Financial Assurance-Basic

Objective of the course:

To submit a successful TP element on CERS.



How many of you are:

- A. Regulators-interested in learning to **review** TP submittals?
- B. Operators-interested in learning to **submit** TP submittals?



How many of you have submitted or reviewed <u>hazardous material</u> <u>business plan</u> submittals on CERS?

A. Yes

B. No



How many of you have submitted or reviewed <u>Tier Permitting</u> <u>submittal</u> on CERS?

A. Yes

B. No



If I have a PBR (highest tier) am I able to treat any type of hazardous waste?

- a. Yes
- b. No
- c. Maybe
- d. I don't know



Answer

1. No; there are specific waste stream and specific treatment technology used to treat waste.



SECTION 1 TP Overview

- 1. TP-PBR Eligibility
- 2. CUPA Tiers



Hazardous Waste (HW) Facility Permit

- Any person who stores, treats or dispose of HW (HSC, Div. 20, Chapter 6.5)
 needs Hazardous Waste Facility Permit
- 5 Tiers
 - Full permit
 - Standardized Permit
 - Permit By Rule(PBR)
 - Conditional Authorization (CA) \(\sum_{\text{CUPA}} \)
 - Conditional Exemption (CE)



Eligibility of TP-PBR 1st.....

- The waste is not regulated under the federal Resource Conservation and Recovery Act of 1976
- The waste is not reactive -section 66261.23
- The waste is not extremely hazardous -66261.107 or 66261.110
- All treatment is conducted in tanks or containers
- All discharges to air comply with applicable federal, state and local air pollution control statutes and regulations



Eligibility of TP-PBR

2nd...

1. The waste to be treated is a hazardous waste only because it is specific type of waste.

AND

2. It must also use **specific type of treatment technology**.



TP PBR Eligibility-Only following HW can be treated

- Aqueous wastes containing hexavalent chromium
- Aqueous wastes containing metals
- Aqueous wastes with total organic carbon less than ten percent
- Sludges, dusts, solid metal objects and metal workings which contain or are contaminated with metals
- Wastes listed in section 66261.120
- Wastes, except asbestos, which have been classified by the Department as special wastes pursuant to section 66261.124
- Inorganic acid or alkaline wastes
- Soils contaminated with metals

- (67450.11) Used oil as defined in Health and Safety Code section 25250.1
 - Containers of 110 gallons or less capacity which are not constructed of wood, paper, cardboard, fabric or any other similar absorptive material, which have been emptied
 - Multi-component resins
 - A waste stream technology combination certified by the Department pursuant to Section 25200.1.5 of the Health and Safety Code
 - Cvanide-containing_wastes

REMEMBER-THAT THESE WASTE MUST ALSO ONLY USE TREATMENT TECHNOLOGIES MENTIONED IN 67450.11



TP PBR Eligibility HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED →

Aqueous wastes containing hexavalent chromium-

Treatment→

▶ (A) Reduction of hexavalent chromium to trivalent chromium with sodium bisulfite, sodium metabisulfite, sodium thiosulfate, ferrous sulfate, ferrous sulfide or sulfur dioxide, provided both pH and addition of the reducing agent are automatically controlled.



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HWTO BETREATED → Aqueous wastes containing metals

TREATMENT TECHNOLOGY→

- (A) pH adjustment or neutralization.
- (B) Precipitation or crystallization.
- (C) Phase separation by filtration, centrifugation or gravity settling.
- (D) Ion exchange.
- ► (E) Reverse osmosis.

- (F) Metallic replacement.
- (G) Plating the metal onto an electrode.
- (H) Electrodialysis.
- (I) Electrowinning or electrolytic recovery.
- (J) Chemical stabilization using silicates and/or cementitious types of reactions.
- (K) Evaporation.
- (L) Adsorption.



TP PBR Eligibility-HW Treated & Treatment Technology

HW TO BE TREATED →

(67450.11)

Aqueous wastes with total organic carbon less than ten percent

Treatment→

- (A) Phase separation by filtration, centrifugation or gravity settling, but excluding super critical fluid extraction.
- (B) Adsorption.
- (C) Distillation.
- (D) Biological processes conducted in tanks or containers and utilizing naturally occurring microorganisms.
- (E) Photodegradation using ultraviolet light, with or without the addition of hydrogen peroxide or ozone, provided the treatment is conducted in an enclosed system:
- (F) Air stripping or steam stripping



TP PBR Eligibility-HW Treated & Treatment Technology

HW TO BE TREATED →

(67450.11)

Sludges, dusts, solid metal objects and metal workings which contain or are contaminated with metals

Treatment →

- (A) Chemical stabilization using silicates and/or cementitious types of reactions.
- ▶ (B) Physical processes which change only the physical properties of the waste such as grinding, shredding, crushing, or compacting.
- (C) Drying to remove water.
- ▶ (D) Separation based on differences in physical properties such as size, magnetism or density.



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED →

Alum, gypsum, lime, sulfur or phosphate sludges

Treatment →

- ▶ (A) Chemical stabilization using silicates and/or cementitious types of reactions.
- ▶ (B) Drying to remove water.
- ▶ (C) Phase separation by filtration, centrifugation or gravity settling



TP PBR Eligibility-HW Treated & Treatment Technology

HW TO BE TREATED →

(67450.11)

- Wastes listed in section 66261.120
- ► Treatment →
 - ▶ (A) Chemical stabilization using silicates and/or cementitious types of reactions.
 - ▶ (B) Drying to remove water.
 - ▶ (C) Phase separation by filtration, centrifugation or gravity settling.
 - (D) Screening to separate components based on size.
 - ▶ (E) Separation based on differences in physical properties such as size, magnetism or density.



TP PBR Eligibility-HW Treated & Treatment Technology

HW TO BE TREATED →

(67450.11)

- Wastes, except asbestos, which have been classified by the Department as special wastes pursuant to section 66261.124,
- ► Treatment →
 - ▶ (A) Chemical stabilization using silicates and/or cementitious types of reactions.
 - ▶ (B) Drying to remove water.
 - ▶ (C) Phase separation by filtration, centrifugation or gravity settling.
 - (D) Magnetic separation.



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED →

- Inorganic acid or alkaline wastes
- ► Treatment →
 - ▶ (A) pH adjustment or neutralization.



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED →

- Soils contaminated with metals
- ► Treatment →
 - ▶ (A) Chemical stabilization using silicates and/or cementitious types of reactions.
 - (B) Screening to separate components based on size.
 - (C) Magnetic separation.



TP PBR Eligibility-HW Treated & Treatment Technology

HW TO BE TREATED →

(67450.11)

- Used oil as defined in Health and Safety Code section 25250.1, unrefined oil waste, mixed oil, oil mixed with water and oil/water separation sludges
- ► Treatment →
 - (A) Phase separation by filtration, centrifugation or gravity settling, but excluding super critical fluid extraction. (B) Distillation. (C) Neutralization. (D) Separation based on differences in physical properties such as size, magnetism or density. (E) Reverse osmosis. (F) Biological processes conducted in tanks or containers and utilizing naturally occurring microorganisms



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED \rightarrow

Multi-component resins may be treated by the following process

- ► Treatment →
 - (A) Mixing the resin components in accordance with the manufacturer's instructions.



TP PBR Eligibility-HW Treated & Treatment Technology (67450.11)

HW TO BE TREATED →

- A waste stream technology combination certified by the Department pursuant to Section 25200.1.5 of the Health and Safety Code as appropriate for authorization under Permit by Rule.
- ▶ 25200.1.5 The department may establish an administrative process to certify hazardous waste environmental technologies that it determines will not pose a significant potential hazard to human health and safety or to the environment if they are used under specified operating conditions.



TP PBR Eligibility-HW Treated & Treatment Technology

(67450.11)

Cyanide-containing wastes

- ► (A) aqueous wastes generated by rinsing workpieces and fixtures holding workpieces that were processed in cyanide-containing solutions;
- ▶ (B) aqueous wastes generated by reverse osmosis or the regeneration of demineralizer (ion exchange)
- ▶ (C) aqueous wastes generated by rinsing containers, pumps, hoses, and other equipment used to transfer cyanide solutions onsite;



TP PBR Eligibility-HW Treated & Treatment Technology

Cyanide-containing wastes

(67450.11)

- ▶ (D) aqueous wastes generated by the following onsite recycling activities:
- 1. rinsing spent anode bags prior to onsite reuse; or
- 2. rinsing empty containers prior to onsite reuse;
- ▶ (E) aqueous wastes generated by onsite laboratories ...
- (F) spent process solutions containing recoverable amounts of metal that may be treated by electrowinning (paraphrase see 67450.11(d)(6))
- ▶ (G) Spent cyanide-containing process solutions may be treated by slow addition to the aqueous waste for the purpose of reducing cyanide processing hazards (paraphrase see 67450.11 (d)(7))



TP PBR Eligibility-HW Treated & Treatment Technology

APPROVED TREATMENT →

(67450.11)

- Cyanide-containing wastes may be treated by-
 - ► (A) oxidation by addition of hypochlorite;
 - (B) oxidation by addition of peroxide or ozone, with or without the use of ultraviolet light;
 - (C) alkaline chlorination;
 - (D) electrochemical oxidation;
 - (E) ion exchange; or
 - (F) reverse osmosis.



What If I Am NOT treating one of the above waste, my HW is not in a tank/container, my waste is RCRA, Reactive, or Extremely hazardous?

You may not be eligible for PBR and may need to contact DTSC

- 1. Full permit
- 2. Standardized Permit



I qualify for PBR, but what's the difference between...

- Permit By Rule (PBR)
 OR
- Conditional
 Authorization (CA)
 OR
- Conditionally Exempt (CE)

Why does it matter if I'm ONLY submitting in CERS?

 BECAUSE.....There are different submittal requirements for PBR/CA/CE



To Find Right Tier; You can read:

- For PBR: California Code of Regulation, Title 22, division 5 67450.11 (which is what we just reviewed)
- For CA; CE: California Health & Safety Code, division 20, Chapter 6.5
 - 25200.3(a) [CA]
 - 25201.5(a) [CE]

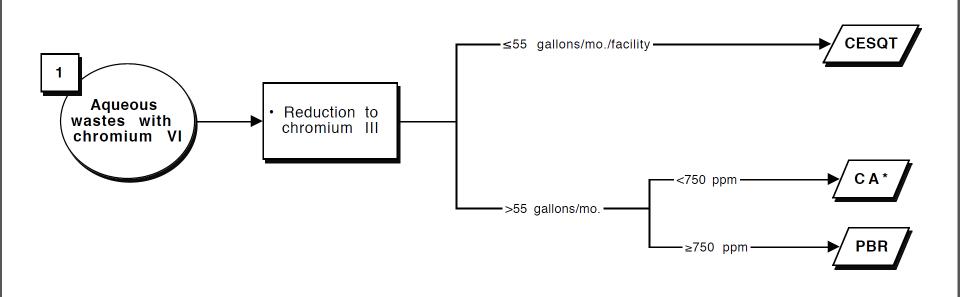






Onsite Tiered Permitting — Flowchart

(For non-RCRA or RCRA exempt hazardous waste facilities conducting onsite treatment.)



CESQT — Conditionally Exempt Small Quantity Treatment (Health and Safety Code (HSC §25201.5(a))
CESW — Conditionally Exempt Specified Wastestream (HSC §25201.5(c))
CEL — Conditionally Exempt-Limited (HSC §25201.14)

To Determine Your Tier-Break it up into 4 invisible columns

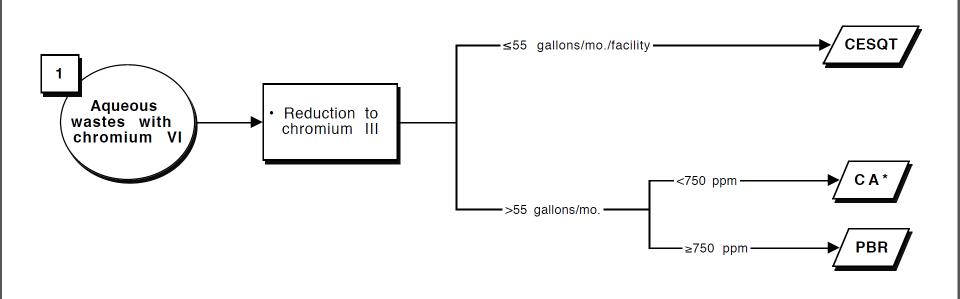
- → DETERMINEYOURTIER
- 1. TYPE OF WASTE BEING TREATED
- TECHNOLOGY BEING USED TO TREAT THAT WASTE
- VOLUME/QUANTITY OF WASTE BEINGTREATED PER MONTH/PER FACILITY
- 4. CONCENTRATION OF WASTE BEING TREATED



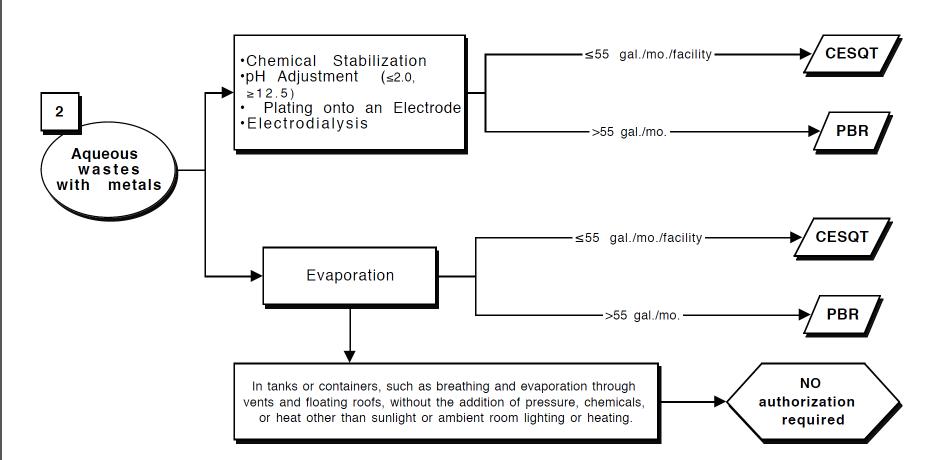


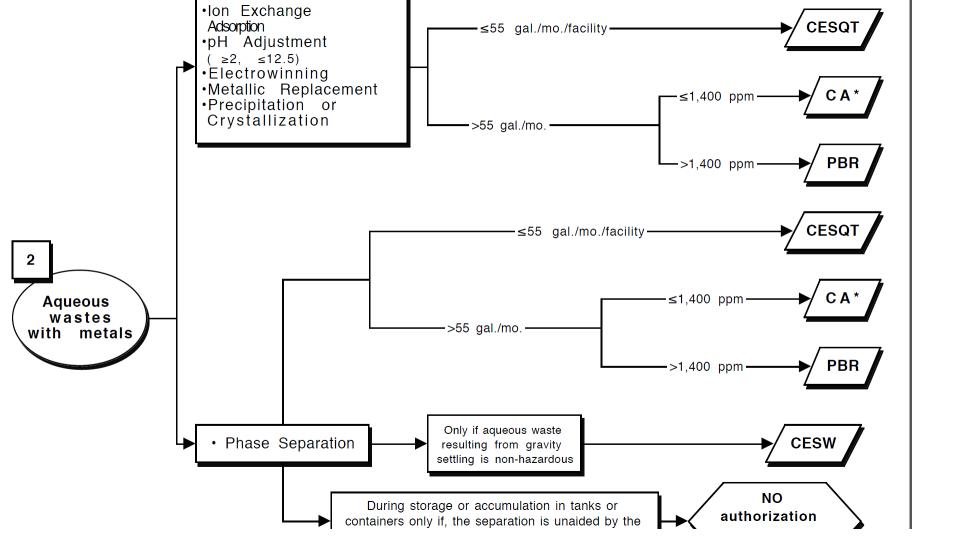
Onsite Tiered Permitting — Flowchart

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BREAKTIME! (3 mins)



26th California Unified Program Annual Training Conference February 26-29, 2024

Section 2 TIER PERMITTING SUBMITTAL ON CERS

YES, I AM ELIGIBLE FOR PBR SUBMITTAL ON CERS...

Now you must request authorization from CUPA to treat HW under PBR



Poll Question 1

When do you have to submit TP submittal?

- A. Initially before you begin operation & when there is a change in your operation.
- B. Initially and annually for PBR and CA.
- C. Annually for PBR/CA/CE.
- D. Initially and annually for PBR only.



4 Main Types of TP Submittal

- Requirement vary based on:
 - Initial PBR (we will cover)
 - Annual PBR
 - Initial CA*
 - Initial CE*

*Annual submission is not required



- Onsite Hazardous Waste Treatment Notification-Unit Page [67450.2(b)(3)(G)]
 - FTU serial number
 - Description of treatment process(es)
 - Quantity of influent waste
 - Quantity and disposition of treatment effluent and residuals
 - Description of treatment process operation (i.e. continuous, batch, intermittent)
 - Hours of operation
 - Identification of whether the unit is a tank or container
 - Basis for determining that a hazardous waste facility permit is not required



- Treatment facility information [67450.2(b)(3)(B)]
- Prior enforcement history [67450.2(b)(3)(F)]
- Property owner notification [67450.2(b)(3)(c)]
- Tank systems [66265.191(a)/192(a)]
- Local agency notification [67450.2(b)(3)(A)]
- Financial assurance certification per unit [67450.2(b)(3)(D) 67450.13]
- Closure cost estimate per unit [67450.13(b)(1)(A)]
- Name and location of financial institution [67450.13(b)(1)(D)]



We will meet those requirement by submitting...

- 1. Business owner page
- 2. Business activity page
- 3. Tier Permitting Facility page
- 4. Onsite Hazardous Waste Treatment Notification page (PBR)
 Plot Plan, Prior Enforcement, Tank Container Certs, Agency notification,
 Property owner notification



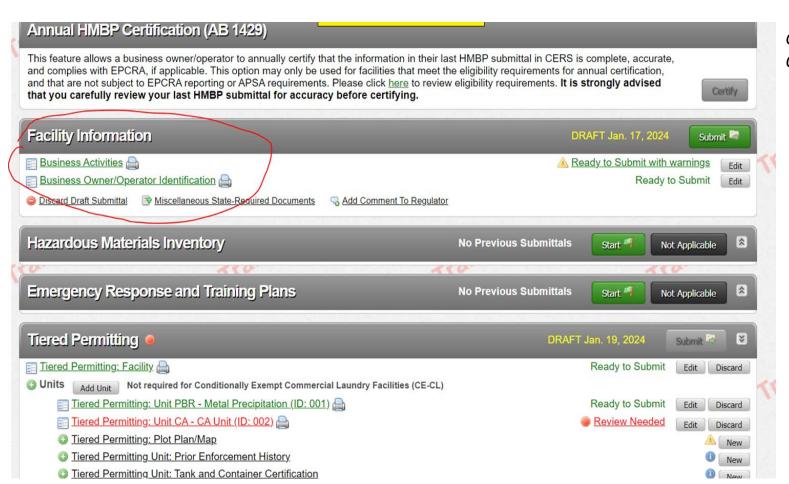
Business owner page

Initial Notification of Intent to operate shall contain:

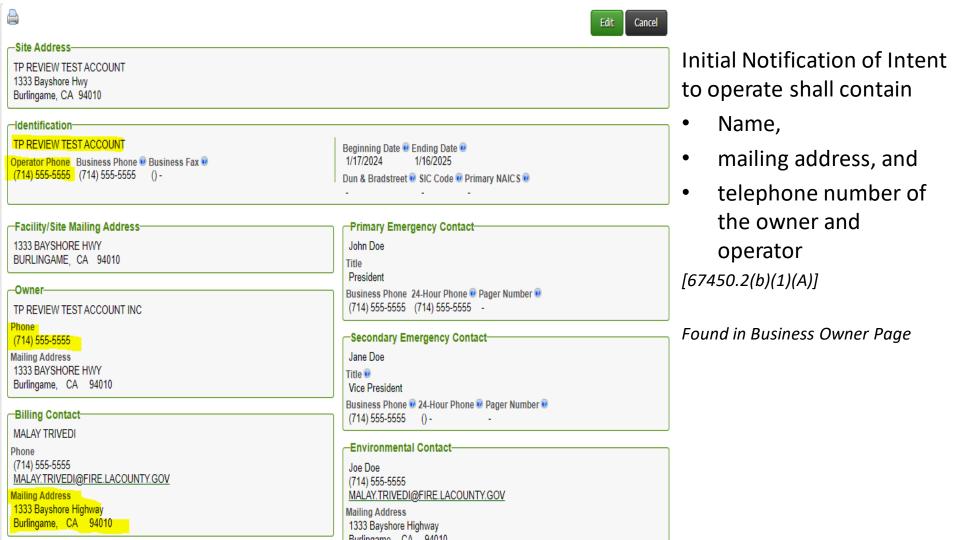
- Name
- Mailing address
- Telephone number of the owner and operator [67450.2(b)(1)(A)]



INITIAL PBR NOTIFICATION REQUIREMENTS



GO to → Business Owner page



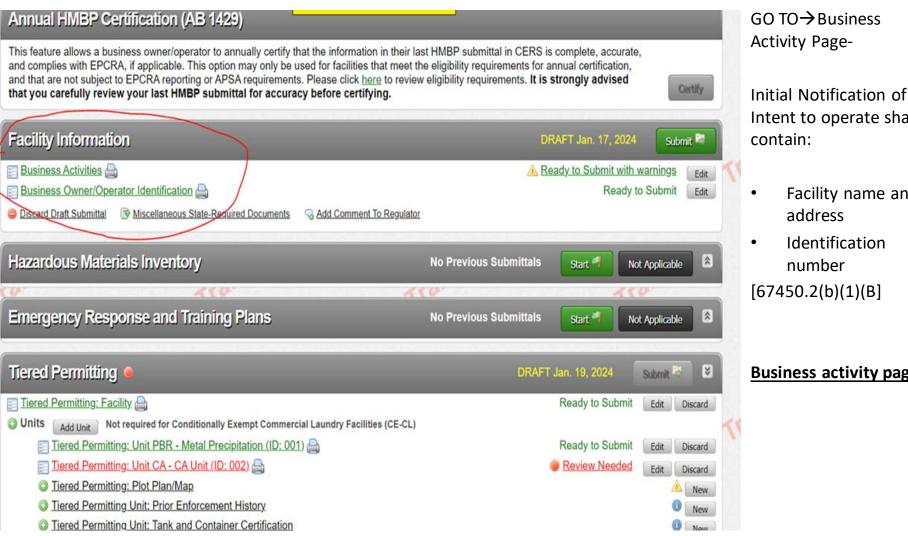
Business Activity Page

Initial Notification of Intent to operate shall contain:

- Facility name and address
- Identification number

[67450.2(b)(1)(B]





Activity Page-

Intent to operate shall contain:

- Facility name and address
- Identification number [67450.2(b)(1)(B]

Business activity page-

Submittal Guidance Marning (2) Advisory (0) All (2) Required (0) Warning guidance let you know of issues that probably apply to you, but are not required to resolve before submitting the Facility Information submittal element. ANO Federal or State EPAID is on file in CERS for the Hazardous Waste Generator's facility (CERS ID: [10187963]). Either a Federal EPAID (if monthly RCRA waste generated exceeds threshold) or State EPA ID should be submitted in the Facility Information submittal element for all Hazardous Waste Generators. A The EPAID number is not valid for the Facility name and location provided. Please validate the EPAID on your Business Activities form Cancel —Site Identification— **Facility Name** CERSID Edit TP REVIEW TEST ACCOUNT 10187963

Retrieve EPA ID

EPA ID Number

CAL000190540

Business Site Address Edit

1333 Bayshore Hwy

Burlingame , CA 94010 County: San Mateo

—Hazardous Materials-

Business activity page-

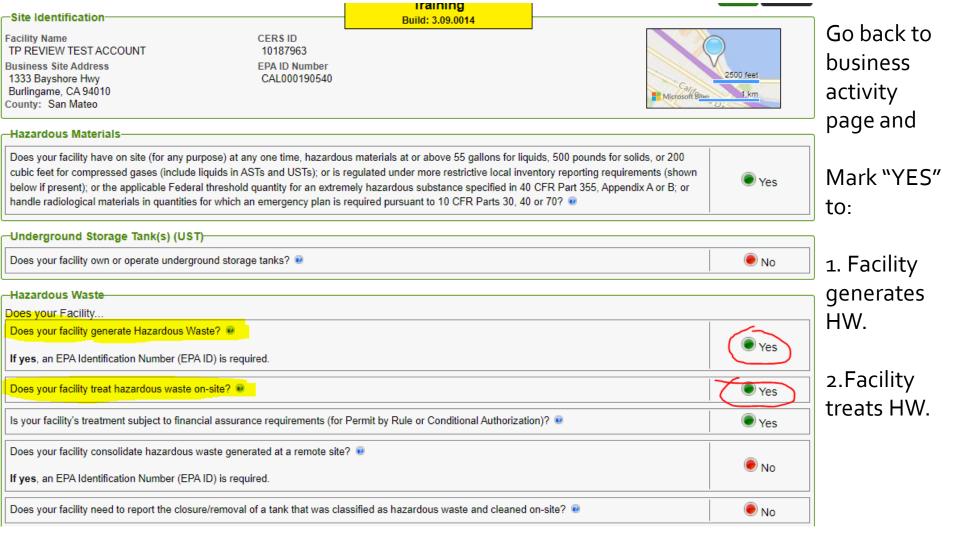
Initial Notification of Intent to operate shall contain:

- Facility name and address
- Identification number[67450.2(b)(1)(B]

View/Edit Location Map

- 1. Business owner page
- 2. Business activity page
- 3. Tier Permitting Facility page
- 4. Onsite Hazardous Waste Treatment Notification page (PBR)





Annual HMBP Certification (AB 1429)

Tiered Permitting Unit: Prior Enforcement History

Discard Draft Submittal

Tiered Permitting Unit: Tank and Container Certification

This feature allows a business owner/operator to annually certify that the information in their last HMBP submittal in CERS is complete, accurate, and complies with EPCRA, if applicable. This option may only be used for facilities that meet the eligibility requirements for annual certification. and that are not subject to EPCRA reporting or APSA requirements. Please click here to review eligibility requirements. It is strongly advised

that you carefully review your last HMBP submittal for accuracy before certifying.





Tiered Permitting Unit: Local Age	ency Notification
Tiered Permitting Unit: Property	Owner Notification
○ Financial Assurance Add Certification	Required for Facilities with PBR and CA Units Only

📰 Tiered Permitting Unit: Financial Assurance Certification - Mechanism Type: (Unknown) 🚵

Tiered Permitting: Estimate of Closure Costs

Tiered Permitting: Financial Assurance Closure Mechanism Miscellaneous State-Required Documents Add Comment To Regulator

Review Needed

Edit

New

New

New

New

Tiered Permitting: Facility: TP REVIEW TEST ACCOUNT Home » Prepare Submittal (10187963) » Tiered Permitting: Facility (Draft) Instructions/Help × Some treatment activities are exempt from reporting provided certain conditions are met (see Appendix A of the Onsite Hazardous Waste Treatment Notification Instructions at Onsite Hazardous Waste Treatment Notification Instructions - Appendix A). Otherwise, you must complete this submittal element if your facility is a hazardous waste generator performing treatment of hazardous wastes at the site where the waste is generated, and the facility is eligible under the Conditional Exemption (CE), or Conditional Authorization (CA) tiers, or operates a Fixed Treatment Unit (FTU) under the Permit by Rule (PBR) tier, To determine which tier or tiers apply to your operations, refer to the DTSC Onsite Tiered Permitting Flow Chart (https://dtsc.ca.gov/2020/04/17/document-request/). Discard Cancel -Number of Units at Facility-–Permit Status (Check all that apply)-# Unit Type / Tier With the exception of CE-CL ■ Facility Permit ● 0 Conditionally Exempt - Small Quantity Treatment (CESQT) Units the Number of Units 0 Conditionally Exempt Specified Wastestream (CESW) for this facility are Interim Status @ automatically calculated 1 Conditionally Authorized (CA) Standardized Permit @ based on each populated 1 Permit by Rule (PBR) Unit Page. Filling out the 0 Conditionally Exempt - Limited (CEL) appropriate Unit Pages for Variance @ this Facility will automatically 0 Number of CE-CL Units update these numbers. Consent Agreement @ 2 TOTAL UNITS —Certification-Waste Minimization I certify that I have a program in place to reduce the volume, quantity and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. Owner/Operator Name @ Request for Shortened Review Period (CE and CA only) JOHN DOE OYes ONo Owner/Operator Title @ Date Certified @

HEAD PLATING SUPERVISOR

Tiered Permitting: Facility: TP REVIEW TEST ACCOUNT

Home >> Prepare Submittal (10187963) >> Tiered Permitting: Facility (Draft)

② Instructions/Help



Some treatment activities are exempt from reporting provided certain conditions are met (see Appendix A of the Onsite Hazardous Waste Treatment Notification Instructions at Onsite Hazardous Waste Treatment Notification Instructions - Appendix A). Otherwise, you must complete this submittal element if your facility is a hazardous waste generator performing treatment of hazardous wastes at the site where the waste is generated, and the facility is eligible under the Conditional Exemption (CE), or Conditional Authorization (CA) tiers, or operates a Fixed Treatment Unit (FTU) under the Permit by Rule (PBR) tier. To determine which tier or tiers apply to your operations, refer to the DTSC Onsite Tiered Permitting Flow Chart (https://dtsc.ca.gov/2020/04/17/document-request/).

Appendix A - Exempt Treatment Activities



26th California Unified Program Annual Training Conference February 26-29, 2024

APPENDIX A-EXEMPT FROM NOTIFICATION

- 1. Biotechnology Elementary Neutralization Activities...wastes generated by biotechnology manufacturing or biotechnology process.
- 2. Neutralization of Acid/ Alkaline Wastes from Regeneration of Ion Exchange Media –
- 3. Neutralization of Acid/ Alkaline Wastes from the Food Processing Industry –
- 4. Silver Recovery
- 5. Sieving or Filtering Under Limited Conditions Sieving or filtering liquid hazardous waste to remove solid fractions, WITHOUT added heat, chemicals, or pressure
- 6. Phase Separation Under Limited Conditionsif the separation is unaided by the addition of heat or chemicals, and the activity is conducted onsite.
- 7. Combination of Wastestreams Under Limited Conditions -...IF combining two or more waste streams that are not incompatible into a single tank or container
- 8. Evaporation of Water Under Limited Conditions ...such as breathing and evaporation through vents and floating roofs, WITHOUT the addition of pressure, chemicals, or heat other than sunlight or ambient room lighting or heating.



come a cauncing acavace are exempt from reporting provided certain OHORE TIGERIADES WESTE TECHNICITY TOURISERION HISTOCIONS OF Training Onsite Hazardous Waste Treatment Notification Instructions - Append submittal element if your facility is a hazardous waste generator Build: 3.09.0014 nder the Conditional Exemption (CE), or Conditional Authorization performing treatment of hazardous wastes at the site where the waste (CA) tiers, or operates a Fixed Treatment Unit (FTU) under the Permit by Rule (PBR) tier. To determine which tier or tiers apply to your operations, refer to the DTSC Onsite Tiered Permitting Flow Chart (https://dtsc.ca.gov/2020/04/17/document-request/). Discard Save Cancel -Number of Units at Facility--Permit Status (Check all that apply)-# Unit Type / Tier Facility Permit @ With the exception of CE-CL Conditionally Exempt - Small Quantity Treatment (CESQT) 0 Units, the Number of Units Interim Status @ 0 Conditionally Exempt Specified Wastestream (CESW) for this facility are automatically calculated Conditionally Authorized (CA) Standardized Permit • based on each populated 1 Permit by Rule (PBR) Unit Page. Filling out the Variance 🕶 0 Conditionally Exempt - Limited (CEL) appropriate Unit Pages for this Facility will automatically 0 Number of CE-CL Units Consent Agreement @ update these numbers. 1 TOTAL UNITS -Certification-Waste Minimization I certify that I have a program in place to reduce the volume, quantity and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete, I am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. Owner/Operator Name 🐷 Request for Shortened Review Period (CE and CA only) OYes ONo JOHN DOF Owner/Operator Title @ Date Certified W

HEAD PLATING SUPERVISOR

1/23/2024

Per	mit Status (Check all that apply)——
No	Facility Permit 🕏
No	Interim Status 🖗
No	Standardized Permit @
No	Variance 🕡
No	Consent Agreement 🕡

-Certification-

Waste Minimization I certify that I have a program in place that I have selected the practicable method of treatment, st

<u>Tiered Permitting Certification</u> I certify that the unit or units permitting tier, including generator and secondary containm supervision in accordance with a system designed to assur manage the system, or those directly responsible for gathe

I am aware that there are substantial penalties for submittir

Owner/Operator Name
NICK GRANA
Owner/Operator Title
VP
Date Certified
10/3/2023 12:

- 1. DTSC-The Full Permit Tier Includes all facilities requiring a RCRA permit, plus selected non-RCRA activities . "Check this box ONLY if you now have or have ever held a state or federal hazardous waste facility full permit for any of these treatment units"
- 2. DTSC-Interim status-Interim Status allows existing facilities that become subject to newly enacted hazardous waste laws to continue operations in a protective manner during the permit application process.
- 3. DTSC-The Standardized Permit Tier A facility that manages waste not regulated under RCRA but regulated as a hazardous waste by the State of California. I.e. recyclers, oil transfer stations, and precious metals recyclers.
- 4. DTSC-Variance- A variance exempts the applicant from specific requirements as indicated in the variance. The regulations in California Code of Regulations, title 22
- 5. DTSC-Consent agreement- When approved, the consent agreement represents a legally binding contract between an operator and state. i.e. not prosecute as operator complies with the terms of the agreement.

	Discard	Save Cancel
-Permit Status (Check all that apply)——	Number of Units at Facility—	
☐ Facility Permit ●	# Unit Type / Tier	Mark the constitution of OF OI
Interim Status ®	0 Conditionally Exempt – Small Quantity Treatment (CESQT)	With the exception of CE-CL Units, the Number of Units
☐ Interim Status ●	Conditionally Exempt Specified Wastestream (CESW)	for this facility are
Standardized Permit 🕶	1 Conditionally Authorized (CA)	automatically calculated based on each populated
	1 Permit by Rule (PBR)	Unit Page. Filling out the
☐ Variance	0 Conditionally Exempt – Limited (CEL)	appropriate Unit Pages for this Facility will automatically
Consent Agreement 🖲	0 Number of CE-CL Units	
Certification Waste Minimization I certify that I have a program in place	2 TOTAL UNITS see to reduce the volume, quantity and toxicity of waste generated to the degree I have	update these numbers. determined to be economically practicable and
Certification Waste Minimization I certify that I have a program is place that I have selected the practicable method of treatment, incred Permitting Certification I certify that the unit or unitermitting tier, including generator and secondary contain upervision in accordance with a system designed to assume the system, or those directly responsible for gating the system, or those directly responsible for gating the system.	2 TOTAL UNITS	determined to be economically practicable and threat to human health and the environment. te statutes and regulations for the indicated ints were prepared under my direction or lased on my inquiry of the person or persons whacourate, and complete.
Certification Vaste Minimization certify that have a program is placted to a program is placted to the practicable method of treatment. Gered Permitting Certification certify that the unit or unitermitting tier, including generator and secondary contain upervision in accordance with a system designed to assuranage the system, or those directly responsible for gath am aware that there are substantial penalties for submit over the program of the	2 TOTAL UNITS be to reduce the volume, quantity and toxicity of waste generated to the degree I have storage, or disposal currently available to me which minimizes the present and future to described in these documents meet the eligibility and operating requirements of star most requirements, it so tits under penalty of law that this document and all attachments user that qualified personnel property gather end evaluate the information submitted. Be hering the information, the information is, to the best of my knowledge and belief, true, tting false information, including the possibility of fines and imprisonment for knowing to Request for Shortened Review Period (C	determined to be economically practicable and threat to human health and the environment. te statutes and regulations for the indicated into were prepared under my direction or lased on my inquiry of the person or persons whacourate, and complete.
Certification Vaste Minimization certify that have a program is place at have selected the practicable method of treatment, iered Permitting Certification certify that the unit or unitermitting tier, including generator and secondary contain upervision in accordance with a system designed to assuranage the system, or those directly responsible for gath am aware that there are substantial penalties for submit over the containing	2 TOTAL UNITS be to reduce the volume, quantity and toxicity of waste generated to the degree I have storage, or disposal currently available to me which minimizes the present and future its described in these documents meet the eligibility and operating requirements of star ment requirements. Foodify under penalty of law that this document and all attachmes sure that qualified personnel properly gather and evaluate the information submitted. Behering the information, the information is, to the best of my knowledge and belief, true, tting false information, including the possibility of fines and imprisonment for knowing virial property.	determined to be economically practicable and threat to human health and the environment. te statutes and regulations for the indicated into were prepared under my direction or lased on my inquiry of the person or persons whacourate, and complete.
Certification Vaste Minimization certify that have a program is placted to program is placted to proceed the practicable method of treatment. Gered Permitting Certification certify that the unit or unitermitting tier, including generator and secondary contain upervision in accordance with a system designed to assuranage the system, or those directly responsible for gath am aware that there are substantial penalties for submit owner/Operator Name DOWNER/OPERATOR TITLE D	2 TOTAL UNITS be to reduce the volume, quantity and toxicity of waste generated to the degree I have storage, or disposal currently available to me which minimizes the present and future to described in these documents meet the eligibility and operating requirements of star most requirements, it so tits under penalty of law that this document and all attachments user that qualified personnel property gather end evaluate the information submitted. Be hering the information, the information is, to the best of my knowledge and belief, true, tting false information, including the possibility of fines and imprisonment for knowing to Request for Shortened Review Period (C	determined to be economically practicable and threat to human health and the environment. te statutes and regulations for the indicated into were prepared under my direction or lased on my inquiry of the person or persons whacourate, and complete.
Certification Waste Minimization I certify that I have a program is place that I have selected the practicable method of treatment, incred Permitting Certification I certify that the unit or uniformitting tier, including generator and secondary contain supervision in accordance with a system designed to assumanage the system, or those directly responsible for gating the system of the system	2 TOTAL UNITS be to reduce the volume, quantity and toxicity of waste generated to the degree I have storage, or disposal currently available to me which minimizes the present and future to described in these documents meet the eligibility and operating requirements of star mment requirements. Footify under penalty of law that this document and all attachments that qualified personnel properly gather and evaluate the information submitted. Exhering the information, the information is, to the best of my knowledge and belief, true, tting false information, including the possibility of fines and imprisonment for knowing visiting false information, including the possibility of fines and imprisonment Review Period (Corporation).	determined to be economically practicable and threat to human health and the environment. te statutes and regulations for the indicated into were prepared under my direction or lased on my inquiry of the person or persons whacourate, and complete.

Build: 3.09.0014

Some treatment activities are exempt from reporting provided certain conditions are met (see Appendix A of the Onsite Hazardous Waste Treatment Notification Instructions at Onsite Hazardous Waste Treatment Notification Instructions - Appendix A). Otherwise, you must complete this submittal element if your facility is a hazardous waste generator performing treatment of hazardous wastes at the site where the waste is generated, and the facility is eligible under the Conditional Exemption (CE), or Conditional Authorization

UNITS
automatically
calculated when
you add a unit,
exception of CE
which you must
manually add

×

Instructions/Help

Some treatment activities are exempt from reporting provided certain conditions are met (see Appendix A of the Onsite Hazardous Waste Treatment Notification Instructions at Onsite Hazardous Waste Treatment Notification Instructions - Appendix A). Otherwise, you must complete this submittal element if your facility is a hazardous waste generator performing treatment of hazardous wastes at the site where the waste is generated, and the facility is eligible under the Conditional Exemption (CE), or Conditional Authorization (CA) tiers, or operates a Fixed Treatment Unit (FTU) under the Permit by Rule (PBR) tier. To determine which tier or tiers apply to your operations, refer to the DTSC Onsite Tiered Permitting Flow Chart (https://dtsc.ca.gov/2020/04/17/document-request/).

Discard Cancel -Permit Status (Check all that apply)-–Number of Units at Facility Unit Type / Tier ☐ Facility Permit ● With the exception of CE-CL Conditionally Exempt - Small Quantity Treatment (CESQT) Units, the Number of Units Interim Status 🗓 Conditionally Exempt Specified Wastestream (CESW) for this facility are automatically calculated Conditionally Authorized (CA) Standardized Permit based on each populated Permit by Rule (PBR) Unit Page, Filling out the Variance 🕶 Conditionally Exempt – Limited (CEL) appropriate Unit Pages for this Facility will automatically Number of CF-CL Units Consent Agreement 🖭 update these numbers. TOTAL UNITS -Certification Waste Minimization I certify that I have a program in place to reduce the volume, quantity and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Tiered Permitting Certification I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the indicated permitting tier, including generator and secondary containment requirements. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. am aware that there are substantial penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. Owner/Operator Name Request for Shortened Review Period (CE and CA only) JOHN DOE OYes ONo. Owner/Operator Title @ Date Certified 🥶 HEAD PLATING SUPERVISOR 1/23/2024

Each notification shall be completed, dated, signed [67450.2(b)(3)]

numberl

Treatment facility information [67450.2(b)(3)(B)]

FTU contact person and telephone

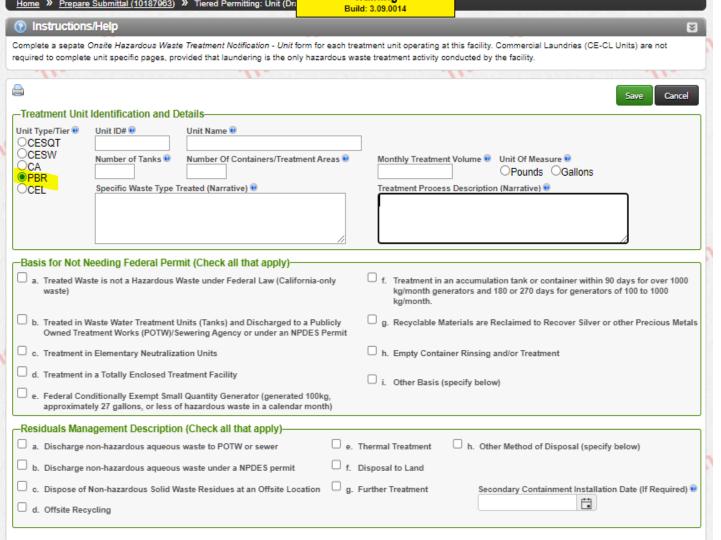
Tier permitting -Facility page

- 1. Business owner page
- 2. Business activity page
- 3. Tier Permitting Facility page
- 4. Onsite Hazardous Waste Treatment Notification Page (PBR)-

Plot Plan, Prior Enforcement, Tank Container Certs, Agency notification, Property owner notification







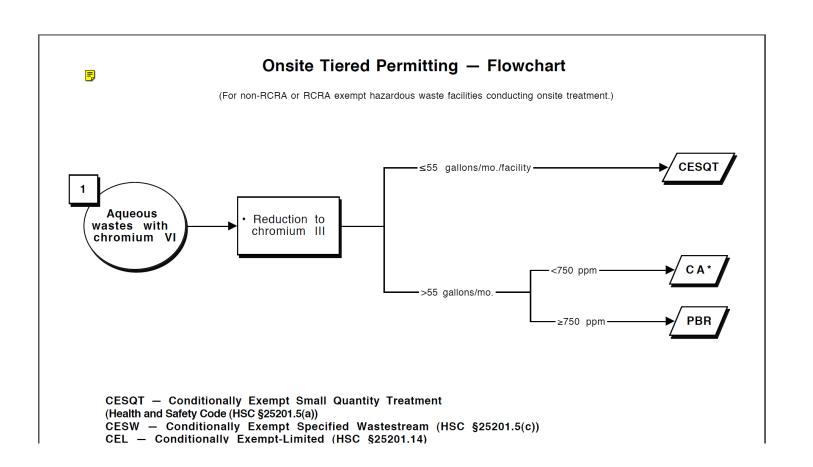
<u>Unit type/Tier-</u>

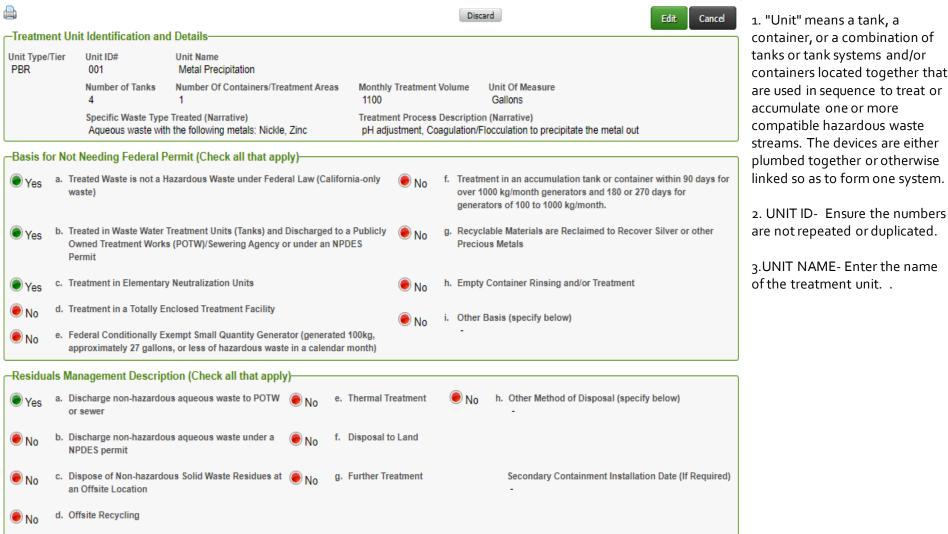
PBR-

Will populate only PBR options at the bottom of the page

Residuals Management Description (Check all that apply)— Build: 3.09.0014	
a. Discharge non-hazardous aqueous waste to POTW or sewer Build 3.00.0014 Build 3.00.0014 h. Other Method of Disposal (specify below)	
□ b. Discharge non-hazardous aqueous waste under a NPDES permit □ f. Disposal to Land	
c. Dispose of Non-hazardous Solid Waste Residues at an Offsite Location g. Further Treatment Secondary Containment Installation Date (If Require	d) 🕶
d. Offsite Recycling	
At least one Waste and Treatment Combination must be provided.	_
-Permit by Rule (PBR) - Waste and Treatment Process Combinations	
Aqueous wastes containing hexavalent chromium may be treated by the following process:	
Reduction of hexavalent chromium to trivalent chromium with sodium bisulfite, sodium metabisulfite, sodium thiosulfite, ferrous sulfate, ferrous sulfide, or sulfur dioxide provided both pH & addition of the reducing agent are automatically controlled	3
2. Aqueous wastes containing metals listed in Title 22, CCR, Section 66261.24(a)(2) and/or fluoride salts may be treated by the following technologies:	
pH Adjustment / Neutralization	
Precipitation or Crystallization	
Phase Separation by Filter, Centrifuge, or Gravity Settling	
□ Ion Exchange	
Reverse Osmosis	
☐ Metallic Replacement ☐ Plating onto an Electrode	
□ Electrodialysis	
☐ Electrowinning or Electrolytic Recovery	
Chemical Stabilization Using Silicates or Cementitious Reactions	
Evaporation	
Adsorption	
3. Aqueous wastes with total organic carbon less than 10% as measured by EPA Method 9060 and less than 1% total volatile organic compounds as measured by EPA Method 8240 may be treated by the following technologies:	d
Phase separation by filter, centrifuge, or gravity settling, but excluding super critical fluid extraction	
Adsorption	
Distillation	
Biological processes conducted in tanks or containers and utilizing naturually occuring microorganisms	
Photodegradation using ultraviolet light, with or without the addition of hydrogen peroxide or ozone, provided the treament is conducted in an enclosed system	
Air stripping or steam stripping	
4. Sludges, dusts, solid metal objects and metal workings which contain or are contaminated with metals listed in Title 22, CCR, Section 66261.24(a)(2) and/or fluoride salts to be treated by the following technologies:	nay
Chemical stabilization using silicates or cementitious types of reactions	
Physical processes which change only the physical properties of the waste such as grinding, shredding, crushing, or compacting.	
Drying to remove water	
Separation based on differences in physical properties such as size, magentism, or density	
5. Alum, gypsum, lime, sulfur or phosphate sludges may be treated by the following technologies:	
☐ Chemical stabilization using silicates or cementitious types of reactions	

Remember this?

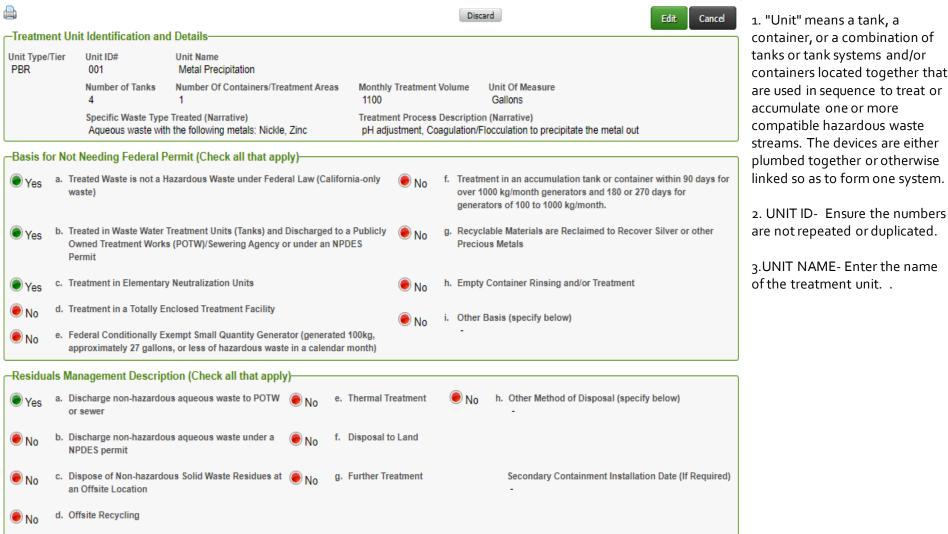




container, or a combination of tanks or tank systems and/or containers located together that are used in sequence to treat or accumulate one or more compatible hazardous waste streams. The devices are either plumbed together or otherwise linked so as to form one system.

are not repeated or duplicated.

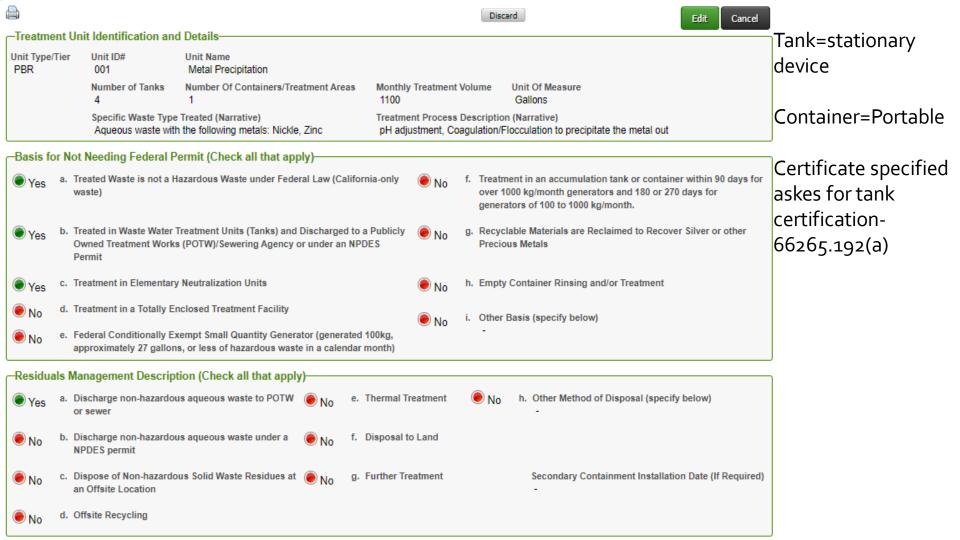
3.UNIT NAME- Enter the name of the treatment unit. .

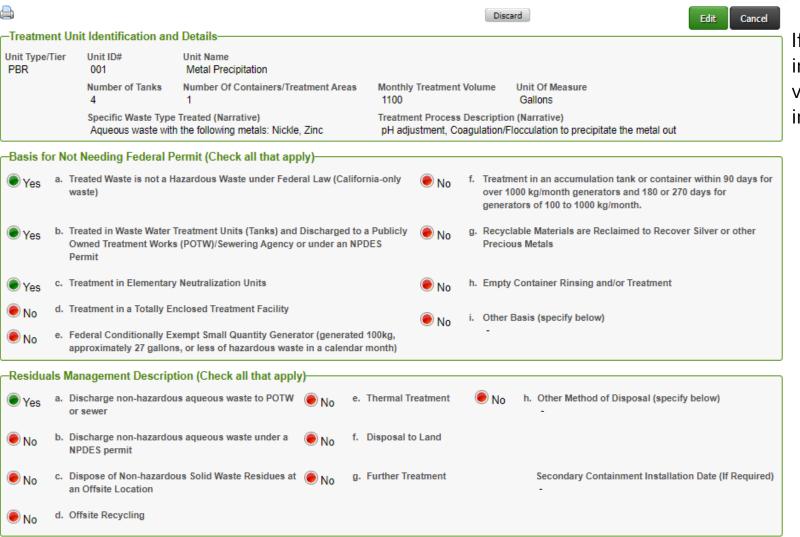


container, or a combination of tanks or tank systems and/or containers located together that are used in sequence to treat or accumulate one or more compatible hazardous waste streams. The devices are either plumbed together or otherwise linked so as to form one system.

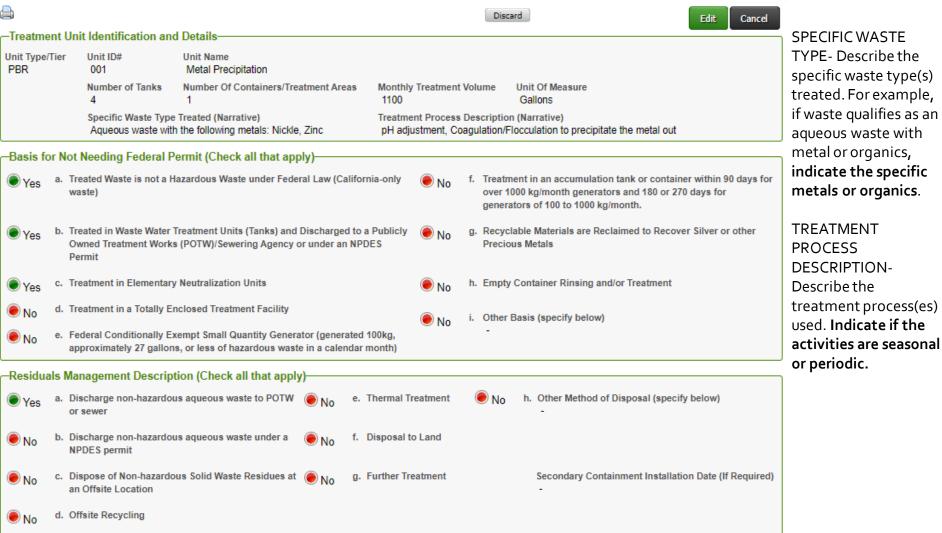
are not repeated or duplicated.

3.UNIT NAME- Enter the name of the treatment unit. .

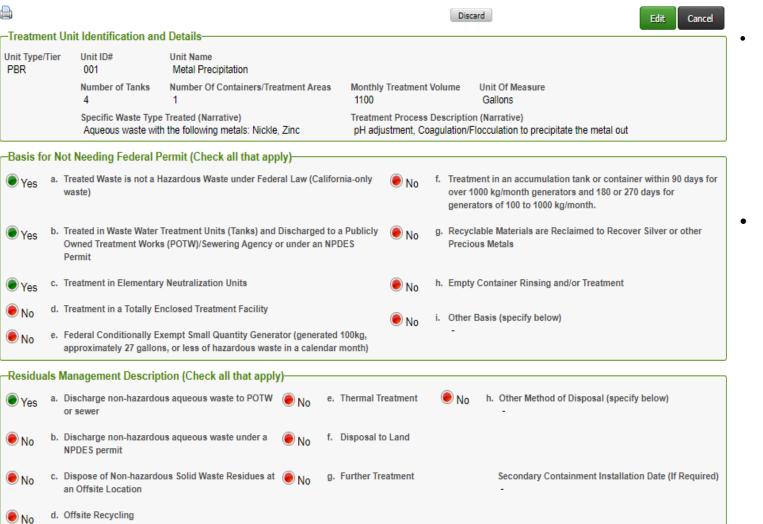




If fluctuatingindicate highest volume treated in any month



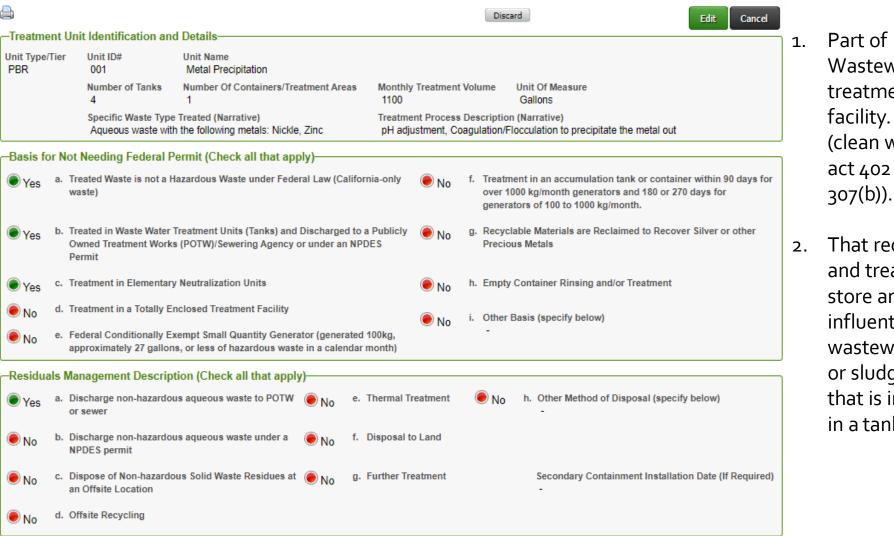
TYPE- Describe the specific waste type(s) treated. For example, if waste qualifies as an aqueous waste with metal or organics,



treatment operations that are not required to obtain a federal permit are eligible for the onsite permitting tiers. Must mark one.

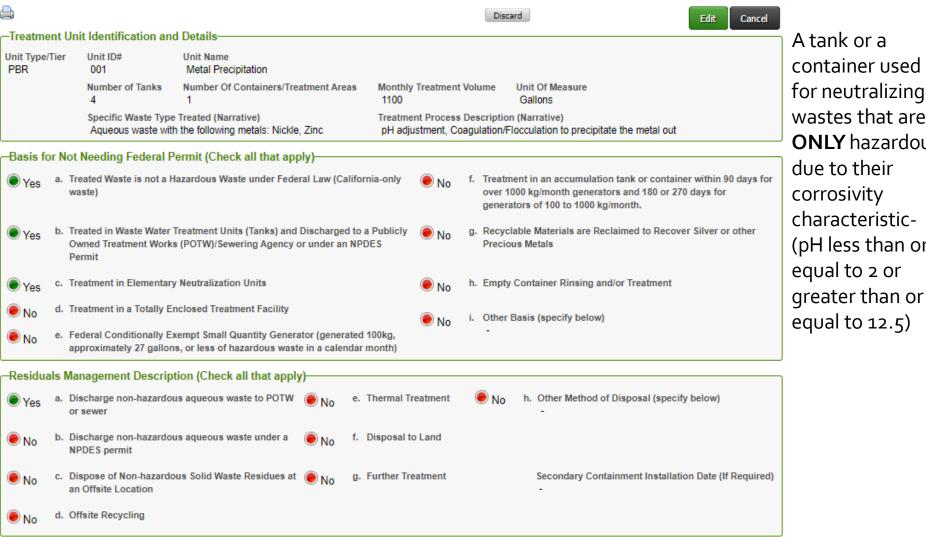
Only onsite

Hazardous waste permit is not required under RCRA and the federal regulations adopted under RCRA (40 CFR).

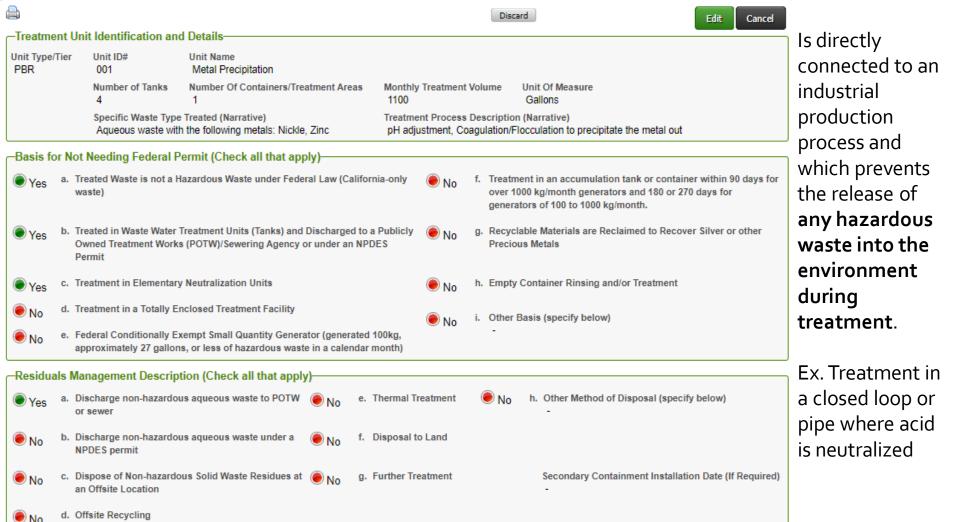


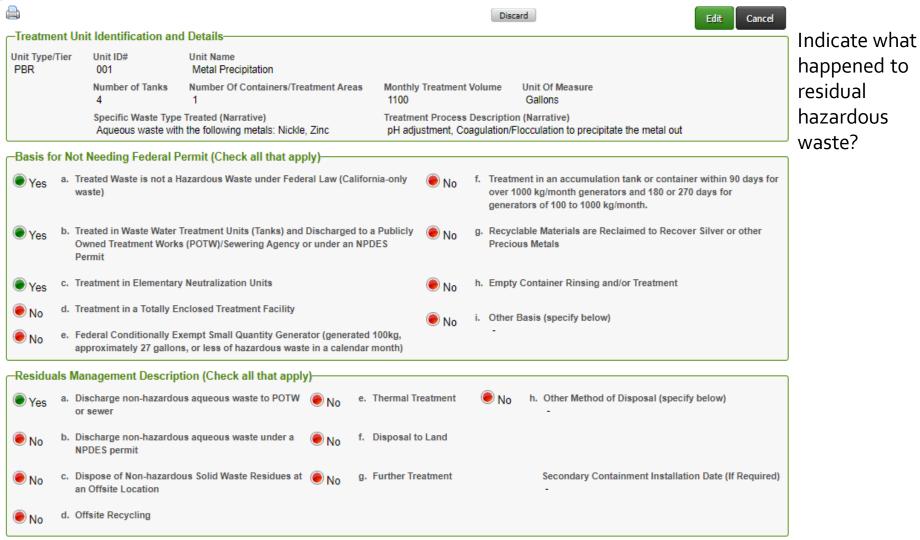
Wastewater treatment facility. (clean water act 402 or

That receive and treats or store an influent wastewater or sludge that is in HW in a tank.



A tank or a container used for neutralizing wastes that are **ONLY** hazardous due to their corrosivity characteristic-(pH less than or equal to 2 or

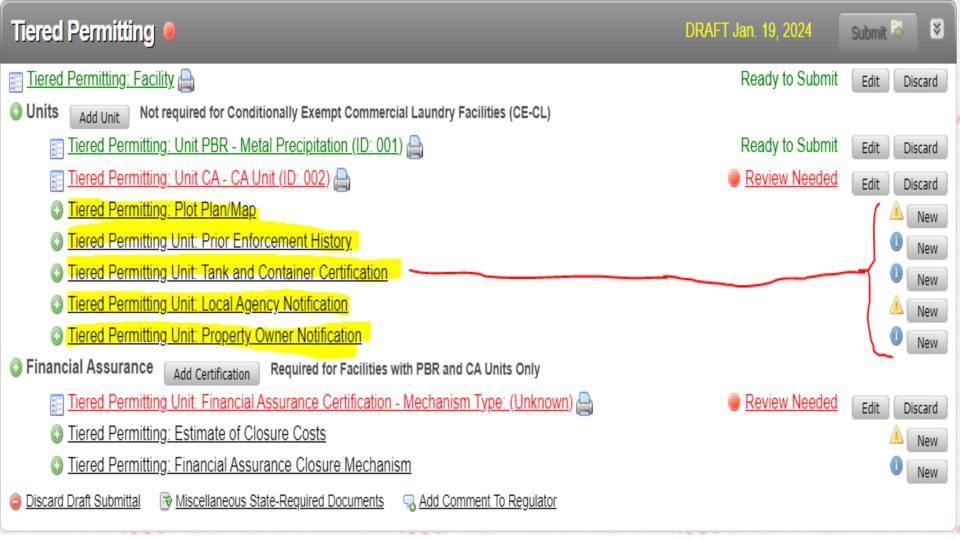


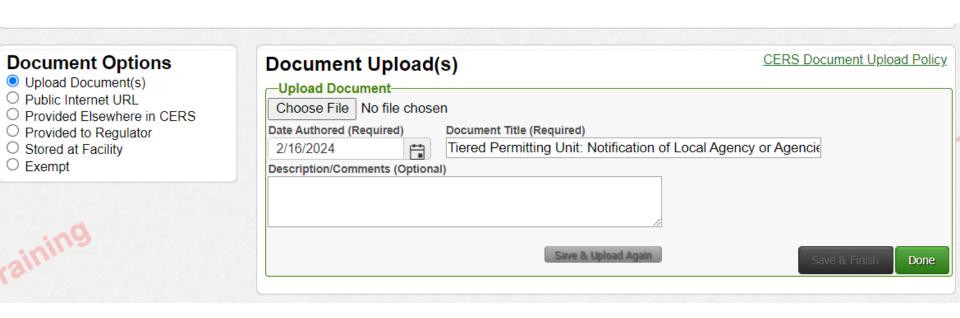


- 1. Business owner page
- 2. Business activity page
- 3. Tier Permitting Facility page
- 4. Onsite Hazardous Waste Treatment Notification Page (PBR)-

Plot Plan, Prior Enforcement, Tank Container Certs, Agency notification, Property owner notification







- Plot Plan-[67450.2(b)(3)(B)]
- 1. Plot plan **detailing** where the hazardous waste treatment(s) will occur.
- Detailing the location or locations of the unit or units at this facility.
- The site Map uploaded with your facility's Hazardous Materials Inventory may be used if the unit numbers are clearly indicated.
- For me, Ideally a flow diagrams and detailed descriptions of waste streams and treatment processes with unit flow.



Prior Enforcement History

- Upload a statement documenting any convictions, judgments, settlements, or orders resulting from any action by any local, State, or federal environmental or public health enforcement agency concerning the operation of the facility within the <u>last three years</u>. [67450.2(b)(3)(f)]
- The summary should include case and docket number, name and address of the agency, date, brief explanation, type of case (criminal, civil, administrative) and final resolution (including fines and penalties).



Prior Enforcement History

- https://cersregulator2.calepa.ca.gov/Enforcement
- https://dtsc.ca.gov/hw-projects/enforcement-cases/
- https://www.envirostor.dtsc.ca.gov/public/
- https://echo.epa.gov/facilities/facility-search/results
- CalOES website



Tank Integrity Assessment Certification

- Is treatment happening in tanks?
- How many tanks?
- Are they all certified?





26th California Unified Program Annual Training Conference February 26-29, 2024

Tank integrity Assessment Certifications

- 67450.2(b)(3)(G)-The onsite HW treatment notification.....shall include...the certification specified in section
- 66264.175(c)- PE Certified
- 66265.191(a)-Existing tank requirement
- 66265.192(a)-New tank requirement





Tiered Permitting: Tank and Container Certification(s)

Tank and/or containment system certifications are required to be submitted only for PBR units by 22 CCR 67450.2(b)(3)(G), when applicable. Containment system certifications must be a written statement signed by an independent, qualified professional engineer, registered in California, that indicates the containment system is suitably designed (22 CCR 66264.175(c)). Please see 22 CCR 66265.191(a) and 66265.192(a) for tank system certification requirements.

To upload a document, select the **Browse** button and then the file on your computer to upload, provide a document title, and then select **Save & Finish** to complete the upload. Use of other document options shown on the left must be approved by your local regulator.

Document Options

- Upload Document(s)
- O Public Internet URL
- O Provided Elsewhere in CERS
- O Provided to Regulator
- Stored at Facility
- Exempt

Document Upload(s) Upload Document

Choose File No file chosen

Date Authored (Required)

Document Title (Required)

2/13/2024

Tiered Permitting Unit: Tank and Container Certification

Description/Comments (Optional)

Save & Uplo

Save & Finish

CERS Document Upload Policy

Done

Tank integrity Assessment Certifications

• 66264.175(c):

A written statement signed by an independent, qualified professional engineer, registered in California, that indicates that the containment system is suitably designed to achieve the requirements of this section.



Tank integrity Assessment Certifications

C DATA TRANSMISSION



PE License look-up at
Department of Consumer
Affairs

https://search.dca.ca.gov/





26th California Unified Program Annual Training Conference February 26-29, 2024

Tank integrity Assessment Certifications (Existing tank)

"Existing tank"-

Installation had commenced on or prior to the following dates:

- 7/14/1986 for tanks holding RCRA waste
- 7/1/1991 for tanks holding Non-RCRA hazardous waste or RCRA waste with exemption

66265.191(a)- Not Leaking or is unfit for use-if no secondary containment Keep HW tank assessment on file



Tank integrity Assessment Certifications (new tank-66265.192a) 66265.192(a)- "New tank" –

- Structural support/strength, design standard, seams, pressure control
- Compatible waste,
- Corrosion protection-contact with soil/water
- HW assessment on file to include-



Tank integrity Assessment Certifications

What about 66265.192(k)-???

- Tank Configuration
- Age of tank
- Leak detection equipment
- Spill prevention/overfill equipment
- Estimate remaining life of the tank
- Secondary containment volume
- Etc...

- → To be kept on file at facility
- → Valid for 5yrs or remaining service life.
- → 66265.192(k)...Not required as part of treatment notification???



Local agency notifications [67450.2(b)(3)(A)]

Where is the treated waste being discharged to-

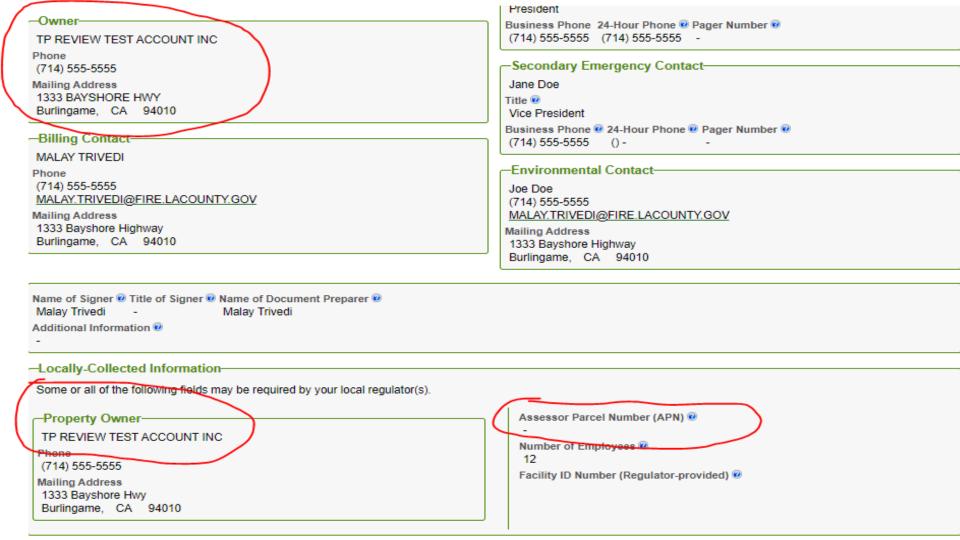
- A certification signed by the owner or operator specifying the local authorities that have been notified of the intended operation.
- At a minimum, the owner or operator shall notify the agency operating the POTW, if the treatment results in discharge to a POTW, and any other agency that requires notification for the operation of the FTU(s) at that facility.



Notification Property Owner-[67450.2(b)(3)(C)]

- Documentation that the facility operator has notified the property owner, if different.
- (A letterhead with signed copy would suffice and would be uploaded) to ensure that the property owner is aware that facility is treating waste on their property.





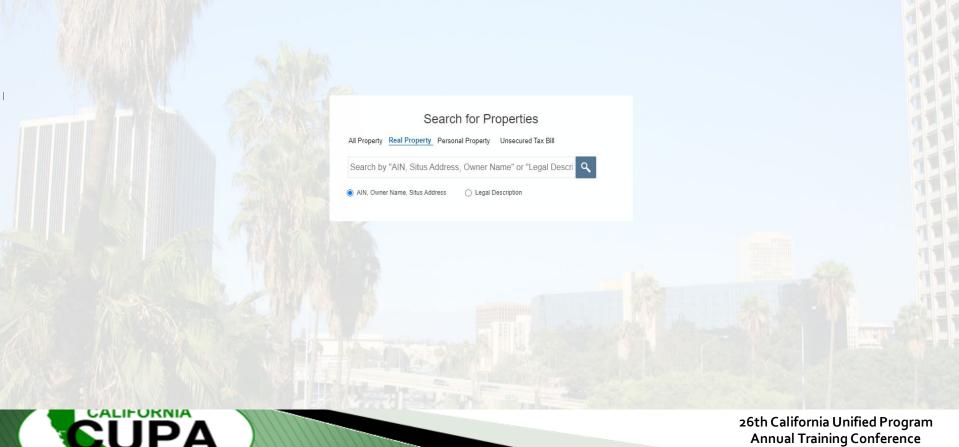




February 26-29, 2024







• <u>To be included in HW Treatment Notification Submittal</u> per [67450.2(b)(3)(G)], Where in CERS?

FTU serial number?

Quantity of influent waste?

Board of equalization account number?

(67450.2(b)(3)(B))

Hours of operation?



26th California Unified Program Annual Training Conference February 26-29, 2024

INITIAL PBR vs. ANNUAL PBR

- Phase I environmental assessment [67450.7(a)(3)], [25200.14] which assesses release of HW and clean up.
- Complete Phase I environmental assessment within one year of receiving the permit. Submit to DTSC and copy to CUPA.
- DTSC Form 1151 "Phase I Environmental Checklist" may be used to fulfill this requirement.
 - https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/02/HWM-TP_Phase-I-Env-Assessment-Chcklist.pdf



INITIAL CA

- Generator name, identification number, site address, mailing address and telephone number [HSC 25200.3(e)(3)(A)]
- Description of the physical characteristics and chemical composition of the waste [HSC 25200.3(e)(3)(B)]
- Description on the waste treatment activity and basis for determining that a
 hazardous waste facility permit is not requires [HSC 25200.3(e)(3)(C)]
- Description of the characteristics and management of any treatment residuals [HSC 2500.3(e)(3)(D)]
- Statement documenting any prior conviction/judgments/settlements/orders within past 3 years [HSC 2500.3(e)(3)(E)]



- ANNUAL CA
- No requirement for annual submittals of TP documents [HSC 25200.3(1)]
- Closure cost estimate must be adjusted annually for inflation but does not need to be submitted [67450.13(A)(4)]
- Inflation factor due by March 1st of each subsequent year [67450.13(a)(2)]



- INITIAL CE
- Generator name, identification number, site address, mailing address and telephone number [HSC 25201.5(d)(7)(C)(i)]
- Description of the physical characteristics and chemical composition of the waste [HSC 25201.5(d)(7)(C)(ii)]
- Description of the waste treatment activity and basis for determining that a hazardous waste facility permit is not required [HSC 25201.5(d)(7)(C)(iii)]
- Description of the characteristics and management of any treatment residuals [HSC 25201.5(d)(7)(C)(iv)]
- ANNUAL CE -No requirement for annual submittals of TP



BREAKTIME! (3 mins)



Section 3 Financial Assurance-Basic

REFER TO 66265.143



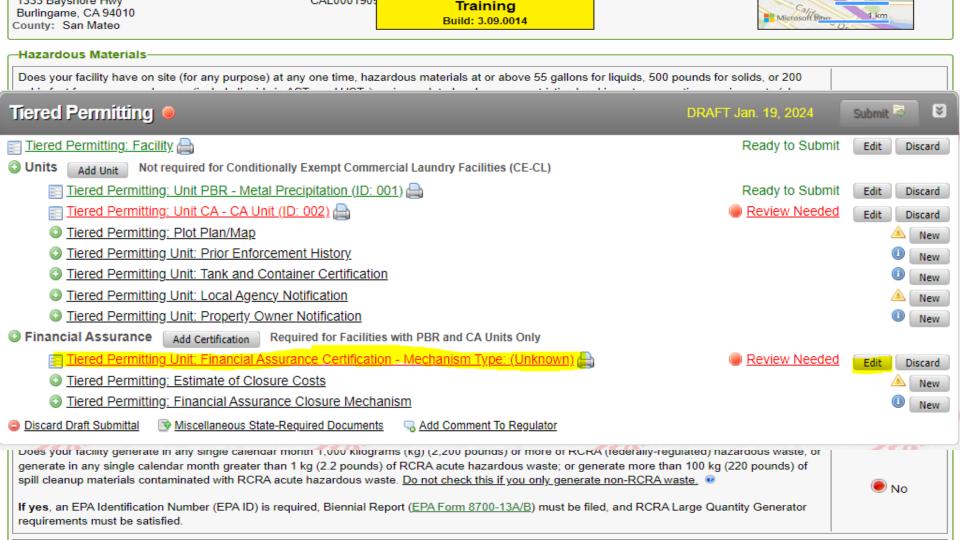
Dullu, 3.05.0014 Hazardous Materials-Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive local 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? 👽 -Underground Storage Tank(s) (UST)-No Does your facility own or operate underground storage tanks? Hazardous Waste Does your Facility... Does your facility generate Hazardous Waste? @ Yes If yes, an EPA Identification Number (EPA ID) is required. 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? . No If yes, an EPA Identification Number (EPA ID) is required. Does your facility need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site? 🕡 No 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 greater than 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate 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. @ No 🥌 If yes, an EPA Identification Number (EPA ID) is required, Biennial Report (EPA Form 8700-13A/B) must be filed, and RCRA Large Quantity Generator requirements must be satisfied. Is your facility a Household Hazardous Waste (HHW) Collection site? .

Your facility is subject to financial assurance.
I.e. If you are a PBR/CA

Financial Assurance-Basic

- Financial assurance certification [67450.13]
 - Closure cost estimate per unit [67450.13(b)(1)(A)]
 - Financial assurance mechanism requirements [67450.13(b)(1)(B)]
 - Name and location of financial institution [67450.13(b)(1)(C)]
 - Effective date of the closure assurance for each unit [67450.13(b)(1)(D)]





Financial Assurance-Basic

Financial Assurance Not Required

- Business that don't treat HW
- Federal and State site are not subject to financial assurance (city and county are subject to it)
- PBR/CA facilities operating <30 days in calendar year
- Closure cost estimate <\$10,000
- CE are not required



Poll Question 5

If facility is claiming \$10,000 exemption, is this for the closure of:

- A. Closure cost for all the units?
- B. Closure cost for every unit?



Poll Question 5

If facility is claiming \$10,000 exemption, is this for the closure of:

- A. Total closure cost estimate less than or equal to \$10,000. Closure cost for all the units?
- B. Closure cost for every unit?



Estimated Closure Costs Calculator

take into account any parvage value that may be realized from the pale of wapted, lacility phaetare or equipment, land or other facility assets. Following is a model closure cost estimate:

ACTIVITY

- Removal, treatment (on-site or off-site), or disposal of waste inventories
- Removal and disposal of soil
- Decontamination of equipment and structure
- Demolition and removal of containment system components or structure
- Transportation
- Sampling and analysis of waste, soil, equipment, and structure
- 7. Certification or other demonstration of closure ("clean" closure or specified level of decontamination)
- Other expenses (specify)

NOTESFORMER GARLY A GOLV AND BUT AND B qualify for an exemption.

5000.00

COST

200.00

2222.00 5222.00

8522.00

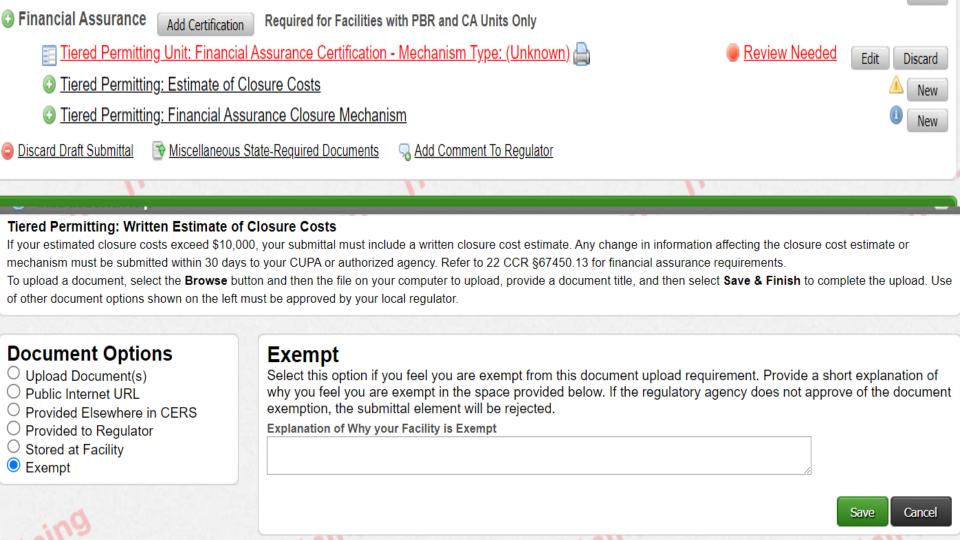
1100.00

1200.00

\$23466.00

Done

Cancel



Closure Cost

- Provide estimate cost incurred for closing each unit.
- If there is a change in closure cost-it should be updated within 30 days.
- Closure cost should coincide with closure plan BUT...hmm..closure plan is not required to be submitted into CERS???
- Adjust the closure cost estimate for inflation by March 1st of each year



<u>Estimated closure cost</u>

- Removal of waste
- Decontamination of tank
- Demolition/removal of debris
- Disposal of equipment/containment system
- Labor
- Sampling, possible contamination removal soil
- Cost of hiring PE
- Etc.



- Actual closure cost can offset the initial estimated closure cost by subtracting..
 - Salvage value of equipment
 - Value of waste
 - Facility structure/Land
 - Labor rate using own employee and equipment



- Ensure that-
 - Closure cost estimate are updated from last year
 - Estimated are adjusted for inflation



Closure cost estimate-How is it calculated? Go to—Bureau of Economic Analysis

- www.bea.com
- → Look for table 1.1.9
- → Look for implicit price deflator
- → Look at price deflator for previous 2 years ending in Q3 and divide them up.



Table 1.1.9. Implicit Price Deflators for Gross Domestic Product

[Index numbers, 2017=100] Seasonally adjusted

Last Revised on: November 29, 2023 - Next Release Date December 21, 2023

Line	2021	2021	2021	2021	2022	2022	2022	2022	2023	2023	2023
Alle	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
1 Gross domestic product	107.668	109.305	110.920	112.848	115.135	117.671	118.962	120.093	121.261	121.766	122.8
2 Personal consumption expenditures	106.547	108.174	109.673	111.487	113.574	115.568	116.902	118.098	119.309	120.044	120.8
3 Goods	101.348	103.450	105.379	108.051	111.145	113.795	114.617	114.643	114.844	114.911	115.1
4 Durable goods	97.844	101.218	103.593	105.894	108.072	108.435	109.214	108.764	108.521	108.547	107.3
5 Nondurable goods	103.245	104.572	106.240	109.127	112.754	116.745	117.591	117.899	118.366	118.457	119.5
6 Services	109.091	110.445	111.701	113.043	114.572	116.205	117.809	119.624	121.370	122.461	123.6
7 Gross private domestic investment	105.514	106.528	108.074	110.457	112.891	115.431	117.389	118.176	119.228	119.087	119.5
8 Fixed investment	105.881	106.920	108.772	111.042	113.626	116.227	118.098	119.140	120.384	120.370	120.9
9 Nonresidential	102.377	102.430	103.555	105.438	107.135	109.070	110.673	111.545	113.278	113.334	113.5
10 Structures	106.613	108.254	110.631	116.512	120.356	124.898	129.638	131.830	134.127	134.429	133.6
11 Equipment	99.752	98.915	100.091	101.524	103.584	105.640	107.073	108.610	110.700	110.381	111.0
12 Intellectual property products	102.745	102.901	103.374	103.876	104.286	104.992	105.446	105.158	106.326	106.610	106.9
13 Residential	118.262	122.622	127.003	130.673	136.374	141.401	144.306	146.043	145.102	144.779	146.6
14 Change in private inventories											
15 Net exports of goods and services					- -	- -	-	-	-		_
16 Exports	106.518	111.128	113.718	115.581	120.539	126.104	123.075	121.326	121.359	120.169	121.4
17 Goods	105.215	111.074	114.083	116.167	122.478	129.886	125.159	121.694	120.799	118.816	120.0
18 Services	108.891	110.806	112.519	113.901	115.923	117.610	118.141	120.013	122.021	122.504	123.9
19 Imports	102.425	105.452	107.052	108.876	112.364	115.284	114.025	112.795	112.426	111.052	111.1
20 Goods	101.495	104.663	106.251	108.200	112.147	115.147	113.368	111.429	110.763	109.048	109.2
21 Services	106.550	108.807	110.486	111.700	112.903	115.420	116.629	118.687	119.701	119.938	119.5
22 Government consumption expenditures and gross investment	110.707	112.381	113.918	115.759	118.109	121.271	122.113	123.086	123.548	123.221	124.7
23 Federal	107.395	108.445	109.543	110.784	112.726	114.600	115.953	117.119	118.311	118.917	120.0
24 National defense	107.443	108.582	109.704	111.059	113.494	115.983	116.800	117.838	118.805	119.356	120.6
25 Nondefense	107.346	108.282	109.347	110.439	111.749	112.827	114.876	116.207	117.684	118.359	119.4
26 State and local	112.770	114.848	116.664	118.889	121.503	125.482	126.005	126.858	126.855	125.936	127.
Addendum:											
27 Gross national product	107.591	109.225	110.838	112.765	115.050	117.582	118.872	120.002	121.168	121.673	122.7

1 - 6 1

- The number was derived by dividing:
- 2023 Q3 122.735 = 1.032
- 2022 Q3
 118.872
- Implicit Price Deflators for GDNP published on November 29. IPD for GDP gets revised monthly. But we usually stick with the one close to December.



- My closure cost > \$10,000 and I don't qualify for any other exemption!
- To ensure adequate resources or funds are available to close a unit, we must:
 - Set aside funds equal or greater to estimated cost
 - Guarantee from third party
 - Demonstrate the financial ability to cover the closure cost



Types of Financial Assurances Mechanisms

- Trust Funds
- Surety Bonds
- Letter of Credit
- Insurance
- Financial Test & Corporate Guarantee
- Alternative Financial Mechanism
- Multiple financial mechanism

- USE 22-CCR-66264.151 for exact wording
- USE 22-CCR-66265.143 for details
- ENSURETHE BENEFICIARY IS THE CUPA NOT DTSC
- Original to be sent to CUPA not DTSC



- Trust Funds-Form 1154
 - Owner/operator (grantor) deposits money into banks, savings and loans, credit union (trustee) and enter a contract (trust agreement)
 - Pay-in period deposit can be made for period up to 5 years or life of the facility-whichever is shorter
 - Must have money equal to facilities closure cost estimate



Surety Bonds-Use form 1155, 1156

- 3 party agreement CUPA (oblige) ---Owner(principal)---Surety company
- Surety company guarantees CUPA, that they will pay for the closure if owner is not able to.
- 2 types of surety bonds-
 - Financial guarantee bonds- can be used with PBR/CA
 - Performance bonds-can NOT be used with PBR/CA



Financial Test & Corporate Guarantee (66265.143(e)

- A corporation can demonstrate it has sufficient resources to provide for closure cost.
 - Letter from CFO
 - Copy from Independent auditor with
 - · Most recent financial statement
 - Special report from independent auditor
 - Corporation must have \$10mil in tangible net worth (90% in usa)
 - Must meet-
 - Financial ratio test or investment grade from "moody's"



Letter Of Credit-1157

- Guarantee made by financial institution stating if owner does not meet its closure obligation the beneficiary (CUPA) may get money.
- Must be "Irrevocable" (renewed annually until cancelled)
- Think of letter of credit like a line of credit.



Closure Insurance – DTSC Form 1158

- An insurance company guarantees performance of closure to the CUPA
 - Risk Transfer-Like insurance, policy holder makes payment and hope a claim is never needed to be made by the CUPA
 - Full funded-presumes claim will be made sometimes in the future
- Insurance company must be underwritten by a company that is authorized to write insurance in one or more of the 50 states
- Submit to the CUPA annually



<u>Alternative Financial Mechanism</u>

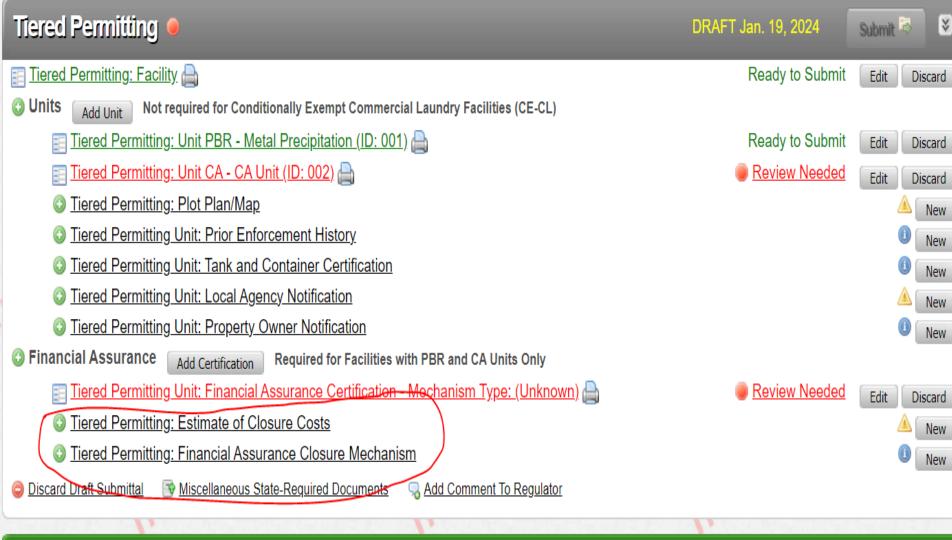
- Owner proposes alternative financial mechanism for acceptance by CUPA.
- CUPA may consider Amt. of funds, availability of funds, restriction on access.
- Owner to submit a letter requesting that proposed mechanism be acceptable



Multiple Financial Mechanism

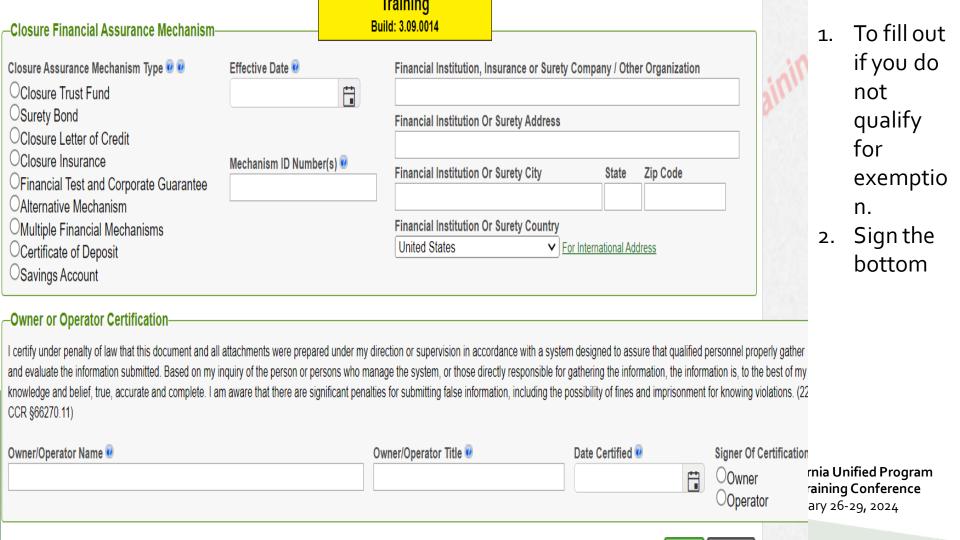
- Combination of the mechanisms mentioned above as opposed to any one mechanism.
- Combination must cover the closure cost estimate
- Designate one as "primary" other as "excess"





- Financial assurance certification [67450.2(b)(3)(D) 2 67450.13]
 - Closure cost estimate per unit [67450.13(b)(1)(A)]
 - Original document used to satisfy financial assurance mechanism requirements [67450.13(b)(1)(B)]
 - Name and location of financial institution [67450.13(b)(1)(C)]
 - Effective date of the closure assurance for each unit [67450.13(b)(1)(D)]

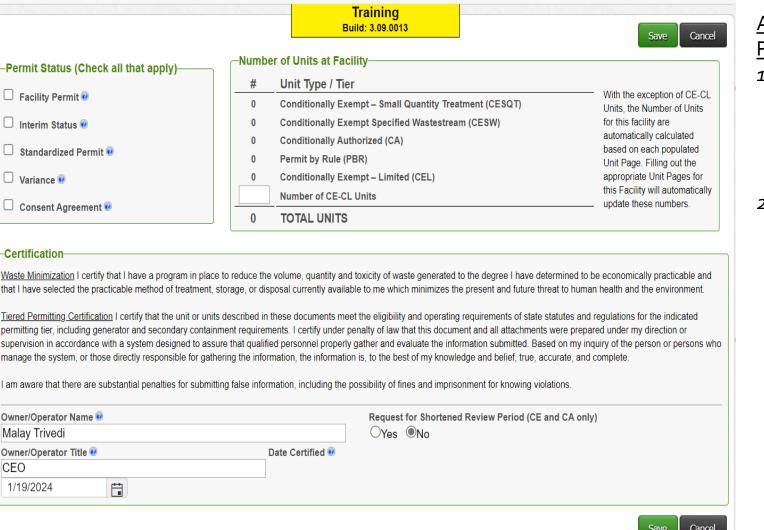




• Release of Financial Assurance requirement-

Within 60 days after receiving certification from operator/owner with PE
 Certified stating final closure has been completed accordance with closure
 plan, CUPA shall notify in writing that the owner/operator no longer required
 to maintain financial assurance or provide detail written statement why CUPA
 believes the closure has not been conducted accordance with standard.





CUPA IRAINING HM APSA HW LAWS IP Recycling 17 CERS (# DISC-IRACKING Ownership 😽 KCKAInfo-Emanifest V MAPS 🖼 MYLacounty 📑 MyLacounty-External 🏌 Photos - Google

Also certifying-Paraphrasing..

- 1. Program in place to reduce the volume, quantity and toxicity of waste generated.
- 2. Units meet the eligibility for the indicated tier, qualified personnel submitted the information is, to the best of my knowledge and belief, true, accurate, and complete

TIER PERMITTING SUBMITTAL ON CERS

• Time Frames:

- Notifications to be submitted 60 days prior to initial treatment activities [67450.2(b)(2)]
- Within 45 calendar days of receipt of notification, the CUPA shall acknowledge in writing the authorization, denial of authorization or the notify the operator of deficiencies [67450.3(b)(4)]



TIER PERMITTING SUBMITTAL ON CERS

Administratively Complete

• This Department has received the completed annual Permit by Rule (PBR) notification for this facility. Your notification is administratively complete but has not been reviewed for technical adequacy. A technical review of your notification will be conducted when a representative of this Department performs an onsite inspection. Pursuant to Title 22, California Code of Regulations (CCR), Section 67450.3(d), you are hereby reauthorized to operate the PBR unit(s) identified in this notification from March 15, 2024 to March 14, 2025.





Any unanswered Questions?

Contact-Malay Trivedi, Los Angeles County Fire Dept.

Malay.Trivedi@fire.lacounty.gov



26th California Unified Program Annual Training Conference February 26-29, 2024