



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 01/01/2026PAGE 1 OF 2

RECORD ID #: _____

Onsite Hazardous Waste Treatment - Permit By Rule

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. CA = Conditional Authorization; CE = Conditionally Exempt; CESW = Conditionally Exempt Specified Wastestream; SQT = Small Quantity Treatment; CEL = Conditionally Exempt - Limited; PBR = Permit by Rule; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; PE = Professional Engineer

GENERAL REQUIREMENTS - ALL TIERS

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 3250005	Failure to obtain a hazardous waste facilities permit, or other grant of authorization, prior to accepting, treating, storing, or disposing of a hazardous waste at the facility, area, or site. HSC 25201.5, CEL: HSC 25201.14, CA: HSC 25200.3; or PBR 22 CCR 67450.1
<input type="checkbox"/> HMD1704	Number of tanks, containers, and/or treatment processes is not correct for each treatment unit. CE: HSC 25201.5(d)(7), 25201.5(a),(c); CEL: HSC 25201.14(a); CA: HSC 25200.3(a) & (e)(3); PBR: 22 CCR 67450.2(b)(3)(G), 67450.3(c)(4) & 67450.11
<input type="checkbox"/> HMD1705	Estimated/actual monthly treatment volume is not appropriate for the indicated tier(s). CE: HSC 25201.5(a) & (d)(7)(C); CEL: HSC 25201.14(c); CA: HSC 25200.3(b)(1) & (e)(3); PBR: 22 CCR 67450.2(b)(3)(G) & 67450.11
<input type="checkbox"/> HMD1706	Waste identification, waste type, and/or treatment method not correct for the tier(s) indicated. CE: HSC 25201.5; CEL: HSC 25201.14(a); CA: HSC 25200.3; PBR: 22 CCR 67450.3(c)(4), 67450.11
<input type="checkbox"/> HMD1707	Number of onsite treatment units is not the same as the number notified. CE: HSC 25201.5(d)(7), 25201.5(i) & 25201.14(c); CA: HSC 25200.3(e) & (k); PBR: 22 CCR 67450.2(b) & 67450.3(c)
<input type="checkbox"/> HMD1708	Residuals management information not adequate or noted correctly on notification form. CE: HSC 25201.5(d)(7)(C)(iv) & (d)(6); CEL: HSC 25201.14(c)(1); CA: HSC 25200.3(b)(4) & (e)(3)(D); PBR: 22 CCR 67450.3(c)(5)
<input type="checkbox"/> HMD1709	Indicated basis for not needing a federal permit is incorrect. CE: HSC 25201.5(d)(7) & CEL: HSC 25201.14(c)(1); CA: HSC 25200.3(e)(3)(C); PBR: 22 CCR 67450.2(b)(3)(G) & 67450.11
<input type="checkbox"/> HMD1710	Site map/plot plan does not adequately show the location of treatment unit(s). CE: HSC 25201.5(d)(7); CA: HSC 25200.3(e); PBR: 22 CCR 67450.2(b)(3)(B)
<input type="checkbox"/> HMD1711	Inadequate or no written inspection schedule for containers, tanks, & equipment (must include inspections for safety and emergency equipment, specify problems checked, and frequency of inspections). For containers: CE: HSC 25201.5(d)(4)&(5); CEL: 25201.14(c)(1); CA: 25200.3(c)(5); PBR: 22 CCR 67450.3(c)(8)(B) & 67450.3(c)(9)(A) & (D); 66265.15 (For tanks, also 22 CCR 66265.195)
<input type="checkbox"/> HMD1712	Inadequate or no records of inspections (must include dates, times, name of inspector, observations, and specifics of needed repairs or corrective actions). (3 years for CE and PBR units, 5 years for CA). CE: HSC 25201.5(d)(4)&(5), 25201.14(c)(1); CA: HSC 25200.3(c)(5)&(7); PBR: 22 CCR 67450.3(c)(8) & (9)(A) & (D), 66265.73(a)&(b)(1); 66265.15(b),(d)
<input type="checkbox"/> HMD1713	Facility does not meet all POTW industrial waste discharge requirements, as applicable, or is missing records of such. CEL: HSC 25201.14(c)(1); CE: HSC 25201.5(d)(6); CA: HSC 25200.3(c)(7); PBR: 22 CCR 67450.3(c)(5)(A)
<input type="checkbox"/> HMD1714	Improper/inadequate closure of (includes removal or decon. of equipment, waste residues, containment systems, soils and/or structures). CE: HSC 25201.5(d)(8)(A); CEL: HSC 25201.14(c)(1); CA: HSC 25200.3(g)(1); PBR: 22 CCR 67450.3(c)(11)
<input type="checkbox"/> HMD1715	Notification was not made to CUPA after treatment unit closure requirements were met. CE: 25201.5(d)(8)(B); CEL: 25201.14(c)(1); CA: 25200.3(g)(2); PBR: 67450.3(c)(11) Note: for PBR, notification must be made 15 days BEFORE completion of closure.
<input type="checkbox"/> HMD1716	Inadequate or no written operating instructions for unit (how to do waste treatment, and how to manage residuals; AND records of the dates, volumes, and types of wastes treated). Records must be kept 3 years for CE; 5 years for CA; or until closure-PBR unit. CE: HSC 25201.5(d)(3)&(5); CEL: HSC 25201.14(c)(1); CA: HSC 25200.3(c)(6) & (7); PBR: 22 CCR 67450.3(c)(9)(D), 66265.73(a) & (b)(1)
<input type="checkbox"/> HMD1717	Treatment not being done in tanks or containers. CA: HSC 25200.3(b)(2); PBR: 22 CCR 67450.11(a); CE: HSC 25201.5(d)(9); CEL: 25201.14(c)(1)
<input type="checkbox"/> 3210053	Failure to electronically submit to the CUPA an annual Tiered Permit notification. 22 CCR 45 67450.3(c)(1)
<input type="checkbox"/> 3230072	Failure to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction including but not limited to: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste. 22 CCR 15 66265.17(a); 22 CCR 45 67450.3(c)(9)(A)

PERMIT BY RULE

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 3210002	Failed to submit in CERS, the treatment notification 60 days before commencing hazardous waste treatment. 22 CCR 67450.2(b)(2); 27 CCR 15188(a),(b)
<input type="checkbox"/> 3210047	Failure to treat only hazardous waste that is generated onsite. 22 CCR 45 67450.3(c)(6)
<input type="checkbox"/> 3210007	Failed to submit to the CUPA in CERS an amended notification within 30 days after a change has occurred. 22 CCR 67450.3(c)(2); 27 CCR 15188(a),(b)
<input type="checkbox"/> 3210022	Failure of the owner or operator of a facility who operates a fixed treatment unit (FTU) under a permit by rule to implement and/or complete a corrective action program at the facility. Shall consist of a Phase 1 environmental assessment and subsequent corrective actions. HSC 25200.14(b)(1)and (e); 22 CCR 67450.7(a)(3), 67450.3
<input type="checkbox"/> 3210026	Failure to prepare correctly and/or failure to submit to the CUPA, the Certification of Financial Assurance, a written estimate of the cost of closing each unit, or an approved financial assurance mechanism, if applicable. 22 CCR 67450.13(a)(1),(b), 66265.143; 27 CCR 15188(f)
<input type="checkbox"/> 3210028	Failed to adjust Closure Cost Estimate for inflation by March 1st. 22 CCR 67450.13(a)(2)
<input type="checkbox"/> 3210030	Failure to update the closure cost estimate whenever a change occurs that increases the cost of closure, and/or failure to maintain a copy at the facility. 22 CCR 67450.13(a)(3); 27 CCR 15188(f)
<input type="checkbox"/> 3230048	Failed to permanently mark the exterior of each FTU with the name of the person which owns or operates the FTU, facility EPA identification number, and an individual unit serial number. 22 CCR 67450.3(c)(7)
<input type="checkbox"/> 3210011	Cyanide: Failure to maintain records at the facility for a minimum of three years and made available to authorized representatives of DTSC, the CUPA, or the U.S. EPA upon request. 22 CCR 67450.11(d)(7)(E)
<input type="checkbox"/> 3220002	Cyanide: Failure of the owner or operator treating cyanide waste solutions to provide initial and annual training to employees, who handle cyanide process solutions, cyanide-containing rinse waters, or manage cyanide-containing aqueous waste, on how to reduce wastes in the production area. 22 CCR 67450.11(d)(4)(D)
<input type="checkbox"/> 3230044	Cyanide: Failure of the owner or operator while adding spent cyanide-containing process solutions to the aqueous waste for the purpose of reducing cyanide processing hazards to meet the requirements. 22 CCR 67450.11(d)(7)(A), 67450.11(d)(7)(B), 67450.11(d)(7)(C), 67450.11(d)(7)(D)
<input type="checkbox"/> 3230045	Cyanide: Failure of the generator while treating cyanide waste solutions under Permit by Rule to meet the requirements per 22 CCR. 22 CCR 67450.11(d)(1), 67450.11(d)(2), 67450.11(d)(3) Cyanide: Failure of the owner or operator treating cyanide waste solutions to implement the following to reduce waste generation, and minimize or



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- # 3230046 Cyanide: Failure of the owner or operator treating cyanide waste solutions to implement the following to reduce waste generation, and minimize or eliminate releases to work areas and the environment: A) Use holding racks and/or drain boards between all process and rinse tanks to contain plating drag-out, rinse solution drag-out, and return drag-out solutions to process tanks; B) Use countercurrent rinsing to reduce water use and wastewater generation when multiple sequential rinse tanks are used; C) At a minimum, every four (4) years, review the use of cyanide-containing process baths to determine if a non-cyanide alternative with equivalent results is available as part of:
1. The Source Reduction Evaluation Review and Plan pursuant to HSC 25244.19,
 2. An Environmental Management System, or
 3. An environmental performance evaluation plan. 22 CCR 67450.11(d)(4)(A),(B),(C)
- HMD1745 Failed to have annual waste minimization certification completed/submitted to CUPA (must outline waste minimization program as economically feasible and state that treatment is in accordance with waste minimization program). 22 CCR 66262.45(c)
- HMD1751 Failed to have the PBR notification renewed/filed annually in CERS (due by January 1st). 22 CCR 67450.3(c)(1)& (c)(2), (c)(10)
- 3230087 Written waste analysis plan does not exist or is inadequate in specifying parameters of analysis, testing methods, frequency of sampling and analysis, and sampling methods used to obtain representative samples, or failed to retain waste analysis documentation for three years. 22 CCR 66265.13(a) (b) & 67450.3(c)(8)(A)&(c)(9)(A)
- 3230081 Proper secondary containment with leak detection is not provided or is not: compatible with stored waste, free of cracks & leaks, protecting containers from contact with accumulated liquid, capable of containing a 24 hour/25 year storm precipitation, or 100% largest container volume, whichever is greater. 22 CCR 67450.3(c)(9); Containers: 22 CCR 66264.175; Tank systems: 22 CCR 66265.193 & .194
- 3210012 Facility has not obtained a written statement & assessment signed by an independent, California registered professional engineer (PE) certifying that tank system and secondary containment for tanks or containers met all the design and leak detection requirements of 22 CCR. (Five year reassessment is reqd.) For the CA tier treatment in containers, does not require a written statement signed by a PE for the containment area. HSC 25200.3(c)(4); 22 CCR 66264.175(c); & 66265.190 - 66265.202, 67450.3(c)(9)(F)
- 3230075 Failure to provide posted sign stating "Danger Hazardous Waste Area-Keep Out" and to provide one of the following means of security to the active hazardous waste portion of the facility:
- 1) A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) which continuously monitors and controls entry; or
 - 2) An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff), which completely surrounds area; AND a means to control entry, at all times, through the gates or other entrances (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility). 22 CCR 15 66265.14; 22 CCR 45 67450.3(c)(9)(A)
- HMD1757 Facility does not have an satisfactory written closure plan (plan must specify how & when each unit will be closed, sampling information when applicable, equipment decontamination steps & procedures, expected year of closure, and estimated time required to close each unit). 22 CCR 67450.3(c)(11)
- 3210016 Failure to obtain CUPA approval prior to the replacement of identical or functionally equivalent tank system parts or components. 22 CCR 15 66265.192(l), 66265.192(m)
- HMD1758 All hazardous waste was not removed within 90 days of last treatment in accordance with the unit's closure plan. 22 CCR 67450.3(c)(11)(D)
- HMD1759 All closure activities were not completed within 180 days after final treatment. 22 CCR 67450.3(c)(11)(E)
- 3230086 Failure to prepare a written closure plan, to notify CUPA 15 days prior to the completion of closure, or to submit to CUPA a closure certification signed by the owner/operator and an independent P.E. 22 CCR 45 67450.3(c)(11)(D), 67450.3(c)(11)(F), 67450.3(c)(11)(G), 67450.3(c)(8)(G)
- 3250004 Failure of owner or operator to properly close a hazardous waste tank system ensuring the minimization of further maintenance and that all other requirements have been met. 22 CCR 66265.111, 114, 197; 22 CCR 67450.3(c)(11)
- 3240002 Failure to notify DTSC of a release, fire, and/or explosion within 15 days and include the following:
- 1) Name, address, and telephone number of the owner or operator;
 - 2) Name, address, and telephone number of the facility;
 - 3) Date, time, and type of incident (e.g., fire, explosion);
 - 4) Name and quantity of material(s) involved;
 - 5) The extent of injuries, if any;
 - 6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
 - 7) Estimated quantity and disposition of recovered material that resulted from the incident. 22 CCR 66265.77(a), 66265.56(j) 22 CCR 57450.3(c)(9)(D)