California Department of Toxic Substances Control
RESOURCE CONSERVATION AND RECOVERY GRANT WORK PLAN
STATE FISCAL YEARS (FY) 15/17
(JULY 1, 2014 THROUGH JUNE 30, 2017)

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Commented [WK1]: Overall, it would be helpful to have each section of the WP follow the same format (if possible)

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Commented [WK2]: Details are below for what to include in this section

California Hazardous Waste Program Overview

The proposed RCRA Grant Work Plan supports the Department of Toxic Substances Control's (DTSC) Mission:

> "To protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation and encouraging the manufacture of chemically safer products."

Additionally, the Program strategies, tasks, and activities described in the proposed RCRA Work Plan that follows also supports the following goals and objectives in EPA's Strategic Plan FY 2011-2015:

Goal 3: Cleaning Up Communities and Advancing Sustainable Development

> **Objective 3.2**: Preserve Land: Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.
>
> **Objective 3.3**: Restore Land: Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites

Goal 4: Ensuring the safety of chemicals and preventing pollution

> **Objective 4.2:** Promote Pollution Prevention

Goal 5: Enforcing Environmental Laws

> **Objective 5.1:** Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.

The activities described in the Work Plan involve all organizational programs at DTSC. The following document is organized according to the core program that performs the work.

PROGRAM SPECIFIC WORK PLANS

HAZARDOUS WASTE MANAGEMENT PROGRAM

ENFORCEMENT AND EMERGENCY RESPONSE DIVISION WORKPLAN

COMPLIANCE ASSURANCE

The goal of the monitoring and enforcement activities enumerated in this grant application is to secure and maintain a high level of compliance with State and Federal hazardous waste laws and regulations. The Enforcement and Emergency Response Division (EERD) monitoring and enforcement activities form the core regulatory presence in California and compliment federal and local government efforts to provide: 1) a credible deterrent to polluters; and 2) incentives to achieve a greater level of compliance with hazardous waste laws and regulations. EERD intends to complete all work agreed upon, and will use its expertise, experience, and professional judgment to move resources among program elements, activities, and initiatives in addressing the most pressing hazardous waste issues and needs as they arise.

The work that will be conducted by the Department of Toxic Substances Control's (DTSC) EERD will occur in the program elements, activities, and initiatives described below. EERD estimates that 17 Personnel Years (PYs) will be expended in each year of this three-year grant. Of those, a maximum of 2 PYs will be expended each year for the Mexico Border Grant, and a maximum of 2 PYs will be working with the Certified Unified Program Agency (CUPA)/generator inspection activities. In addition, $100,000 in contracts will be used to augment the Mexico Border efforts.

The activities detailed in this work plan meet the RCRA Core Program guidelines detailed on March 4, 2014, grant guidance provided to DTSC by United States Environmental Protection Agency (U.S. EPA), and the U.S. EPA FY 2011-2015 Strategic Plan Goal 5, Objective 5.1 by enforcing environmental laws to assure strong, consistent, and effective enforcement of federal environmental laws.

I. INSPECTION AND MONITORING

The key to any regulatory program is an effective inspection and monitoring system. EERD will work in partnership with the U.S. EPA, California Environmental Protection Agency (Cal/EPA), and local CUPAs to fully implement and assure compliance with the Resource Conservation and Recovery Act (RCRA) standards as applied to generators, transporters and Treatment, Storage, or Disposal Facilities (TSDFs). EERD's compliance monitoring efforts will occur through the completion of combined State and Federal core program inspections and initiatives set forth below. In accordance with the Government Performance and Results Act (GPRA) Goal 9, Objective 1 (Enforcement Tools to Reduce Non-Compliance) Sub-objective 2, EERD will, to the extent practicable, incorporate environmental justice considerations in its compliance monitoring, and deter non-compliance by targeting at least 50 percent of all compliance monitoring activities in high-risk, disproportionately exposed communities.

Commented [NC3]: Not sure where they got this from? There is no goal 9?

Commented [NC4]: Nice idea, how will they determine this?

Commented [WK5R4]: This is also the same language from the last work plan; was this successful in the last cycle?

A. CORE INSPECTION ACTIVITIES

EERD will conduct statutorily mandated facility and generator inspections consistent with the California program RCRA authorization. EERD has developed a system to target and schedule facilities for inspection. This system includes consideration of factors such as "off-site rule facilities" (annual inspections), incinerators (annual inspections), operating Treatment, Storage, or Disposal (TSD) (biennial inspections), federal facilities (annual inspections), closed facilities and post-closure permitted facilities which require post-closure permits (at least every three years or more frequently depending on potential risk). This approach has been used successfully for the past several years and is anticipated to be used in preparing future targeting. (Note: Post-closure permitted facility inspections were changed from bi-annual to tri-annual, in fiscal year 2004-05). By July 1 of each year of the three year grant period, EERD will submit a list of the facilities to be inspected that fiscal year. Because this This list is enforcement confidential ~~it~~and will be submitted under a separate cover but is by reference a part of EERD's grant commitment.

Universe (RCRAInfo)

Active Land Disposal	Active Storage and/or Treatment	Post-Closure	LQGs	SQGs	Transporter
#	#	#	#	#	#

Number of LQGs listed in HWTS = #

Type of Inspection	Number of Committed Grant Inspections per year	Actual (A) or Potential (P) Grant Covered Inspections	Estimated number of Hours to Complete Inspection
CEIs of TSDFs	37	A	31 to 226
CEIs of Post-Closure Facilities	7	A	?
LQGs	4	A	?
Transporter	0	P	?
OAM	?	?	?
Financial Assurance Reviews	?	?	?
Used Oil Recyclers	?	?	?

1. FACILITY INSPECTIONS

Commented [SJ6]: The list should include anticipated quarter the inspection will be completed.

Commented [WK7]: Key Commitment to highlight

Commented [SJ8]: Suggest inserting CA Universe table here. If DTSC wants to identify a different number using a different database identify below table.

Commented [SJ9]: Suggest that the narrative below can be reduced and incorporated into a table or listed as concise bullet points.

Facility inspections conducted during the grant cycle will be performed in accordance with the inspection lists submitted on or before July 1 of each year as a part of this grant application. EERD's workload standards range from 31 to 226 hours for Compliance Evaluation Inspections (CEIs), which comprise the majority of facility inspections planned by EERD. All inspections, investigations, and enforcement response activities will be conducted in accordance with prevailing policies and procedures. Currently, EERD plans to conduct the following facility inspections:

Type of inspection	# of Inspections Planned per Year
CEI-operating facilities	37-39
CEI-post closure permits	7-11
Groundwater Monitoring Evaluation (GME)	As resources are available
Groundwater Operation and Maintenance Inspection (OAM)	As resources are available
Groundwater Monitoring Report (GAR)	As resources are available
Focused Compliance Inspection (FCI) - Incinerators	As resources are available
FCI - Land Disposal Facilities	2

In addition, EERD anticipates that during the grant period, Follow-Up Inspection (FUI) activities may be carried out at facilities that require more monitoring than is afforded through a single CEI, to assure compliance with RCRA standards. FUIs occur in addition to regularly scheduled CEIs, and may include, but will not necessarily be limited to, in-depth record reviews, remote surveillance, monitoring manifested wastes entering or leaving facilities, and mass balance reviews. FUIs may require several visits to a facility during the course of a year to respond to particular situations or environmental concerns. An FUI is not required under the grant, but may be an authorized activity if resources are available to conduct this work. EERD will inspect a minimum of 50 TSDFs annually as part of the grant work commitment, which will consist of a mix of the various categories listed above.

EERD will conduct Financial Assurance evaluations for all RCRA TSDFs along with the CEIs. These will be tracked and reported as separate inspections.

DTSC views GME and O&M inspections to be an important element of comprehensive environmental regulation of facilities in California. A new type of groundwater inspection, GAR, will be added as another element. It will start as a pilot project during the first fiscal year and if successful, will

Commented [SJ10]: What is the average number of hours required to complete a CEI including field, report, and enforcement time?

Commented [SJ11]: If keep narrative format, this number should correspond to the minimum number identified in the above DTSC table.

Commented [NC12]: If you take the low end of the range above, this only adds up to 46 facilities per year?

Commented [WK13R12]: The legal requirement is that operating TSDs need to be inspected once every two years; therefore 50% of the universe needs to be inspected annually. DTSC may want to consider creating a multi-year strategy similar to the permitting strategy that lays out when each site will be inspected

Commented [NC14]: Great! The FA data should be entered into RCRAInfo

continue for the rest of the fiscal year. As engineering geology resources become available to EERD, GME, O&M, and GAR inspections will be considered for incorporation into the annual work plan defined by the grant.

EERD's Focused Compliance Inspections (FCIs) are similar to CEIs but mainly focus on a specific regulated activity such as, Import/Export, TSD Used Oil Recycler, Boiler/Industrial Furnace, Incineration, Land Disposal, and Universal Waste Rule. FCIs can be substituted for CEIs at operating TSDFs provided that the TSDF has a good compliance track record.

2. GENERATOR INSPECTIONS

EERD will perform RCRA generator inspections in CUPA counties and cities. A total of four (4) generator inspections are planned for each year of the grant. This includes up to four (4) businesses operating in CUPA counties under "Standardized Permits" for purposes of State law, and regarded as RCRA generators for purposes of this grant. EERD will give priority consideration to inspecting Large Quantity Generators (LQGs), generators operating in high-risk, disproportionately exposed communities, and generators in under-performing CUPAs where any resultant enforcement could have the added benefit of fostering and developing the CUPA enforcement expertise and capacity. The minimum number of generator inspections performed under the grant will be four (4) conducted each year.

3. TRANSPORTER INSPECTIONS

Persons who transport RCRA hazardous wastes will be inspected to assure compliance with regulations governing the transportation of those hazardous wastes. Specific inspection activities will include reviews of manifests, tanks and containers, and storage procedures, if relevant. EERD may inspect a limited number of transporters throughout the grant year when resources are available.

B. INITIATIVES

The initiatives described in this section are intended to identify violators of federal and state laws and regulations, illegal hazardous waste treatment and disposal practices, and companies that illegitimately include themselves within exclusions and exemptions to RCRA Subtitle C provisions. These focused efforts serve many purposes:

1) Collect information to better understand the unique aspects of a discrete subset of the regulated community;

2) Bring enforcement and compliance resources to underserved environmental justice communities that are impacted by non-compliant businesses;

3) Raise awareness of a particular issue, hazard or regulation;

Commented [SJ15]: How many facilities will be identified to be included in the pilot project? What will be defined as a successful pilot project? How many CEI inspections will be substituted for a permitted TSDF inspection (e.g., 1 CEI will equal 2 GARs).

Commented [NC16]: Define "good" does this mean not a SNC? (significant non-complier per EPA definition)

Commented [WK17]: This is down from 7 in the last cycle

Commented [NC18]: Can they quantify this 2-3? 10-12? Etc.

Commented [SJ19]: Again suggest information can be summarized and placed in a table format or concise bullet points. In either case, the information should clearly state that it is being covered under the grant or has a potential to be covered under the grant.

Commented [WK20]: Lists and such are okay to put into table formats for easier and shorter reading

4) Level the playing field where some businesses are suspected of operating at a competitive advantage through non-compliance; and

5) Increase compliance by providing a higher level of focused inspection and enforcement.

During the period of this grant, EERD may develop additional initiatives. EERD will submit an amendment to the U.S. EPA Project Officer before any grant resources are committed to such projects. EERD, in cooperation with U.S. EPA and CUPAs, will also consider joint initiatives (e.g., geographic or sector-based initiatives devised by U.S. EPA).

1. AUTHORIZED AND UNCOMMITTED INITIATIVES

Commented [NC21]: Not exactly sure what this means v/v the grant? Lots of good stuff in here, very ambitious plan.

a. ENVIRONMENTAL JUSTICE

DTSC's Environmental Justice (EJ) Initiative aligns with U.S. EPA and the Cal/EPA strategies and guidance regarding environmental justice. The initiative builds upon developing DTSC efforts to incorporate EJ into ~~all~~ its programs, ~~which is consistent with Region 9 priorities~~. DTSC's new Strategic Plan also includes efforts targeted at impacted communities.

2015-17 Environmental Justice Initiative activities include:

Commented [SJ22]: Suggest moving some of the detailed information into an attachment or appendix.

Commented [WK23]: How will all of this be documented

Goal 1 – Use of available data and screening tools to prioritize overburdened communities and prioritize enforcement and compliance:

- Integrate data from Cal/EPA CalEnviroScreen and other Geographic Information System (GIS)-based screening tools into DTSC decision-making.
- ~~Develop and distribute guidelines to EERD staff on the use of screening tools and data to ensure staff understands the value and usage of screening tools.~~
- Train EERD staff on proper usage of screening tools.
- Use GIS-based screening tools to prioritize the investigation of public complaints, inspections, groundwater audits, and enforcement actions in overburdened communities.
- Identify industries and geographical regions for enhanced enforcement activities using screening tools and pertinent data. ~~Enforcement activities may include inspections, criminal investigations, and corrective action.~~
- Complete three (3) pilot projects in the Los Angeles Basin using geographic information system data to identify contamination sources of complex soil and groundwater plumes in disproportionately impacted communities ~~to enhance and speed up DTSC's ability to effectively address the contamination issues.~~

Commented [SO24]: Combine these, seems duplicative. You train them to use these tools to inform decisions.

Commented [SO25]: This should all be combined into one or two bullets. Implement and develop a GIS-based system to visualize important data to identify industries and geographical regions for enhanced enforcement activities. Train EERD staff on the appropriate use of such screening tools to inform inspections in disproportionately impacted communities.

Commented [SO26]: Seems duplicative, combine these

Commented [NC27]: This sounds interesting, would this involve SFD sites and/or RCRA Corrective action sites? Are they suggesting enforcement to get the clean up going? Or some other mechanism?

Goal 2 – Improve Communication:

- Improve the public availability of information and increase transparency and public involvement within overburdened communities.
- Provide publicly accessible online GIS maps and other information, such as permitted hazardous waste facility locations relative to burdened communities, as determined by CalEnviroScreen data.
- Provide publicly accessible CalEnviroScreen scores and/or screening tool rankings of the most burdened and at risk communities located near DTSC permitted facilities.
- Implement a pilot project that allows for greater transparency and opportunity for public comment on proposed DTSC enforcement settlements.
- Provide online public access to EERD inspection data and key documents for TSDFs.
- Draft regulations to require the electronic submittal of permitting and cleanup related information to enhance public availability.
- Develop an environmental justice website that highlights environmental justice data and measures, resources for burdened communities, CalEnviroScreen information and links, grant funding opportunities, environmental justice related news, and environmental justice contacts.
- Develop strategies to increase public participation activities for permitting of hazardous waste facilities.
- Increase press releases for enforcement actions occurring in burdened communities, as deterrents for non-compliance and prophylactic industry compliance.

Goal 3 – Improve Coordination and Collaboration:

- Maximize impact and effectiveness of resources by coordinating and collaborating with the public, academia, and federal, state, and local agencies.
- Provide environmental justice fundamentals training to EERD and Permitting staff to increase staff understandings of environmental justice principles.
- Participate in the Cal/EPA EJ Compliance and Enforcement Work Group to conduct multi-media enforcement activities in ~~regional~~ areas~~, identified through CalEnviroScreen, as experiencing high levels of multiple pollution burdens~~ of interest.
- Continue support of the 710 Corridor Discovery Pilot Study.
- ~~Work to implement~~ Develop an EJ Student Internship Program ~~to mentor graduate and undergraduate students in research, issue identification and resolution, policy development, and web~~

Commented [NC28]: I thought this was already available online?

Commented [SO29]: Combine these into one bullet, too much overlap also include the one mentioned below

Commented [SO30]: Combine, some overlap

Commented [SO31]: This is not enforcement, this is rulemaking

Commented [SO32]: Fold into top bullet

Commented [SO33]: Why is this here?

Commented [SO34]: This should be in public relations. Or this should be something like "Refer enforcement actions to public relations office to increase public awareness of environmental violations"

Commented [SO35]: This seems out of place.

Commented [SO36]: Is this different than the LA Basin pilot project

~~design~~.

- Maintain, and when resources allow, expand organizational support for community task forces and the Innovation, Value, Access, & Networking (IVAN) online reporting tool.
- Provide training and develop guidance on roles and responsibilities for governmental liaisons/problem solvers statewide on the use of reporting networks, and collaborating with community organizations.

Commented [SO37]: This should be revised or removed.

Commented [SO38]: This needs to be revised.

Statewide Task Forces

DTSC will continue to participate in six community-led monthly task forces statewide.

The current community-led task forces (subject to change) include:

- Kern Environmental Enforcement Network Task Force (KEEN)
- Fresno Environmental Reporting Network Task Force (FERN)
- Imperial County Environmental Justice Task Force – ICEJTF
- East Coachella Valley Task Force
- Inland Valley (San Bernardino and Riverside Counties) Task Force hosted by CCAEJ
- LA County Environmental Justice Network (LAEJN)

b. ELECTRONIC WASTE

EERD will consider a two- to three-year initiative to inspect California handlers of universal waste (UW) lamps, batteries, and mercury-containing equipment. EERD's recent experience in investigating complaints received from the public has shown that many such UW handlers also collect electronic waste, and that the federally regulated universal waste streams (particularly UW lamps) have the potential to be significantly mismanaged.

DTSC, not local regulatory agencies, has primary responsibility for regulating companies who collect universal waste from offsite. Since UW lamps and batteries have a relatively low recovery value and may be regarded as "liability waste streams" by small companies, they have a higher potential to be mismanaged than electronic devices that can be refurbished, salvaged, or recycled. As part of the new initiative, EERD would focus on inspecting companies that collect both federally regulated UW and electronic waste, and would plan to inspect ten such handlers each fiscal year if implemented.

c. USED OIL

EERD in coordination with CalRecycle will continue to provide oversight of transporters, transfer stations, and recyclers of used oil in accordance with California's Hazardous Waste Control Law. Inspection and enforcement efforts will continue within the used oil sector to ensure proper management, with the intention of ultimately contributing toward an increased used oil recycling rate. In addition, the Department's Used Oil Team will continue to focus on establishing and maintaining Used Oil Testing and Reporting Agreements with out-of-state facilities to provide out-of-state used oil testing options for California's transporters. In 2014, the Department will begin a mandated program with out-of-state re-refiners. Used oil re-refining agreements will be established with out-of-state re-refiners that receive California used oil. Re-refining incentives will be paid out by CalRecycle, while the Used Oil Team will conduct site visits verifying the re-refining process. The Used Oil Team also looks forward to working with CalRecycle as a result of the Life Cycle Analysis for Used Oil that was conducted, and the Used Oil Life Cycle Assessment Report to the Legislature. Findings highlight areas for improvement within California's used oil program. The Department will work with CalRecycle on implementing recommendations for improving California's used oil program and increasing used oil recycling rate.

d. SCRAP METAL RECYCLING

DTSC's EERD and Office of Criminal Investigations (OCI) are working on a joint initiative to conduct inspections and investigate complaints at scrap metal recycling facilities statewide. A majority of scrap metal recycling facilities are located within communities experiencing multiple environmental impacts. This initiative is focusing on recyclers who may accept vehicles, appliances, mixed scrap metal, baghouse dust, e-waste and other metal-containing wastes. Metal dusts and other chemicals from the processing of these wastes often create off site impacts to neighboring communities. DTSC is collaborating with local air districts, CUPAs, and other state agencies on a multimedia, multi-agency inspection effort to inspect metal recycling facilities Statewide, to ensure compliance with environmental laws and regulations with DTSC requirements. Fourteen (14) site inspections/ investigations have been conducted altogether in both the Southern California areas of Sun Valley and Fontana as well as in the Central Valley areas of Hanford, Visalia, and Fresno. The team is currently addressing the violations found, such as storage of hazardous waste in piles without authorization, illegal disposal of hazardous waste,

mismanagement of hazardous waste, and receiving appliances/e-waste without authorization. Additional inspections/investigations are planned.

Commented [WK39]: How does this fall under the RCRA grant; is specific grant money going to this?

2. AUTHORIZED AND COMMITTED INITIATIVES

a. NONE AT THIS TIME

If new or additional funding or staff resources become available during the term of the grant, DTSC, in partnership with U.S. EPA, will explore evolving regulatory programs to determine if initiatives are warranted.

Commented [WK40]: This language is probably not needed

II. HAZARDOUS WASTE GENERATORS REGULATION (CUPA Coordination and Support)

Commented [WK41]: Needs to be clear that 20% of the universe should be inspected each year…all generators inspected once every five years.

EERD will continue its partnership with Cal/EPA and the CUPAs to assure that the hazardous waste generator program in California meets federal expectations and more importantly provides suitable protection for the citizens of the State. This will entail working with the approximately eighty-three (83) separate local programs. DTSC efforts will include but are not limited to coordinating with Cal/EPA, evaluating CUPA inspection, enforcement, and recordkeeping, and assisting in the collection, analysis, and submittal of data to document management activities. This will be done by conducting the activities outlined below.

A. ASSISTANCE

EERD will continue to provide guidance and technical assistance to both the local regulators and the regulated community regarding RCRA hazardous waste requirements within California, with a specific focus on RCRA resource recovery and recycling issues, hazardous waste classification, and RCRA generator activities. RCRA activities that are eligible to charge to the grant include workshop/seminar presentations, responding to verbal and written inquiries from CUPAs and the regulated community, onsite facility evaluations, and development and distribution of fact sheets intended to provide focused guidance on specific issues.

B. EXTERNAL TRAINING

EERD will continue to provide training to local governments to help meet their training needs. The date, location, subject, and number of classes delivered, and the date and type of training technical assistance provided will also be included in grant reports.

C. INDEPENDENT OVERSIGHT

EERD will continue to conduct independent generator inspections on a limited basis (along with appropriate enforcement follow-up) within CUPA jurisdictions to ensure the hazardous waste generator program is being implemented properly at the local government level. These inspections would

focus on the CUPA's ability to conduct generator inspections and evaluate compliance status of regulated facilities, enforce State and federal laws and regulations, provide compliance assistance, respond to complaints, and implement timely and appropriate enforcement activities. The generator inspections will be primarily conducted at generator facilities that were recently inspected by a CUPA. EERD will work with U.S. EPA to determine the appropriate generators to inspect based on any national priorities or other appropriate factors. In special circumstances, EERD may inspect generators that have not been recently inspected by a CUPA. This function is part of evaluating the CUPA's hazardous waste program. It is also intended that these inspections will help to foster the abilities of the local programs to identify violations, collect necessary evidence, prepare reports that support and document violations and, where appropriate, take enforcement actions.

EERD will also step in and take actions when it has been determined that the CUPA is unwilling or unable to properly enforce RCRA requirements. EERD will conduct at least four (4) independent generator oversight inspections under the grant each year.

D. UNIFIED PROGRAM INFORMATION COLLECTION AND REPORTING

1. Data Analysis

EERD, in cooperation with Cal/EPA, will ensure the CUPAs are properly collecting and maintaining the required data through the onsite CUPA triennial evaluations. These Inspection and Enforcement Summary Reports are required to be submitted annually by CUPAs to Cal/EPA and will be evaluated and analyzed to identify indicators of CUPA performance in implementing the generator program, such as inspection and compliance rates. Cal/EPA's California Environmental Reporting System (CERS) went live in January 2013. Businesses that generate hazardous waste are now required to enter facility and hazardous waste information into CERS. CUPAs must enter results of all generator inspections, including compliance and enforcement data. This electronic reporting system aims to improve data collection, quality and timeliness. It will also facilitate statistical compliance data reporting to U.S. EPA.

U.S. EPA may periodically view implementation progress of CERS by visiting http://www.calepa.ca.gov/cupa/EReporting/default.htm.

2. Large Quantity Generator Inspection Reporting

EERD will work with CAL/EPA to assure that large quantity generator inspection and enforcement data is reported to U.S. EPA in a timely and accurate fashion so it can be uploaded to the national RCRAInfo system.

E. U.S. EPA ENFORCEMENT REFERRALS

If U.S. EPA makes enforcement referrals to DTSC, for inspections conducted by U.S. EPA, EERD will take appropriate enforcement in consultation with U.S. EPA.

Commented [SJ42]: How will DTSC ensure CUPAs are properly collecting and data should be more specific..

Commented [SJ43]: Does DTSC develop a summary report? If yes, EPA would like DTSC to provide use with a copy of this report. If no, still would like to receive copies of the reports.

Commented [NC44]: OK…but how are they ensuring that relevant data is being pushed from CERS to RCRAInfo?

Commented [WK45R44]: Also wondering how often this will occur? Previous grant cycle committed to forwarding EPA data with 60 days of CalEPA approval

Commented [SJ46]: Be more specific how EERD work with CalEPA to get the CUPAs to enter inspection and enforcement data into CERS and CERS inspection and enforcement data uploaded to RCRAInfo.

Commented [NC47]: This doesn't make sense to me. "how" will the data be reported to EPA? I assume per above that it will uploaded into CERS and that then, CERS pushes data to RCRAInfo?

Commented [SJ48]: Who should EPA make referrals to? EERD Branch Managers? or one single contact?

F. PERIODIC EVALUATIONS OF LOCAL CUPA PROGRAMS

EERD, in conjunction with Cal/EPA, will also continue to evaluate the CUPA's implementation of the hazardous waste program, including the RCRA elements. In the past, these evaluations have included a summary of program activities as well as compliance with RCRA goals and objectives. EERD will continue to focus on how the CUPAs are implementing the RCRA hazardous waste regulatory program and what they need to do better. The newer evaluations are expected to be more qualitative in looking at the classification of violations and the appropriateness of the enforcement action taken as opposed to quantitative assessments of just the number of inspections conducted as a function of the total number of businesses in the jurisdiction.

Commented [WK49]: This comment is the same as the last cycle- were these new evaluations used? Need updated information.

III. COMPLAINT INVESTIGATIONS

Where violations of federal hazardous waste laws are alleged or suspected, complaint investigations and related enforcement actions will be conducted and charged to the RCRA grant. Time recorded in conducting a complaint investigation will begin when a decision has been made to commence the investigation. This decision will be based on information received and verified, or on reasonable belief that federal hazardous waste laws are being violated. Complaint investigations generally begin with an in-depth review of the alleged violation history through various federal and State databases containing inspection and enforcement histories as well as waste management databases. Complaints may be closed based on electronic reviews, field investigations, consultations with other governmental agencies, or other information.

All appropriate accounting codes will be used when complaint investigations are charged against the RCRA grant. Time will cease being charged to the RCRA grant for any complaint investigation once it has been documented that federal laws have not been violated, or after completion of the appropriate report, whichever occurs first.

IV. ENFORCEMENT ACTIVITIES

DTSC will take appropriate enforcement against all RCRA violators (e.g., facilities, generators, and transporters) discovered through the program elements, activities, and initiatives set forth in this application, pursuant to DTSC'S Enforcement Response Policy [EO-02-003-PP] updated January 2008, successive amended versions of that policy, and other DTSC policies and procedures relevant to enforcement response action, and will follow the Quality Assurance Project Plan dated April 30, 1996 and approved by U.S. EPA on January 10, 1997, or any updates to this plan. DTSC will:

Commented [WK50]: Mention that the new QAPP is being drafted; 1996 is way out of date and should not be the main reference

- Take timely and appropriate enforcement actions consistent with DTSC's policies;
- Evaluate and bring to timely closure self-disclosure of violations received

by DTSC;

- Assure investigation and appropriate action for open tips, citizen complaints, and/or DTSC referrals, as set forth in DTSC's Complaint Policy Procedure [EO-02-008-PP] dated January 2008 or any updates to this policy.
- Invest compliance monitoring resources to support the development of enforcement actions against Significant Non-Compliers (SNCs) with violations in more than one State or location. U.S. EPA will assist EERD in identifying multi-State violators;
- Pursue appropriate enforcement actions for environmental violations identified through environmental justice initiative work;
- Assure that violators return to compliance in a timely manner; and,
- Promote waste minimization and recycling through Supplemental Environmental Projects, when appropriate.

V. DATA ENTRY, MANAGEMENT, AND REPORTING

DTSC will continue to develop and maintain the EERD EnviroStor database and work with Region 9 staff to coordinate data sharing from this database with the RCRAInfo System. DTSC will report inspection, violation, and enforcement data into RCRAInfo on a monthly basis to ensure accurate, timely and complete tracking of RCRA core measures. DTSC will assist U.S. EPA by auditing the data translated to RCRAInfo and confirming via email that data transmitted to RCRAInfo is accurate.

Commented [SJ51]: Should also reference back to section CUPA data entry described above.

Commented [NC52]: Really!! I don't think that they are doing this now, in fact, I think some data isn't uploaded at all and some is only uploaded once a quarter?

Commented [WK53]: How will DTSC help with the audit?

A. DATA ENTRY AND MANAGEMENT

During this grant cycle, DTSC commits to improvement of data quality in the RCRAInfo subtitle C module, focusing on correctness, timeliness, and efficiency of data submittals into RCRAInfo. EERD will also participate in the State Review Framework to confirm data accuracy submitted to RCRAInfo.

DTSC will:

- Transfer data to RCRAInfo on at least a monthly basis;
- Load files conforming to RCRAInfo translation load rules procedures, directly into Central Data Exchange (CDX);
- Transmit RCRAInfo data using U.S. EPA standards and XML schema to convert Inspection, Violation, and Enforcement data in the Central Data Exchange (CDX);
- Develop a quality assurance/quality control edit check in the system;
- Run RCRAInfo reports and identify and correct discrepancies between EnviroStor and RCRAInfo; and,

Commented [NC54]: This would be great if they do it. We should get them to add some language here that they will "report the results" of this QA/QC stuff in the quarterly/semi-annual reports and in our monthly conf calls.

- Continue to work to correct any data deficiencies noted in the EnviroStor data system.

DTSC's ability to achieve accurate data upload through CDX is dependent on U.S. EPA's ability develop appropriate change and deletion functions for RCRAInfo through the CDX data upload process.

Commented [NC55]: What does this mean??

VI. MISCELLANEOUS ACTIVITIES

In addition to meeting the above-described commitments in the areas of compliance assistance, compliance incentives, compliance monitoring, enforcement, and data entry and reporting, EERD will engage in the following activities:

A. COMPLIANCE ASSISTANCE

Compliance assistance activities by EERD will focus on newly regulated handlers, small businesses in priority industrial sectors, small businesses with compliance problems, and businesses operating in high-risk, disproportionately exposed communities. Additionally, EERD will offer compliance assistance to all respondents in enforcement actions. The assistance offered by EERD will take various forms including, but not limited to, consultations and referrals when requested, the development and distribution of informational materials, mailing letters and announcements to interested persons, and responding to individual telephone calls and letters from persons posing specific compliance-related questions. EERD will focus on pollution prevention efforts to assist businesses with implementation of Best Management Practices and alternative technologies to reduce the amount of toxic materials~~material s~~ used and waste generation. EERD will also support compliance assistance and work conducted by the EJ Environmental Enforcement Task Forces throughout California.

B. COMPLIANCE INCENTIVES

The Cal/EPA Recommended Guidance on Incentives for Voluntary Disclosure provides an incentive for compliance by encouraging the regulated community to voluntarily discover, disclose, and correct violations before they are identified by regulatory agencies for enforcement investigation or response. When self-disclosures are received by EERD, they will be evaluated in accordance with the Cal/EPA guidance and entered into EERD EnviroStor. Self-disclosed violations will be distinguished from other violations recorded in the data system by using the Facility Self-Disclosure (FSD) code in the inspection type field.

Commented [WK56]: Does this eventually get to RCRAInfo

C. MANIFEST ENFORCEMENT COORDINATION

These activities involve the development and use of reports from the HWTS manifest data system. Those reports enable EERD to study business

patterns that point to potential violations, and to target specific violators. EERD will use manifest enforcement tools to support issuance of enforcement orders, to develop probable cause to target inspection resources and support search warrants, and aid in criminal and civil cases during trials and negotiations. In addition, EERD may conduct initiatives based on this system, e.g., identity theft (where one entity is routinely using another entity's identification number).

VII. CALIFORNIA-MEXICO BORDER PROGRAM

The Border Area encompasses a band sixty-miles-wide on either side of the line that separates California from Mexico. Since pollution does not recognize international boundaries, activities that contribute to environmental improvement conducted within the broadly defined region can be counted towards the Border Program.

EERD proposes to expend up to two (2) PY and up to $100,000 in contract funds in each year of this grant that will be used to further the goals and objectives of the Border 2015/2017 bi-national program as related to the management of hazardous waste.

U.S. EPA and its Mexican counterpart agency, Secretaria de Medio Ambiente y Rescursos Naturales (SEMARNAT), in conjunction with California are currently working under the new US-Mexico Border 2020 Program, a bi-national, eight year environmental program with five goals. The agreement was signed August 2012 and followed the Border 2012 Program. Goals 3 and 5 of the five goals have objectives that pertain to waste management compliance, enforcement, and environmental stewardship. DTSC is one of several California environmental agencies that are state partners under Border 2020.

Three areas of activities to be implemented under the RCRA State and Tribal Assistance Grants (STAG) are:

- Border 2020 Program Coordination and Support
- Surveillance & Enforcement
- Compliance and Enforcement Capacity Building

A. BORDER 2020 PROGRAM COORDINATION AND SUPPORT

1. DTSC will lead, or co-lead with other agencies, and participate in the California Border Enforcement Task Force and the Binational California/Baja California Waste and Enforcement Task Force, the Border-wide Waste Policy Forum, and the National Coordinators Meeting and other associated Border 2020 meetings that focus on border waste management, enforcement, pollution prevention, and voluntary stewardship programs. The California and Binational Waste and Enforcement Task Force will meet not more than three times per

year. The Waste Policy Forum will meet once every other year and the National Coordinators Meeting (NCM) will meet at least once every other year, but not more than every year.

2. Attendance at these meetings will require international travel and DTSC will work to obtain necessary advance approvals.
3. DTSC will coordinate with Cal/EPA, the Cal-Recycle, U.S. EPA, and other border task force members to propose, coordinate, and implement border priorities and activities through the border state and binational task forces. The task forces will communicate regularly via emails, conference calls, and meetings to address specific border waste and management including compliance and enforcement issues.
4. DTSC will designate a point of contact to lead and coordinate activities associated with planning and hosting the task force meetings including outreach for the binational meetings to facilitate and encourage attendance at the public session of the meetings. DTSC will coordinate with U.S. EPA to provide Spanish-English translation services for all binational meetings.
5. DTSC will report hazardous waste related information associated with the requirements of the Consultative Mechanism, the existing agreement for binational communication on the siting of hazardous waste facilities in the border region.
6. DTSC will facilitate communication between Mexican state and federal enforcement agencies to address import/export issues of hazardous waste or hazardous materials being shipped for recycling.

B. SURVEILLANCE & ENFORCEMENT

1. DTSC will continue their border inspections associated with Northbound and Southbound surveillance and enforcement of hazardous waste shipments through the California Ports of Entry (POE), while working closely with key partners such as US Customs and Border Protection (CBP), San Diego County and others.
2. DTSC will monitor waste shipment activities, as necessary, by taking representative samples of hazardous waste shipments and conducting follow up communications to verify that the waste reached its final destination where needed.
3. DTSC, upon request from CBP, will participate in special operations conducted at the POE of U.S and Mexico where resources allow.
4. DTSC will report on their border inspection activities and the results of these activities in DTSC's mid-year and end-of-year reports. DTSC will also provide a verbal report on the inspection program at each quarterly Waste and Enforcement Task Force meeting, and as necessary provide audio-visual reports. The mid-year and end-of-year reports will provide data on the types and volumes of waste being

imported or exported and the potential risks associated with those wastes and include the following minimum information:

a. total number of mobile highway shipment, railroad cargo shipment, and fixed facility inspections conducted;
b. geographic location of the inspections;
c. import or export destination of RCRA-related cargo;
d. hazard class and amount of RCRA-related material;
e. whether the cargo was related to a Maquiladora industry;
f. sampling event information, if applicable;
g. identification of any DTSC trans-boundary-related violations;
h. enforcement actions taken, and penalties collected;

5. DTSC will annually assess their inspection program and implement any changes that would make it more effective. Any proposed changes will be shared with the California Border Enforcement Task Force including U.S. EPA.

C. COMPLIANCE ASSISTANCE TRAINING

DTSC and San Diego County Department of Environmental Health staff will conduct hazardous waste management training workshops in the cities of Mexicali and Tijuana, B.C. Mexico. Past training sessions conducted in Mexico have proven to be very successful with several of the training sessions having the maximum number of participants. The DTSC will team with Procuraduria Federal de Proteccion Ambiente (PROFEPA) and SEMARNAT in providing the training. Previous evaluation results of the training showed high marks and participants requested more similar training/workshops. During the coming grant cycle, DTSC will provide training on: 1) the requirements for import and export of hazardous wastes, 2) transportation and transporter registration requirements, and 3) training on hazardous waste classification using a guide in Spanish and English.

Commented [WK57]: Any minimum number of trainings?

D. COMPLIANCE AND ENFORCEMENT CAPACITY BUILDING

1. DTSC will identify and implement activities to increase and improve compliance with environmental best practices and laws. To meet this objective, DTSC will develop and implement activities that would increase capacity for Mexican and US environmental inspectors and border industry, academic, and non-profit stakeholders to learn about each country's respective best waste management practices and compliance requirements. Examples of these efforts include: (1) informal communications with respective Mexican regulatory agency

staff to share information, (2) pilot sampling exercises, and (3) workshops.

2. DTSC will support the Arizona Department of Environmental Quality (ADEQ) in the development of their border compliance and enforcement program. ADEQ continues to communicate with U.S. EPA and CBP in Arizona's ports of entry to increase the presence of environmental inspectors at the ports. DTSC will work to actively communicate with ADEQ to exchange information about border compliance and enforcement activities between Arizona and California.

E. PORT OF ENTRY (IMPORT AND EXPORT OF HAZARDOUS WASTE)

DTSC will place emphasis on tracking the import and export of hazardous wastes. Import notices will be reviewed and facilities in California designated to receive the wastes will be checked to assure that those facilities are permitted to accept the wastes in question. Information identifying the types and volumes of wastes imported and exported, and the companies that import and export hazardous wastes will be retained. That data will be used to target inspections and to inform academic studies, policy-making decisions, and regulatory actions as necessary. Compliance assistance materials will be prepared, revised, and updated for distribution to persons engaged in hazardous waste import and export activities.

PERMITTING DIVISION WORK PLAN

Permitting activities support US EPA's Strategic Plan Goal 3, Cleaning Up Communities and Advancing Sustainable Development, Objective 3.2, Preserve Land: Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

PLANNED ACCOMPLISHMENTS

The multi-year projection table lists the details of DTSC's permitting goals over the next three years. In summary, DTSC plans to:

1) Meet the projected GPRA commitments for each year in this grant cycle.
2) Make timely permit decisions on all new permits and permit renewals. Related to this, DTSC proposes to reduce the expired permit backlogs.
3) Issue closure plan approvals or verify the closure of facilities and make post closure permit determinations at land disposal facilities.
4) Complete ongoing work from previous fiscal years.

I. PERMIT PROGRAM IMPROVEMENTS

The Issuance of permits for the management of hazardous waste is a fundamental regulatory activity performed by DTSC. DTSC understands the importance of issuing permits that are protective, timely, and enforceable. Additionally, DTSC believes that permits should be written using consistent procedures and transparent standards. To this end, DTSC is in the process of improving the Permitting Program as part of DTSC wide "Fixing the Foundation" initiative. The Permitting Program plans to implement the following changes to improve the permitting process:

1) ~~Provide an earlier and greater focus on identifying~~Identify~~ing~~ and ~~addressing~~ address environmental justice concerns in the permitting process~~.~~ prior to public notice (or some other point that DTSC can specifically identify)
2) Develop a complete and residual training program to ensure permitting staff are knowledgeable on current processes and procedures.
3) Establish clear permitting performance metrics to ensure consistency and accountability.
4) Update and standardize technical permit review materials including model documents, guidance documents, and policy memos.
5) Increase intra-agency coordination, at a minimum, with legal, enforcement and public participation, and other potential offices ~~-~~during the permitting process.

6) ~~Enhance enforceability of Permits.~~I believe this should say something like "Prioritize or verify the inclusion of enforceable permit conditions with enforcement staff."
7) Keep the public more up to date on the progress in processing permits to increase transparency.
8) Improve data management system to facilitate project management and improve performance metrics.
9) Define and Develop strategies that will reduce permit processing time whenever feasible.
10) Develop permits that are protective of human health and the environment ~~by creating standards for enhancing protection for public health and environment~~.

II. ENVIRONMENTAL JUSTICE

DTSC is committed to developing a more robust and meaningful strategy for addressing the needs and concerns of these environmental justice communities. ~~In moving forward with this commitment,~~ DTSC ~~proposes to~~will develop and implement an environmental justice community assessment and engagement process. ~~As part of this~~This process~~, DTSC would compile~~ will include a list of environmental health concerns, potential mitigation measures, and the boards, departments and offices that DTSC ~~could~~ intends to partner with to help address those concerns.~~ A~~

The permitting office will develop a new engagement strategy ~~for impacted communities would also be created to~~ ~~involve~~ that encourages earlier stakeholder involvement ~~stakeholders earlier~~ in the permitting process. DTSC ~~is~~ plans to ~~committed to~~ conduct~~ing~~ more extensive community outreach for its permitting decisions.~~, particularly because environmental concerns in the community have been identified as one of the biggest reasons for permit delays.~~

III. DATA MANAGEMENT

DTSC tracks all permitting activities through a centralized information system called EnviroStor. This system transfers data from DTSC to USEPA's RCRAInfo database system. DTSC will strive to maintain and provide high quality data that is timely and accurate. DTSC will continue work with USEPA to meet data needs and resolve Permitting data issues. DTSC will at a minimum provide uploads of California permitting data to RCRAInfo on a quarterly basis.

Commented [NC58]: Earlier in the workplan it said that uploads would be monthly?

IV. PERIODIC MEETINGS/UPDATES TO USEPA

DTSC and USEPA will continue to meet periodically to measure progress towards the GPRA Permitting goals. Changes to facility or commitment dates within the multi-year strategy will be noted and summarized in the Quarterly Reports of Grant Accomplishments.

Commented [NC59]: I thought they were only doing semi-annual reports?

V. REPORTING

As shown in the multi-year projection table, ~~DTSC~~DTSC's ~~plans to meet the following commitments~~total projected permitting workload for the 2015-2~~1~~017 Grant Period is the following:

1) Initial Permit - ~~2~~1
2) Permit Renewals - ~~29~~40
3) Permit Modifications - Class 1=17, Class 1*=1, Class 2=2, Class 3=1
4) Closure Plan Approvals – 1
5) Closure Verifications – 2
6) Post Closure Permits or Other Mechanisms – ~~11~~12
7) Emergency Permits – 126

Commented [ZM60]: Changed from 2 to 1. The only interim facility to my knowledge is Exide

Commented [ZM61]: Changed from 29 Renewals to 40 as per my count in the Multi-Year Table

Commented [ZM62]: These should be combined into one entry since they are concurrent steps towards closure of a facility (or a unit). I counted 4 total in the Multi-Year Table

Commented [ZM63]: Changed the number of PC permits from 11 to 12.). I counted 12 in the Multi-Year Table

Commented [ZM64]: The number of Emergency permits they are proposing is: 126 which is what they issued last year. That is too high. This has to do with one company "Clean Harbors" that goes to different labs to pick up unstable waste solvents that they need to treat to stabilize prior to transporting. I recommend that we suggest to them to issue Clean Harbors and or the Labs permit(s) to cover this work and reduce the Emergency Permit workload. In my opinion, this work doesn't fit the definition of an Emergency Permit.

DTSC will report the permits it issues, by permit type, on a biannual basis to EPA Region 9. This report should identify which permit actions are for facilities either located in or planned to be sited in geographic areas identified by CalEnviroScreen as being in the top 10% of highest scoring census zip codes. EPA recognizes that the workload outlined above reflects both Government Performance and Results Act (GPRA) and non-GPRA accomplishments. Over the 2015- 2017 Grant Period, DTSC will accomplish at least 24 Government Performance and Results Act goals, which specifically excludes the issuance of emergency permits and permit modifications.

DTSC will also record the permitting backlog and permitting process cycle time for each of the permitting categories above. DTSC will report the number of permits in its backlog and the average cycle time in days for each of its permit commitments to EPA Region 9 biannually. DTSC plans to reduce the number of permits in its backlog and the average number of days it takes to process its permits over the 2015-2017 Grant Period.

VI. DRAFT PERMITS SUBMITTAL TO US EPA

As specified in the Memorandum of Agreement (MOA) between DTSC and USEPA Region 9 signed on December 22, 2009, DTSC will make available all draft RCRA permits and related documents for review by USEPA Region 9. As needed, USEPA may review the Permit and related documents and submit comments based on its review.

POLICY AND PROGRAM SUPPORT DIVISION RCRA GRANT WORK PLAN

GRANT MANAGEMENT

Communication Schedule

Staff from EPA and DTSC will communicate as needed, but at a minimum will hold a call between each agency's project officers on a monthly basis. Additionally, meetings between senior management at DTSC and EPA will be organized as needed, with a goal of at least bi-annual discussions to address overall grant progress

Reporting Schedule

Reporting of grant-related progress and accomplishments, to the U.S. EPA, will be made twice each fiscal year; once after completion of the second quarter and a final report at the end of the year.

DTSC will submit Self-Assessment Reports as Follows:

SFY 14/15 Mid-Year Report	02/01/15
SFY 14/15 End of Year Report	09/01/15
SFY 15/16 Mid-Year report	02/01/16
SFY 15/16 End of Year Report	09/01/16
SFY 16/17 Mid-Year Report	02/01/17
SFY 16/17 End of Year and End of Grant Report	09/01/17

Because the final report is scheduled for 9/01/17, after the close of the budget period, it will be funded by the FY 18/20 grant.

The reports will address both the grant work plan and the GPRA goals. The reports should be accumulated for each SFY.

The reports will also address each program element or major groups of elements and include the following:

- Successful aspects of the program.
- Plans that will not be completed as scheduled and new schedules.
- Factors contributing to missed activities.
- Whether adjustments to spending for resources are necessary.
- Specify the funding amount which may not be expended and what actions are necessary to address the situation.

BIENNIAL REPORT

Biennial report activities support US EPA's Strategic Plan Goal 3, Cleaning Up Communities and Advancing Sustainable Development, Objective 3.2, Preserve Land: Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

In FYs 2014-2017, DTSC will establish a Biennial Report (BR) program that ensures BR data is complete and accurate. The BR is generated from a biennial survey of large quantity hazardous waste generators (LQGs) and treatment, storage, and disposal facilities (TSDFs). The results are compiled and used to evaluate and characterize RCRA hazardous waste management, generation, treatment, storage, disposal, minimization, and waste management capacity.

I. BIENNIAL REPORT ACTIVITIES

Commented [WK65]: See notes from Liz Janes

A. FY 2016 is a reporting year for BR. DTSC will conduct the following activities in FY 2016:

1. Identify all RCRA LQGs and TSDFs operating in California during the 2015 survey cycle and develop and maintain an accurate mailing list of facilities;
2. Encourage filers to obtain the BR Forms on-line no later than January 1, 2016;
3. Provide outreach and on-line training to the regulated community during FY 2016. DTSC will provide classroom training if state travel restrictions allow. DTSC will provide EPA with a plan and schedule by December 2015. DTSC will provide EPA with a copy of BR-related materials distributed to the regulated community that were not developed by EPA to avoid presenting conflicting guidance to the BR help-line and regulated community.
4. Collect all forms and electronic forms no later than March 1, 2016. DTSC will contact facilities if forms are incomplete or not received by the due date to obtain missing data or reports;
5. Perform QA/QC on data received to identify discrepancies in reported quantities of wastes managed, received, shipped, and generated by comparing to previous years' data. Discrepancies will be investigated, verified, and/or corrected;
6. Directly translate the BR flat file into RCRAInfo before June 11, 2016. Once data is loaded into RCRAInfo, DTSC will continue data quality procedures and re-submit revised data prior to final submission by October 1, 2016;
7. Continue data quality assurance efforts by using the BR Data Quality Reports in RCRAInfo. Verify any discrepancies identified by the HQ in the State Summary Report and reload the corrected data into RCRAInfo.

B. DTSC will conduct the following activities in FY 2017:

1. Continue to assist EPA Region 9 in QA/QC efforts and maintenance of previously filed BRs;
2. Identify all RCRA LQGs and TSD facilities operating in California during the 2015 survey cycle, develop, and maintain an accurate mailing list of facilities.

AUTHORIZATION

Authorization Activities SFY 2014-15

DTSC will develop a schedule for submitting an application to USEPA for authorization of the Universal Waste Rule. The lack of RCRA Authorization to enforce Universal Waste laws creates problems for DTSC as without the authorization, USEPA's Universal Waste regulations are not in affect in California. Therefore, all federal Universal Waste (lamps, batteries, pesticides, and mercury-containing equipment) in California must be managed under full hazardous waste requirements.

Once DTSC has the authority from USEPA, DTSC will initiate the Photovoltaic Modules Management Standards regulations package. DTSC is also working on finalizing the emergency regulations for Disposition Options for Universal Waste Cathode Ray Tubes (CRTs) and CRT Glass that expire in October 2014.

Commented [NC66]: DTSC may also need to make changes to state law to accommodate the new federal e-manifesting system.

Commented [WK67]: This section should be revised after the meeting between EPA and DTSC scheduled for 4/24

Commented [NC68]: They should specify what a complete application consists of (e.g. rules, AG statement, updated/draft MOA, etc.)

CLEAN UP PROGRAM RCRA GRANT WORK PLAN

CORRECTIVE ACTION

Corrective Action activities support US EPA's Strategic Plan Goal 3, Cleaning Up Communities and Advancing Sustainable Development, Objective 3.3, Restore Land: Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites.

I. MATCHING FUNDS

As RCRA Corrective Action work is a Grant commitment, it will be offered as part of the required 25% matching funds or at least $7,075,000 for the entire 3-year RCRA Grant. Once DTSC demonstrates to U.S. EPA that a specific amount of Corrective Action work has been accomplished without the use of RCRA Grant funds, the equivalent amount of funds can be redirected to fund other RCRA Grant activities.

Commented [NC69]: Huh? Not sure what this means or if we are OK with this? What are the requirements for matching funds…can they provide "in kind services" as this seems to imply or must they put up cash? Does this meet the regulatory requirement for matching funds?

This Corrective Action Workplan includes facility-specific work related to RCRA Facility Assessment (RFA), Corrective Action Orders (CAOs), and negotiating Consent Agreements. Interim/Stabilization Measures, RCRA Facility Investigation (RFI), Corrective Measures Study. Also included; information management, multi-year strategy, and Biennial Report (BR) activities.

Commented [NC70]: This is poorly written, needs a re-write.

The Workplan also contains a reserve of RCRA Grant-eligible projects above and beyond available grant funding or DTSC resources to substitute for projects that get delayed, drop out of the system or extend beyond 3 years through no fault of DTSC. This reserve of uncommitted projects is proposed for use as replacement to DTSC's currently planned Workplan commitments. All projects in the reserve are part of the RCRA 2020 baseline for GPRA goals.

Commented [WK71]: George Randell (GR)- this section does not belong here; old grant language

II. CORRECTIVE ACTION PRIORITIES FOR FISCAL YEARS ~~2011-2014~~ 2015- 2017

DTSC corrective action priorities for FYs 2015-2017 include, but are not limited to, the following:

A. Meeting annual GPRA goals and objectives agreed upon by U.S. EPA and DTSC
B. Completing work on all high-priority corrective action sites
C. Completing ongoing work from previous FYs

DTSC is only requesting grant funding for RCRA Facility Assessments (RFAs), Corrective Action Orders (CAOs), and negotiating consent agreements. The remaining corrective action events (Interim/Stabilization Measures, RCRA Facility Investigation (RFI), Corrective Measures Study, Information Management, Multi-Year Strategy, and Biennial Reporting (BR) activities) will be completed under state funding, and this non-

grant funded Corrective Action work is identified in the Workplan with the letters "AR" (reimbursable~~)~~.

DTSC will continue to track and report on its efforts to achieve GPRA goals and objectives by measuring progress at DTSC lead corrective action facilities to meet the "Current Human Exposures Under Control" (CA725) and "Mitigation of Contaminated Groundwater Under Control" (CA750) such that national EI projections are achieved for FYs 2015-2017.

Approximately 261 RCRA corrective action sites are listed on the updated 2001 GPRA Baseline for Corrective Action that are undergoing continued joint U.S. EPA Region 9/DTSC re-evaluations to meet EIs and analysis of accelerated final remedy implementation. About 74 of the 261 RCRA sites are being addressed by RCRA analogous State cleanup programs, including California's Regional Water Quality Control Boards (RWQCBs), whom DTSC is working closely with.

III. MULTI-YEAR STRATEGY (MYS) OF GPRA PROJECTS

The Workplan's Multi-Year Strategy shows targets for GPRA goals for all 3 years of the RCRA Grant cycle. It tracks and projects all facilities and sites for which DTSC has been delegated RCRA/C authority, including sites managed by the Cleanup Program and the Regional Water Quality Control Boards (RWQCB). Any coordination protocols between DTSC and the RWQCBs affecting achievement of GPRA objectives and performance measures will be coordinated by DTSC. The MYS tracks and projects planned workload for FYs 2015 through 2017.

AUTHORIZED AND COMMITTED

IV. GPRA CORRECTIVE ACTION GOALS

The FY 2015-2017 RCRA Grant cycle numerical goals for corrective action are as follows:

A. Control all identified unacceptable human exposures from site contamination to at or below health-based levels for current land and/or ground water use conditions at 95% of RCRA 2020 baseline facilities. (Human Health EI)
B. Control the migration of contaminated ground water through engineered remedies or natural processes at 75% of RCRA 2020 baseline facilities. (Ground Water EI)
C. Complete Site wide Remedy Construction at 51% of the RCRA 2020 baseline facilities.

AUTHORIZED and UNCOMMITTED

Commented [WK72]: GR- No mention of Remedy Construction Complete. DTSC should check our grant guidance on this. Frank Dellechaie has been tasked with evaluating the remedy complete status of the 2020 baseline facilities.

Commented [NC73]: This is confusing, does AR mean reimbursable or non-remimbursable??

Commented [WK74]: The baseline was updated since then; please use the most current version

Commented [WK75]: GR - No mention of new goal at Construction Complete CA900 or CA999

Commented [WK76]: GR - Old grant language needs evaluating. Just so that everyone understands, many years ago the grant listed specific facilities that would meet certain goals. We also had a "substitute" list of facilities that could be used in case DTSC wasn't able to meet commitment. We no longer manage the program to that level of detail.

Commented [WK77]: GR- The values quoted do not coincide with the table below with the correct FY percentages. DTSC should check our grant guidance to make sure they have the correct numbers.

Commented [WK78]: Old Language

V. GPRA CORRECTIVE ACTION INTERIM MILESTONES

EI	FY 14/15	FY 15/16	FY16/17
Human Health	**93%**	**95%**	**95%**
Groundwater	**80%**	**84%**	**88%**
Remedy Complete	**70%**	**75%**	**80%**

VI. CORRECTIVE ACTION – GREENER CLEAN UPS

To encourage sustainable actions during corrective action, DTSC will begin integrating components of our "Interim Advisory for Green Remediation" into RCRA grant work. CAOs and Consent Decrees will reflect the need to incorporate life-cycle analysis. Interim/Stabilization Measures and Corrective Measures Studies will examine and consider steps to reduce the environmental footprint of site cleanups. The interim advisory has been instrumental in incorporating measures such as improving energy efficiency, reducing air emissions, and conserving water during the cleanup process. DTSC will collaborate with EPA to develop a framework for greener cleanups principles in Corrective Action. Through the use of the Interim Advisory DTSC corrective action will:

A. Identify Best Management Practices (BMPs) for more sustainable corrective actions
B. Provide training to staff to assist in the preparation of a footprint analysis for initial studies and EIRs
C. Update staff on principles of greener cleanups during periodic training courses

EPA would also like for DTSC, in consultation with EPA, will identify two corrective action facilities in each fiscal year that will serve as demonstration sites for greener corrective action.

Commented [NC79]: Awkwardly written.

Commented [WK80]: Steve Armann (SA) – Is there a point of contact for this

VII. COMPLETED OUTPUT REVIEWS (CORs)

This is an ongoing program evaluation activity. COR provides the mechanism that U.S. EPA and DTSC use to review the quality of the corrective action work products completed by DTSC staff. These CORs are collaborative reviews of DTSC's performance in producing program outputs, including GPRA goals, and are conducted by personnel from U.S. EPA, DTSC Headquarters, and DTSC Regional offices. During the reviews, a joint team of U.S. EPA and DTSC staff (COR Team) examine randomly selected RCRA corrective action work products to determine quality and conformance with the applicable laws, regulations, and guidance. Formal reports that provide recommendations will be prepared.

Commented [WK81]: GR- This has not been done in approximately ten years. Please evaluate.

VIII. PROGRAM-WIDE ACTIVITIES

In addition to the above non-project specific activities, some of the activities absolutely essential for the effective implementation of an authorized RCRA program are as follows: program evaluation, program streamlining, regulation development, guidance development, and development and delivery of training. This will be undertaken or continued during FYs 2015-2017.

DTSC will also evaluate the RCRA Facilities databases to determine the true status of sites where the status or additional activities are not clear. This evaluation would result in a written record addressing the site status, providing appropriate documentation, and a recommendation for further activities or removal from the lists/lists. The first priority would be to address the RCRA INFO Financial Assurance Required site list, followed by internal lists indicating that financial assurance or additional corrective action may be required at a facility. In addition, we will evaluate inactive facilities where the closure status remains in question.

Commented [NC82]: Not sure what they are referring to here? Is this RCRAInfo?

Commented [WK83]: GR- Whole section needs to be re-written. Or deleted. Not sure what DTSC is committing to.

IX. ENVIRONMENTAL JUSTICE ACTIVITIES.

The Department of Toxic Substances Control (DTSC) and the United States Environmental Protection Agency (U.S.EPA) launched the "Southern California – Clean, Green and Healthy Schools Partnership" (Partnership) to foster cooperation, enhance transparency and promote coordination related to environmental impacts affecting students and staff at schools in Southern California. The Partnership is intended to facilitate discussions of potential environmental impacts between regulatory agencies, school districts, parents and teachers and the community. Initially, it is going to be a 6 month pilot, but we expect that the project will continue on. A large number of these schools are located in vulnerable communities.

WEI/Mecca – DTSC staff participate in the EJ Task Force for this project. Additionally, a used oil recycling permit application will be submitted to the State for processing

Outreach – DTSC staff will continue outreach activities to engage the community, maintain transparency and enhance the level of public engagement in the process.

Commented [WK84]: SA - The corrective action grant guidance did not request this type of information. It is o.k. to keep or put in another section other than corrective action.

X. PUBLIC PARTICIPATION

DTSC must allow and consider input from the public before a remedy selection is made. Fact sheets, public meetings, information repositories, and other public involvement activities are worthwhile activities. The DTSC Public Participation Branch is consulted to determine the appropriate public involvement activities needed during all stages of corrective action at a given facility.

Commented [NC85]: It's interesting that they call out public participation for the corrective action activities but not for permitting?

XI. INFORMATION MANAGEMENT

Commented [WK86]: GR - Our understanding is that the current envirostor and RCRA info link are working very well. There is mention of quarterly updates and eventually moving to monthly updates into RCRA info. I believe this section was cut and pasted and needs to be properly addressed to the current conditions of the actual information management system.

DTSC will report corrective action outputs, including GPRA accomplishments, into RCRAInfo to ensure accurate, timely, and complete tracking and reporting of RCRA core measures. DTSC will report on progress in meeting GPRA goals and schedule transfer of data to RCRAInfo approximately every three months. The tentative target upload dates are September 15th, December 15th, March 31st and June 30th.

Commented [NC87]: Again, conflicts with earlier data loads of monthly?

DTSC will assist U.S. EPA with the following:

1. Maintaining accurate corrective action universes in RCRAInfo.

2. Audit and confirm via e-mail that RCRAInfo is accurate on a quarterly basis.

DTSC has an established information management program (EnviroStor) that ensures RCRA corrective action program activities are adequately reflected in RCRAInfo (i.e., core elements in the major modules). DTSC intends to make further improvements to this program over the next three years. To this end, DTSC plans to eventually:

Commented [WK88]: Provide a timeline of when goals will be accomplished

1. Transfer the data to RCRAInfo once per month during the first week of each month, or if feasible, on a daily basis.

2. Load files conforming to RCRAInfo translation load rules procedures, directly into Central Data Exchange (CDX).

3. Pursue implementing Corrective Action agreements between state's local and federal agencies. Transmit their RCRAInfo data using U.S. EPA standards and XML schema to convert their Corrective Action data in the Central Data Exchange.

4. Continue providing functionality in EnviroStor so staff have the capability to clean up data and delete data errors.

5. DTSC will work with USEPA Region 9 to develop QA/QC procedures to ensure the correctness and accuracy of data translated from EnviroStor to RCRAInfo.

6. If funding is available, upgrade EnviroStor to remain compliant with RCRAInfo Versions.

DTSC will complete a QA/QC review of the data to ensure the information is complete and accurate, and ensure that this information has been entered in RCRAInfo.

A. CORRECTIVE ACTION DATA CLEANUP AND MAINTENANCE

Data management systems must include complete information on actions taken to initiate corrective action, stabilize sites, and cleanup contamination. During FYs 2015-2017, the current DTSC reporting tools (i.e., Smart Forms, Database Reports, Tally Sheets, etc.) will continue to be modified, as needed, to include all

events necessary to track progress in meeting GPRA sub-objectives, including review of facilities at the unit level to ensure accuracy.

A Data Management Team has been assembled to oversee regional staff facility information review and cleanup between DTSC's Database and U.S. EPA's RCRA Info database. To ensure the cleanup project's success and to underscore DTSC's continued commitment, 100 hours per project manager has again been dedicated to database cleanup for FYs 2015-2017.

XII. REPORTING

This task includes activities necessary to prepare the Quarterly and Self Assessment Reports of Grant Accomplishments within the next Grant cycle.

Commented [NC89]: I thought they were doing semi-annual reporting?

A. REPORTING FORMAT

This is a three year Workplan. Quarterly Reports of Grant Accomplishments will be prepared by DTSC and provided to U.S. EPA Region 9 at regularly scheduled intervals. Amendments to the Workplan will be negotiated if necessary at the time of these reports. Contents of these reports may be revised after Workplan amendments are negotiated to ensure that all appropriate Workplan activities are addressed in the reports.

B. REPORTING SCHEDULE

Reporting of Corrective Action progress, to the U.S. EPA, will be made twice each fiscal year; once after completion of the second quarter and a final report at the end of the year.

C. SELF ASSESSMENT

DTSC will include a brief self-assessment in each report addressing the following:

1. Highlighting successful aspects of the program and discussing the factors (programmatic or agency-wide) influencing success.
2. Identifying whether any planned activities have been or are expected to be delayed or missed, and forecasting the expected completion date.
3. Substitutions for Grant commitments that will slip into the next fiscal year will be discussed in this section.
4. Identifying factors contributing to missed commitments, if any.
5. Identifying actions to address the factors contributing to missed commitments, if any.
6. Identifying whether resources are being spent as planned, or whether adjustments are necessary to account for funding that may not be expended in FYs 2015-17. Specify the funding amount that may not be expended and what actions are necessary to address the situation.
7. Commenting on the accuracy of data in the database.
8. Commenting on successes and impediments to moving facilities through the GPRA goals.

Commented [WK90]: This is not specific to corrective action alone; may consider moving to the grants management section (majority is already suggested language)

Identifying actions for program improvements based on recommendations made in our Quarterly Reports of Grant Accomplishments and by U.S. EPA as a result of our previous year's performance.

Summary report highlighting current human exposures under control and migration of contaminated ground water under control (EIs) determinations, including progress in achieving these indicators; and facility specific corrective action terminated milestones

SAFER PRODUCTS AND WORKPLACES PROGRAM
DTSC Green Chemistry and Safer Consumer Products
Proposed Commitments for RCRA/C 3011 Grant 2015-2017

Commented [WK91]: Language should be added to address:
1) 3 year PP Workplan (due Oct 1, 2014) on page 32
2) Add in IPA and MOU Committments
3) Add in PY estimate level of effort to SCP

Waste Minimization/Pollution Prevention

EPA's objectives for Waste Minimization and Pollution Prevention are reflected in the US EPA 2011-2015 Strategic plan, goals 3 (reducing waste generation) and 4 (promoting pollution prevention by businesses, governments and citizens). EPA measures progress toward these goals using the following measures:

1. Reduction of generation of the high priority chemicals, as reflected in EPA's TSCA Work Plan which includes 83 priority chemicals and 31 additional priority chemicals found in hazardous waste.
2. Reduction in pounds of hazardous materials by P2 program participants.
3. BTUs of energy conserved by P2 program participants.
4. Gallons of water saved by P2 program participants.

DTSC's proposed commitments are outlined below:

AUTHORIZED AND COMMITTED:

Commented [WK92]: Old grant language

1. Implementation of the State's Green Chemistry Initiative: DTSC will continue with implementation of the Green Chemistry Initiative, primarily via efforts to implement various provisions of the new Safer Consumer Product Alternatives regulations. DTSC will focus on activities that will promote achieving environmental results within the grant period. These efforts include the following tasks:
    a. Providing impacted and interested stakeholders with relevant and useful information and tools related to chemicals, their hazards and toxicology, products containing chemicals of concern, safer alternatives, alternatives analysis, and California's regulatory requirements. Specific tasks and deliverables to support this effort will include:
        i. Development and distribution of fact sheets, "priority product" profiles and FAQs.
        ii. Development of the Safer Consumer Products data management system. This system will provide public stakeholders, via a web interface, the ability to submit comments and documents (AAs, petitions, data) to DTSC. The system will provide full search capability for public documents and provide high level security for the submission and management of trade secret and confidential business information.
        iii. Maintenance and development of DTSC's Toxics Information Clearinghouse (TIC). The TIC is a decentralized system for collection, maintenance, and distribution of information on specified chemicals via a publicly accessible web-based portal. The TIC provides a portal to multiple web-based sources of chemical-specific information for hazard traits, toxicity endpoints, and other

related properties. DTSC has coordinated with EPA to insure that EPA sponsored data management tools are incorporated into California's TIC. DTSC will continue to build TIC capability through continued collaboration with EPA as well as with business, industry, NGO, other government and academic sources.

iv. Development of Alternatives Analysis guidance, tools, training and information. DTSC will be developing comprehensive guidance for conducting Alternatives Analyses under the state's Safer Consumer Products regulatory requirement framework. Deliverables will include guidance development workshops/webinars, published guidance documents, case studies, training materials and delivery. DTSC will work with EPA to determine which specific deliverables have greater value/priority with EPA (e.g. development of OECD AA tool box) and align funding appropriately. Note: Should DTSC receive EPA OPPTD P2 grant funding for FY 2014, we will modify the RCRA grant to reflect specific activities not covered in the P2 grant.

2. Promoting Green Chemistry Education and Practice: DTSC will continue to collaborate with higher education institutions and industry partners to further the development of green chemistry based curriculums, education and practice to create a work force which understands green chemistry principles and develops useful tools;
   a. DTSC will continue to support the UC Berkeley Center for Green Chemistry Greener Solutions program by providing expertise and funding for the continued growth of the program. Deliverables include annual student/industry collaborative reports and students with increased knowledge and capabilities.
   b. DTSC will sponsor a UC Santa Barbara Bren School of Environmental Science and Management Master's Thesis Group Project entitled "Safer Consumer Products Alternatives Analysis Development." This project will address expansion of the alternative product evaluation practice for hazardous chemicals in consumer products. The final deliverables will be part of DTSC's Guidance for entities to conduct alternative analyses (AA).
   c. DTSC will collaborate with industries who manufacture priority products identified in our regulations, or potential priority product categories as identified in the DTSC three year Priority Products Work Plan, to collaborate on the development of product specific tools, information and Alternatives Assessments for general use within targeted sectors.

AUTHORIZED AND OPTIONAL:

Commented [WK93]: Old grant language

1. Green Business Program support: To the extent feasible, DTSC will continue to work with local government green business programs to maintain and enhance the Green Business Program and database to collect and manage data identifying environmental outcomes. Cumulative outcome data will be provided to US EPA.

2. Support for the Western Sustainability and Pollution Prevention Network (WSPPN). WSPPN provides important educational and networking opportunities for local pollution prevention providers across California. DTSC used to provide staff support to local programs, but has not been able to do so in the past several years. DTSC will consider utilizing the skills and resources of WSPPN for outreach and training for Safer Consumer Products tools.

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DRAFT DEPARTMENT OF TOXIC SUBSTANCES CONTROL RCRA WORKPLAN

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DIVISION: Hazardous Waste Management Program **PROGRAM:** Office of Permitting **PERIOD:** 7/01/11-6/30/18	**FEDERAL SHARE:** $[Enter Funding] **STATE SHARE:** $[Enter Funding] **TOTAL:** $[Enter Funding]	**DEPUTY DIRECTOR:** **Brian Johnson** **PROGRAM MANAGER:** **Rizgar Ghazi**

TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: Administer the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals.

GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
					As a minimum, enter dates when NOD is signed, draft permit is completed, public hearing held and effective date for each permit
FY10	Operating Permit	Clean Harbors Wilmington LLC EPA ID No. CAD 044 429 835	9/2011	9/15/11	9/15/11 Status: Permit issued
FY10	Operating Permit	Kinsbursky Brothers Supply Inc EPA ID No. CAD 088 504 881		6/14/11	6/14/11 Status: Permit issued
FY11	Closed	Detrex Corp EPA ID No. CAD 020 161 642	5/2013	Clean Closed	12/2/02 Status: Clean Closure of all units 12/2/2002. Deed restriction implemented as a condition for remedial activities and termination of corrective action.
FY11	Post Closure Permit	EI Dupont De Nemours & Company Inc EPA ID No. CAD 009 151 671	12/7/11	12/7/11	12/7/11 Status: Permit issued
FY11	Undergoing Closure	Beazer East Inc EPA ID No. CAD 009 112 087			New Operating Permit withdrawn 5/23/88 Closure Plan received 5/3/88 for SURFSTR1 Closure Plan received 12/27/88 for CONTAIN1
FY11	Operating Permit	Pacific Gas and Electric – Diablo Canyon EPA ID No. CAD 077 966 349		6/30/06	6/18/12 Clean Closure Acceptable 6/30/06 Permit Renewal issued (Expires 7/30/16. Call In Letter to be issued 1/30/15)
FY11	Operating Permit	Pacific Resource Recovery Services Inc EPA ID No. CAD 008 252 405	4/2012	5/23/12	5/23/12 Status: Permit issued
FY11	Closed	Safety Kleen Systems Inc EPA ID No. CAD 093 459 485	3/2012	8/8/12	8/8/12 Status: Clean closed facility
FY12	Undergoing Closure	The Boeing Co – Canoga park, US Dept of Energy EPA ID No. CA3 890 090 001	10/2012	3/4/13	6/4/12 Status: ISD ceased operating. 3/4/13 Status: Closure transferred to CA (SSFL Team). 3/4/13 Status: Letter to File – Not a GPRA goal. 5/15/2013: Grant Commitment Met?? Per Mike Z. DTSC will not get a GPRA goal for this since it was claimed in 2007.
FY12	Closed	Beckman Coulter Inc EPA ID No. CAD 008 254 708	6/2013	6/25/2013	7/27/16 Status: Permit expires 7/27/16 1/18/08 Status: Closure Notice received. Entire facility undergoing closure.

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					3/2/11 Status: Closure Plan received. 6/25/13 Status: Closure Verification issued-Facility Closed. Substitute Facility for Grant and GPRA Goal. Grant met. GPRA goal will be met pending U.S. EPA HQ approval. Per EPA, GPRA goal not met.
FY 12	Post Closure Permit	Phillips 66 Company- San Francisco Refinery EPA ID No. CAD 009 108 705	9/2013	1/23/2013	1/19/12 Status: Post Closure Permit issued on 2/21/2012 for Primary Storm Basin SurflmpUnit expires on 2/20/22 1/23/13 Status: Closure Verification issued for Primary Storm Basin Unit 2/13/14 Status: 1st NOD Issued (Post Closure Permit for Landfarm expires 4/13/14) Grant and GPRA Goal pending U.S. EPA HQ approval. Goal not met
FY12	Undergoing Closure	Safety-Kleen Systems Inc EPA ID No. CAD 980 817 159	3/2013	3/5/2013	3/5/13 Status: Closure transferred to CA. Letter to File 3/5/13. Substitute Facility for Grant and GPRA goal. Grant and GPRA goal met
FY12	Operating Permit	D/K Environmental EPA ID No. CAT 080 033 681	10/1/2012	10/1/2012	11/10/11 Status: 4 existing units clean closed 10/1/12 Status: Permit issued for Rail Car Loading/Unloading and new Container Unit. It will expire on 9/30/22 Grant and GPRA goal met
FY12	Undergoing Closure	Defense Distribution Depot San Joaquin – Sharpe Site EPA ID No. CA8 210 020 832	6/2015	8/7/2013	7/12/05 Status: 1st NOD for closure plan issued 2/25/05 Status: Clean closure acceptable for containment building 605 2/10/04 Status: Facility submitted intent to close 8/72013: Grant & GPRA goals will be met pending U.S.EPA HQ approval. Goals met.
FY12	Post Closure Permit	Former International Light Metal Corp Facility EPA ID No: CAD 030 398 622	3/5/2013	3/5/2013	3/5/2013: Post Closure Permit issued Substitute Facility for Grant and GPRA. Grant met. GPRA goal will be met pending U.S. EPA HQ approval. Grant met. Per EPA, GPRA goal not met.
FY12	Closure	Transfer Station Inc. EPA ID No: CAD 982 417 560		5/10/2013	7/17/13: Facility never built – closed 5/10/13: Closed. Grant met. Per EPA, GPRA goal not met.
FY12	Closure (Non-operating)	US Marine Corps- Camp Pendleton EPA ID No: CA2 170 023 533	4/30/2013	4/30/2013	4:30/13: Facility closed Substitute Facility for Grant and GPRA. Grant met. GPRA goal will be met pending U.S. EPA HQ approval. Per EPA, GPRA goal not met.
FY12	Closure	Raytheon Vision Systems EPA ID No: CAD 028 260 297		6/26/2013	6/26/13: Clean Closure Verification Substitute Facility for Grant and GPRA. Grant met. GPRA goal will be met pending U.S. EPA HQ approval. Per EPA, GPRA goal not met.
FY13	Post Closure Permit (New)	ACME Fill Corporation EPA ID No. CAD 041 835 695	6/2014		1/27/13 Status: Revised application submitted – New PC 7/17/13 Status: Legal/Ag review of FR Compliance Schedule. Moved to FY 13/14. 3/26/13 Status: Admin Review completed

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FY13	Operating Permit	Crosby & Overton EPA ID No. CAD 028 409 019	6/2014		5/6/09 Status: NOD issued 5/15/13 Status: CEQA Issues 7/17/13 Status: Moved to FY 13/14 1/31/14 Draft Permit Renewal
FY13	Operating Permit	Demenno Kerdoon EPA ID No. CAT 080 013 352	9/2014		7/6/11 Status: Permit expired 7/6/11 2/28/13 Status: 2nd NOD issued
FY13	Undergoing Closure	Defense Distribution Depot San Joaquin - Tracy EPA ID No. CA4 971 520 834	3/2014		8/31/05 Status: Permit expired 7/12/05 Status: 1st NOD for closure plan issued 2/10/04 Status: Facility submitted intent to close. Moved to FY 13/14. 10/8/13 Status: Ed to talk to Chris Sherman on taking over project. PM to send Memo on Transfer to CA for closure
FY13	Operating Permit	Lawrence Livermore National Laboratory EPA ID No. CA2 890 012 584	9/2014		8/20/08 Status: Call-in completed 3/10/11 Status: 2nd NOD issued 1/23/13 Status: CEQA Approved
FY13	Operating Permit	Lawrence Livermore National Laboratory – Site 300 EPA ID No. CA2 890 090 002	12/2014		6/18/08 Status: Draft permit issued 8/2/08 Public Comment End
FY13	Post Closure Permit	Lawrence Livermore National Laboratory – Site 300 EPA ID No. CA2 890 090 002	12/2014		12/14/12: Admin review complete
FY13	Operating Permit	Naval Air Weapons Station China Lake EPA ID No. CA2 170 023 152	6/2014		6/30/11 Status: Permit expired 3/1/11 Status: Administrative review complete 7/17/13 Status: CEQA issues. Move to FY 13/14
FY13	Operating Permit	Naval Air Station North Island (NASNI) Mixed Waste Storage Facility EPA ID No. CAR 000 019 430	9/2014		1/2/08 Status: Permit expired 1/28/08 Status: Administrative review complete 6/13/13 Status: Move to FY 13/14 – Resource issue 3/3/14 Response to 1st NOD received
FY 13	Post Closure Permit	USS Posco Industries EPA ID No. CAD009150194	3/2014		12/13/13 Status: Draft Permit Public Noticed. Public Comment Period ends 1/27/2014
FY13	Operating Permit	Veolia ES Technical Solutions LLC-Richmond EPA ID No. CAT 080 014 079	4/2014		7/16/12 Status: Final Part A& B received 7/17/13 Status: Closure Plan Issue. Move to FY 13/14 8/16/13 Status: Technical Completeness Letter issued 2/11/14 Status: Draft Permit Public Noticed. Comment Period ends 3/28/14
FY13	Closure	Norac Pharma (S&B Pharma DBA Norac Pharma) EPA ID No. CAD008352957	1/2014	1/28/14	1/28/14 Status: Referred for Closure to Corrective Action
FY 13	Closure	Romic Environmental Technologies Corp. EPA ID No. CAD009452657	1/2014	1/28/14	1/28/14 Status: Referred for Closure to Corrective Action

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FY14	Operating Permit	Clean Harbors San Jose EPA ID No. CAD 059 494 310	6/2015		2/19/13 Status: Permit expires 2/19/13. 6/30/12 Status: Call In complete 12/13/12 Status: Admin review complete
FY14	Operating Permit	Clean Harbors Westmorland, LLC EPA ID No. CAD 000 633 164	9/2015		6/4/12 Status: Technical Completeness 4/25/11
FY14	Operating Permit	The Dow Chemical Company EPA ID No. CAD 076 528 678	6/2015		6/4/12 Status: Operating permit expires on 4/28/13. Post Closure permit expires on 12/12/17 11/8/11 Status: Call In complete 10/29/12 Status: Part A and B received 10/14/13 Response to 1st NOD Received
FY14	Operating Permit	John Smith Road Landfill EPA ID No. CAD 990 665 432	6/2015		12/8/13 Status: Permit expires 12/8/13 9/11/12 Status: Call In letter complete
FY14	Closure	Riverbank Army Ammo EPA ID No. CA7 210 020 759	10/2014		12/30/11 Status: Facility submitted intent to close 12/28/11 Status: Facility stopped operating 2/25/12 Status: Public Comment period ended
FY14	Operating Permit	Sandia National Laboratories EPA ID No. CA2 890 012 923	6/2015		3/29/14 Status: Permit expires 3/29/14 11/6/13 Public Notice – Permit received.
FY 14	Post Closure Permit	Panoche Facility EPA ID No. CAD000060012	6/2015		1/18/13 Status: Administrative Review Completed
FY14	Operating Permit	Phibro Tech, Inc. EPA ID No. CAD 008 488 025	12/2014		3/29/1995 Call-In Letter issued 6/4/12 Status: Draft permit to be re-noticed ??
FY14	Operating Permit	Evoqua Water Technologies LLC EPA ID No. CAD 097 030 993	12/2014		7/7/08 Status: Renewal NOD issued
FY 14	Post Closure Permit	Tesoro Carson Refinery EPA ID No. CAD077227049	6/2015		11/26/13 Status: Response to 2nd NOD
FY 14	Post Closure Permit	Vine Hill Complex EPA ID No. CAD982521460	6/2015		1/10/13 Status: Administrative Review Completed
FY15	Operating Permit	Chemical Waste Mgmt Inc. Kettleman EPA ID No. CAT 000 646 117	6/2016		6/14/12 Status: Permit expires 6/30/13. 2/15/13 Status: Part A and B received 2/18/13 DTSC Meeting Summary provided by WM

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FY15	Operating Permit	Clean Harbors Buttonwillow, LLC EPA ID No. CAD 980 675 276	2/2016		10/4/07 Status: 2nd NOD issued 10/10/13 Response to 2nd NOD Received 11/2013 DTSC Initiated request for facility to chnge their waste staging practice which resulte in tentative design changes.
FY15	Operating Permit	Evergreen Oil Inc EPA ID No. CAD 980 887 418	6/2016		1/5/15 Status: Permit expires 1/5/15
FY15	Operating Permit	Exide Technologies Inc. EPA ID No. CAD 097 854 541	12/2015		8/3/12 Status: 2nd NOD issued
FY 15	Post Closure Permit	Forward Landfill EPA ID No. CAD990794133	7/2015		3/19/13 Status: Administrative Review Completed
FY15	Operating Permit	HGST Inc EPA ID No. CAR 000 128 793	6/2016		5/15/15 Status: Permit expires 5/16/15
FY15	Post Closure Permit	Kearney – KPF EPA ID No. CAD 981 429 715	6/2016		7/22/14 Status: Permit expires 7/22/14 6/26/13 Call-In Letter Issued
FY15	Operating Permit	KW Plastics of California EPA ID No. CAD 982 435 026	6/2016		7/28/14 Status: Permit expires 7/28/14 3/3/14 Administrative Review Complete
FY15	Operating Permit	Pacific Scientific Energetic Materials Co EPA ID No. CAD 009 220 898	6/2016		5/11/16 Status: Permit expires 5/11/16
FY 15	Post Closure Permit	Phillips 66 Company San Francisco Refinery EPA ID No. CAD009108705	12/2015		11/13/13: Administrative Review Completed 2/13/14 1st Notice of Deficiency Issued

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FY15	Operating Permit	Southern California Edison Co– San Onofre Nuclear Generating Station EPA ID No. CAD 000 630 921	6/2016		1/30/15 Status: Permit expires 1/30/15 1/2/14 Application Part A & B Received
FY16	Closure	The Dow Chemical Company EPA ID No. CAD 009 547 050	2016		6/4/12 Status: Facility withdrew permit renewal application and opted for closure through corrective action. 7/28/06 Status: Permit expired 7/28/96 Status: Renewal permit issued, closure plan was part of this permit. *****
	Operating Permit	Duke Energy Moss Landing LLC EPA ID No. CAT 080 011 653	2016		4/6/16 Status: Permit expires 4/6/16 Call In Letter to be issued 4/6/2014
	Operating Permit	General Chemical Corp Bay Point Works EPA ID No. CAD 009 142 290	2016		5/26/16 Status: Permit expires 5/26/16
	Operating Permit	General Electric International Inc EPA ID No. CAD 030 584 502	2016		11/30/14 Status: Permit expires 11/30/14 10/2/13 Call In Letter Issued
	Operating Permit	Naval Air Station San Diego EPA ID No. CA6 170 024 289	2016		7/26/16 Status: Permit expires 7/26/16
	Operating Permit	Pacific Gas & Electric–Diablo Canyon EPA ID No. CAD 077 966 349	2016		7/30/16 Status: Permit expires 7/30/16
	Operating Permit	Safety Kleen Systems Inc. EPA ID No. CA0 000 084 517	2016		7/28/16 Status: Permit expires 7/28/16
	Post Closure Permit	TFX Aviation Inc. EPA ID No. CAD008383127	2016		Call In Letter to be issued 4/7/14

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FY17	Post Closure Permit	Big Blue Hills Pesticide Cont Disposal EPA ID No. CAT 080 010 606	2017		9/7/17 Status: Permit expires 9/7/17 Call In letter to be issued 3/7/2016
	Operating Permit	Boeing Satellite Systems, Inc. EPA ID No. CAD 060 897 063	2017		4/10/17 Status: Permit expires 4/10/17
	Operating/Post Closure Permit	Chevron El Segundo Refinery EPA ID No. CAD 008 336 901	2017		5/17/17 Status: Permit expires 5/17/17 Call In Letter to be Issued 5/15/2015
	Operating/Post Closure Permit	Chevron USA Inc Richmond Refinery EPA ID No. CAD 009 114 919	2017		3/7/13 Status: PC permit expires 3/7/13. 10/11/16 Status: Operating permit expires 10/11/16 PC Renewal: 12/21/2012 Administrative Review complete
	Operating Permit	GEM of Rancho Cordova LLC DBA PSC Environmental SVS of Rancho Cordova EPA ID No. CAD 980 884 183	2017		4/25/17 Status: Permit expires 4/25/17
	Operating Permit	Lawrence Berkeley National Laboratory EPA ID No. CA4 890 008 986	2017		12/21/16 Status: Permit expires 12/21/16
	Operating Permit	Quemetco Inc. EPA ID No. CAD066233966	2017		
	Operating Permit	Safety-Kleen EPA ID No. CAD 066 113 465	2017		7/23/17 Status: Permit expires 7/23/17
	Operating Permit	Safety Kleen Systems Inc Highland Service Center EPA ID No. CAD 000 613 927	2017		6/23/17 Status: Permit expires 6/23/17

DIVISION: Hazardous Waste Management Program **PROGRAM:** Office of Permitting **PERIOD:** 7/01/11-6/30/18	**FEDERAL SHARE:** $[Enter Funding] **STATE SHARE:** $[Enter Funding] **TOTAL:** $[Enter Funding]	**DEPUTY DIRECTOR:** **Brian Johnson** **PROGRAM MANAGER:** **Rizgar Ghazi**

TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: Administer the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals.

GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Operating Permit	San Diego Gas & Electric Co Miramar Waste Management Facility EPA ID No. CAD 981 168 107	2017		8/5/17 Status: Permit expires 8/5/17
	Operating Permit	Southern. California Gas Co EPA ID No. CAD 981 422 017	2017		5/4/17 Status: Permit expires 5/4/17
	Operating Permit	Southern. California Gas Co EPA ID No. CAT 000 625 137	2017		7/30/17 Status: Permit expires 7/30/17
FY17	Operating Permit	Edwards Air Force Base EPA ID No. CA1 570 024 504	2017		11/3/15 Status: Permit expires 11/3/15 Call In Letter to be issued 6/7/2014 [Two closures in progress since 1998 (Unit OBOD2, OBOD1)]
	Post Closure Permit	Phillips 66 Co Los Angeles Refinery Carson Plant EPA ID No. CAD 980 881 676	2018		11/26/17 Status: Permit expires 11/26/17 Call in letter to be issued 11/6/2015
	Post Closure Permit	Phillips 66 Co Los Angeles Refinery Wilmington Plant EPA ID No. CAD 088 237 679	2018		7/24/18 Status: Permit expires 7/24/18 Call in letter to be issued 11/23/2016
	Post Closure Permit	The Dow Chemical Company EPA ID No. CAD 076 528 678	2018		12/12/17 Status: OP Permit (BIF) expired 4/27/13, OP Permit expires 7/30/16, PC Permit expires 12/12/17
	Post Closure Permit	Occidental of Elks Hills Inc EPA ID No. CA4 170 024 414	2018		7/15/18 Status: Permit expires 7/15/18
	Post Closure Permit	Benson Ridge Facility EPA ID No. CAD 000 633 289	2018		6/10/18 Status: Permit expires 6/9/18

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TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

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GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Post Closure Permit	Montezuma Hills facility EPA ID No. CAD 079 089 512	2018		10/20/18 Status: Permit expires 10/20/18
	Operating Permit	Raytheon Space & Airborne Systems EPA ID No. CAD 000 633 230	2018		10/8/17 Status: Permit expires 10/8/17
	Operating Permit	Rho Chem LLC EPA ID No. CAD 008 364 432	2018		8/28/18 Status: Permit expires 8/27/18
	Closed	Safety Kleen EPA ID No. CAD 053 044 053	2018		10/26/17 Status: Permit expires 10/26/17 Facility Closed 10/26/2007
	Closed	Safety Kleen EPA ID No. CAT 000 613 943	2018		10/26/17 Status: Permit expires 10/26/17 Facility Closed 10/26/2007 (Refer RWQCB)
	Closed	Safety Kleen EPA ID NO. CAT 000 613 968	2018		10/26/17 Status: Permit expires 10/26/17 Facility Closed 10/26/2007
	Operating Permit	Safety Kleen Systems Inc EPA ID No. CAD 000 613 976	2018		5/23/17 Status: Permit expires 5/23/17
	Operating Permit	Safety Kleen Systems Inc El Monte Accumulation Center EPA ID No. CAT 000 613 893	2018		5/7/18 Status: Permit expires 5/4/18
	Undergoing Closure	Shell Martinez Refinery EPA ID No. CAD 009 164 021	2018		5/21/18 Status: Permit expires 5/21/18 Closure Notice Received 1/6/2014

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TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: Administer the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals.

GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Post Closure Permit	Techalloy Co Inc. EPA ID No. CAD 059 277 137	2018		2/29/18 Status: Permit expires 3/1/18
	Operating Permit	Travis Air Force Base EPA ID No. CA5 570 024 575	2018		1/19/18 Status: Permit expires 1/19/18
	Operating Permit	Dept of Air Force Vandenberg AFB EPA ID No. CA9 570 025 149	2018		5/6/18 Status: Permit expires 5/5/18
Beyond	Operating Permit	Aerojet Rocketdyne, Inc. EPA ID No. CAD 000 030 494	2019		2019 Status: 2 Permits – OP expires 3/28/2019 & PC expires 4/13/2019
	Post Closure Permit	Golden Eagle Refinery EPA ID No. CAD 000 072 751	2019		2019 Status: Permit expires 2/29/2019
	Operating Permit	Safety Kleen Systems Inc EPA ID No. CAT 000 613 935	2019		2019 Status: Permit expires 3/17/2019
	Post Closure Permit	Square D Company EPA ID No. CAD 050 746 775	2019		2019 Status: Permit expires 5/31/2019
	Post Closure Permit	West County Landfill Inc EPA ID No. CAD 041 844 002	2019		2019 Status: Permit expires 5/31/2019
	Operating Permit	Chevron Chemical Co. EPA ID No. CAD 043 237 486	2020		2020 Status: Permit expires 7/23/2020
	Post Closure Permit	Honeywell International Inc. Former Baron Blakeslee EPA ID No. CAD 074 644 659	2020		2020 Status: Permit expires 3/17/2020
	Post Closure Permit	The Boeing Co –Canoga Park EPA ID No. CAD 093 365 435			4/17/06 Status: 1st NOD issued
	Closure	Chemtura Corporation (formerly Witco Corporation) EPA ID No. CAD 009 137 779			Under corrective action per C. Padilla 4/23/2013 5/28/02 Status: Permit expired

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TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: Administer the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals.

GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Closure	Dynegy Morro Bay LLC EPA ID No. CAT 080 011 646			6/4/12 Status: Waiting for confirmation on clean closure of unit 5 6/30/09 Status: Permit expired 8/15/08 Status: Clean closed units 1, 2, and 3 1989 Status: Clean closed unit 4
	Closure	Gallade Chemical, Inc. EPA ID No. CAD 029 363 876			6/4/12 Status: Undergoing closure through clean up
	Closed	IBM Corporation EPA ID No. CAD 990 843 989			1/2003 Status: Facility sold to Hitachi GST Closure Final 5/18/2009
	Closure	LA Department Water & Power EPA ID No. CAD 000 633 305			6/4/12 Status: Undergoing closure through clean up 11/9/00 Status: 1st NOD for closure plan issued
	Closure	Safety-Kleen Systems Inc EPA ID No. CAD 980 817 159			11/1/00 Status: Closure plan received 3/5/2013 Referred to Corrective Action
	Closure	Statewide Environmental Services EPA ID No. CAD 000 088 252			6/4/12 Status: Undergoing closure through clean up
	Meet EPA the following Permitting GPRA Goals for each federal fiscal year (FFY): FFY 12 - 8 FFY 13 - 8 FFY 14 - 8 [Note: The FFY is from Oct. 1 to Sept.				FFY 12 – 8 GPRA Permits achieved.
	Complete Class II Permit Modifications			6/30/12	Rho Chem Corporation – Completed 3/18/2012
	Complete Class I* Permit Modifications			6/30/12	Ducommun Aerostructures – Completed 10/31/2011 etc.

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TASK 3: PERMITTING

TASK 3.1: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: Administer the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals.

GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Complete Class I Permit Modifications			6/30/12	17 completed (list out facilities)
	Complete Emergency Permits		6/30/12		3 completed (list out facilities)
	Enter Permit Activity Events Into the RCRAInfo database as necessary.		12/2011 12/2012 12/2013		**NOTE:** Permit Activity Events include: Receipt of new or renewing Permit Applications, Issuance of Permits, Effective dates for permits, Changes to Unit Details such as changes to capacities, closure of units, and addition of units, other significant permit changes affecting permit details.
	Enter Financial Assurance Data and Events into the RCRAInfo database as necessary.		12/2011 12/2012 12/2013		**NOTE:** Financial Assurance Events include: Submittal of new financial assurance mechanisms, updating of financial assurance instruments, annual updates to cost estimates.