California Department of Toxic Substances Control (DTSC)
Resource Conservation and Recovery Act (RCRA) Grant Fiscal Years 2011-2014

EPA's Strategic Plan Goal and Objective

The tasks in this Workplan support the following Goal and Objective from EPA's Strategic Plan:

Goal 3: **Cleaning Up Communities and Advancing Sustainable Development.**

Clean up communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas.

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.

EPA-R9-2016-005534-0004878

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PROGRAM: PERMITTING

TASK: HAZARDOUS WASTE PERMITS ADMINISTRATION

DESCRIPTION: DTSC is **authorized and committed** to administering the Hazardous Waste Permits Program in accordance with the California Code of Regulations and achieve EPA GPRA goals. DTSC will complete 8 permit actions in each of the following federal fiscal years: FY12, FY13, and FY14.

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
FY11	Operating Permit	Clean Harbors Wilmington EPA ID No. CAD 044 429 835	9/2011	9/15/11	9/15/11 Status: Permit issued
FY 11	Operating Permit	Kinsbursky Bros EPA ID No. CAD 088 504 881		6/14/11	6/14/11 Status: Permit issued
FY12	Closure Permit	Detrex 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.
FY12	Post Closure Permit	El Dupont EPA ID No. CAD 009 151 671	12/7/11	12/7/11	12/7/11 Status: Permit issued
FY12	Operating Permit	Kopper (Beazer) EPA ID No. CAD 009 112 087		2/9/12	2/9/12 Status: Permit issued
FY12	Operating Permit	Pacific Gas and Electric - Diablo EPA ID No. CAD 077 966 349		6/18/12	6/18/12 Status: Permit issued
FY12	Operating Permit	Pacific Resource Recovery Service EPA ID No. CAD 008 252 405	4/2012	5/23/12	5/23/12 Status: Permit issued
FY12	Closure Permit	Safety Kleen – Reedley EPA ID No. CAD 093 459 485	3/2012	8/8/12	8/8/12 Status: Clean closed facility

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FY13	Closure Permit	Boeing Company – SSFL RMHF 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). Letter to File 3/4/13
FY 13	Post Closure Permit	ConocoPhillips San Francisco Refinery - Rodeo EPA ID No. CAD 009 108 705	5/2013		1/19/12 Status: New Post Closure issued for Primary Unit. It expires on 2/20/22. Post Closure Permit for Landfarm expires 4/13/14 3/6/13 Status: Closure Verification and LUC to be issued for Container1 Unit
FY13	Operating Permit	Crosby & Overton EPA ID No. CAD 028 409 019	6/2013		5/6/09 Status: NOD issued
FY13	Operating Permit	D/K Environmental EPA ID No. CAT 080 033 681	9/2012		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
FY13	Closure Permit	Safety Kleen San Jose 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 GPRA
FY13	Operating Permit	US Navy China Lake EPA ID No. CA2 170 023 152	8/2013		6/30/11 Status: Permit expired 3/1/11 Status: Administrative review complete
FY13	Operating Permit	US Navy Naval Air Station – North Island (NASNI) EPA ID No. CAR 000 019 430	9/2013		1/2/08 Status: Permit expired 1/28/08 Status: Administrative review complete
FY13	Operating Permit	Veolia ES Technical Solutions LLC-Richmond (aka Onyx Environmental) EPA ID No. CAT 080 014 079	9/2013		7/16/12 Status: Final Part A& B received
FY14	Post Closure Permit	ACME Landfill EPA ID No. CAD 041 835 695	9/2014		1/27/13 Status: Revised application submitted – New PC

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FY14	Operating Permit	Clean Harbors Buttonwillow, LLC EPA ID No. CAD 980 675 276	9/2014		10/31/07 Status: 2nd NOD issued
FY14	Operating Permit	Clean Harbors Westmorland, LLC EPA ID No. CAD 000 633 164	9/2014		6/4/12 Status: Technical Completeness 4/25/11
FY14	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: 2 nd NOD issued
FY14	Operating Permit	Exide Technologies Vernon Facility EPA ID No. CAD 097 854 541	9/2014		8/13/12 Status: 2nd NOD issued
FY13	Operating Permit	Lawrence Livermore National Lab EPA ID No. CA2 890 012 584	9/2013		8/20/08 Status: Call-in completed 3/10/11 Status: 2 nd NOD issued
FY13	Operating Permit	Lawrence Livermore National Laboratory – Site 300 (Tracy) EPA ID No. CA2 890 090 002	9/2014		6/18/08 Status: Draft permit issued
FY13	Operating Permit	Siemens Water Technologies Corp (U.S. Filter Recovery Service) EPA ID No. CAD 097 030 993	6/2014		7/7/08 Status: Renewal NOD issued
FY15	Operating Permit	Chemical Waste Mgmt Inc. Kettleman EPA ID No. CAT 000 646 117	6/2015		6/14/12 Status: Permit expires 6/30/13. 2/15/13 Status: Part A and B received
FY15	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
FY15	Operating Permit	Defense District Depot Sharpe EPA ID No. CA8 210 020 832	6/2015		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

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FY15	Operating Permit	Defense District Depot Tracy EPA ID No. CA4 971 520 834	8/2015		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
FY15	Operating Permit	Dow Chemical Pittsburg 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
FY15	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	Operating Permit	Phibro Tech, Inc. EPA ID No. CAD 008 488 025	9/2014		6/4/12 Status: Draft permit to be re-noticed 12/13
FY15	Closure Permit	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
FY15	Operating Permit	Sandia National Lab CA EPA ID No. CA2 890 012 923	6/2015		3/30/14 Status: Permit expires 3/30/14
FY16	Operating Permit	Evergreen Oil – Newark EPA ID No. CAD 980 887 418	6/2016		1/5/15 Status: Permit expires 1/5/15
FY16	Operating Permit	General Electric Co. Anaheim EPA ID No. CAD 030 584 502	12/2015		11/30/14 Status: Permit expires 11/30/14

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FY15	Operating Permit	Hitachi Global Storage Tech EPA ID No. CAR 000 128 793	6/2016		5/15/15 Status: Permit expires 5/15/15
FY15	Operating Permit	Kearney – KPF EPA ID No. CAD 981 429 715	6/2016		7/22/14 Status: Permit expires 7/22/14
FY15	Operating Permit	KW Plastics EPA ID No. CAD 982 435 026	6/2016		7/28/14 Status: Permit expires 7/28/14
FY15	Operating Permit	Pacific Scientific Energetic Material Co. Inc. EPA ID No. CAD 009 220 898	6/2016		5/11/16 Status: Permit expires 5/11/16
FY15	Operating Permit	So. Cal Edison – San Onofre EPA ID No. CAD 000 630 921	6/2016		1/30/15 Status: Permit expires 1/30/15
Beyond	Operating Permit	Beckman Coulter EPA ID No. 008 254 708	2016		1/18/08 Status: Closure Notice received. Entire facility undergoing closure. 3/2/11 Status: Closure Plan received. 7/27/16 Status: Permit expires 7/27/16.
	Closure Permit	Dow Chemical Company - Torrance 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	Dynergy Moss Landing EPA ID No. CAT 080 011 653	2016		4/6/16 Status: Permit expires 4/6/16

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	Operating Permit	Edwards AFB EPA ID No. CA1 570 024 504	2016		11/3/15 Status: Permit expires 11/3/15
	Operating Permit	General Chemical Bay Point EPA ID No. CAD 009 142 290	2016		5/26/16 Status: Permit expires 5/26/16
	Operating Permit	NASA Dryden EPA ID No. CA9 800 005 036	2016		6/30/16 Status: Permit expires 6/30/16
	Operating Permit	Naval Air Station San Diego (aka US Navy Station San Diego) EPA ID No. CA6 170 024 289	2016		7/26/16 Status: Permit expires 7/26/16
	Post Closure 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 Corp - Sacramento EPA ID No. CA0 000 084 517	2016		7/28/16 Status: Permit expires 7/28/16
	Post Closure Permit	Blue Hills DSPL Site EPA ID No. CAT 080 010 606	2017		9/7/17 Status: Permit expires 9/7/17

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GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	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
	Operating Permit	Chevron 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
	Operating Permit	GEM of Rancho Cordova, LLC EPA ID No. CAD 980 884 183	2017		4/25/17 Status: Permit expires 4/25/17
	Operating Permit	Lawrence Berkeley National Lab EPA ID No. CA4 890 008 986	2017		12/21/16 Status: Permit expires 12/21/16
	Operating Permit	Safety Kleen Corp. – Fresno EPA ID No. CAD 066 113 465	2017		7/23/17 Status: Permit expires 7/23/17
	Operating Permit	Safety Kleen Corp. – Highland EPA ID No. CAD 000 613 927	2017		6/23/17 Status: Permit expires 6/23/17

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	Operating Permit	San Diego Gas & Electric Co. EPA ID No. CAD 981 168 107	2017		8/5/17 Status: Permit expires 8/5/17
	Operating Permit	So. California Gas Co – Los Angeles EPA ID No. CAD 981 422 017	2017		5/4/17 Status: Permit expires 5/4/17
	Operating Permit	So. California Gas Co. – Pico Rivera EPA ID No. CAT 000 625 137	2017		7/30/17 Status: Permit expires 7/30/17
	Post Closure Permit	ConocoPhillips – Carson Plant LARC (formerly Tosco) EPA ID No. CAD 980 881 676	2018		11/26/17 Status: Permit expires 11/26/17
	Post Closure Permit	ConocoPhillips – LARW (aka Tosco) EPA ID No. CAD 088 237 679	2018		7/24/18 Status: Permit expires 7/24/18
	Post Closure Permit	Dow Chemical Company - Pittsburg EPA ID No. CAD 076 528 678	2018		12/12/17 Status: Permit expires 12/12/17
	Post Closure Permit	Elks Hills Oil Field (Occidental Oil & Gas) EPA ID No. CA4 170 024 414	2018		7/15/18 Status: Permit expires 7/15/18

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GPRA Year	OUTPUT DESCRIPTION	FACILITY	PLANNED DATE	ACTUAL DATE	COMMENTS
	Post Closure Permit	IT Corp. Benson Ridge Fac EPA ID No. CAD 000 633 289	2018		6/10/18 Status: Permit expires 6/10/18
	Post Closure Permit	IT Corp. Montezuma Hills EPA ID No. CAD 079 089 512	2018		10/20/18 Status: Permit expires 10/20/18
	Operating Permit	Raytheon Space & Airborne System EPA ID No. CAD 000 633 230	2018		10/8/17 Status: Permit expires 10/8/17
	Operating Permit	Rho Chem Corp EPA ID No. CAD 008 364 432	2018		8/28/18 Status: Permit expires 8/28/18
	Operating Permit	Safety Kleen Corp EPA ID No. CAD 053 044 053	2018		10/26/17 Status: Permit expires 10/26/17
	Operating Permit	Safety Kleen Corp. EPA ID No. CAT 000 613 943	2018		10/26/17 Status: Permit expires 10/26/17
	Operating Permit	Safety Kleen Corp. – Salida EPA ID NO. CAT 000 613 968	2018		10/26/17 Status: Permit expires 10/26/17

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	Operating Permit	Safety Kleen Corp. – Santa Ana EPA ID No. CAD 000 613 976	2018		5/23/17 Status: Permit expires 5/23/17
	Operating Permit	Safety Kleen Corp. – El Monte EPA ID No. CAT 000 613 893	2018		5/7/18 Status: Permit expires 5/7/18
	Operating Permit	Shell Oil Products Martinez Ref EPA ID No. CAD 009 164 021	2018		5/21/18 Status: Permit expires 5/21/18
	Post Closure Permit	Techalloy Western Inc. EPA ID No. CAD 059 277 137	2018		2/29/18 Status: Permit expires 2/29/18
	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	Vandenberg AFB EPA ID No. CA9 570 025 149	2018		5/6/18 Status: Permit expires 5/6/18
	Operating Permit	Aerojet General Corporation EPA ID No. CAD 000 030 494	2019		2019 Status: 2 Permits – OP & PC expires 2019
	Post Closure Permit	Tesoro Golden Eagle Refinery EPA ID No. CAD 000 072 751	2019		2019 Status: Permit expires 2019

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	Operating Permit	Safety Kleen Corp. – Los Angeles EPA ID No. CAT 000 613 935	2019		2019 Status: Permit expires 2019
	Post Closure Permit	Square D Co. EPA ID No. CAD 050 746 775	2019		2019 Status: Permit expires 2019
	Post Closure Permit	West County Landfill EPA ID No. CAD 041 844 002	2019		2019 Status: Permit expires 2019
	Operating Permit	Chevron Chemical Co. EPA ID No. CAD 043 237 486	2020		2020 Status: Permit expires 2020
	Post Closure Permit	Honeywell International Inc. (aka Baron Blakeslee (Newark) EPA ID No. CAD 074 644 659	2020		2020 Status: Permit expires 2020
	Post Closure Permit	Boeing Company – SSFL 1, 2, 3, 4 EPA ID No. CAD 093 365 435			4/17/06 Status: 1st NOD issued
	Closure Permit	Chemtura Corporation (formerly Witco Corporation) EPA ID No. CAD 009 137 779			6/4/12 Status: Under corrective action per C. Padilla 5/28/02 Status: Permit expired
	Closure Permit	Dynergy Morro Bay 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 Permit	Gallade Chemical, Inc. EPA ID No. CAD 029 363 876			6/4/12 Status: Undergoing closure through clean up

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	Operating Permit	IBM Corporation EPA ID No. CAD 990 843 989			1/2003 Status: Facility sold to Hitachi GST
	Closure Permit	Main Street Center, LA Dept of 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
	Operating Permit	Safety Kleen Corp EPA ID No. CAD 980 817 159			11/1/00 Status: Closure plan received
	Closure Permit	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. 30.				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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	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.

PERMITTING AND HAZARDOUS WASTE PRIORITIES FOR FISCAL YEARS 2011-2014

AUTHORIZED AND COMMITTED

1. BIENNIAL REPORT

In FYs 2011-14, DTSC will establish a Biennial Report (BR) program that ensures all BR data is complete and accurate. The BR survey of large quantity generators (LQGs) and treatment, storage and disposal facilities (TSDFs) is conducted to cover facility and waste generation activity of the previous year. The resulting BR is maintained and managed to evaluate and characterize RCRA hazardous waste management, generation, treatment, storage, disposal, minimization, and waste management capacity.

The following procedures will be implemented by DTSC:

A. DTSC will identify all RCRA LQGs and TSD facilities operating within California during the 2011 & 2013 survey cycle and develop and maintain an accurate mailing list of generators and facilities.

B. DTSC will continue to assist US EPA Region 9 in QA/QC efforts and maintenance of DTSC1995, 1997, 1999, 2001, 2003, 2005, 2007, 2009, and future (e.g. 2011) Biennial Report System (BRS) databases.

C. Procure the BRS implementer software by December 1, 2011 and 2013.

D. Encourage filers to obtain the Biennial Report Forms on-line no later than January 1 of the submitting year (i.e., 2012 and 2014).

E. Provide outreach training to the regulated community during FYs2012 and 2014. DTSC should provide US EPA with an outreach plan and schedule by December 2011 and 2013. DTSC should provide US EPA with a copy of all written, BRS related materials distributed to the regulated community that were not developed by US EPA. This will ensure that US. EPA Region 9 and DTSC do not provide conflicting guidance to the US EPA BRS helpline and regulated community.

F. Collect all forms and electronic forms no later than March 1 of the submitting year. DTSC shall contact facilities if forms are incomplete or if forms are not received by the due date to obtain any missing data or reports.

G. Perform QA/QC on data received to identify discrepancies in reported quantities of wastes managed, received, shipped and generated by comparing

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to previous years' data. Any discrepancies should be investigated, verified, and/or corrected.

H. Submit the initial data extract electronically to U.S. EPA Region 9 before June 11 of the submitting year. Once data is loaded into RCRAInfo, DTSC should continue their data quality assurance efforts and submit any revised data to US. EPA Region 9 prior to final submission by October 1 of the submitting year. Data submitted to US. EPA Region 9 must pass the basic and advanced BRS edit check. The data must be compiled in, or translated into, the currently US. EPA approved BRS data files. The data must be submitted to US EPA on a CD or thru DTSC'S FTP site.

I. Continue data quality assurance efforts by using the advanced edit report, verification report, shipper/receiver reports, and other national quality assurance reports available in RCRAInfo or the BRState software. DTSC will complete these data quality analyses and correct the data by October 1 of the submitting year.

J. Identify all LQGs and TSDFs, which are listed as being active in RCRAJnfo but did not submit a Biennial Report during the survey cycle. DTSC shall perform analysis on this list in order to determine each non-reporting LOG and TSD. Non-reporters will be notified to submit the Biennial Report.

2. NOTIFICATIONS

From July 1, 2011 to June 30, 2012, EPA will perform the Notifications task as an in-kind service for DTSC. Starting on July 1, 2012 DTSC will be responsible for performing all tasks related to Notifications. The Notifications task includes the following responsibilities:

A. Processing all new RCRA Notification forms and issuing federal EPA ID numbers to waste handlers through an acknowledgement letter. Notification forms should, at a minimum, collect the information required on EPA Form 8700-12.

B. Reviewing, managing, and updating site information in RCRAInfo as requested or required by law.

C. Conducting data entry on all EPA ID numbers issued by California including emergency, temporary, and Research & Development ID numbers. All related documents will be preserved by DTSC for record keeping.

D. Emergency EPA ID numbers issued after DTSC office hours will be communicated to DTSC the next business day and all related documents will be forwarded to DTSC for

record keeping.

E. Maintaining records of all Notification forms in accordance with DTSC's records retention schedule.

AUTHORIZED and UNCOMMITTED

3. PERMITTING

A. Completing permit and closure determinations on all facilities operating under interim status (currently there are 4 facilities still awaiting a permit decision).

B. Making and completing timely permit determinations on all new permits and permit renewals to avoid backlogs.

C. Making closure plan approvals, post closure permit determinations, or verification of closure, at priority inactive land disposal facilities.

D. Completing ongoing work from previous FYs.

At present, it is anticipated that the GPRA Permitting Baseline list for California will be made up of 57 sites.

4. ENVIROSTOR

DTSC tracks their permitting activities through a centralized information system called EnviroStor. This system allows ease of transfer of information to U.S. EPA's RCRA Info on a quarterly basis.

5. PERIODIC MEETING/UPDATES TO U.S. EPA

DTSC and U. S. EPA will continue to meet periodically to measure progress towards the GPRA Permitting goals. Changes such as facility or commitment dates to the multi-year strategy will be noticed and summarized in the Quarterly Reports of Grant Accomplishments

6. COMPLETED OUTPUT REVIEWS (CORs)

This is an ongoing program evaluation activity. COR provides the mechanism that US. EPA and DTSC use to review the quality of the Permit Program Outputs completed by DTSC staff. These CCRs are collaborative-reviews of DTSC'S performance in producing program outputs, including GPRA goals, and are conducted by personnel from US EPA, DTSC Headquarters, and DTSC Regional offices. During the reviews, a joint team of US. EPA and DTSC staff (CORTeam) examin randomly selected RCRA permitting work products to determine quality and conformance with the applicable laws, regulations, and guidance. Formal reports that provide recommendations are prepared.

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7. 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 2011-2014.

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. 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.

8. POLLUTION PREVENTION

Pollution prevention is a strategic objective of DTSC and a strategic goal of U.S. EPA during FYs 2011-2014, DTSC will continue to promote pollution prevention through the permitting process. Whenever RCRA permits for on-site facilities come up for renewal, DTSC will also review source reduction plans for those facilities subject to Senate Bill 14 requirements. This coordinated review will help to determine what Kind of permit conditions and/or special permit language could be added to the renewed permit to achieve hazardous waste source reduction. In addition, pollution prevention information from the source reduction plans will be presented in the pre-permit decision public notice document(s). The intended purpose of this latter activity is to facilitate public dialog on the adequacy of a facility's pollution prevention efforts.

9. INFORMATION MANAGEMENT

DTSC will report permitting outputs into RCRAInfo every three months to ensure accurate, timely, and complete tracking and reporting of RCRA core measures. DTSC will report on progress in meeting permitting 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.

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

A. Maintaining accurate permitting universes in RCRAInfo.

B. 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 permitting 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:

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

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

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

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

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

F. 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.

10. REPORTING

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

11. 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.

12. SELF ASSESSMENT

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

A. Highlighting successful aspects of the program and discussing the factors (programmatic or agency-wide) influencing success.

B. Identifying whether any planned activities have been or are expected to be delayed or missed, and forecasting the expected completion date.

C. Substitutions for Grant commitments that will slip into the next fiscal year will be discussed in this section.

D. Identifying factors contributing to missed commitments, if any.

E. Identifying actions to address the factors contributing to missed commitments, if any.

F. Identifying whether resources are being spent as planned, or whether adjustments are necessary to account for funding that may not be expended in FYs 2011-14. Specify the funding amount that may not be expended and what actions are necessary to address the situation.

G. Commenting on the accuracy of data in the database.

H. Commenting on successes and impediments to moving facilities through the GPRA goals.

I. 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.

J. Summary report highlighting permitting of interim status facilities; permit renewals and denials issued; new permits issued.

13. REPORTING SCHEDULE

Reporting of Permitting and Hazardous Waste progress, to the U.S. EPA, wil l be made twice each fiscal year; once after completion of the first quarter and a final report at the end of the year.

CORRECTIVE ACTION

1.0 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 $7,304,000 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.

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

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.

2.0 CORRECTIVE ACTION PRIORITIES FOR FISCAL YEARS 2011 -2014

DTSC corrective action priorities for FYs 2011-2014 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 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 El projections are achieved for FYs 2011 -2014.

Approximately 246 RCRA corrective action sites are listed on the 2001 GPRA Baseline for Corrective Action that are undergoing continued joint U.S. EPA Region 9/DTSC re-evaluations to meet Els and analysis of accelerated final remedy implementation. About 74 of the 246 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.

3.1 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 BERP 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 2011 through 2014.

AUTHORIZED AND COMMITTED

3.2 GPRA CORRECTIVE ACTION GOALS

The FY 2011-2014 RCRA Grant cycle numerical goals for corrective action are as follows:

A. Control all identified unacceptable human exposures from site contamination to at

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or below health-based levels for current (and and/or ground water use conditions at 95% of RCRA 2020 baseline facilities. (Human Health El)

B. Control the migration of contaminated ground water through engineered remedies or natural processes at 75% of RCRA 20 20 baseline facilities. (Ground Water El)

C. Complete Sitewide Remedy Construction at 51% of the RCRA 2020 baseline facilities.

AUTHORIZED and UNCOMMITTED

3.3 GPRA CORRECTIVE ACTION INTERIM MILESTONES

El	FY 11/12	FY12/13	FY13/14
Human Health	85%	90%	95%
Groundwater	67%	71%	75%
Remedy Complete	43%	47%	51%

3.4 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 Outputs completed by DTS 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 are prepared.

3.5 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 2011-2014.

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

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status remains in question.

3.5.1 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.

3.5.2 INFORMATION MANAGEMENT

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.

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:

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 U. S. EPA 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.

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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.

3.5.3 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 2011-2014, 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 2011-2014.

4.0 REPORTING

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

4.1 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.

4.2 SELF ASSESSMENT

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

A. Highlighting successful aspects of the program and discussing the factors (programmatic or agency-wide) influencing success.

B. Identifying whether any planned activities have been or are expected to be delayed or missed, and forecasting the expected completion date.

C. Substitutions for Grant commitments that will slip into the next fiscal year will be discussed in this section.

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D. Identifying factors contributing to missed commitments, if any.

E. Identifying actions to address the factors contributing to missed commitments, if any.

F. Identifying whether resources are being spent as planned, or whether adjustments are necessary to account for funding that may not be expended in FYs 201J1-14. Specify the funding amount that may not be expended and what actions are necessary to address the situation.

G. Commenting on the accuracy of data in the database.

H. Commenting on successes and impediments to moving facilities through the GPRA goals.

I. 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.

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

4.3 REPORTING SCHEDULE

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

DTSC Pollution Prevention and Green Technology
Proposed Commitments for RCRA Grant 2011-2014

Waste Minimization, Pollution Prevention, and Green Chemistry

DTSC is AUTHORIZED and COMMITTED to the following Outputs/Activities:

1. Green Chemistry Initiative: Continue implementation of the Green Chemistry Initiative.

Consistent with US EPA's Strategic Plan, activities that are funded by this cooperative agreement for the Green Chemistry Initiative include the following:

a. Identifying wastes and priority chemicals for reduction

b. Implementing a program to reduce wastes and priority chemicals

EPA and DTSC will collaborate on efforts to advance, develop, and implement the Green Chemistry Initiative in accordance with the Memorandum of Understanding between EPA and DTSC.

Activities may include, but are not necessarily limited to:

a. Adopting the Safer Consumer Products regulations by October 1, 2013
b. Posting the Candidate Chemicals List by November 1, 2013
c. Proposing the Draft Initial Priority Products List by April 1, 2014
d. Advancing the science of alternatives assessment by developing draft first stage AA Guidance document by October 1, 2013 and final first stage AA Guidance document by April 1, 2014.
e. Developing an Interim Data Management Plan for the Safer Consumer Product program by September 1, 2013 and implementing a Feasibility Study Report for long term data management and Information Technology by April 1, 2014. Collaborating with EPA on the new chemical portal by September 1, 2013.
f. Advancing training and educational opportunities by developing a draft inventory of AA training curriculum by June 30, 2013 in collaboration with multi-State chemicals work.

An IPA from U.S. EPA Region 9 will be assigned to provide technical assistance, to enhance U.S. EPA and DTSC collaboration. The IPA will:

a. Develop a comparison of EPA's TSCA, California SCP, and the EU REACH program by May 1, 2013 for use by both EPA and California.
b. Develop a draft inventory of EPA chemical information databases/sources by March 15, 2013 and final inventory by April 15, 2013 for use by California as they prioritize chemicals under the SCP and for EPA Region 9.
c. Support California in the analysis and prioritization of product/chemical combinations by developing a draft matrix for gathering data and studies from EPA data sources and other "reliable information" between January 2013 and July 2013.
d. Provide California DTSC staff with EPA Green Chemistry/Safer Consumer Products contacts, data, data, tools and other resources needed for implementing the CA Safer Consumer Products Program on an ongoing basis between December 2013 and December 2014.
e. Develop meeting/conference call agendas and prepare background information for joint EPA Region 9 or HQ /California DTSC meetings on Green

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Chemistry and Safer Consumer Products (March 2013 – March 2014).

DTSC will report results to EPA biannually.

2. EPA and DTSC will work together to review Output/Activity #1 by November 30, 2012. This activity will be reviewed and modified to more clearly identify and define outputs for the Green Chemistry initiative and the IPA. As of May 2013, this item is complete.

3. Green Business Program Data Management: Continue to support local government green business programs to maintain and enhance the Green Business Program database to collect and manage data identifying environmental outcomes. DTSC will report cumulative environmental outcome data to EPA biannually. The cumulative outcome data shall include reporting on metrics reflecting reductions in solid and hazardous wastes, energy consumption, water use, and the generation of green house gases. DTSC will also report on the number of certified and pending green businesses participating in the California Green Business Network.

ENFORCEMENT AND EMERGENCY RESPONSE

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 Program (EERP) 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. EERP 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.

Work conducted by the Department of Toxic Substances Control's (DTSC) EERP will occur in the program elements, activities, and initiatives described below. EERP 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 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.

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I. INSPECTION AND MONITORING

Key to any regulatory program is an effective inspection and monitoring system. EERP will work in partnership with U.S. 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). EERP's compliance monitoring efforts will occur through completion of combined State and Federal core program inspections and initiatives set forth below. In accordance with GPRA Goal 9, Objective 1 (Enforcement Tools to Reduce Non-Compliance) Sub-objective 2, EERP 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.

CORE INSPECTION ACTIVITIES

EERP will conduct statutorily-mandated facility and generator inspections consistent with the California program RCRA authorization. EERP 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 FY 2004-05.) By July 1 of each year of the three year grant period, EERP will submit a list of the facilities to be inspected that fiscal year. Because this list is enforcement confidential it will be submitted under a separate cover but is by reference a part of EERP's grant commitment.

1. FACILITY INSPECTIONS

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. EERP's workload standards range from 31 to 226 hours for Compliance Evaluation Inspections (CEIs), which comprise the majority of facility inspections planned by EERP. All inspections, investigations, and enforcement response activities will be conducted in accordance with prevailing policies and procedures. Currently, EERP 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
GME	As resources are available
O&M	As resources are available

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FCI-incinerators	**As resources are available**

In addition, EERP anticipates that during the course of the grant, enhanced surveillance activities may be carried out at facilities that require more monitoring than is afforded through a single CEI, to assure compliance with RCRA standards. Enhanced surveillance activities 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. Enhanced surveillance may require several visits to a facility during the course of a year to respond to particular situations or environmental concerns. Enhanced surveillance is not required under the grant, but may be an authorized activity if resources are available to conduct this work. EERP 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. DTSC views Groundwater Monitoring Evaluations (GME) and Operation and Maintenance (O&M) Inspections to be an important element of comprehensive environmental regulation of facilities in California. As engineering geology resources become available to EERP, GME and O&M inspections will be considered for incorporation into the annual work plan defined by the grant.

2. GENERATOR INSPECTIONS

EERP will perform RCRA generator inspections in CUPA counties and cities. A total of seven generator inspections are planned for each year of the grant. This includes up to seven businesses operating in CUPA counties under "Standardized Permits" for purposes of State law, and regarded as RCRA generators for purposes of this grant. EERP 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 CIJPA enforcement expertise and capacity. The minimum number of generator inspections performed under the grant will be 7 conducted each year.

3. TRANSPORTER INSPECTIONS

Persons who transport RCRA hazardous wastes will be inspected to assure compliancy 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. EERP may inspect a limited number of transporters throughout the grant year when PY 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

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purposes: 1) to collect information to better understand the unique aspects of a discrete subset of the regulated community; 2) to bring enforcement and compliance resources to underserved environmental justice communities that are impacted by non-compliance businesses; 3) to enforce the federal Cathode Ray Tube (CRT) Rule; 4) to raise awareness of a particular issue, hazard or regulation; 5) to level the playing field where some businesses are suspected of operating at a competitive advantage through non-compliance; and 6) to increase compliance by providing a higher level of focused inspection and enforcement. During the period of this grant, EERP may develop additional initiatives. EERP will submit an amendment to the U.S. EPA Project Officer before any grant resources are committed to such projects. EERP, 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 COMMITTED INITIATIVES

A. ENVIRONMENTAL JUSTICE ENFORCEMENT

The Environmental Justice (EJ) Enforcement Initiative addresses both RCRA and State enforcement and compliance issues in EJ communities and furthers DTSC's compliance with California's Environmental Justice law. California is the first state in the nation with an environmental justice law. Government Code section 65040.12 (adopted September 10, 2001) defines environmental justice in the State as "the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and enforcement of environmental laws and policies."

The goals of the EJ Initiative are to:

1. Develop communication channels that enable the identification of environmental problems through consultation with community leaders.

2. Prioritize sites for audits that may involve inspections, criminal investigations, and emergency clean up and enforcement action.

3. Develop dialog with other state and location environmental organizations and solicit their support in solving environmental problems identified.

4. Provide continual communication channels with community leaders.

5. Provide community leaders with access to environmental enforcement decision making and policy development.

In support of the national EJ priorities articulated by U.S. EPA, the EJ Enforcement initiative is unique, effective and ongoing in California communities. Community members are working with EERP inspectors, staff in the Office of Criminal Investigations, the Imperial County CUPA Program and other local, state and federal programs to build solutions to

serious environmental problems. Work is underway in Los Angeles area communities; Imperial County; the City of Fresno; and San Bernardino and Riverside Counties. Community led EJ Enforcement task forces provide forums for dialog and identification of environmental violations. Community representatives learn about the work underway and participate in the process.

In 2010 EERP's EJ Enforcement Initiative was honored as a "Bright Idea in American Government" by the Ash Center for Democratic Governance and Innovation at Harvard University's Kennedy School of Government.

More importantly the EJ Program works! Community representatives often do accurately identify environmental problems that may not have come to the attention of regulators through other means. Solving serious environmental problems often takes working closely with other environmental regulatory agencies. In the Los Angeles EJ Program, staff have shared information with the South Coast Air Quality Management District. The combined efforts of the two agencies have resulted in significant environmental gain at several facilities.

Three objectives support and enhance the EJ Enforcement Initiative. They are:

1. Reduce environmental harm and health risks through targeted enforcement actions of the "worst offenders" identified by EJ communities;

2. Minimize arbitrariness by establishing fair, consistent, and uniform enforcement; and

3. Democratize the environmental enforcement processes by opening enforcement to the public. Together, the community and government must develop and implement government strategies and performance measures for environmental enforcement.

EERP's EJ Enforcement Initiative requires effective strategic planning focusing on several priorities. Priorities are to:

1. Respond to citizen complaints effectively.

2. Build effective partnerships with other environmental regulatory agencies in order to comprehensively address environmental issues in EJ communities.

3. Refine performance measures in order to measure and improve EERP's EJ Enforcement work.

4. Develop reporting tools to share accomplishments.

5. Continue and build additional citizen led task forces to ensure two way communication and foster partnerships.

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EERP staff are assigned to work in each of the EJ communities where bus tours and workshops have taken place. In several communities EERP staff is participating in citizen led task forces. The EJ Enforcement work is enhanced by a grant for $160,000 from the U.S. EPA to fund its "Building Healthy Communities Initiative." As part of this project, EERP staff have done extensive training and field work in the City of Maywood. During the coming year similar work will be done in the City of Wilmington. More information on the work underway in each EJ community is provided below:

Environmental Justice Work in the Los Angeles Area

The Enforcement and Emergency Response Program's Environmental Justice Initiative was first introduced to community representatives during a Los Angeles bus tour and workshop on July 31 and August 1, 2007. The event was co-sponsored by Pacoima Beautiful. The tour provided Enforcement and Emergency response staff with an opportunity to view a number of locations in the Los Angeles area and hear from city officials and community residents regarding environmental problems associated with the locations. The Los Angeles Environmental Justice Initiative has always focused on increased enforcement efforts and community collaboration. The follow up workshop for the Los Angeles tour was co-sponsored by the UCLA Environmental Law School on Thursday, November 15, 2007.

Since the 2007 Los Angeles bus tour, Chatsworth staff has strengthened partnerships with Los Angeles Environmental Justice groups and with community residents in Maywood, California. Also important are the partnerships formed with the U. S. EPA, the Los Angeles Regional Water Quality Control Board and the South Coast Air Quality Management District. When serious environmental contamination problems affecting many Los Angeles communities are recognized, solutions to those problems will only be found through the efforts of environmental regulatory agencies working together.

Inspections and subsequent enforcement taken as a result of the tour were conducted at the Quemetco, Exide and Gregg Industries facilities. Additionally, EERP managers leveraged staff resources to conduct approximately 80 inspections along the Interstate I-710 corridor. Eight inspections were conducted as a direct result of the LA bus tour. Twenty-four inspections were completed in response to citizen complaints. $302,000 in penalties were collected as a result of enforcement actions taken when Class I violations were cited at the conclusion of the inspections. The Maywood Partnership with members from several environmental regulatory agencies and Maywood community residents has resulted in significant progress on drinking water quality issues.

Southern California: Interstate 710 Corridor Collaborative Pilot Study

The densely populated communities closest to the Interstate 710 (I-710) corridor in Los Angeles County are severely impacted by pollution from goods movement and industrial activity. U. S. EPA is working with DTSC to coordinate environmental assessment work in this roughly 32-square mile area. The area is heavily developed, highly populated and

subject to sustained hazardous waste releases going back to its industrial development in the 1940s and continuing to the present. The area comprises a vast collection of industrial and commercial enterprises that either surround or are next to residential neighborhoods. Several sectors within the 710 corridor are being assessed and environmental damage is being addressed in collaboration with U. S. EPA, state and local officials, and community leadership. Two of the sector review areas are highlighted below:

Vernon-Commerce Discovery Project

DTSC is evaluating properties within the cities of Vernon, Huntington Park, Maywood, and Commerce through the Vernon-Commerce Discovery Project. This effort is identifying sites that may have current or historical releases of hazardous substances and wastes in the soil, or may have contributed to the regional groundwater contamination in this area. DTSC compiled a list of over 200 potentially contaminated sites within the four-city area based on the review of databases, maps, and input from community groups) and other agencies. A screening process including site inspections was used to refine the list to 30 sites. As of December 2010, the DTSC team has begun the sampling phase for these sites. Sites with elevated levels of contamination or health risk will be further investigated and cleaned up through agreements or enforcement orders with the potentially responsible parties. The Project's goal is to identify contaminated sites which may be impacting the nearby communities and groundwater.

South Central Discovery Project

The Discovery project was conducted in an inner-city neighborhood encompassing four square miles of South Central Los Angeles, where small businesses and residences exist alongside abandoned shops and waste that pose a risk to human health and the environment, DTSC partnered with U.S. EPA on this project to maximize resources and ensure that the area was thoroughly investigated, in addition, DTSC worked closely with the Los Angeles County Department of Public Works Water Resources Division to update agency information on contaminated sites in the South Central area that may potentially be impacting the drinking water wells. Potential sites were identified by studying Sanborn maps, aerial photographs historical agency records, and drive-by investigations. The sites were then prioritized to collect limited soil vapor and soil matrix samples. This work has resulted in specific site investigations, remedial action orders and voluntary cleanup agreements.

EERP inspectors are supporting the Discovery Project with inspections at both RCRA and non-RCRA hazardous waste generators identified through the Discovery effort. This will enable clean up staff to move more quickly to clean up contaminated properties.

Imperial County Environmental Justice Enforcement Task Force The Imperial County Environmental Justice Enforcement Task Force includes representatives from industry, local government, and private citizens who live and work in the Imperial Valley. The task force is co-chaired by the DTSC Imperial CUPA. In Imperial County DTSC is the state-appointed

hazardous materials government entity, also known as the Imperial County Certified Unified Program Agency (CUPA) and the Comité Civico Del Valle Inc. (CCV). Comité Civico Del Valle is an Environmental Justice organization based in Brawley. The organization works to improve the environment and health of Imperial Valley residents, and take enforcement action against violators.

Utilizing a combination of Internet technology and monthly community meetings, the Imperial County Environmental Justice Enforcement Task Force brings environmental education and awareness to residents at the U.S.-Mexico border. One important goal of the Task Force is to improve government's enforcement response to identified community concerns and correct non-compliant activity associated with RCRA and non-RCRA violations that are resolved through enforcement actions. The assignment of a "community problem solver" to work with residents and community advocates in investigating reports of environmental damage is something that has worked well in Imperial County. The problem solver enlists the aid of other state, local and federal agencies in investigating violations and taking appropriate enforcement action as necessary, resolving issues, and providing residents with results that verify and explain the outcome of investigations.

IVAN http://www.ivanonline.org/

In July 2010, CCV deployed an online reporting platform called the Imperial Visions Action Network (IVAN). It is tailored to the needs of Environmental Justice community residents who participate in the task force. The IVAN Web site facilitates residents' ability to report environmental harms or concerns in Imperial County. It uses information submitted by individuals to monitor and track potential environmental violations.

Reports of suspected environmental damage and health impacts are submitted to IVAN either online or via smart phone with photos or video clips. This appears on the web site in near-real time. Once reports are posted on IVAN, often including related links and information from government web sites, they are visible to anyone who views the web site. Government agencies also monitor and respond to these reports as part of their Imperial County Environmental Justice Enforcement Task Force activities.

To date the Imperial County Task Force has tackled 81 cases. 28 of the cases were initiated as a direct result of the bus tours. 37 were logged on IVAN and 16 were brought to the attention of government regulators during Task Force meetings. Class one violations were cited at the conclusion of 11 inspections. Complaints received by the Task Force generated $90,000 in penalties paid to DTSC Imperial CUPA and $30,000 more in legal settlements to fund Environmental Justice work. DTSC also participated in 22 multi-jurisdictional investigations.

Inland Empire: Riverside and San Bernardino Counties

Since formation of the Inland Valley Task Force in August 2009, in response to community

concerns regarding the Burlington Northern Santa Fe (BNSF) Rail yard and Intermodal Facility, DTSC has worked with the University of California, Davis DELTA Group to evaluate toxic particulate deposition concerns related to BNSF.

DTSC and other environmental regulatory agencies, including the South Coast Air Quality Management District and the Air Resources Board began to work with Environmental Justice community members and the DELTA Group in the winter of 2009. At that time air sampling was undertaken in two residential locations. In the summer of 2010, DTSC also began to develop and build a prototype Green Air system. The system's preliminary measurements match theoretical efficiency predictions to remove harmful diesel particles from the air before the air enters a home. A second-generation prototype now under construction is expected to achieve a 90 percent removal rate for diesel particles and will undergo future real-world testing in the Environmental Justice community.

Central California

DTSC started its San Joaquin Valley Environmental Justice Program effort in October 2008, with a bus tour and workshop in Fresno County. Issues of concern included a proposed Kings River Conservation District power plant and a proposed household hazardous waste collection site in West Fresno. Tour participants also raised concerns about odor problems at the Cargill Beef Packers meat processing operation, Darling International rendering operations and Protein Inc., food processing operations. Other concerns included disposal of automobile fluids at Jaime's Auto Dismantling and Pick-N-Pull. Residents likewise singled out an abandoned former chemical plant known as Wingate Chemical Co., and noted presence of lead contamination in older homes in the Fresno area. The Fresno Environmental Justice Task Force has continued to meet since the bus tour and initial workshop.

Continuing the Environmental Justice Enforcement Initiative enables EERP to serve underrepresented communities through enforcement of RCRA and non-RCRA statutory and regulatory requirements. Enforcement action taken against violators found In EJ communities sends a strong compliance incentive message to would-be violators in EJ communities.

B. ELECTRONIC WASTE

EERP, in coordination with the Department of Resources Recycling and Recovery (CalRecycle), will evaluate e-waste shipments both within and beyond California in an attempt to prevent far-reaching consequences to human health and the environment. Specifically, EERP's E-Waste Team will investigate 1) shipments of e-waste to unauthorized handler destinations in California, 2) shipments of CRT glass to domestic facilities that fail to reuse the glass in CRT manufacture or lead smelting as required, and 3) shipments abroad that fail to conform to Covered Electronic Device (CED) export demonstration requirements. In all instances, illegal shipments can lead to unauthorized treatment or illegal disposal of

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e-waste. Failure to manage e-waste according to the Universal Waste Rule standards moves electronic waste into the regulated hazardous waste universe.
In the course of its three e-waste enforcement initiatives, EERP expects to find possible violations of the federal CRT Rule and will make referrals to U.S. EPA as appropriate. EERP has set an ambitious goal of achieving at least a 50% increase in compliance within a year of starting each initiative. EERP expects that the second initiative, in particular, will influence the evolution of CRT glass recycling facilities across the country.

2. AUTHORIZED AND UNCOMMITTED 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.

II. HAZARDOUS WASTE GENERATORS REGULATION

(CUPA Coordination and Support)

EERP will continue its partnership with the California Environmental Protection Agency (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 80 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

EERP 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, onsite facility evaluations, and development and distribution of fact sheets intended to provide focused guidance on specific issues. EERP will report the number of inquiries responded to, the date and type of workshop/seminar presentations, and other outreach activities. Copies of fact sheets developed will be included with Grant reports.

B. EXTERNAL TRAINING

EERP 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

EERP 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 and respond to complaints, and implement enforcement activities. The generator inspections will be primarily conducted at generator facilities that were previously inspected by a CUPA. EERP will work with U.S. EPA to determine the appropriate generators to inspect based on any national priorities or other factors based on other appropriate factors. In special circumstances, EERP may inspect handlers that have not been 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.

EERP will also step in and take actions when it has been determined that the CUPA is unwilling or unable to properly enforce the RCRA requirements. The minimum number of generator inspections performed under the grant will be 7 conducted each year.

D. UNIFIED PROGRAM INFORMATION COLLECTION AND REPORTING

1. Data Analysis

EERP, in cooperation with Cal/EPA, will ensure the CUPAs are properly collecting and maintaining the required data through the onsite CUPA triennial evaluations. These reports are required to be submitted annually by CUPAs and will be evaluated and analyzed to identify indicators of CUPA performance in implementing the generator program, such as inspection rates and compliance rates. Cal/EPA's California Environmental Reporting System (CERS) that is currently under development is on schedule to be completed by January 2013. Implementation of CERS will improve data collection, quality and timeliness. Implementation will also facilitate statistical compliance data reporting to U.S. EPA. The results of the analyses will be forwarded to U.S. EPA within sixty (60) days of approval from Cal/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

EERP 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.

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E. U.S. EPA ENFORCEMENT REFERRALS

If U.S. EPA makes enforcement referrals to DTSC, EERP will provide the appropriate enforcement response in consultation with U.S. EPA for referrals of inspections conducted by U.S. EPA. Activities may include: consultation and coordination with U.S. EPA inspectors and attorneys, preparing a draft and final administrative enforcement order, negotiating orders, overseeing orders, formal and informal settlement conferences with facilities, responding to written and verbal inquiries from facilities and CUPAs, tracking enforcement information, preparing enforcement related documents, review of other inspections related documentation, follow-up inspections and/or sampling activity.

F. PERIODIC EVALUATIONS OF LOCAL CUPA PROGRAMS

EERP, 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. Now that the local CUPA inspection and enforcement program has matured to a greater extent, EERP will now be looking more at 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. A schedule of the evaluations and reports will be shared with U.S. EPA as they are developed, but not less frequently than once a year.

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. Furthermore, DTSC will:

- Take timely and appropriate enforcement actions consistent with DTSC's policies;
- Evaluate and bring to timely closure of self-disclosures received by DTSC;
- Settle or initiate litigation of violations determined during the course of all inspections and investigations, and 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;
- 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 EERP in identifying multi-State violators;
- Pursue enforcement actions for environmental violations indentified 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.

V. DATA ENTRY. MANAGEMENT & REPORTING

DTSC will continue to develop and maintain the Inspections, Complaints and Enforcement EnviroStor (ICE in EnviroStor) data base and work with Region 9 staff to coordinate data snaring from this data base 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.

A. DATA ENTRY AND MANAGEMENT

During this grant commitment 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. EERP will also participate in the State Review Framework to confirm data accuracy submitted to RCRAInfo.

- Transfer data to RCRAInfo on 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 QA/QC edit check in the system.

- Run RCRAInfo reports and identify and correct discrepancies between ICE in EnviroStor and RCRAInfo.

- Continue to work to correct any data deficiencies noted in the ICE in 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. DTSC will provide monthly data uploads to RCRAInfo.

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, EERP will engage in the following activities:

A. COMPLIANCE ASSISTANCE

Compliance assistance activities by EERP 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, EERP will offer compliance assistance to all respondents in enforcement actions. The assistance offered by EERP 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 ID interested persons, and responding to individual telephone calls and letters from persons posing specific compliance-related questions. EERP will focus on pollution prevention efforts to assist businesses with implementation of Best Management Practices and alternative technologies to reduce the amount of toxic material s used and waste generation. EERP will also support compliance assistance and work conducted by the EJ Environmental Enforcement Task Forces throughout California.

B. COMPLIANCE INCENTIVES

The Cal/EPA policy for self-audit certification provides an incentive to 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 EERP, they will be evaluated in accordance with the Cal/EPA Self-disclosure Policy and entered into ICE / 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.

C. PORT OF ENTRY (Import and Export of Hazardous Waste)

Emphasis will be placed on tracking imported and exported 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. Those 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.

D. MANIFEST ENFORCEMENT COORDINATION

These activities involve the development and use of reports from the HWTS manifest data system. Those reports enable EERP to study business patterns that point to potential violations, and to target specific violators. EERP 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, EERP may conduct initiatives based on this system, e.g., identity theft (where one entity is routinely using another entity's ID number).

VII. CALIFORNIA-MEXICO BORDER PROGRAM

The Border Area encompassed a band 60-miles-wide on either side of the line that separates California from Mexico. In recognition of the fact that 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.

Working in this area poses a number of unique challenges. First is the language barrier which can greatly impede communications. Second, EERP is constrained by State policies that tightly control and restrict travel across the border. This can limit our ability to provide timely support to counterparts in Mexico and serves as another barrier to effective communications. Third are the sheer number of agencies involved in any border issues; including customs, immigration, and federal, State, and local environmental officials, which complicate and often delays effective action. This is further complicated by rapid turnover of staff within these various organizations.

During the past several years Mexico has changed its environmental laws. Hazardous and solid wastes with high fuel values may now be legally imported into Mexico for use as supplemental fuels. Exportation of these materials is just starting to be discussed and implemented. California and Mexican officials need to coordinate to address issues such as load rejection, falsification of the waste analysis, and the potential for increased illegal dumping in Mexico where loads never make it to the intended point of incineration.

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There are also opportunities posed by the fact that DTSC is taking over the local hazardous waste enforcement program in Imperial County. While none of the Imperial County CUPA work will be charged to the grant, DTSC will have additional staff located in the Border Area who may be able to undertake projects in support of the Border Program objectives.

EERP proposes to expand up to 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 2012/2014 bi-national program as related to the management of hazardous waste.

The California Environmental Protection Agency is a partner in the Border 2012/2014 Program and DTSC is a participant in this partnership. The Department of Toxic Substance Control's Border Program traditionally has conducted work in three areas through the RCRA Grant funding.

Under the program DTSC supports activities to meet Border 2012/2014 objectives under Goal 3 reduce land contamination and Goal 6 compliance, enforcement, and environmental stewardship. Under the past grant commitments, DTSC has provided Border 2012 program support, compliance assistance outreach and training, and import/export inspections. Recently, DTSC added two waste and enforcement activities: assess border import/export trends and promote electronics recycling. The Department's Imperial County Certified Unified Program Agency (CUPA) group will also provide support for Border Enforcement Work in Imperial County.

A. BORDER 2012/2014 PROGRAM SUPPORT

Staff from DTSC participates in the Border Waste and Enforcement Task Force meetings. The DTSC Imperial CUPA Program Manager will be co-chairing the meetings for the California regulatory agencies, which are typically held three to four times per year. DTSC staff will also attend other Border 2012/2014 regional or national meetings and will facilitate the exchange of information about Border Waste and Enforcement programs with other Border 2012/2014 partners.

B. COMPLIANCE ASSISTANCE TRAINING

DTSC Border Unit staff and staff from San Diego County Department of Environmental Health conduct training/workshops In Mexico. The training sessions have proven to be very successful with several of the training sessions having the maximum number of participants. The DTSC Border Unit will team with 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 wastes into California, 2) transportation and transporter registration requirements, and 3) training on hazardous waste classification using a guide in Spanish and English.

C. IMPORT/EXPORT INSPECTIONS

One of the key efforts performed by DTSC is conducting Border Truck inspections on US-bound hazardous waste shipments at Otay Mesa and East Calexico Ports of Entry.

Several enforcement cases were generated as a result of the inspections. San Diego County also assists in this inspection effort through the DTSC contract with the county. Periodically, inspectors may choose to conduct spot inspections of Mexican-bound scrap metal, universal waste (i.e. CRTs), and other hazardous materials shipments. Several enforcement actions were generated as result of southbound truck stop inspection. The inspection effort with U.S Customs & Border Protection will continue at the Otay Mesa Port of Entry and the East Calexico Port of Entry.

D. MAQUILADORAS GREEN CHEMISTRY/POLLUTION PREVENTION ROUNDTABLE

DTSC plans to convene a voluntary meeting of the larger Maquiladora companies to discuss California's Green Chemistry program and the potential benefits of utilizing Green Chemistry in the industrial manufacturing process. We anticipate holding the meeting in Mexico. Maquiladora companies will receive information on how they can participate in the Green Chemistry program. We anticipate bringing together members of the Department's Science Advisory Panel and Department staff for the Green Chemistry roundtable. The major goal of the Green Chemistry program is to reduce or eliminate hazardous chemicals in products and in the environment. This goal is accomplished by: 1) significantly reduce adverse health and environmental impacts of chemicals used in commerce, by encouraging the redesign of products, manufacturing processes and approaches. 2) Detect the presence of toxic chemicals - from lead to phthalates - in children's items and other consumer goods. 3) To encourage smarter design, manufacture and packaging of products with less or no toxic material.

DTSC will inform Mexican state environmental agency officials and the EPA Waste Management Division border coordinator prior to setting the dates for these workshops to solicit their input in conducting these events and facilitate their participation. DTSC also anticipates providing information to the Mexican government and to Mexican media on our efforts. Distribution of information on toxics in products will be particularly important.\

E. EVALUATION OF IMPORT OF HAZARDOUS WASTE INTO CALIFORNIA AND EXPORT OF HAZARDOUS WASTE THROUGH THE CALIFORNIA BORDER

DTSC will prepare summary information on hazardous waste imported and exported through the Mexican Border. The summary information will provide data on the types and volumes of waste being imported or exported and the potential risks associated with those wastes. Three sources of data will be used to prepare the summary data. They are: 1) hazardous waste, import and export notices received and reviewed by staff in our Chatsworth office, 2) manifest documents collected during the Border Truck Stops, and 3) information from the DTSC Hazardous Waste Tracking System (HWTS). The HWTS data system collects both manifest copies from the generator and destination facility. Information required on the new federal manifests on import and export of wastes is recorded in the HWTS data base. Information that may be provided could include:

- Total number of inspections performed;
- Geographic location of the inspection;
- Import or export destination of RCRA-related cargo;
- Hazard class and amount of RCRA-related material;

- Whether the cargo was related to a Maquiladora industry;
- Sampling event information, if applicable;
- Identification of any DTSC transboundary-related violations;
- enforcement actions taken, and penalties collected;
- Proposed staff and time associated with inspections; and
- Proposed staff and time associated with inspection support activities.

At the request of U.S. EPA, EERP will support Arizona Department of Environmental Quality (ADEQ) in the development of their border compliance and enforcement program by facilitating the exchange of information related to inspection procedures, protocols, and any other assistance, including conference calls and facilitating visits by ADEQ staff during actual inspections at the California border port of entry.

F. ELECTRONIC WASTE RECYCLING

DTSC has two goals for E-waste efforts in the Border Program: 1) work with the universities or community groups in Mexico to help them sponsor e-waste collection events, and 2) work with the Baja California Secretary for Environmental Protection to help the Secretary maximize the benefit of a US Environmental Protection Agency grant for electronics waste collection events. Staff with experience in conducting e-waste collection events in California will be brought in to help with the planning for the events. DTSC also plans to work with waste recycling experts and academics at the University of Baja California in developing a waste recycling program.

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