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## Household Hazardous Waste Regulatory Basics Handouts

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# Waste Classification 101

## Hazardous Waste

T22, CCR §66261.1 et seq.

### Universal Waste T22, CCR Ch. 23

- Lamps (F-tubes)
- Batteries
- Electronic Devices
  - Including Covered Electronic Devices
- Mercury devices

### Recyclable T22, Ch. 16

- Used oil
- Antifreeze
- Lead-acid batteries
- Some solvents

- Solar panels (soon universal waste)
- Pesticides
- Solvents
- Cleaners
- Light ballasts
- Asbestos



## Agency Contacts

## Household Hazardous Waste Collection Options

	Permanent	Temporary Collection Event	Door to Door (a)	Curbside collection	Recycle-Only (ABOP) Center	Universal Waste	Residential Medical Waste
<b>Description</b>	Permitted hazardous waste facility at a fixed location	Permitted hazardous waste facility at temporary location	Service authorized to collect all HHW	Service authorized to collect recyclable hazardous waste from residences	Fixed location accepting recyclable waste (b)	Drop-off location or pick up for universal waste	Drop-off location or pick up for sharps and other household medical waste
<b>Waste Types</b>	ALL	ALL	ALL	Only recyclable wastes and universal wastes	Only recyclable wastes	CRT, Fluorescent lamps, small batteries	Needles and other non-regulated medical waste
<b>Permitting</b>	PBR approved by CUPA	PBR approved by CUPA	Traditional Notify CUPA Non-traditional PBR	Notification	Notification	Notification	Home-generated sharps consolidation point
<b>Staff Training</b>	24/8 hour HAZWOPER	24/8 hour HAZWOPER	24/8 hour HAZWOPER	HW Training	HW Training	HW Training	Bloodborne Pathogen recommended
<b>Site EPA ID Number</b>	Required	Required	Required for hauler *	Required for hauler *	Required	NA	NA
<b>Shipping document</b>	Manifests & Bill of Lading	Manifests & Bill of Lading	Traditional-Receipt Non-traditional-consolidated manifest	NA	Bill of Lading	Bill of Lading	Tracking document
<b>Regulatory Limitations</b>	Maximum 5 gallons/50 pounds transport	5 gallons/50 pounds transport	Certified hazardous waste vehicle	<ul style="list-style-type: none"> <li>• Single residence limit</li> <li>• ≤ 10 pounds small batteries &amp; oil filters</li> <li>• ≤ 5 gallons used oil</li> <li>• ≤ 5 gallons latex paint</li> <li>• No lead acid batteries</li> <li>• No antifreeze</li> </ul>	Storage limit of 180 days (Lead-acid batteries maybe stored up to one year)	Unlimited	

(a) Traditional Door-to-Door hauls to a permanent HHW facility. A Non-traditional uses a 10-day transfer station then to a TSDF

(b) Recyclable hazardous wastes include: latex paint, used oil, used oil filters, antifreeze, spent lead-acid batteries, small dry cell batteries, intact fluorescent lamps, and Intact spent high density discharge lamps

HHW = Household hazardous waste; PBR = Permit-by-rule; CUPA = Certified Unified Program Agency (Local environmental agency)

## Transportation limits

Material	Quantity	H&SC Title 22	Limits/Notes
General	Maximum 5 gallons or 50 pounds CESQG to TSDF	25163 (c)	<ul style="list-style-type: none"> <li>• Large generator 1000 kg exempt</li> </ul>
Public agency Authorization	15 gallons or(?) 125 pounds	25218.5.1	<ul style="list-style-type: none"> <li>• Adequate public education on proper packaging and transporting</li> </ul>
Variance			Formal approval required by DTSC..
<b>Specific Materials</b>			
Latex Paint	Unlimited, if recyclable	25217	<ul style="list-style-type: none"> <li>• Bill of lading required</li> <li>• Must be transferred for recycling.</li> <li>• Business plan</li> <li>• EPA ID Number</li> </ul>
Lead acid batteries	Maximum 10 batteries at one time	Title 22, CCR 66266.81 (a)(1)	
Used Oil	Maximum 55 gallons, container maximum 55 gallons	25250.11	<ul style="list-style-type: none"> <li>• Transporter has generated the oil</li> <li>• Prior verification that facility will accept</li> <li>• Certified center may limit</li> </ul>
	Maximum 20 gallons, container maximum 5 gallons	25250.11	<ul style="list-style-type: none"> <li>• Prior verification of acceptance not required</li> </ul>
Used Oil Filters		Title 22, CCR 66266.130	<ul style="list-style-type: none"> <li>• HW hauler not required</li> <li>• Must be transported to storage facility , scrap processor, smelter, or solid waste incinerator that recycles the casings</li> <li>• Requires bill of lading</li> <li>• Only transport properly drained filters</li> <li>• Containers must be tightly-sealed and well-secured</li> <li>• Store less than one ton</li> </ul>
Mercury, elemental	10 pounds or less	Title 22, CCR 66266.120	<ul style="list-style-type: none"> <li>• Must be transported to a resource recovery facility for recovery</li> <li>• Allowed for non-generator</li> </ul>
Universal Waste Batteries Thermostats Lamps CRTs CEDs Aerosol cans Mercury thermometer Mercury motor vehicle switches Other mercury wastes		T22,CCR 66273  HSC 25201.16	<ul style="list-style-type: none"> <li>• Must become a universal waste transporter</li> <li>• Must comply with federal (49CFR) hazardous material transportation, if applicable</li> <li>• Prohibited from disposing, treating, or diluting the waste, except for responding to releases</li> <li>• Prior approval required if sent to another universal waste handler.</li> </ul>

Material	Quantity	H&SC Title 22	Limits/Notes
Curbside HHW Collection	Maximum collected from residents <ul style="list-style-type: none"> <li>• 10 pounds used oil filters and small batteries</li> <li>• 5 gallons used oil</li> <li>• 5 gallons latex paint</li> <li>• Universal Wastes               <ul style="list-style-type: none"> <li>○ Fluorescent light tubes</li> <li>○ Mercury wastes</li> </ul> </li> </ul>	25218.5 (d)           Max 4 feet Special package	<ul style="list-style-type: none"> <li>• No lead acid batteries or antifreeze</li> </ul>
Recycle Only	<ul style="list-style-type: none"> <li>• Total volume of latex paint, used oil filters, antifreeze, and small batteries not exceed 10 gallons or 100 pounds</li> <li>• Also 2 lead-acid batteries</li> <li>• 20 gal used oil, container &lt;5 gal</li> </ul>	25218.5 (c)	No other HHW accepted
SW hauler		25163 (e)	Hazardous waste hauler registration is not required for “Any person authorized to collect solid waste, as defined in Section 40191 of the Public Resources Code, who unknowingly transports hazardous waste to a solid waste facility, as defined in Section 40194 of the Public Resources Code, incidental to the collection of solid waste”.

### Operations Plan must include

1. PBR notification (66270.60(d)(6)(A))
2. Financial assurance (67450.30)
3. CUPA acknowledgement (66270.60(d)(6)(B))
4. **copies of documents** required from Chapter 15 ((a)(2))
  - a. Article 2, Section 66265.10. General Facility Standards ((except sections 66265.12(b), and 66265.13))
    - i. Waste Analysis Plan – e.g. HazCat
    - ii. EPA ID Number (§66265.11)
    - iii. Records of foreign import of wastes (§66265.12 (a))
    - iv. Ownership change documents (§66265.12 (c))
    - v. Security measures (§66265.14. Security)
    - vi. General Inspection requirements (§66265.15)
      1. Schedule - monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment
      2. Inspection records
    - vii. Personnel training (§66265.16)
    - viii. Precautions to prevent ignition or reactions and incompatibilities (§66265.17)
    - ix. Location standards (§66265.18)
    - x. 24-hour probable maximum precipitation storm design Standards (§66265.25)
  - b. Article 3, 66265.30. Preparedness and Prevention
    - i. Maintenance and Operation of Facility (§66265.31)
    - ii. Required Equipment (§66265.32)
    - iii. Testing and Maintenance of Equipment (§66265.33)
    - iv. Access to Communications or Alarm System (§66265.34)
    - v. Required Aisle Space (§66265.35)
    - vi. Arrangements with Local Authorities.( §66265.37), as appropriate
      1. Arrangements to familiarize police, fire departments, emergency response teams, and the local Office of Emergency Services
      2. Agreements with State emergency response teams, emergency response contractors, and equipment suppliers;
      3. Arrangements to familiarize local hospitals
  - c. Article 4, 66265.50. Contingency Plan and Emergency Procedures
    - i. (except section 66265.53(b))
      1. Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams
  - d. Article 5, 66265.70. Manifest System, Recordkeeping and Reporting
  - e. Article 7, 66265.110 through 66265.115. Closure and Post-Closure
  - f. Article 9, 66265.170. Use and Management of Containers
    - i. Container condition, compatibility,
    - ii. Inspections
  - g. Article 10, 66265.190. Tank Systems Assessment
5. (A) Written Procedures when meet or exceed maximum storage capacity
6. (B) **information** required from 67450.4
  - a. (b)(6) – Name agency or contractor and site supervisor
  - b. (b)(8) – Description of inclement weather procedures
  - c. (b)(9) – CESQG program acceptance measures
  - d. (b)(13) - copy of the documents in Section 66264.17(c) if applicable
    - i. Precautions to prevent ignition or reactions and incompatibilities (duplicate of earlier)
  - e. (b)(14) if applicable - copy of the written bulking protocol approved by the local fire and air pollution prevention
  - f. (b)(16) - copy of the written agreement between the property owner and the operator
  - g. (b)(17) - If managed by a contractor, a copy of the written agreement between the contractor and operator
  - h. (b)(18) – Section no longer exists

# Labels for Containers

(also generator name and address on labels!)

## RECYCLABLES

**USED OIL –  
HAZARDOUS WASTE**

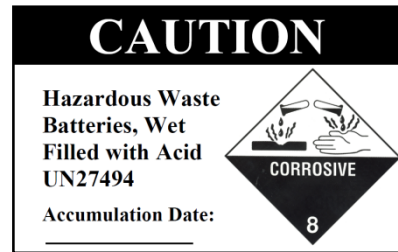
Accumulation Date: \_\_\_\_\_

**DRAINED USED  
OIL FILTERS**

Accumulation Date: \_\_\_\_\_

**USED OIL AND  
GASOLINE FILTERS**

Accumulation Date: \_\_\_\_\_



**Latex Paint**

Accumulation Date: \_\_\_\_\_

- (Max. storage:
- HHW facility 1 year
  - Lead-acid batteries < 1 ton = 1 year
  - Used oil filters < 1 ton = 180 days
  - Used oil 90 days LQG
  - Latex paint 180 days)

## UNIVERSAL WASTES

(Max. 1 year storage)

Name: \_\_\_\_\_  
Address: \_\_\_\_\_

**Universal Waste-**

Battery(ies)

CRT(s)

CRT Glass

Electronic Device(s)

Lamp(s)

Mercury-containing Equipment

Accumulation Date: \_\_\_\_\_

Name: \_\_\_\_\_  
Address: \_\_\_\_\_

**Universal Waste-**

CRT(s)

CRT Glass

Electronic Device(s)

Accumulation Date: \_\_\_\_\_



Corrosive label for lead-acid and alkaline batteries

Name: \_\_\_\_\_  
Address: \_\_\_\_\_

**Universal Waste –  
Battery(ies)**

Accumulation Date: \_\_\_\_\_

Name: \_\_\_\_\_  
Address: \_\_\_\_\_

**Universal Waste –  
Lamp(s)**

Accumulation Date: \_\_\_\_\_



## HAZARDOUS

(Max. storage 90 days or at HHW facility 1 year)



**Oil-Based Paint  
Flammable Liquid  
Hazardous Waste**

Accumulation Date: \_\_\_\_\_

**Aerosols  
Flammable Gas  
Hazardous Waste**

Accumulation Date: \_\_\_\_\_

**Description  
Hazard Class**

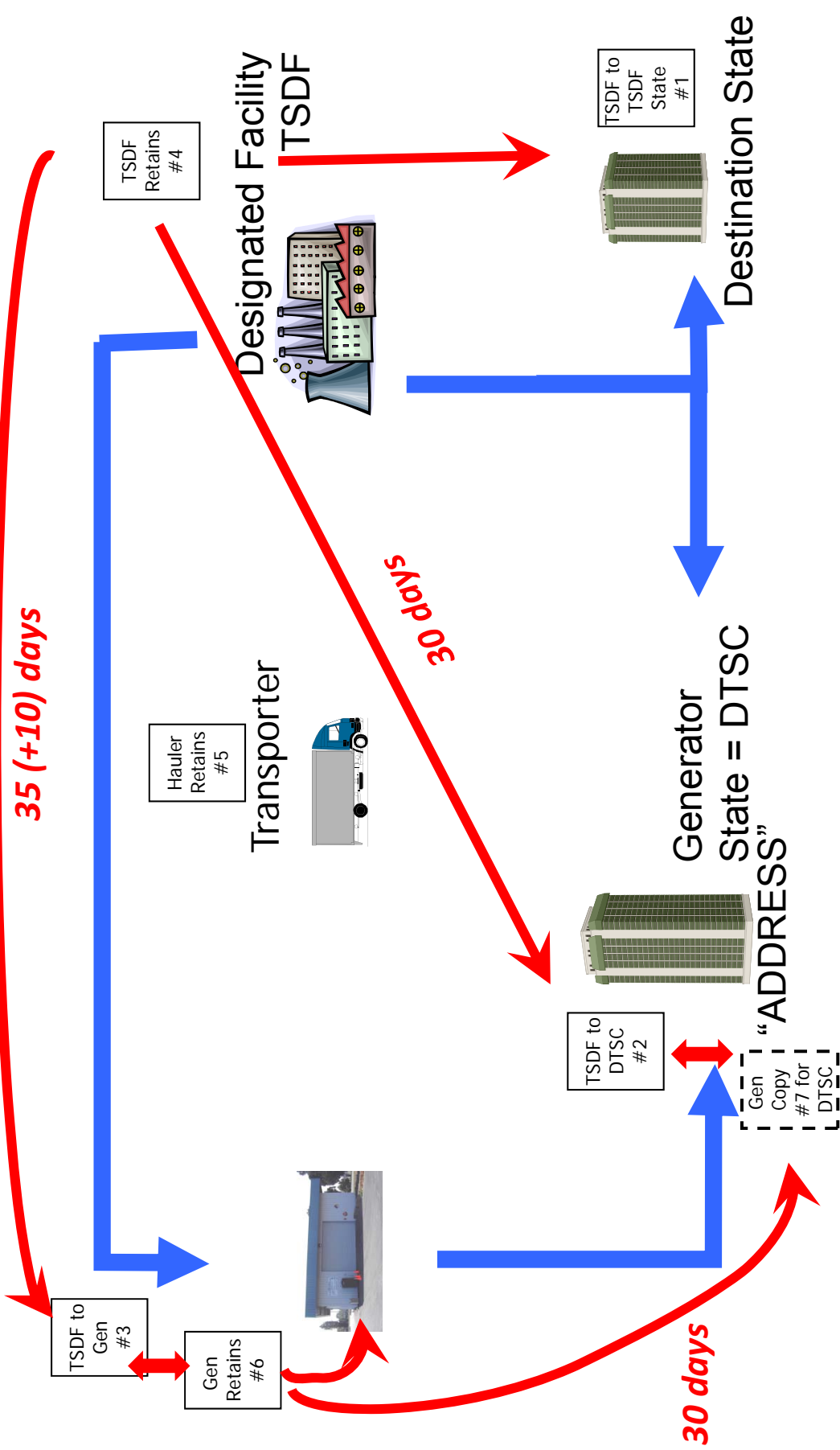
**Hazardous Waste**

Accumulation Date: \_\_\_\_\_





# Manifest Tracking Timeline



For DTSC Use Only  Region _____
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**PERMIT BY RULE NOTIFICATION FORM  
FOR PERMANENT HOUSEHOLD  
HAZARDOUS WASTE COLLECTION FACILITIES**

**Please refer to the attached Instructions before completing this form.**

Initial Notification

Revised Notification

**I. GENERAL INFORMATION**

ID NUMBER: CA \_\_\_\_\_

FACILITY NAME \_\_\_\_\_

FACILITY ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ CA ZIP \_\_\_\_\_ - \_\_\_\_\_

COUNTY \_\_\_\_\_

LOCATION (Description) \_\_\_\_\_

(Latitude & Longitude) \_\_\_\_\_

**II. OPERATOR (PUBLIC AGENCY)**

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_ ZIP \_\_\_\_\_ - \_\_\_\_\_

CONTACT PERSON \_\_\_\_\_  
(Last Name) (First Name)

TELEPHONE NUMBER (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

**III. CONTRACTOR INFORMATION (if applicable)**

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_ ZIP \_\_\_\_\_ - \_\_\_\_\_

CONTACT PERSON \_\_\_\_\_  
(Last Name) (First Name)

TELEPHONE NUMBER (\_\_\_\_)\_\_\_\_-\_\_\_\_\_

**PERMIT BY RULE NOTIFICATION FORM FOR  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITIES**

**IV. THE FOLLOWING LOCAL AND/OR STATE PERMITS ARE REQUIRED FOR OPERATION OF THE PHHWCF:**

	OBTAINED		OBTAINED	
_____	YES <input type="checkbox"/>	NO <input type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
_____	YES <input type="checkbox"/>	NO <input type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
_____	YES <input type="checkbox"/>	NO <input type="checkbox"/>	YES <input type="checkbox"/>	NO <input type="checkbox"/>

**V. PROPERTY OWNERSHIP**

A. Is the property on which the PHHWCF is located owned by the operator? Yes  No   
If not, a written agreement between the operator and the property owner is required.

Property Owner's Name \_\_\_\_\_ Phone (\_\_\_\_)\_\_\_\_-\_\_\_\_\_

Contact Person \_\_\_\_\_

**VI. ACCEPTANCE AND MANAGEMENT OF SPECIFIC WASTE TYPES**

A. Will your facility accept wastes from conditionally exempt small quantity generators? Yes  No

B. Will your facility accept waste from any of the following programs, facilities, or transporters?

- 1. Curbside household hazardous waste collection program? Yes  No
- 2. Door-to-door household hazardous waste collection program? Yes  No
- 3. Temporary household hazardous waste collection facility? Yes  No
- 4. Recycle-only household hazardous waste facility? Yes  No
- 5. Mobile household hazardous waste collection facility? Yes  No
- 6. Registered HW transporter carrying hazardous waste generated by a CESQG? Yes  No
- 7. Registered HW transporter carrying waste from a loadcheck program? Yes  No
- 8. Registered HW transporter carrying abandoned waste under public agency oversight? Yes  No
- 9. Other? Please explain \_\_\_\_\_

C. Does your facility categorically exclude any type of waste (e.g. explosives, infectious waste, compressed gas cylinders, etc.)? If so, please list those categories:

\_\_\_\_\_

\_\_\_\_\_

D. Will your facility consolidate any of the following wastes?

- |   |  |
|---|--|
| <input type="checkbox"/> used oil               | <input type="checkbox"/> antifreeze                                      |
| <input type="checkbox"/> water-based paint      | <input type="checkbox"/> miscellaneous wastes contaminated with solvents |
| <input type="checkbox"/> oil-based paint        | <input type="checkbox"/> gasoline  |
| <input type="checkbox"/> photographic solutions |  |

- solvents
- roofing tar
- caulking/patching compounds
- adhesives

**PERMIT BY RULE NOTIFICATION FORM FOR  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITIES**

**VII. WASTE VOLUME**

A. Please indicate the approximate total volume of hazardous waste brought to the facility in an average month.

\_\_\_\_\_ Gallons or \_\_\_\_\_ Pounds

B. What is the capacity of the container storage area (i.e., drums, roll off bins, etc.) at the facility?

1. Individual storage area total capacity \_\_\_\_\_ gallons/pounds
2. Individual storage area total capacity \_\_\_\_\_ gallons/pounds
3. Individual storage area total capacity \_\_\_\_\_ gallons/pounds
4. Individual storage area total capacity \_\_\_\_\_ gallons/pounds
5. Individual storage area total capacity \_\_\_\_\_ gallons/pounds
6. Individual storage area total capacity \_\_\_\_\_ gallons/pounds

What is the total number of tank storage areas? \_\_\_\_\_

1. Individual tank volume \_\_\_\_\_ gallons. Waste stored \_\_\_\_\_
2. Individual tank volume \_\_\_\_\_ gallons. Waste stored \_\_\_\_\_
3. Individual tank volume \_\_\_\_\_ gallons. Waste stored \_\_\_\_\_
4. Individual tank volume \_\_\_\_\_ gallons. Waste stored \_\_\_\_\_

**VIII. DAYS/HOURS OF OPERATION**

On the average, how many days each month is the facility open to accept wastes?

\_\_\_\_\_ Days per month

What are the hours of operation on the days that the facility accepts wastes from households and CESQGs?

Example: Facility accepts CESQG wastes from 0900-1300 on the first Friday of each month and accepts household wastes Monday through Thursday of each week from 1000-1600

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**PERMIT BY RULE NOTIFICATION FORM FOR  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITIES**

**IX. FACILITY DESCRIPTION:** Please describe the facility in enough detail that a person not familiar with the facility will be able to understand the facility design. Include a description of the lighting, fencing, secondary containment for storage areas, etc.

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**PERMIT BY RULE NOTIFICATION FORM FOR  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITIES**

**X. REQUIRED ATTACHMENTS**

- A.  A plot plan of the facility
- B.  Certification of financial responsibility for closure
- C.  Copy of a written agreement between the property owner and facility operator allowing operation of the PHHWCF ( if applicable)

**XI. OPERATOR CERTIFICATION (PUBLIC AGENCY)**

"I certify that the unit or units described in these documents meet the eligibility and operating requirements of state statutes and regulations for the permit by rule tier. I understand that I am required to provide financial assurance for the costs of closing this facility. I also understand that I am required to file a Phase I Environmental Assessment at a later date as part of the permit by rule application."

"I certify under penalty of perjury under the laws of the State of California that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

\_\_\_\_\_  
Name (Print or Type)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature (Principal executive officer or ranking elected official), CCR, Title 22, Section 66270.11.

\_\_\_\_\_  
Date Signed

**INSTRUCTIONS FOR COMPLETING  
PERMANENT HOUSEHOLD HAZARDOUS WASTE  
COLLECTION FACILITY PERMIT BY RULE NOTIFICATION  
FOR PROPOSED FACILITIES  
FORM DTSC 1094B**

For use by public agencies proposing to operate a permanent household hazardous waste collection facility (PHHWCF).

**EACH SECTION OF THIS FORM MUST BE COMPLETED.  
INCOMPLETE FORMS WILL NOT BE PROCESSED.**

Please check at the top of the form whether this is an initial or a revised notification. If this is a revision to an existing notification, place an asterisk (\*) in the left margin next to the revised information. The notification must be revised whenever there is a significant change to the information required in this notification.

Please enter the name of the facility and the facility identification number at the top of each page.

**I. GENERAL INFORMATION**

**ID NUMBER:**

Enter your facility's 12-character California identification number. This number will begin with the letters "CAH". If you don't know your identification number or do not have an identification number, please contact the Department of Toxic Substances Control (DTSC) Manifest Unit at (916) 324-1781. The Manifest Unit will provide you with your number or send you an application form (Notification of Regulated Waste Activity (EPA Form 8700-12)).

**FACILITY NAME:**

Enter the name of the permanent household hazardous waste collection facility.

**ADDRESS:**

Enter the physical address of the collection facility.

**LOCATION:**

Describe how to locate or get to the facility. If the facility lacks a street name, give the most accurate alternative geographic information (e.g. section number or quarter section number from county records or at intersection of Rts. 425 and 22). Also enter the latitude and longitude of the facility in degrees, minutes and seconds. You may use the map you provide for Item K to determine latitude and longitude. Latitude and longitude information is also available from Regional Offices of the U.S. Department of Interior, Geological Survey and from State Natural Resource Agencies.

**II. OPERATOR (PUBLIC AGENCY)**

**NAME:**

Enter the name of the public agency that will be the legal operator of the PHHWCF.

**ADDRESS:**

Enter the mailing address of the public agency.

**CONTACT PERSON:**

Enter the name of a contact person (last name first) in the public agency who is knowledgeable about the notification and the PHHWCF.

**TELEPHONE:**

Enter the area code and telephone number of the contact person.

**III. CONTRACTOR INFORMATION (IF APPLICABLE):**

Complete this item only if the operator has contracted with another entity (e.g. private contractor) to do the actual management of the PHHWCF.

**NAME:**

Enter the name of the contractor company.

**ADDRESS:**

Enter the mailing address of the contractor company.

**CONTACT PERSON:**

Enter the name of a contact person (last name first) in the contractor company who is knowledgeable about the operation of the PHHWCF.

**TELEPHONE NUMBER:**

Enter the telephone number of the contact person.

**IV. LOCAL AND STATE PERMITS REQUIRED FOR THE OPERATION OF FACILITY**

List all local and state permits required for the operation of the facility. If no permits are required, state "no (local/state) permits are required" on the form. Please indicate whether the required permits have been obtained.

**V. PROPERTY OWNERSHIP**

**PROPERTY:**

Please indicate the legal ownership of the property on which the PHHWCF will be located. If applicable, include the property owner's name and telephone number. Note that if the property owner and the facility operator are different entities, a written agreement must exist between the property owner and the PHHWCF operator allowing operation of the facility.

**VI. ACCEPTANCE OF AND MANAGEMENT OF SPECIFIC WASTE TYPES**

**WASTE FROM CONDITIONALLY EXEMPT SMALL QUANTITY GENERATORS:**

Indicate whether the PHHWCF will accept wastes from conditionally exempt small quantity generators as defined by Health and Safety Code section 25218.

**NON-ACCEPTANCE OF CERTAIN WASTES:**

Please indicate if the PHHWCF will categorically exclude any certain types of waste. Use descriptive terms such as "compressed gas cylinders larger than 20 pounds".

**CONSOLIDATION OF RECYCLABLES:**



Please indicate which recyclable wastes will be consolidated at the PHHWCF.

## **VII. WASTE VOLUME**

### **VOLUME COLLECTED:**

Please indicate the approximate total volume of hazardous wastes you estimate will be brought to the PHHWCF in an average month. Please indicate this figure in either gallons or pounds.

### **STORAGE CAPACITY:**

Please indicate the total capacity of each separate container storage area and specify gallons or pounds. A storage area would usually be a bermed area with an impervious base or some other type of secondary containment. Then for individual tanks, please indicate the maximum capacity of the tank and the type of waste which is stored in that tank.

## **VIII. DAYS AND HOURS OF OPERATION**

Enter the average number of days per month during which the PHHWCF will accept wastes. Indicate also the hours the PHHWCF will be in operation on the days waste is being accepted. Show the hours using a 24-hour clock (for example: 8 am should be shown as 0800 and 1 pm should be shown as 1300).

## **IX. FACILITY DESCRIPTION**

Please provide a detailed description of the physical components of the facility in enough detail that a person not familiar with the facility would be able to enter the facility and be able to understand the facility design. Include fencing, gates, traffic flow, waste removal area, waste sorting areas, and waste storage areas, etc.

## **X. REQUIRED ATTACHMENTS**

### **A. FACILITY PLOT PLAN:**

Each facility must include a drawing showing the general layout of the facility. This drawing should be approximately to scale and fit on an 8½" by 11" sheet of paper. This drawing should show the following:

1. Map scale and date.
2. The property boundaries of the facility.
3. Wind rose orientation.
4. The areas occupied by all storage and treatment units that will be used during operation of the PHHWCF.
5. The name and location of each operation area (Example: used oil storage tank, consolidation area, etc.).
6. The approximate dimensions of the property boundaries and each storage and treatment area.
7. Security provisions (fencing, gates, etc.).
8. Internal roads; on and off site traffic flow.

### **B. CERTIFICATION OF FINANCIAL RESPONSIBILITY FOR CLOSURE:**

Attach certification required by Title 22, CCR, section 67450.30(b).

**C. WRITTEN AGREEMENT BETWEEN PROPERTY OWNER AND FACILITY OPERATOR:**

Please submit a signed agreement by the property owner acknowledging and allowing the operation of the facility if the property owner is different from the legal operator (Public Agency).

**XI. OPERATOR CERTIFICATION**

This section must be completed by a chief executive officer or elected official of the public agency operating the PHHWCF, as specified in Title 22, CCR, section 66270.11. Each copy submitted must have an original signature.

**INSTRUCTIONS FOR SUBMITTAL OF NOTIFICATION**

After completing the form, retain one copy for your records. Additionally, the owner of a PHHWCF shall submit, in person or by certified mail with return receipt requested, a DTSC Form 1094B (11/08) with original signature to CUPA or authorized agency. Submit another copy with original signature to the Department address given below:

Department of Toxic Substances Control  
Consumer Products Section  
Office of Pollution Prevention and Green Technology  
P.O. Box 806, 11th floor  
Sacramento, California 95812-0806

OSWER POLICY DIRECTIVE NO. 9574.00-1

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

NOV 1 1988

MEMORANDUM

SUBJECT; Clarification of Issue Pertaining to Household  
Hazardous Waste Collection Programs

FROM: J. Winston Porter  
Assistant Administrator for Solid Waste  
and Emergency Response

TO: Waste Management Division Directors,  
Regions I-X

As you know, the Agency enthusiastically supports household hazardous waste (HHW) collection and management programs. As part of this support, EPA has sponsored annual HHW conferences since 1986. The first collection programs began in 1981. As of October 1988, over 1300 collection programs have been set up in 44 States and more programs are being planned all the time. EPA believes these programs are important because they: (1) promote citizen awareness regarding proper handling of HHW; (2) reduce the amount of HHW in the municipal solid waste stream which ultimately is taken to municipal solid waste combustors or landfills; (3) limit the amount of HHW which is dumped down a drain and ultimately discharged to a publicly-owned treatment works (POTW), or is dumped indiscriminately; (4) remove a greater amount of HHW from the home, thereby reducing potential safety hazards; and (5) help to reduce the risk of injuries to sanitation workers.

Several issues have been raised pertaining to HHW collection programs. These issues include the liability of collection program sponsors under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); EPA's recommendations regarding the management of HHW; and the regulatory status of HHW that contains dioxin.

RO 11377

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This memorandum clarifies our position on these issues. You should note, however, that State positions may vary; the State agency should be contacted for details on the State's policies or regulations regarding HHW.

1. What does EPA recommend regarding management of HHW collected in HHW collection programs?

As you know, all household wastes are exempt by definition from the Federal hazardous waste regulations promulgated under Subtitle C of RCRA. Section 261.4(b)(1) unconditionally exempts household wastes, including HHW, from the Subtitle C regulations even when accumulated in large quantities. This exemption also applies to HHW collected during a HHW collection program. However, when household wastes are mixed with hazardous wastes from small quantity generators, this resulting mixture is subject to the small quantity generator rules in Section 261.5. For this reason, sponsors of HHW collection programs should be careful to limit the participation in their programs to households to avoid the possibility of receiving regulated hazardous wastes from commercial or industrial sources and triggering all or some of the Subtitle C controls on this waste.

Household waste, including HHW, is subject to the regulations under Subtitle D of RCRA. The current Subtitle D regulations governing the disposal of any solid waste are the "Criteria for Classification of Solid Waste Disposal Facilities and Practices" (40 CFR Part 257). These regulations are general environmental performance standards that are implemented by the States. On August 30, 1988 (see 53 FR 33314) EPA proposed new rules for municipal solid waste landfills at 40 CFR Part 258. HHW can legally be disposed in any solid waste disposal facility, including a municipal solid waste landfill, that is in compliance with the existing "Criteria" and State and local requirements.

Although HHW is exempt from Federal RCRA Subtitle C hazardous waste regulations, EPA recommends that sponsors of HHW collection programs manage the collected HHW as a hazardous waste. When a community has already gone to the effort of expense of collecting these materials, Subtitle C controls provide a greater level of environmental protection. In selecting a management option, the Agency recommends that program sponsors follow the waste management hierarchy of:

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- (1) Reusing and recycling as much waste as possible;
- (2) Treating waste in a hazardous waste treatment facility; and, finally,
- (3) Disposing of remaining waste in a hazardous waste landfill.<sup>1</sup>

The Agency also recommends the use of licensed hazardous waste transporters who will properly identify, label, manifest, and transport the collected wastes for recycling, treatment, or disposal. Although sponsors are not required to manage HHW as a hazardous waste, it is clear from seeing the programs in action, that, in fact, sponsors usually contract with hazardous waste management professionals to run the programs. These contractors generally manage the HHW as a hazardous waste and usually make efforts to reuse and recycle the waste.

## 2. What is the regulatory status of HHW that contains dioxin?

As stated above, HHW is unconditionally exempt from Federal RCRA Subtitle C regulation. This exemption includes HHW that contains dioxin, such as pesticides. Like any household waste, HHW that contains dioxin must be disposed of in accordance with EPA's rules under Subtitle D of RCRA.

The RCRA land disposal restrictions rule issued November 8, 1986, applies only to those dioxin-bearing wastes that are specifically listed as hazardous wastes under Subtitle C of RCRA. Therefore, this rule does not apply to any HHW and does not prohibit hazardous waste land disposal facilities from receiving any HHW, even those potentially containing dioxin.<sup>2</sup> Although dioxin-containing HHW are exempt from EPA's land disposal restrictions rule, we understand that, due to public perception concerns, some Subtitle C hazardous waste management facilities currently do not accept dioxin-bearing HHW. EPA will explore options with State and local governments so that a solution for this problem can be found. For example, we are looking at ways to encourage the waste management industry to reconsider their position and accept these wastes. Some communities have chosen to temporarily store this dioxin-bearing HHW until a more permanent management option can be found. -

<sup>1</sup>To the extent that non-hazardous liquids are not containerized in accordance with Sections 40 CFR 264.314(d), 265.314(c), 2674.316, and 265.316, such liquids are subject to the non-hazardous liquids restrictions set forth at Sections 264.314(e) and 265.314(f). Likewise, the land disposal restrictions do not apply to any other HHW.

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3. What liability do HHW collection programs sponsors have under Subtitle C of RCRA?

As stated above, Section 261.4(b)(10), exempts household wastes, including, HHW, from the Federal Subtitle C regulations. As a result, handlers of HHW are not potentially liable under Subtitle C of RCRA for failure to follow the regulations and are not required to manage collected HHW in Subtitle C hazardous waste management facilities. As previously mentioned, however, EPA recommends that this waste be handled as a Subtitle C hazardous waste.

4. What liability do sponsors of HHW collection programs have under CERCLA?

CERCLA does not contain an exclusion from liability for household waste or an exclusion based on the amount of waste generated. Any waste that qualifies as a hazardous substance under CERCLA is subject to the liability provisions of Section 107. Hazardous substances are defined under Section 101(14) and designated under Section 102(a) of CERCLA. HHW may qualify as a "hazardous substance" if it contains any substance listed in Table 302.4 of 40 CFR Part 302. If a household waste contains a substance that is covered under these CERCLA sections (whether or not it is a RCRA hazardous waste), potential CERCLA liability exists.

Communities should recognize that potential liability under CERCLA applies regardless of whether the HHW has picked up as part of a community's routine waste collection service and disposed of in a municipal waste landfill (RCRA Subtitle D) or if the HHW was gathered as part of special collection program and taken to a hazardous waste landfill (RCRA Subtitle C). The additional safeguards provided by HHW collection and Subtitle C management may reduce the likelihood of environmental and human health impacts and, therefore, may also reduce potential CERCLA liability.

I hope this information will assist you in addressing questions regarding HHW collection and management programs. We are providing copies of this memorandum to States and the major waste management trade associations. I request that you make this information available to any other interested parties in your Region. If you require additional information or clarification on these issues, please contact Allen Maples of the Municipal Solid Waste Program at (202) 382-4683.

cc: State Solid and Hazardous Waste Directors  
Bryan W. Dixon, ASTSWMO  
Dana Duxbury, Consultant to Tufts University, CEM  
William Forester, APWA  
H. Lanier Hickman, GRCDA  
Sheila Prindiville, NSWMA  
Hazardous Waste Branch Chiefs, Regions I-X  
Regional Subtitle D Coordinators, Regions I-X

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

Collection Facility Name: \_\_\_\_\_ EPA ID #: CAH \_\_\_\_\_

Collection Facility Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Sponsor Agency: \_\_\_\_\_

Sponsor Agency Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

Contractor Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_

Date Inspected: \_\_\_\_\_ Inspection Agency: \_\_\_\_\_

Lead Inspector: \_\_\_\_\_ Phone: \_\_\_\_\_

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**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

NOTE: Violations cited below are from California Health and Safety Code (HSC), sections 25100 et seq. and Title 22, California Code of Regulations (Cal. Code Regs.), section 67450.25 that includes requirements from Chapter 12 (use applicable portions of the Generator Checklist), Chapter 15, Articles 2 through 7, 9 and 10 (use applicable portions of the ISD checklist), in addition to the following requirements:

CHECKLIST ELEMENT	YES	NO	COMMENT
<b>A. SUBMITTALS: Has the following document been submitted by the operator (sponsor agency) of the PHHWCF?</b>			
1. PHHWCF Permit by Rule Notification form (DTSC 1094B) (11/08) to CUPA/ or DTSC (if no CUPA). [Title 22, Cal. Code Regs., section 66270.60(d)(6)(A)]	___	___	_____
3. PHHWCF has developed/maintained/implemented operational procedures to be followed whenever the PHHWCF meets or exceeds its maximum storage capacity. [Title 22, Cal. Code Regs., section 67450.25(a)(3)(A)].	___	___	_____
4. PHHWCF only accepts approved classifications of waste: [HSC 25218.1(f) & 25218.3]			
a. household hazardous waste;	___	___	_____
b. hazardous waste that is generated by CESQG.	___	___	_____
<b>B. CONTAINMENT:</b>			
5. Container transfer and storage area has a containment system that is designed and operated to contain a 24-hour, 25-year storm plus 10% of the aggregate volume of all containers or the volume of the largest container, whichever is greater. [Title 22, Cal. Code Regs., sections 67450.25 (a)(1) and 66264.175(b)(3)]	___	___	_____
6. The base underlying the containers in the receiving*, handling and storage areas is free of cracks or gaps and is impervious to the wastes. [Title 22, Cal. Code Regs., sections 67450.25(a)(4)(A) and 66264.175(b)(1)]	___	___	_____
*Tables and carts on which wastes are placed are considered the receiving area.			
7. The containment system is designed and operated to protect the containers from contact with accumulated liquids. [Title 22, Cal. Code Regs., sections 67450.25(a)(1) and 66264.175(b)(2)]	___	___	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

	YES	NO	COMMENT
8. Run-on into the containment system is prevented. [Title 22, Cal. Code Regs., sections 67450.25(a)(1) and 66264.175(b)(4)]	—	—	_____
9. Spilled or leaked waste and accumulated precipitation is removed in a timely manner as is necessary to prevent overflow of the collection system. [Title 22, Cal. Code Regs., sections 67450.25(a)(1) and 66264.175(b)(5)]	—	—	_____
10. a. The operator has submitted to CUPA /or DTSC (if no CUPA) a written statement signed by an independent, qualified professional engineer, registered in California, indicating that the containment system is suitably designed. [Title 22, Cal. Code Regs., section 66264.175(c)]	—	—	_____
or			
b. A engineering certification as required by Title 22, Cal. Code Regs., section 66274.175(c) shall be provided by a manufacturer, an independent professional engineer registered in the state of California or professional engineer employed by the local government entity from a different division or agency than the operator. [Title 22, Cal. Code Regs., section 67450.25(a)(1)(A)]	—	—	_____
<b>C. DOCUMENTATION REQUIREMENTS:</b> Does the PHHWCF have the following documents at the facility?			
11. a. Receipt or proof of mailing notification to CUPA/ or DTSC (if no CUPA). [Title 22, Cal. Code Regs., sections 66270.60(d)(6)(A) and 67450.25(a)(3)]	—	—	_____
b. CUPA/ or DTSC's (if no CUPA) Acknowledgement & or Authorization letter. [Title 22, Cal. Code Regs., sections 66270.60(d)(6)(B) and 67450.25(a)(3)]	—	—	_____
12. A written waste analysis plan (WAP) describing the procedures to characterize unidentified wastes received at the facility into federal DOT hazard classes (operator may use HAZCAT). [Title 22, Cal. Code Regs., section 67450.25(a)(2)(A)]	—	—	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

**YES    NO    COMMENT**

**An operation plan with the following information:**

- |     |   |       |       |       |
|-----|---|-------|-------|-------|
| 13. | The PHHWCF is complying with Chapter 15, Article 8 (Financial Assurance) (DTSC Form 1220), except that the coverage to be maintained is in accordance with Title 22, Cal. Code Regs., section 67450.30.** | _____ | _____ | _____ |
|-----|---|-------|-------|-------|

\*\*Financial Assurance for closure exemptions:

PHHWCF is operated no more than 30 days per year:  
Submit a certification to DTSC with a statement why facility is exempt.

Estimated closure cost is less than \$10,000: Submit a certification to CUPA or DTSC (if no CUPA) with a statement why facility is exempt and adjust closure cost estimate annually for closure plan changes and national inflation index.

- |     |  |       |       |       |
|-----|--|-------|-------|-------|
| 14. | Phase I environmental assessment due to DTSC within one year of commencing operation.<br>[HSC, section 25200.14; and Title 22, Cal. Code Regs., sections 66270.60(d)(B)(6) and 67450.25(a)(5)] | _____ | _____ | _____ |
| 15. | PHHWCF closure plan and post closure. [Title 22, Cal. Code Regs., sections 67450.25(a)(2)(E) and 66265.110-66265.115]  | _____ | _____ | _____ |
| 16. | Site supervisor name(s). [Title 22, Cal. Code Regs., sections and 67450.25(a)(3)(B) 67450.4(b)(6)]   | _____ | _____ | _____ |
| 17. | Description of operating procedure in the event of inclement weather. [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(8)]  | _____ | _____ | _____ |
| 18. | Contingency plan which describes the following:<br>[Title 22, Cal. Code Regs., sections 67450.25(a)(2)(C) and 66265.52 & 66265.56 EXCEPT 66265.53(b)]  |       |       |       |
|     | a. actions to take   | _____ | _____ | _____ |
|     | b. local arrangements  | _____ | _____ | _____ |
|     | c. emergency coordinator list  | _____ | _____ | _____ |
|     | d. list of emergency equipment   | _____ | _____ | _____ |
|     | e. evacuation plan   | _____ | _____ | _____ |

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

	YES	NO	COMMENT
19. Preparedness & prevention: [Title 22, Cal. Code Regs., section 67450.25(a)(2)(B)]			
a. Operator minimizes possibility of fire, explosion or release; [Title 22, Cal. Code Regs., section 66265.31]	—	—	_____
b. Existence of Internal communication or alarm system, portable fire extinguishers, spill control equipment, decontamination equipment, & water at facility; [Title 22, Cal. Code Regs., section 66265.32]	—	—	_____
c. Access to communication device; [Title 22, Cal. Code Regs., section 66265.34]	—	—	_____
d. Aisle space is maintained for emergencies; and [Title 22, Cal. Code Regs., section 66265.35]	—	—	_____
e. Arrangements with police, fire departments, emergency response teams and OES including facility layout & operation. [Title 22, Cal. Code Regs., section 66265.37]	—	—	_____
20. Copy of documents as specified in Title 22, Cal. Code Regs., section 66264.17(c) if applicable. (Ignitables, Reactives, & Incompatible wastes) [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(13)].	—	—	_____
21. If bulking solvents, oil-based paints or gasoline PHHWCF follows a written protocol approved by local fire & air pollution prevention agencies. [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(14)]	—	—	_____
22. Copies of all local permits obtained. [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(15)]	—	—	_____
23. A written agreement between the property owner and the operator if different. [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(16)]	—	—	_____
24. A written agreement between the contractor and the operator [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(17)]	—	—	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

	YES	NO	COMMENT
25. Follows Generator requirements, Chapter 12, Cal. Code Regs.	___	___	_____
a. Meet container management standards (storage time limits, closed, labeled, compatibility, inspected weekly, in good condition, with ignitables/reactives stored at a shorter distance (<50 feet from property line) with written approval of local fire authority. [Title 22, Cal. Code Regs., sections 67450.25(a)(2)(D), 66262.34, and 66265.170]	___	___	_____
b. Copies of manifests retained for 3 years & a legible copy of each manifest used submitted to DTSC within 30 days. [Title 22, Cal. Code Regs., sections 66262.20 and 66262.23]	___	___	_____
c. Inspection standards for hazardous waste accumulation area (container-weekly and tanks-daily). [Title 22, Cal. Code Regs., sections 66265.15 and 66265.195]	___	___	_____
<b>D. CESQG WASTE ACCEPTED:</b>			
26. A description of how CESQG HW will be received separately from the HHW: [Title 22, Cal. Code Regs., sections 67450.25(a)(3)(B) and 67450.4(b)(9)]			
a. either accepts at different hours or <b>Up to 27 gallons or 220 pounds, but not more than 100 kg/month and certain conditions are met</b> [ <del>HSC 25185.5</del> <b>HSC 25218.5</b> ]	___	___	_____
b. receives at separate receiving area from other HHW.	___	___	_____
<b>Household Hazardous Waste Transported to PHHWCF from the following HHW programs:</b>			
(USE a manifest for transporting waste as per HSC, 26160 (d)(1); USE a registered waste hauler as per HSC, 25163 (a); and No manifest is required if transporting 5gal or 50 lbs waste and meeting conditions) [ <del>HSC 25185.3, 25185.4, and 25185.5</del> <b>HSC 25218.3, 25218.4, 25218.5</b> ]			
a. THHWCFs collection program	___	___	_____
b. Recycle-only (BOPs) collection program	___	___	_____
c. Mobile household collection program	___	___	_____
d. Load check program or Transfer station load check program under agreement with the PHHWCF.			
27. Maintains separate record identifying name, address, and identification number (if available) of CESQG, types and quantities of hazardous wastes accepted, and the fees paid to the PHHWCF for the management of those wastes. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(g)]	___	___	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

		YES	NO	COMMENT
<b>E.</b>	<b>WALK THROUGH OBSERVATIONS</b>			
28.	Location of HHW handling area is clearly marked to control public access. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(1)]	—	—	_____
29.	Facility has a buffer zone which has written approval of local agencies. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(2)]	—	—	_____
30.	Facility is large enough to accommodate all equipment, personnel and anticipated number of vehicles for a safe operation. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(3)]	—	—	_____
31.	Facility is paved with asphalt or concrete in good repair. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(4)]	—	—	_____
32.	All waste handling and storage areas have a continuous base that meet the requirements of 66264.175(b)(1). [Title 22, Cal. Code Regs., sections 67450.25(a)(4)(A)]	—	—	_____
33.	There is a physical barrier to delineate the perimeter of HHW handling and storage areas. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(5)].	—	—	_____
34.	The area(s) or structure(s) has the written approved of local agencies, to store ignitable and/or reactive waste. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(6)].	—	—	_____
35.	Waste handling areas are covered for excessive heat Or precipitation. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(7)].	—	—	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

	YES	NO	COMMENT
36. Warning signs are posted outside the receiving, handling and storage areas in English and in languages predominant in the area which state "Danger! Hazardous Waste Area - Unauthorized Personnel Keep Out". [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(8)]	___	___	_____
37. Warning signs are legible from a distance of at least 25 feet. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(8)(B)]	___	___	_____
38. Signs are posted prohibiting food, beverages, and smoking in the receiving, handling, and storage areas. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(8)].	___	___	_____
39. Storage area is a secured area with controlled access or is surrounded by a fence or monitored by 24-hour surveillance system. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(9)(C)]	___	___	_____
40. If facility operates during hours of darkness there is artificial lighting to provide a safe operation. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(9)(D)]	___	___	_____
41. There is a separate storage area for wastes which are ready to be transported off-site. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and [67450.4(d)(9)(E)]	___	___	_____
42. Local agency has approved the traffic control. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(10)(A) and (B)]	___	___	_____
43. Traffic is routed in a one-way direction to minimize backing up or turning around. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(10)(C)]	___	___	_____
44. Persons delivering wastes remain in their vehicles while in the waste acceptance area of the facility. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(d)(10)(D)]	___	___	_____

**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

		YES	NO	COMMENT
<b>F.</b>	<b>WASTE HANDLING PROCEDURES</b>			
45.	Waste handling is performed by trained personnel and provides safety for the participants and workers. [Title 22, Cal. Code Regs., sections 67450.25(a)(4), 67450.4(e)(4), and 66265.16(D)]	—	—	_____
46.	Bulking of wastes is done in a manner which prevents the mixing of incompatible wastes. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(1)(A)]	—	—	_____
47.	Bulking of wastes is performed in a secured area away from the receiving area. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(1)(B)]	—	—	_____
48.	Limit bulking and filtering of wastes to paints compatible solvents, gasoline, antifreeze, used oil and roofing tar. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(2)(B)]	—	—	_____
49.	If bulking solvents, oil-based paints or gasoline during the waste acceptance hours, follows a written protocol approved by local agencies. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(2)(B)]	—	—	_____
50.	Bulks, packages and ships used oil to a facility authorized to receive used oil pursuant to HSC Section 25200. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(3)]	—	—	_____
51.	Properly packages, sorts and labels waste in accordance with Department of Transportation (DOT) requirements pursuant to Code of Federal Regulation (CFR), Title 49, Subchapter C. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(4)]	—	—	_____
52.	Personnel who handle waste meet training requirements specified in Title 22, Cal. Code Regs., section 66264.16(a) and Occupational Safety and Health Administration (OSHA) requirements. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(e)(5)]	—	—	_____
53.	A written report was submitted to CUPA or DTSC (If no CUPA) within 15 days if an incident of noncompliance with these regulatory requirements occurred. [Title 22, Cal. Code Regs., sections 67450.25(a)(4) and 67450.4(i)]	—	—	_____



**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

	YES	NO	COMMENT
54. Manifest Record keeping & Reporting - PHHWCF receiving manifested waste to be in compliance with [Title 22, Cal. Code Regs., sections 67450.25(a)(2)(D) and 67450.4 ( 66265.70 EXCEPT 66265.73(b)(2),	___	___	_____
55. PHHWCF limited to store waste at the facility up to one year from the date of collection. [Title 22, Cal. Code Regs., section 67450.25(a)(6)]	___	___	_____
<b>G. ANY VARIANCES ISSUED BY DTSC?</b> (If yes, describe below).	___	___	_____

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*This report may identify conditions observed this date that are alleged to be violations of one or more sections of the California Health and Safety Code or Cal. Code Regs. relating to the management of hazardous waste. The violations may be described in more detail on the attached note sheet.*

**Inspector(s):**

Lead Inspector: _____	Other Inspector: _____
Signature: _____	Signature: _____
Printed Name: _____	Printed Name: _____
Title: _____	Title: _____
Agency: _____	Agency: _____
Phone Number: _____	Phone Number: _____

**Facility Representative:**

**Your signature acknowledges receipt of this report and does not imply agreement with the findings.**

Signature: _____	Printed Name: _____
Title : _____	Date: _____



**PERMIT BY RULE  
PERMANENT HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
INSPECTION CHECKLIST**

**HOUSEHOLD HAZARDOUS WASTE COLLECTION FACILITY  
CERTIFICATION OF RETURN TO COMPLIANCE**

**For public agencies operating a household hazardous waste collection facility under PBR**

In the matter of the Violation(s) cited on: \_\_\_\_\_

As identified in the Inspection report dated: \_\_\_\_\_

Conducted by: \_\_\_\_\_ (agency)

I certify under penalty of law that:

1. Respondent has corrected the violations specified in the notice of violation cited above.
2. I have personally examined any documentation attached to the certification to establish that the violations have been corrected.
3. Based on my examination of the attached documentation and inquiry of the individuals who prepared or obtained it, I believe that the information is true, accurate, and complete.
4. I am authorized to file this certification on behalf of the Respondent.
5. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
Name (Print or Type)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Public Agency Name

\_\_\_\_\_  
EPA ID Number