



Yana Garcia
Secretary for
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Gavin Newsom
Governor

September 29, 2023

David Thaete
Phibro-Tech Inc.
8851 Dice Rd.
Santa Fe Springs, California 90670-2515

NOTICE OF 2023 FACILITY VIOLATIONS SCORING PROCEDURE SCORE AND COMPLIANCE TIER ASSIGNMENT

Dear David Thaete:

2023 Facility Violations Scoring Procedure (VSP) Score: 21.82
2023 Compliance Tier Assignment: Conditionally Acceptable

The purpose of this letter is to provide Phibro-Tech Inc., CAD008488025, located at 8851 Dice Rd., Santa Fe Springs, California 90670 (hereinafter, the "Facility") with the 2023 Facility VSP Score and 2023 compliance tier assignment pursuant to California Code of Regulations (CCR), title 22, section 66271.54, subdivision (c). The 2023 Facility VSP Score and compliance tier assignment do not constitute an enforcement action.

Based on the inspection violation scores for the Facility for the ten (10) year period beginning January 1, 2013, through December 31, 2022, DTSC calculated a Facility VSP Score of "**21.82**" for the Facility. A Facility VSP Score is the sum of the provisional or final inspection violation scores for each compliance inspection conducted during the preceding ten (10) year period, divided by the number of such inspections. (See 22 CCR, § 66271.54, subd. (a).)

A facility is assigned to one of three compliance tiers based on its Facility VSP Score:

- "Acceptable." A facility that receives a Facility VSP Score of less than 20 shall be designated as having a Facility VSP Score that is "acceptable". (See 22 CCR § 66271.54, subd. (b)(1).)
- "Conditionally Acceptable." A facility that receives a Facility VSP Score equal to or greater than 20 and less than 40 shall be designated as having a Facility VSP Score that is "conditionally acceptable." (See 22 CCR § 66271.54, subd. (b)(2).) Facilities that receive a

final compliance tier assignment of “conditionally acceptable” are required to comply with the additional requirements specified in CCR, title 22, section 66271.56.

- “Unacceptable.” A facility that receives a Facility VSP Score equal to or greater than 40 shall be designated as having a Facility VSP Score that is “unacceptable.” (See 22 CCR § 66271.54, subd. (b)(3).) DTSC is required to initiate permit denial, suspension, or revocation proceedings for facilities that receive a final compliance tier assignment of “unacceptable.” (See 22 CCR § 66271.57.)

As a result of the Facility’s Facility VSP Score, DTSC assigned the Facility to a compliance tier of **“Conditionally Acceptable.”**

Compliance Tier Assignment Challenges

A facility’s compliance tier assignment of “acceptable” or “conditionally acceptable” becomes final after all inspection violation scores upon which the Facility VSP Score is based become final pursuant to CCR, title 22, section 66271.53, subdivision (d). Final compliance tier assignments of “acceptable” or “conditionally acceptable” are not subject to additional administrative dispute resolution. (See 22 CCR § 66271.54, subd. (e).) Owners or operators of facilities assigned to a compliance tier of “unacceptable” may challenge their compliance tier assignment pursuant to CCR, title 22, section 66271.57, subdivision (b). (See 22 CCR § 66271.54, subd. (f).)

Please direct any VSP inquiries, as follows:

VSP_Info@dtsc.ca.gov – for scoring process

VSP_Dispute_Inbox@dtsc.ca.gov – for dispute process

VSP_TierChallenge@dtsc.ca.gov – for compliance tier challenge process

<https://www.envirostor.dtsc.ca.gov/public/> - for permit, permitting process, or DTSC

Permitting Project Manager

Sincerely,

Maria Salomon

Maria Salomon
Branch Chief
Enforcement and Emergency Response Division

Enclosure(s)

Violation Scoring Matrix

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC			10 Year Date Range:			2013-2022			Permit Effective Date:			7/29/1991			Link to EnviroStor	
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670			Number of Inspections:			18			Permit Expiration Date:			7/29/1996			(Inspection Reports, SOVs,	
EPA ID: CAD008488025			Total Number of Violations Scored:			29			Date VSP Completed:			4/19/2023			etc.)	
Inspection Date:	5/28/2013 CEI & 6/19/2013 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score			
Inspection Type:	CEI & FRR															
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202(a)	The facility illegally transferred or offloaded manifested HW from a tanker truck into plastic totes on a roadway that was not authorized by DTSC. The road was located outside and north of ERS-1. After transferring the HW liquids into totes, the facility would then store the waste in ERS-1 for up to a year prior to treatment.	Minimal	The HW was transferred from a tanker truck into plastic totes in an unauthorized area (roadway). The volume and characteristics of the HW in violation were not provided therefore resulting in a minimal potential for harm determination.	Major	Transfer was done in non-permitted area and there was no attempt by facility to modify its permit to allow for transfer in this location for 30 years. The requirement was completely ignored and none of its provisions were complied with.	15	No	n/a	0.00	15			
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation or and/or assure early detection of such releases.	22 CCR 66270.30	The facility failed to conduct tank assessments for Tank W-1 and W-2. In addition, the 2013 tank assessments were incomplete as the facility failed to inspect the interior surfaces and tank bottoms.	Moderate	Tank assessments verify tank integrity. Failure to obtain tank assessments within the specified time limits increased the possibility of an unexpected release to the environment. The tanks stored wastewater as part of the wastewater treatment system. The tanks were used to adjust the pH concentration and had secondary containment. The two tanks each had a capacity of 30,000 gallons. The volume and characteristics of the HW in violation presented a moderate threat.	Major	Tanks W-1 and W-2 were not assessed for 9 years; a 2013 assessment was incomplete as the interior surface and the tank bottoms were not inspected. The permit requires re-certification every three years and the facility missed two cycles for two instances. The requirement was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0.00	20			
Inspection Violation Score:													35.00			
Inspection Date:	1/27/2014	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score			
Inspection Type:	FUI															
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation or and/or assure early detection of such releases.	22 CCR 66264.191(b), (e); 22 CCR 66264.193(c)(3), (e)(1)(B), and (f) and 66270.30	Failed to comply with tank assessment requirements for Tanks W-1 and W-2. The facility failed to provide documentation of the structural support or proper anchoring of the tanks and associated pipings, structural stability calculations, spill prevention equipment, secondary containment leak tests, and secondary containment capacity calculations.	Moderate	Tank assessments verify tank integrity. Failure to obtain tank assessments within the specified time limits increased the possibility of an unexpected release to the environment. A majority of HW liquid in the Wastewater Treatment System went into Tanks W-1 and W-2, which had inadequate tank assessments.	Moderate	The facility's 2013 tank assessment was only partially satisfactory as it was missing a number of regulatory requirements. The tank assessment requirement functioned to some extent, but not all important provisions were complied with.	15	Yes	5/28/2013	25.00	18.75			
Inspection Violation Score:													18.75			

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Facility Name: PHIBRO-TECH INC		10 Year Date Range:		2013-2022		Permit Effective Date:		7/29/1991		Link to EnviroStor			
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EPA ID: CAD008488025		Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023		etc.)			
Inspection Date:	4/23/2014**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI												
Class I Violations:	1**	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202(a)	The facility illegally treated HW not authorized by its 1991 HWFP, when it used and operated a filter press in Area S to treat HW.	Moderate	The facility conducted unauthorized treatment in a permitted area. Copper Carbonate slurry was generated from an authorized treatment unit and moved to an unauthorized filter press to remove precipitated metals (28,000 mg/kg copper; TTLC 2,500). Copper Carbonate is a skin irritant and toxic to aquatic life. Samples exceeded the TTLC levels for Copper by more than 10x the TTLC threshold.	Moderate	The facility's HWFP did not allow for this HW treatment and the facility did not attempt to obtain a permit modification to allow for this treatment. Unauthorized HW treatment in an unpermitted unit constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	15	Yes	5/16/2012 (CEI)	25.00	18.75
Inspection Violation Score:													18.75
Inspection Date:	4/28/2014**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI & GAR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Class II Violations:	1	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(4)	The facility failed to maintain the integrity of groundwater monitoring wells to prevent the wells from acting as a conduit for contaminant transport.	Moderate	Failure to maintain integrity of groundwater monitoring wells increased the potential for the well to act as a conduit for downward contaminant migration and could have resulted in enhanced contaminant release to the environment.	Minimal	On 4/28/2015, two out of 35 groundwater monitoring wells (MW-04 and MW-09) were observed to have compromised well casings and could be moved from side to side without significant effort. The requirement functioned nearly as intended but not as well as if all provisions had been met.	6	No	n/a	0.00	6
	2**	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(6)	The facility failed to maintain integrity of groundwater monitoring wells to prevent entry of contaminants for the surface to the unsaturated zone and/or groundwater aquifers beneath the facility and to prevent contamination of samples.	n/a	Failure to maintain integrity of groundwater monitoring wells increased the potential for the well to act as a conduit for downward contaminant migration and could have resulted in enhanced contaminant release to the environment.	n/a	On 4/28/2015, 25 out of 35 groundwater monitoring wells had one or more of the following: worn out or missing well fault gasket seals, missing or broken bolts, damaged well caps, and/or improperly installed or non-functional looking well caps. The function of the requirement was rendered ineffective because some of its provisions were not complied with.	0	No	n/a	0.00	0
	3**	The deviation from the requirement was significant enough that it could have resulted in failure to assure early detection of HW releases.	22 CCR 66264.97(b)(7)	The facility failed to redevelop the monitoring wells to enable collection of representative groundwater samples, as 8 out of 35 monitoring wells had significant discrepancies between the constructed total depth to the bottom of the wells and the measured depth to the bottom of the wells, indicating that silt accumulated at the bottom of the wells, blocking the well screen and interfering with the collection of representative samples in wells MW-01D, MW-04, MW-05, MW-06D, MW-07, MW-08, MW-17S, and MW-24D.	n/a	Failure to maintain and prevent silt accumulation at the bottom of wells and blocking the well screen could have prevented collection of a representative ground water sample. The failure to adequately maintain the monitoring well called into question the integrity of the groundwater sampling results.	n/a	Eight out of 35 wells had significant discrepancies between as-built total well depth and the measured bottom of the well indicating silt accumulation in the well itself. The act deviated from the requirement, but the requirement functioned to some extent.	0	n/a	n/a	0.00	0
Inspection Violation Score:													6.00
Inspection Date:	1/28/2015	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FUI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC				10 Year Date Range:		2013-2022		Permit Effective Date:		7/29/1991		Link to EnviroStor (Inspection Reports , SOVs , etc.)	
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EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023			
Inspection Date:	6/29/2015 CEI & 11/16/2016 FRR**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operations or other corrective action for releases.	22 CCR 66264.35	The facility failed to maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in two separate areas of the facility: (1) the area located west of the permitted storage unit ERS1 and east of Tank J-3 and (2) adjacent and north of Tank C-9. The available aisle space was very limited or non-existent and there was not enough room for DTSC inspectors to walk down the aisle to inspect the containers in these areas.	Moderate	In an emergency or if there was a release, it would be difficult to access a spill due to inadequate aisle spacing. Several of the HW containers were open, which increased the risk of issues/spills between the inadequately spaced containers.	Moderate	Two of the areas observed had inadequate aisle spacing. The facility's compliance with the aisle space requirements functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0.00	15
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66264.73(b)(1)-(2)	The facility failed to record the location of each HW container within the facility and the quantity of HW at each location. On two instances, inspectors observed at least 200 containers of acidic and alkaline HW outside the permitted storage unit, ERS2. Instead, these containers were located to the east and to the south of ERS2. However, the facility's Container Location Inventory Record indicated that the location of all waste received was either in permitted unit ERS2 or ERS1. In addition, inspectors observed containers of HW located adjacent to Tank C-9, but the facility's Container Location Inventory Record listed those containers as located within ERS2.	Major	Approximately 200 containers of acid and alkaline wastes were stored in an unpermitted area with no secondary containment. HW stored in undocumented locations resulted in mismanagement and illegal storage.	Moderate	200 containers were not properly tracked. However, the facility properly tracked other HW containers on site, so the requirement functioned to some extent.	20	No	n/a	0.00	20
	3	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66270.30 and HWFP Part III, Special Conditions, Page 15, Section 2	On multiple occasions, the facility stored HW in areas not authorized by its HWFP. On or about 6/29/2015, the facility stored approximately 200 containers containing HW outside of the permitted storage unit ERS-2. On or about 8/18/2015, the facility stored approximately 24 55-gallon containers of HW outside the permitted storage unit ERS-2. On 8/18/2015 and 9/23/2015, the facility stored HW in roll off bins and super sacks of HW copper filter cake north of the laboratory. On 9/23/2015, inspectors observed HW in a cabinet located on the first floor of the laboratory.	Major	Numerous containers of acid and alkaline waste were stored in unpermitted areas. Improper storage of incompatible wastes could cause potential harm to human health or the environment. In addition, no secondary containment was present in this unpermitted area.	Major	The facility did not have a permit to store HW in these area, nor did it attempt to obtain a permit modification to store these incompatible wastes together in the unpermitted area. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25

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EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023		etc.)	
	4	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202(a); 22 CCR 66270.30, 66264.177(c); and HWFP, Part III, Section F3	On multiple occasions, the facility illegally stored incompatible HW without a berm, wall, or dike to separate the wastes: (1) on 6/29/2015, the facility stored one 275-gallon tot of acidic HW, two 55-gallon containers of acidic HW, and one 5-gallon container of acidic HW next to several containers of alkaline HW; (2) on 6/30/2015, the facility stored the same 5-gallon container of acidic HW next to several containers of alkaline HW; (3) on 7/15/2015, the facility stored two 55-gallon containers of acidic HW next to several containers of alkaline HW; and (4) on 8/21/2015, the facility stored one 55-gallon container of alkaline HW next to several containers of acidic HW.	Major	Wastes involved were: sulfuric acid, nitric acid, and sodium hypochlorite in liquid form. Volumes ranged from 55 to 275 gallons. The incompatible wastes were stored without a berm, wall, or dike to separate the wastes. In addition, no secondary containment was present, representing a high potential to create a reaction involving heat or fire that could cause injury to workers and harm to the environment.	Major	Multiple instances of storage of incompatible wastes were observed over the course of the multi-day inspection in various locations at the facility. The violation deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25
	5**	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25189.2(a)	The facility made multiple false representations in its Operating Record and Inspection Reports: (1) on or about 6/30/2015, the facility falsely represented in its Container Location Inventory Record that 200 containers of HW were being stored within permitted storage unit ERS1 or ERS2; (2) on or about 8/18/2015, the facility falsely represented in its Container Location Inventory Record that containers of HW were being stored within permitted storage unit ERS2; (3) on or about 8/18/2014, the facility incorrectly stated that in its Enviro Ware Tracking History Record that the date and time when a container of HW is removed from storage, processed and destroyed was identical; and (4) in its RCRA Daily Inspection Reports, the facility stated for the permitted storage unit ERS2, all containers were stored within the permitted unit, when DTSC inspectors observed at least 300 containers of HW outside the permitted unit.	Major	Approximately 200 containers of acid and alkaline waste were stored in an unpermitted area without secondary containment. HW stored in unknown locations resulted in mismanagement and illegal storage. The falsified records did not document the incompatible storage which resulted in a high potential to create a reaction involving heat or fire that could cause human injury and harm to the environment.	Major	The facility falsified the Operating Record on multiple occasions, which caused inaccurate information to be documented. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	25	No	n/a	0.00	25
	6**	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation and/or perform emergency clean-up operation or other corrective action for releases.	HSC 25202(a); 22 CCR 66270.30; HWFP	The facility conducted the following HW management activities that were not authorized by its HWFP: (1) used the Laboratory Pump; (2) used the Main Pump/Pan, also known as the Main Transfer Pump; (3) used and operated the Ammonia Scrubber System Tanks C-1 through C-3 as a treatment system; (4) used and operated a filter press in Area F to treat HW; (5) used and operated a filter press in Area S to treat HW; (6) used and operated a copper oxide centrifuge for HW treatment; (7) used and operated a portable filter press in Area S to treat HW; and (8) used and operated Tank C-40 for HW treatment.	Moderate	Wastes at issue: laboratory waste, copper carbonate, and unknown HW. Multiple processes were cited for unauthorized managing/treating HW around the facility. Tank C40 was not approved for treatment and may not have been designed for reactions that might occur during treatment. An open unit can potentially expose and harm workers. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Major	The facility was using multiple unpermitted systems without first obtaining a permit modification allowing for such use. Unauthorized HW management in unpermitted units constitutes a deviation from the requirement to such an extent that the requirement was completely ignored.	20	Yes	4/23/2014	25.00	25

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EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023		etc.)	
	7	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active period of facility operation.	HSC 25202; 22 CCR 66270.30; 22 CCR 66264.31; and HWFP Section III.G(6)(a)	The facility failed to maintain and operate the facility to minimize the possibility of a release of HW, as: (1) copper carbonate was observed on the ground next to the hopper bins located in Areas S; (2) a fire in the facility baghouse dryer resulted from filter bags catching on fire due to high temperature; (3) cracks and gaps were observed in the facility's Truck Loading/Unloading Area; and (4) solid pieces of HW were observed on the pavement east of the S-Area and west of the Dryer Room.	Moderate	Wastes at issue: copper carbonate, baghouse dust, and copper and lead above TTLC threshold levels. Inspectors observed copper carbonate, above TTLC limits for copper, on the ground next to hopper bins in a permitted area with no secondary containment. Lead and copper above TTLC limits were found in cracks of the asphalt in two separate locations of the facility. A faulty thermal switch resulted in a baghouse fire that could have harmed employees, the public, and the environment.	Major	Inspectors observed multiple instances of the facility's inability to minimize the possibility of a release throughout the facility and across multiple waste streams. The function of the requirement was rendered ineffective.	20	No	n/a	0.00	20
	8	The deviation from the requirement was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	22 CCR 66264.175(b)(1)	The facility failed to provide a containment system free of cracks or gaps, as inspectors observed: (1) containers of HW being stored on the asphalt surface located to the east and south of permitted storage unit ERS2, which was cracked and uncoated, exposing the soil beneath, and (2) one roll-off bin of HW copper filter cake stored on the asphalt located north of the laboratory, which was cracked and uncoated, exposing the subsurface below.	Moderate	Inspectors observed large volumes of containerized HW stored on asphalt surface that was cracked and uncoated. Lead and copper above TTLC limits were found in cracks of the asphalt in the unpermitted area. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Major	The permitted storage area contained cracks and was not coated, which allowed HW to come into contact with the soil beneath. A second non-permitted area also contained cracks in the asphalt where HW was being improperly stored. The HW management requirement for containment free of gaps and cracks was rendered ineffective because some of its provisions were not complied with.	20	No	n/a	0.00	20
	9**	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and/or delivered to an authorized HW facility. Waste type represents a significant threat to human health or safety.	HSC 25202	The facility failed to comply with conditions of its HWFP by performing the following HW management activities that were not authorized: (1) on 7/16/2015, the facility stored and treated cyanide HW prior to satisfying conditions set forth in its HWFP, Section IA and Section II; (2) on 7/16/2015, the facility stored three 275 gallon totes of cyanide HW in ERS2; and (3) on 9/9/2015, the facility treated cyanide HW in Tank J-2.	Major	Three 275-gallon totes of HW were observed in the permitted storage area. The facility was treating cyanide HW in Tank J-2 (a tank not authorized to treat cyanide). Cyanide is highly toxic. The volume and characteristics of the substances involved presented a major threat to public health, safety, and the environment.	Moderate	The facility was authorized to treat or store cyanide HW, but only if it satisfied conditions set forth in its HWFP which had not been met at the time of the inspection. While the activity was allowed by the facility's HWFP, specific permit criteria were not met for multiple instances noted. The requirement functioned to some extent, although not all of its important provisions were complied with.	20	No	n/a	0.00	20
	10	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	22 CCR 66262.11	The facility failed to make a HW determination for the following: (1) on 8/18/2015 and 9/23/2015, 6 super sacks and one roll-off bin of copper filter cake was observed being managed as excludable recyclable material, even though the facility was formally notified by DTSC on 7/8/2015, that it must manage copper filter cake as HW; (2) on 9/23/2015, a 5-gallon bucked containing honey-colored sludge waste, with no label, was observed under a sink in the laboratory. The sludge was tested and met the HW characteristic of corrosivity.	Moderate	Waste at issue: (1) six super sacks and one roll off bin of copper filter cake; (2) 5-gallon bucket of honey colored sludge waste with pH of 1 that meets the HW characteristic of corrosivity. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Moderate	Copper filter cake was labeled as ERM, resulting in improper management. One 5 gallon bucket was stored in an open container with no label under the laboratory sink. Failure to conduct a HW determination in these two instances resulted in the waste being improperly managed / handled by the facility. The requirement functioned to some extent as other wastes in the area were managed correctly.	15	No	n/a	0.00	15
	11**	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25160 and 22 CCR 66262.20	The facility shipped HW copper filter cake without a HW manifest, without completing any of the required manifests, or providing any manifest to DTSC.	Moderate	The facility shipped HW copper filter cake without a HW manifest on multiple occasions. The volume and characteristics of the substances involved presented a moderate threat to public health, safety, and the environment.	Minimal	As noted in the previous violation, by failing to conduct a HW determination, the facility improperly characterized the copper filter cake as ERM and overlooked the requirement to use a manifest during shipment, as the copper filter cake was a HW. As a result, the function of the requirement was rendered ineffective.	6	No	n/a	0.00	6
Inspection Violation Score:													216.00

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Inspection Type:	FCI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00
Inspection Date:	12/8/2015	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00
Inspection Date:	12/15/2015**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FUI												
Class I Violations:	1	The deviation from the requirements was significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	HSC 25202; 22 CCR 66270.30; 22 CCR 66264.31; and HWFP Section III.G(6)(a)	The facility failed to maintain and operate facility to minimize the possibility of fire, exposure or release of HW or HW constituents to the air, soil or surface water which could threaten human health or the environment.	Minimal	Inspectors observed copper carbonate on the pavement in permitted Area S behind hopper bins, which contained copper carbonate. Concentration levels and volume of HW in violation were not provided.	Minimal	Unknown practices by the facility led to the release of HW onto the pavement. As a result, a minimal extent of deviation is assigned.	2	Yes	6/29/2015	25.00	2.5
	2	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility and/or prevent releases of HW or constituents to the environment during the active or post closure period of facility operation.	22 CCR 66262.11	The facility failed to make a HW determination.	Minimal	Inspectors observed one full roll-off bin of copper filter cake adjacent to Tanks W5 and W6 that was improperly labeled as Excluded Recyclable Material. HW concentration levels for copper were not provided, and the waste cited in violation was solid, resulting in a minimal threat to human health and the environment.	Minimal	It is unknown what steps the facility took, if any, to make a HW determination. As a result, a minimal extent of deviation is assigned.	2	Yes	6/29/2015	25.00	2.5
	3**	The deviation from the requirements was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202 and 22 CCR 66270.30	The facility stored HW in an unauthorized area.	Minimal	Inspectors observed one roll off bin containing copper filter cake in an unpermitted area adjacent to Tanks W5 and W6. HW concentration levels for copper were not provided, and the waste cited in violation was solid, resulting in a minimal threat to human health and the environment.	Minimal	The permit did not authorize storage of HW copper filter cake in this area. The act deviated from the requirement to such an extent that the function of the requirement was rendered ineffective.	2	Yes	6/29/2015	25.00	2.5
	4	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that HW are destined for and delivered to an authorized HW facility.	HSC 25202 and 22 CCR 66270.30(a)	The facility failed to comply with the conditions of its HWFP by performing activities not authorized by its HWFP.	Minimal	Multiple instances for multiple process listed: (1) Main Pump. (2) Ammonia Scrubber System Tanks C1, C2 and C3. (3) Filter Press in F Area. (4) Filter Press in S Area and (5) Copper Oxide Centrifuge. Most of the instances cited were for unpermitted ancillary equipment which presented a minimal threat to human health and the environment.	Major	Multiple instances of unauthorized management activities throughout the facility. The act deviated from the requirement to such an extent that the requirement was rendered ineffective.	15	Yes	6/29/2015	25.00	18.75
Inspection Violation Score:													26.25

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC				10 Year Date Range:		2013-2022		Permit Effective Date:		7/29/1991		Link to EnviroStor	
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670				Number of Inspections:		18		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs,	
EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023		etc.)	
Inspection Date:	5/1/2017	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00
Inspection Date:	6/30/2017 CEI & 8/30/2017 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00
Inspection Date:	5/30/2018	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI / Transporter												
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0
Inspection Violation Score:													0.00
Inspection Date:	10/9/2018**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FCI												
Class I Violations:	1**	The deviation from the requirement was significant enough that it could have resulted in a failure to assure that proper closure and post closure activities will be undertaken.	HSC 25202; HWFP Modified Part V.(E)(7)(Pond 1 Closure Status Report); and 22 CCR 66265.113(a)(6)	The facility failed to implement closure of Pond 1, as required by its HWFP.	n/a	Pond 1 was a surface impoundment that was not closed and housed wastewater treatment Tanks WW1 and WW2. The facility sampled around Pond 1. The Pond was empty and was used as secondary containment for the tanks. HW included wastewater containing inorganic constituents such as ammonia, lead, zinc, cadmium, copper, chromium, iron, nickel, and arsenic. The dimensions of the historic pond are approximately 35x36x3 feet.	n/a	Pond 1 Closure Plan Approval modification decision was reinstated effective 9/20/2017 for implementation by the facility. According to the schedule, closure of Pond 1 was to begin by 3/20/2018 and closure was required no later than 9/20/2018. As of the date of the inspection, closure of Pond 1 had not begun. The act deviated from the requirement to such an extent that the requirement was completely ignored and none of its provisions were complied with.	0	No	n/a	0.00	0
Inspection Violation Score:													0.00
Inspection Date:	12/21/2018**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	FRR												
Class I Violations:	1**	The deviation from the requirements was significant enough that it could result in a failure to assure adequate financial resources to pay for facility closure.	22 CCR 66264.143(b)(6); 22 CCR 66264.143(b)(7); 22 CCR 66265.143(b)(6); and 22 CCR 66265.143(b)(7)	The facility's closure cost mechanism (Financial Guarantee Bond & Standby Trust) was underfunded.	Moderate	With inadequate financial assurance for closure in excess of \$1.6 million, if the site was to close, the public would be responsible for paying the deficiency. Such a deficiency in financial assurance directly impacts the ability to respond to events that impact human health or the environment.	Minimal	The facility's underfunded financial assurance for closure was such that it rendered the requirement of having coverage ineffective as it would not be sufficient to cover closure costs.	6.00	No	n/a	0.00	6
Inspection Violation Score:													6.00
Inspection Date:	9/4/2019 CEI & 4/17/2020 FRR**	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score
Inspection Type:	CEI & FRR												
Class I Violations:	1**	The violation was a deviation from the requirements significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment from three leaking totes and one super sack during the active period of facility operation.	HSC 25202; 22 CCR 66270.30 and 66264.171; and HWFP (91-3-TS-002) Section III, Section C "Storage Conditions" Section 2, page 15.	On or about 9/4/2019, the facility failed to transfer hazardous wastes from leaking containers to containers in good condition.	Moderate	Three totes of 330-gallons each containing nitric acid nickel (leaking tote in ERS-1), waste permanganate (leaking tote #1 in ERS-2), and ammonia copper stripper etchant (leaking tote #2 in ERS-2) were cited. In addition, one super sack of solid HW containing copper filter cake was observed leaking liquid (less than 5 ounces in total in ERS-2, Photo 8) at the time of the inspection. The wastestreams cited in violation were corrosive, toxic, and/or ignitable. The HW in the totes and a super sack were stored in permitted areas within secondary containment. The amount and characteristics of the HW cited in the permitted HW storage units presented a moderate potential for harm to public health / facility workers and the environment.	Moderate	DTSC inspectors observed leaking containers in areas ERS-1 and ERS-2. Two of the four containers identified (one tote in ERS-1 (Photo 1) and one super sack in ERS-2 (Photo 8)) were observed to be dripping liquid at the time of the inspection. The leaks from the other two containers identified were not dripping at the time of the inspection but a residual build up of material was observed in the vicinity of the mouth of the container valve (Photos 4 and 6). ERS-1 and ERS-2 were two permitted units out of eight permitted units inspected and represented a moderate extent of deviation, as it demonstrated that the requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC				10 Year Date Range:		2013-2022		Permit Effective Date:		7/29/1991			Link to EnviroStor	
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670				Number of Inspections:		18		Permit Expiration Date:		7/29/1996			(Inspection Reports, SOVs,	
EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023			etc.)	
	2**	The violation was a deviation from the requirements significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment from three leaking totes and one super sack during the active period of facility operation.	HSC 25202; 22 CCR 66270.30(a) and 66264.175(b)(1); and HWFP Section III, Section M "Inspections" page 27.	On or about 9/4/2019, the facility failed to document and fix leaks in containers and abrasions to secondary containment.	Moderate	Three totes of 330-gallons each containing nitric acid nickel (leaking tote in ERS-1), waste permanganate (leaking tote #1), and ammonia copper stripper etchant (leaking tote #2) were cited. In addition, one super sack of solid HW containing copper filter cake was cited in violation leaking liquid (less than 5 ounces in total) at the time of the inspection. The wastestreams cited in violation were corrosive, toxic, and/or ignitable. A leaking valve on the side of a tank was cited in S-Area and another leaking valve on the side of a tank with a visible abrasion was cited in F-Area. Cracks and abrasions were observed in the secondary containment of Area ERS-1. The leak observed from the F-Area tank valve was not dripping at the time of the inspection (Photo 20). The HW containers (totes, super sack, and tank valves) cited were stored in permitted areas. The total volume of HW stored in the containers and tanks cited in violation had the potential to be released if leaks were not fixed in a timely manner. The amount and characteristics of the HW stored in the containers cited in violation presented a moderate potential for harm to public health / facility workers and the environment.	Moderate	DTSC inspectors observed leaking containers in Areas ERS-1 and ERS-2, and cracks and abrasions in the secondary containment of Area ERS-1, the leaking valve on the side of the tank was cited in S-Area, and the tank with a leaking valve and visible abrasion was cited in F-Area. Two of the four containers identified (tote in ERS-1 (Photo 1) and super sack in ERS-2 (Photo 8)) and one of the two tank valves (S-Area tank valve (Photos 13 and 14)) were observed to be dripping liquid at the time of the inspection. S-Area, F-Area, ERS-1, and ERS-2 were four permitted units out of eight permitted units inspected and represented a moderate extent of deviation as it demonstrated that the requirement functioned to some extent, although not all of its important provisions were complied with.	15	No	n/a	0	15.00	
	3	The violation was a deviation from the requirements significant enough that it could have resulted in a failure to prevent releases of HW or constituents from the satellite accumulation container to the environment during the active period of facility operation.	HSC 25202; 22 CCR 66270.30(a) and 66264.173(a); and HWFP Part III Special Conditions Section 2 "Storage in Containers" page 15.	On or about 9/4/2019, the facility failed to maintain it's laboratory's satellite accumulation storage container in good condition and failed to keep it closed.	Minimal	Approximately 10 gallons of waste solids, arsenic, chrome, cadmium, lead, and other debris was cited in violation which were corrosive and toxic hazardous wastestreams. The concrete beneath the laboratory container cited was observed to be stained. However, the small volume associated with the single facility laboratory container of hazardous waste cited in violation represented a minimal potential for harm to public health / facility workers and the environment.	Major	DTSC inspectors observed a HW label affixed to the container. The container was observed on the floor next to a trash can used for solid waste debris (nitrile gloves, plastic bottles, and paper materials were observed within), and was observed to be approximately 1.5 feet tall, rectangular in shape, and made of black plastic. The container was stored in an open space beneath an overhanging counter. After moving the container out to further inspect, inspectors observed the flooring where the container was stored to be concrete, which was stained. The top of the container was observed to be open with no mechanism for securing the container closed. Inspectors also observed brownish stains on the lid, sides of the container, and upon the label. The violation deviated from the requirement to such an extent that the function of the requirement was rendered ineffective because some of its provisions were not complied with.	15	No	n/a	0	15.00	

Violation Scoring Matrix

Facility Name: PHIBRO-TECH INC				10 Year Date Range:		2013-2022		Permit Effective Date:		7/29/1991		Link to EnviroStor		
Address: 8851 DICE RD SANTA FE SPRINGS, CA 90670				Number of Inspections:		18		Permit Expiration Date:		7/29/1996		(Inspection Reports, SOVs,		
EPA ID: CAD008488025				Total Number of Violations Scored:		29		Date VSP Completed:		4/19/2023		etc.)		
	4	The violation was a deviation from the requirements significant enough that it could have resulted in a failure to perform emergency clean-up operation or other corrective action for releases by preventing access to HW containers due to blocked aisle space.	22 CCR 66264.35	On or about 9/4/2019, the facility stored hazardous waste containers in such a way that there was no aisle space between containers located in Area ERS-2.	Minimal	Two super sacks containing copper filter cake solid hazardous waste (non-RCRA) were cited in violation. The super sacks cited in violation blocked the aisle preventing adequate access and egress from one direction and could have slowed down timely emergency clean-up if a sudden unplanned release of hazardous waste occurred, representing a minimal potential for harm to public health / facility workers / emergency responders and the environment.	Moderate	DTSC inspectors observed the super sacks completely blocking aisle space for one aisle in Area ERS-2. The storage area was set up to contain hundreds of storage containers, and there were yellow lines painted on the ground to serve as a guideline for storage to allow for aisle space. The waste stored in yellow lines on either side of one aisle converged, completely blocking the aisle. There were two super sacks blocking the aisle at the time of inspection. One exit route was blocked because the super sacks were stored such that you could only enter and exit from one direction. While only two containers were cited in violation, they prevented unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment to a portion of the Area ERS-2 Storage Area in case of an emergency. The violation represented a moderate extent of deviation as it demonstrated that the requirement functioned to some extent (a portion of the storage area was blocked), although not all of its important provisions were complied with.	6	No	n/a	0	6.00	
	5**	The violation was a deviation from the requirements significant enough that it could have resulted in a failure to prevent releases of HW or constituents to the environment as potentially impacted materials not remediated could be released during the active period of facility operation and during the closure fieldwork.	22 CCR 66265.113(b)	On or about 9/4/2019, DTSC inspectors observed that construction and remediation work was in progress in Pond 1 and closure of the unit is not yet completed.	Minimal	The volume of the hazardous waste in violation was not provided. The hazardous wastestreams associated historically with Pond 1 (settling pond) included wastewater containing inorganic constituents such as ammonia, lead, zinc, cadmium, copper, chromium, iron, nickel, and arsenic. Justification for any higher potential for harm designation above minimal was not available without an estimate of the volume of hazardous waste cited in violation.	Major	The facility was required to close Pond 1 in accordance with the approved closure plan within 180 days of March 20, 2018 pursuant to DTSC's December 4, 2015 and June 7, 2016 letters. The facility should have completed closure of Pond 1 by September 17, 2018 and had therefore been out of compliance for approximately one year at the time of the inspection. The violation deviated from the requirement to such an extent that the function of the requirement was rendered ineffective resulting in a major extent of deviation designation.	15	No	n/a	0	15.00	
Inspection Violation Score:														66.00
Inspection Date:	12/10/2020	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score	
Inspection Type:	FCI/GAR													
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00	
Inspection Violation Score:														0.00
Inspection Date:	9/27/2021 CEI & 10/19/2021 FRR	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score	
Inspection Type:	CEI & FRR													
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00	
Inspection Violation Score:														0.00
Inspection Date:	5/12/2022	Class I Justification	Citation	Violation	Potential for Harm	Potential for Harm Justification	Extent of Deviation	Extent of Deviation Justification	Initial Score	Repeat (Yes/No)	Date(s) of Previous Violation	Adjustment Factor (%)	Adjusted Score	
Inspection Type:	FCI													
Class I Violations:	0	n/a	n/a	No Class I Violations	n/a	n/a	n/a	n/a	0	n/a	n/a	n/a	0.00	
Inspection Violation Score:														0.00

Violation Scoring Matrix

Facility Name:	PHIBRO-TECH INC	10 Year Date Range:	2013-2022	Permit Effective Date:	7/29/1991	Link to EnviroStor (Inspection Reports , SOVs , etc.)
Address:	8851 DICE RD SANTA FE SPRINGS, CA 90670	Number of Inspections:	18	Permit Expiration Date:	7/29/1996	
EPA ID:	CAD008488025	Total Number of Violations Scored:	29	Date VSP Completed:	4/19/2023	

FACILITY VIOLATIONS SCORING PROCEDURE SCORE				
Inspection Number	Number of Violations Scored	Inspection Type(s)	Inspection Date(s)	Inspection Violation Score
1	2	CEI & FRR	5/28/2013 CEI & 6/19/2013 FRR	35.00
2	1	FUI	1/27/2014	18.75
3	1	FCI	4/23/2014**	18.75
4	3	FCI & GAR	4/28/2014**	6.00
5	0	FUI	1/28/2015	0.00
6	11	CEI & FRR	6/29/2015 CEI & 11/16/2016 FRR**	216.00
7	0	FCI	8/7/2015	0.00
8	0	FCI	12/8/2015	0.00
9	4	FUI	12/15/2015**	26.25
10	0	FCI	5/1/2017	0.00
11	0	CEI & FRR	6/30/2017 CEI & 8/30/2017 FRR	0.00
12	0	CEI / Transporter	5/30/2018	0.00
13	1	FCI	10/9/2018**	0.00
14	1	FRR	12/21/2018**	6.00
15	5	CEI & FRR	9/4/2019 CEI & 4/17/2020 FRR**	66.00
16	0	FCI/GAR	12/10/2020	0.00
17	0	CEI & FRR	9/27/2021 CEI & 10/19/2021 FRR	0.00
18	0	FCI	5/12/2022	0.00
Sum of Inspection Violation Scores				392.75
*FACILITY VSP SCORE				21.82

*FACILITY VSP SCORE = Sum of Inspection Violation Scores/Total Number of Inspections conducted in 10 year (calendar) timeframe
**Indicates these violations were disputed. See Dispute Document Decision for specific information related to the dispute decision and final score(s). Scores in red indicate a revised final score. Scores in black remain unchanged.

- CCR = California Code of Regulations

CDI = Case Development Inspection

CEI = Compliance Evaluation Inspection

CI = Complaint Investigation

DTSC = Department of Toxic Substances Control

EPA ID = Environmental Protection Agency Identification

FCI = Focused Compliance Inspection

FII = Focused Incident Inspection

FRR = Financial Records Review

FSD = Facility Self Disclosure
- FUI = Follow-Up Inspection

GAR = Groundwater Audit Report

HSC = Health and Safety Code

HW = Hazardous Waste

HWFP = Hazardous Waste Facility Permit

n/a = Not Applicable

NFRR = Non-Financial Record Review

RCRA = Resource Conservation and Recovery Act

SOV = Summary of Violations

VSP = Violations Scoring Procedure