

TIERED PERMITTING OVERVIEW

M-B1

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Emphasis on Overview



Closer Than This



But Not This Close

Poll Question 1

Tell Me Your Role and Experience on Tiered Permitting

ROLE

- CUPA/Regulator
- Industry/Regulated Entity
- Consultant
- Other

EXPERIENCE LEVEL

- Little Knowledge
- Somewhat Familiar
- Good Experience
- I Can Fake It

Tiered Permitting Overview – Agenda

- **Background**
- Overview of Tiers
- The Wastes and Treatment Processes
- Assessing Systems for Applicability
- FTU vs. TTU
- Compliance Requirements – PBR
- Compliance Requirements – CA
- Compliance Requirements – CEL/CESW/CESQT
- Common Violations/Issues and Suggestions

Disclaimer



- You must refer to the regulations (CA Title 22, Div. 4.5), statutes [Health & Safety Code (HSC) Div. 20, Ch. 6.5], or DTSC Guidance
 - Abbreviated content in some references
 - Need to review the facts of each situation
- We will focus on more common industry situations
 - Not household hazardous waste collection facilities
 - Not school hazardous waste collection, consolidation, and accumulation facilities

Background

- EPA (40 CFR 270) does not require a permit for the following hazardous waste treatment activities:
 - Totally enclosed treatment facilities
 - Directly connected to process equipment to avoid releases
 - Elementary neutralization units
 - Treatment of wastes hazardous solely due to corrosivity
 - Wastewater treatment units
 - Tank treatment prior to POTW/NPDES permitted discharge
 - Generator self-treatment in tanks or containers

California Statutory Differences

- California's Toxic Substances Control Program facility permitting predated RCRA regulations
- California became authorized to enforce RCRA on August 1, 1992
- Measures were needed to correct regulatory misalignments



California Statutory Differences

- AB 1772* overhauled the state permitting program and established a five-tier permitting system
 - Filled in the gap between federal exemptions from permitting and CA hazardous waste control program
 - Balanced regulatory requirements with risks posed by the facility
 - Referred to as Tiered Permitting Program (TPP)

Facilities Subject to TPP

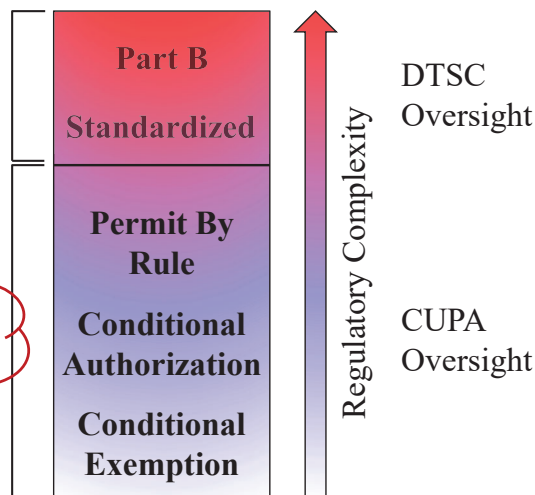
- California generators **treating** their own hazardous waste that is:
 - Non-RCRA hazardous waste
 - RCRA hazardous waste that does not need an EPA treatment permit
 - Totally Enclosed Treatment, Elementary Neutralization, Wastewater Treatment; or
 - Generator treatment in tanks or containers

Treatment Tiers

Applies to Off-Site
Hazardous Waste
(Commercial TSDFs)

**This is what we will be
talking about**

Tiers for On-Site
Waste Treatment by
Generators



Broad Definition of “Treatment”

- Defined in HSC 25123.5

Except as provided in (b) and (c) means **any method, technique, or process** which is not otherwise excluded from the definition of treatment by this chapter and which is designed to **change the physical, chemical, or biological character or composition of any hazardous waste** or any material contained therein, or which removes or reduces its harmful properties or characteristics for any purpose.

Exclusions from Treatment

- (b)(2)(A) **Sieving or filtering** liquid hazardous waste to remove solid fractions, without added heat, chemicals, or pressure, **as the waste is added to or removed from a storage or accumulation tank or container.** For purposes of this subparagraph, **sieving or filtering does not include absorption, reverse osmosis, or ultrafiltration.**



- (b)(2)(B) **Phase separation** of hazardous waste during storage or accumulation in tanks or containers, if the separation is unaided by the addition of heat or chemicals.

Exclusions from Treatment

- (b)(2)(C) **Combining two or more waste streams** that are not incompatible into a single tank or container if both of the following conditions apply:
 - (i) The waste streams are being **combined solely for the purpose of consolidated accumulation or storage** or consolidated offsite shipment, and they are not being combined to meet a fuel specification or to otherwise be chemically or physically prepared to be treated, burned for energy value, or incinerated.
 - (ii) The combined waste stream is managed in compliance with the **most stringent of the regulatory requirements** applicable to each individual waste stream.

Exclusions from Treatment

- (b)(2)(D) **Evaporation of water** from hazardous wastes in tanks or containers, such as breathing and evaporation through vents and floating roofs, without the addition of pressure, chemicals, or heat other than sunlight or ambient room lighting or heating.
- (c) “Treatment” does not include the combination of glutaraldehyde or orthophthalaldehyde, which is used by medical facilities to disinfect medical devices, with formulations containing glycine as the sole active chemical, if the process is carried out on site.

Exclusions from Treatment

- HSC 25201.12 “Notwithstanding any other provision of law, a hazardous waste facilities permit or other grant of authorization from the department... are not required for a facility, with regard to the facility’s operation of a **physical process to remove air pollutants from exhaust gases** prior to their emission to the atmosphere, as permitted by an air pollution control district or an air quality management district, unless a permit is required for that operation pursuant to the federal act.”

Recycling (Brief Comment)

Not Subject to Tiered Permitting:

- HSC 25143.2(b) – Not treatment if used/reused in industrial process or returned to original process (but no reclamation allowed) (Excluded Recyclable Materials or ERM)
- HSC 25143.2(c) – Allows treatment without full or tiered permitting if waste generated on site is recycled on site and managed as hazardous waste
- HSC 25143.2(d) – Identifies non-RCRA hazardous waste recycled in certain ways are ERM (some allow filtering, screening, grinding, sorting, etc.)

What Treatment May Look Like



What Treatment May Look Like



Tips for Industry and Inspectors



- If you have a wastewater discharge to sewer or NPDES:
 - Look upstream to determine all wastes that are discharged to sewer
 - Are they hazardous at point of generation?
 - Are the waste characteristics changed (i.e., “treated”) by simply combining wastewater streams?
- Look for treatment chemicals (e.g., acids/bases for pH adjustment or flocculants)
- Ask about any prior processing of haz or non-haz wastes sent off site

Tips for Industry and Inspectors



- It is not always in the wastewater discharge (Clamshell Evaporator for Drums of Wet Sludge)



What Treatment May Look Like

Note Cone Bottom –
Used to Collect Solids



Note Tank for Adding
Treatment Chemicals

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Permit By Rule (PBR)

- Higher hazard waste streams (stronger acids, more metals, etc.)
- Higher volumes (varies by waste)
- More processes are permissible under this tier
- May include combination of waste treatment processes
- Cyanide waste streams

Conditional Authorization (CA)

- Usually a hazardous waste due to only one characteristic
- Often metal-containing wastewaters
- Limits are frequently:
 - 5,000 gallons per month
 - 45,000 pounds per month

Conditional Exemption (CE)

- Smaller quantities
- Less hazardous waste streams
- Low-risk treatment techniques
 - Container rinsing for purposes of making it empty (Section 66261.7)
 - Neutralization

Program Has Evolved

- Some CE waste streams were not originally included and required CA or PBR, but are now CE
 - Demineralizer regeneration wastes
 - Biotech Clean-In-Place (CIP) kill wastes
 - Food wastes
 - Laboratory wastes



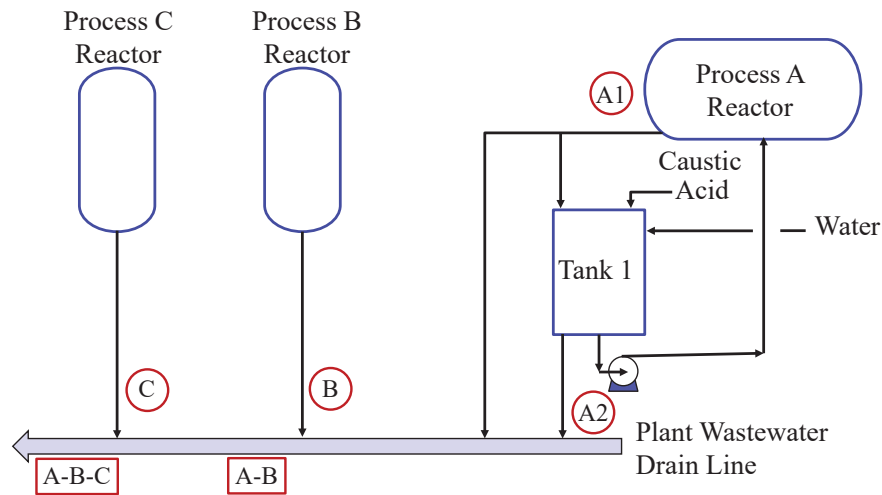
Important Consideration for TPP

- Waste must be hazardous at point of generation (POG)
- Not subject to permitting under RCRA (e.g., totally enclosed treatment system, self treatment in tanks or containers, elementary neutralization)
- Must meet waste description
- Treated by one of the methods specified

Point of Generation

- Not always clear
- Work upstream to find point of discard
 - Not always at sewer discharge
 - Could be discharge from process to line that ultimately goes to sewer
 - Look for other streams entering the wastewater line or the collection vessel/batch tank

Example – Points of Generation



Points of Generation

- A1 POG only if it goes to a drain
- If system flushes first with caustic then later with acid, A2 may be POG if Tank 1 is part of process or Tank 1 is Treatment Tank
- B and C are POGs
- A-B or A-B-C are separate POGs if the waste stream changes after addition
- Treatment tier based on waste characteristic and volumes at each point

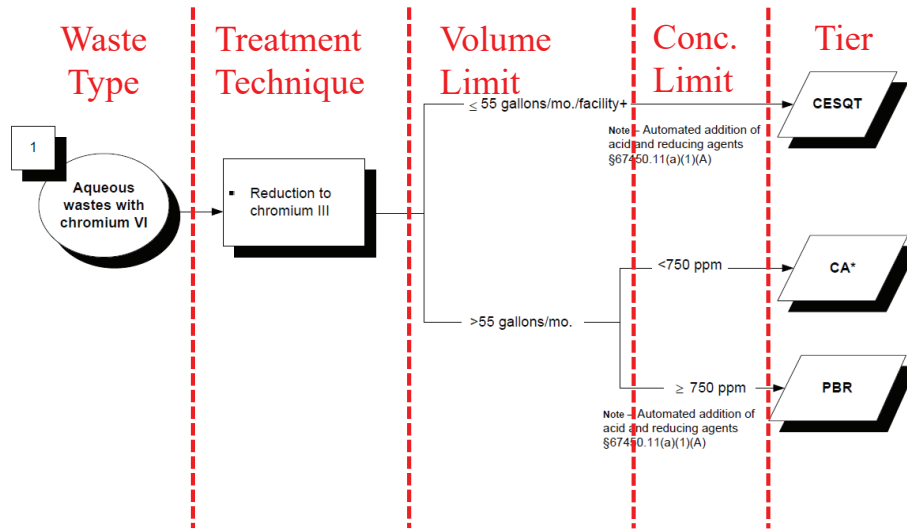
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The DTSC Tiered Permitting Flowchart

- The simplest and best reference (10/2017) – search “tiered permitting flowchart” at www.dtsc.ca.gov
- Read as five columns:
 - Waste type and limits
 - Treatment techniques
 - Volume limits
 - Concentration limit (not always)
 - Applicable tier

Example

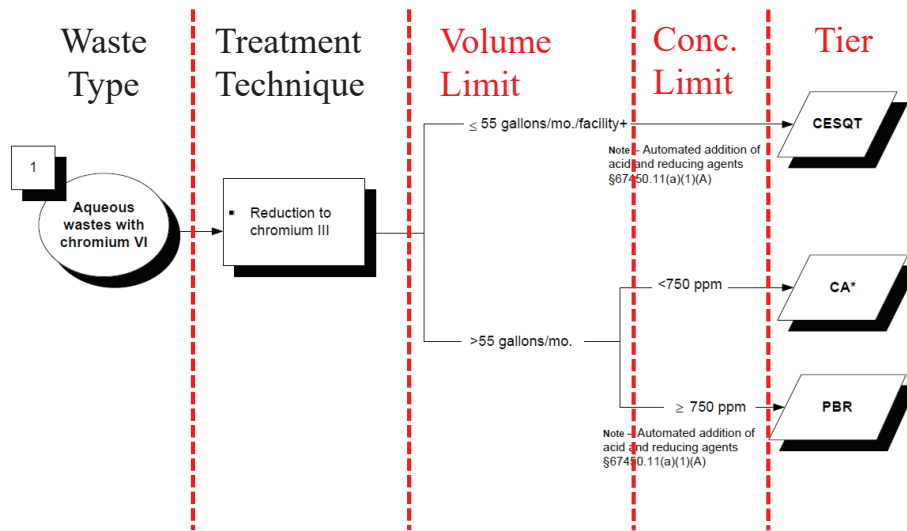


Wastes and Treatment Methods

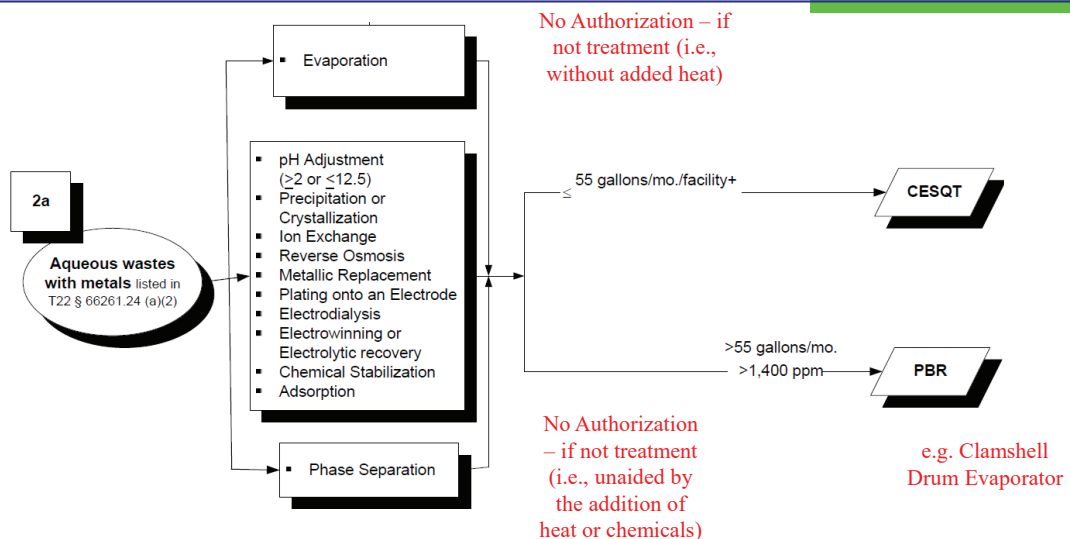
See Supplemental Handout on Waste Streams and Allowable Treatment Methods

| Waste Stream | Allowable Treatment Methods |
|---|--|
| 1. Aqueous wastes with Chromium-VI | <ul style="list-style-type: none"> Reduction to Chromium-III |
| 2a. Aqueous wastes with metals [listed in Section 66261.24(a)(2)] [CAM 17 List] | <ul style="list-style-type: none"> Evaporation pH adjustment Precipitation or crystallization Ion exchange Reverse osmosis Metallic replacement Plating onto an electrode Electrodialysis Electrowinning or electrolytic recovery Chemical stabilization Adsorption Phase separation |

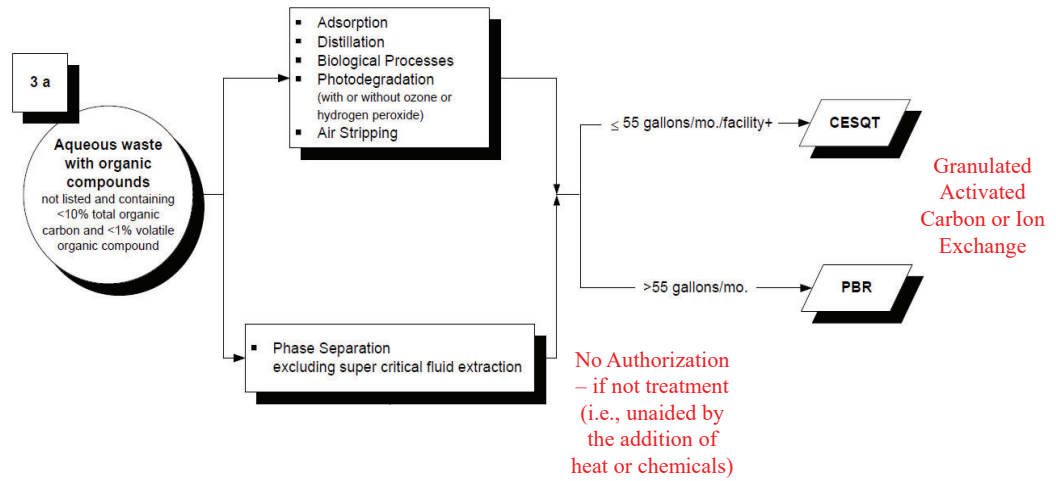
Then Look at Other Factors for Proper Tier



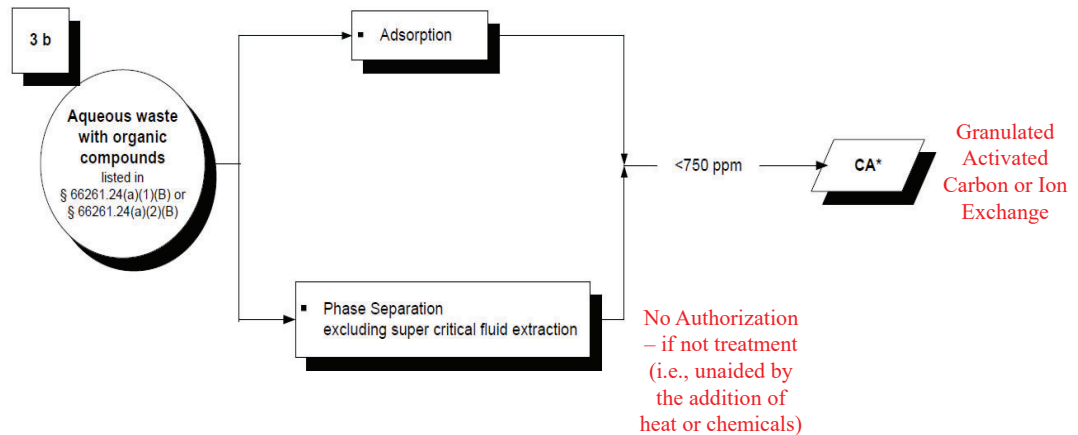
Examples



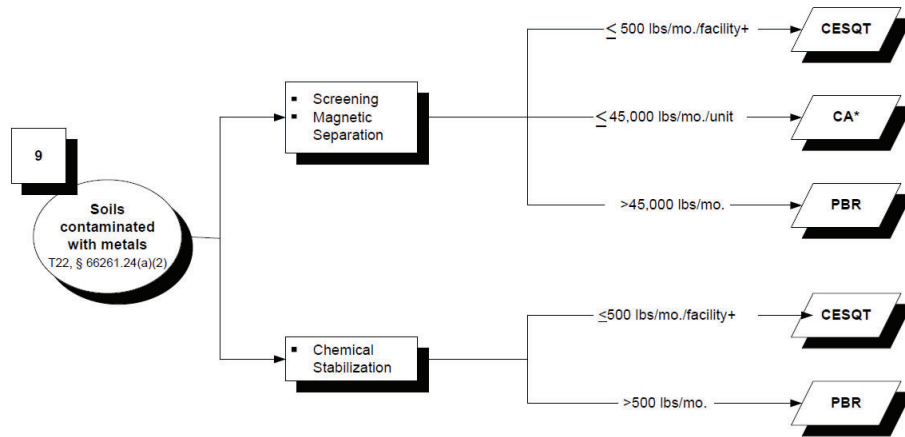
Examples



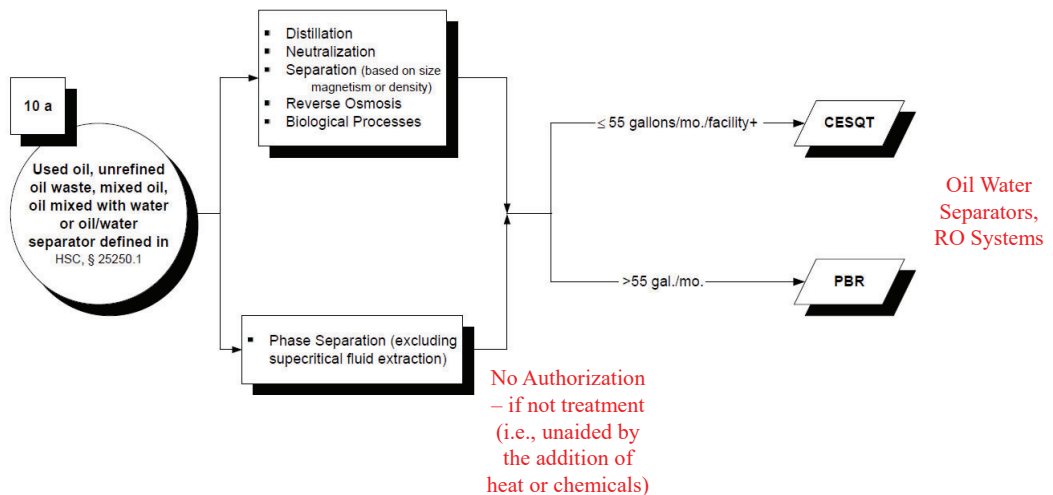
Examples



Examples



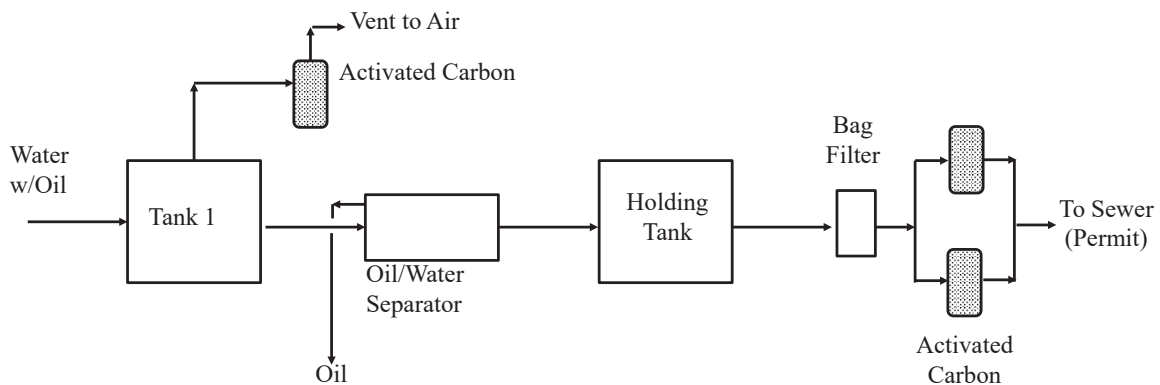
Examples



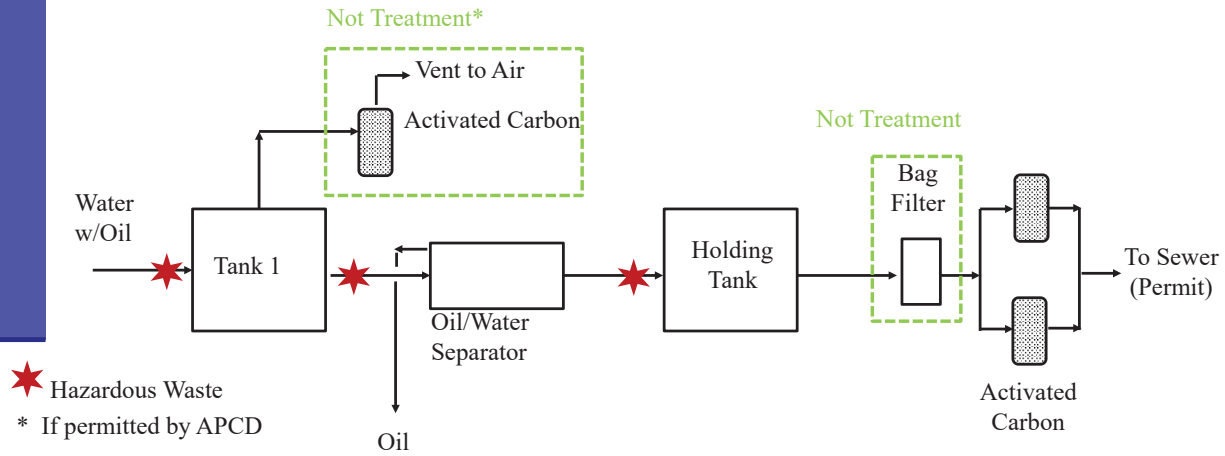
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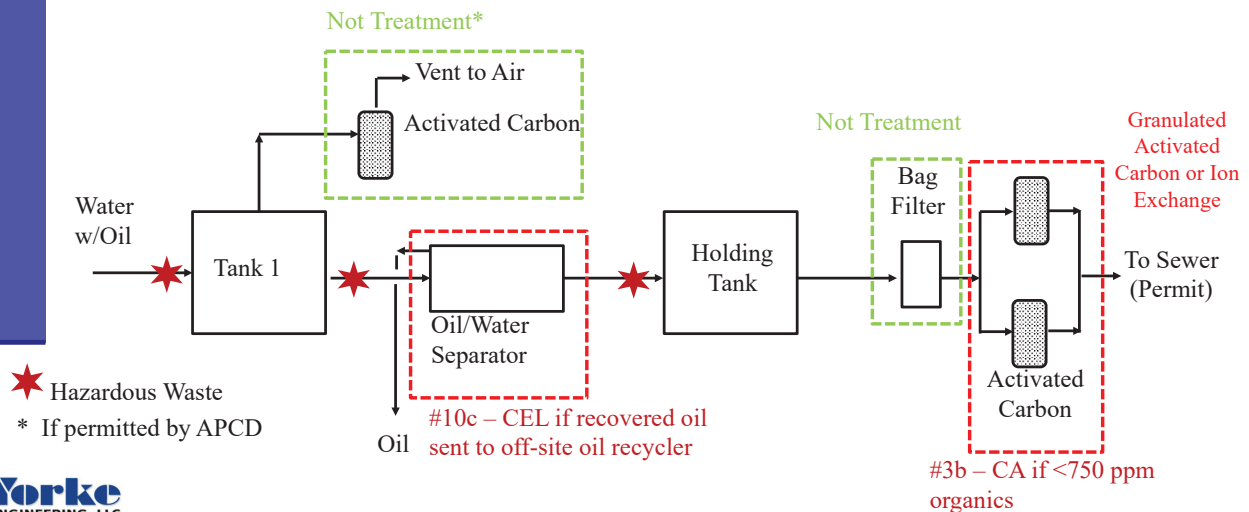
Example 1 – Evaluating a Process



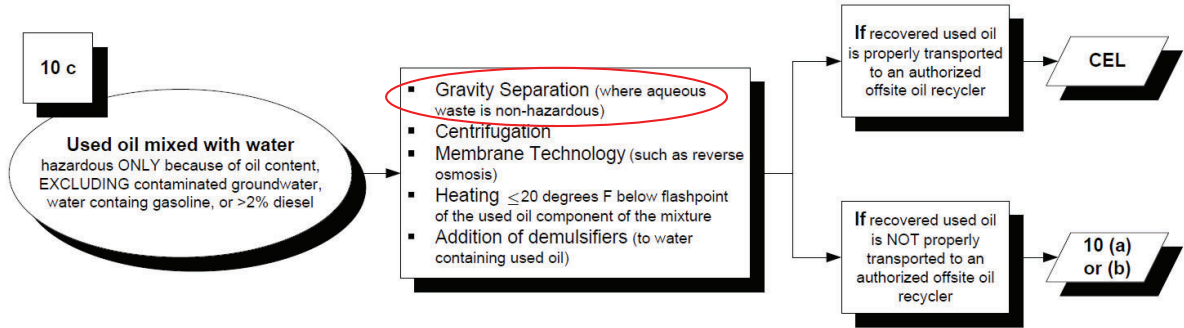
Example 1 – Evaluating a Process



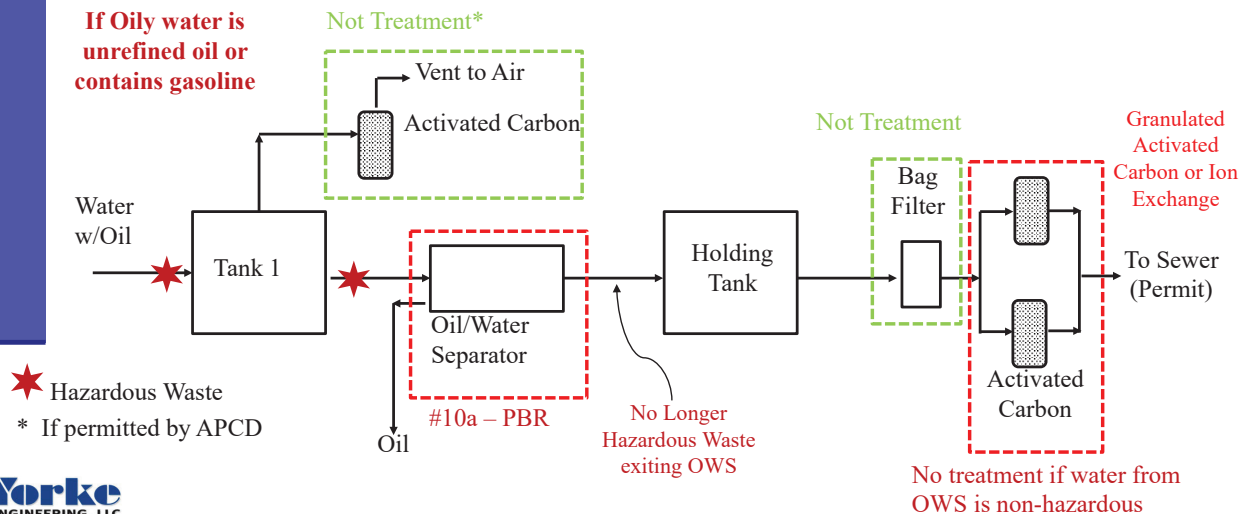
Example 1 – Evaluating a Process



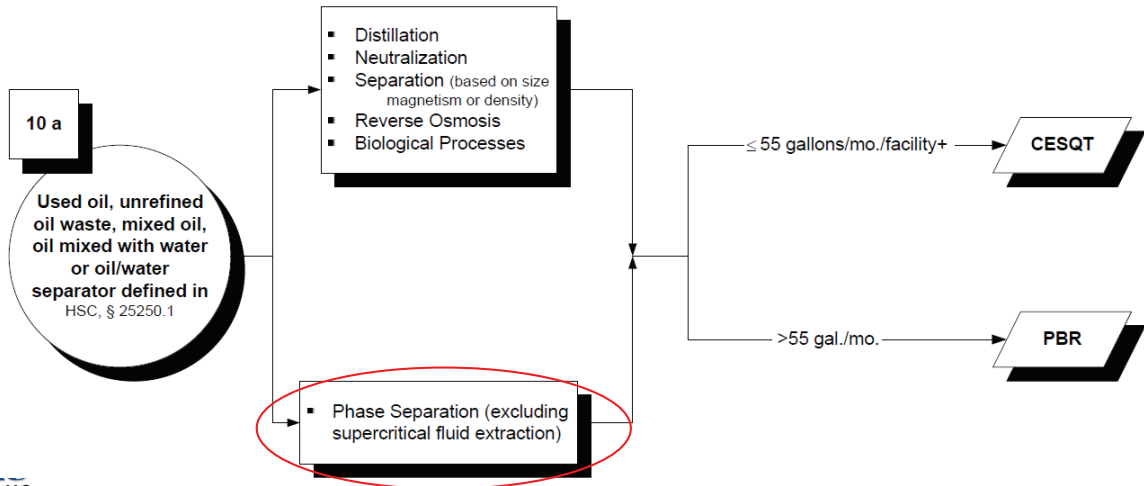
Example 1



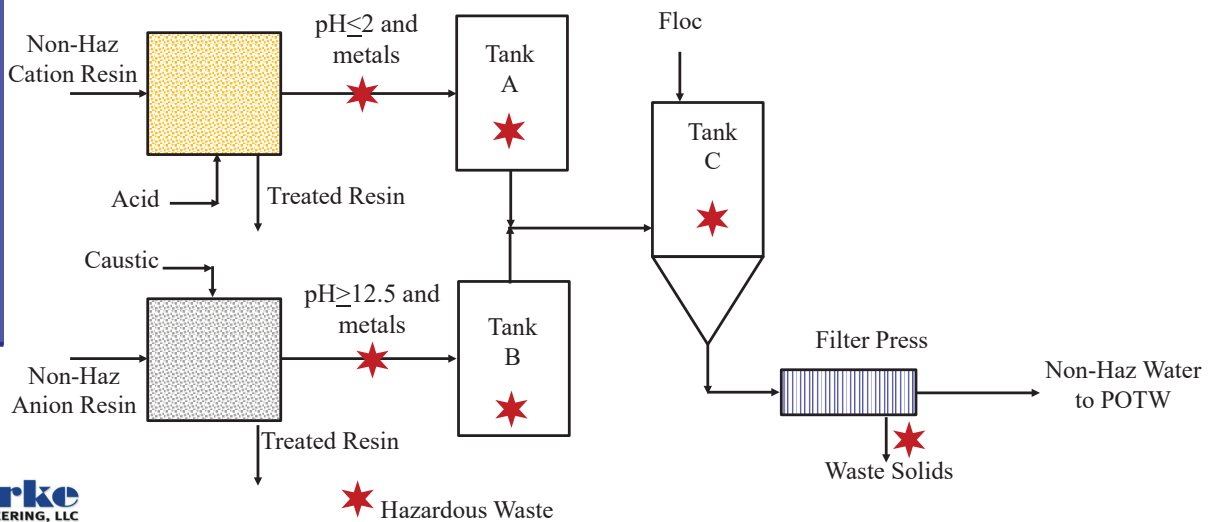
Example 1A – Evaluating a Process (Note Different Assumptions)



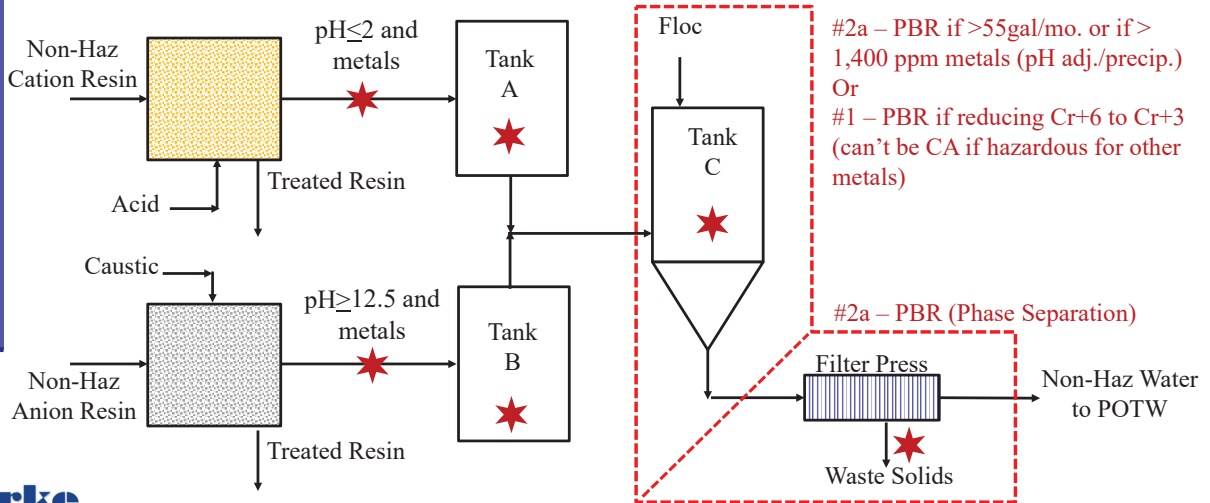
Example 1A



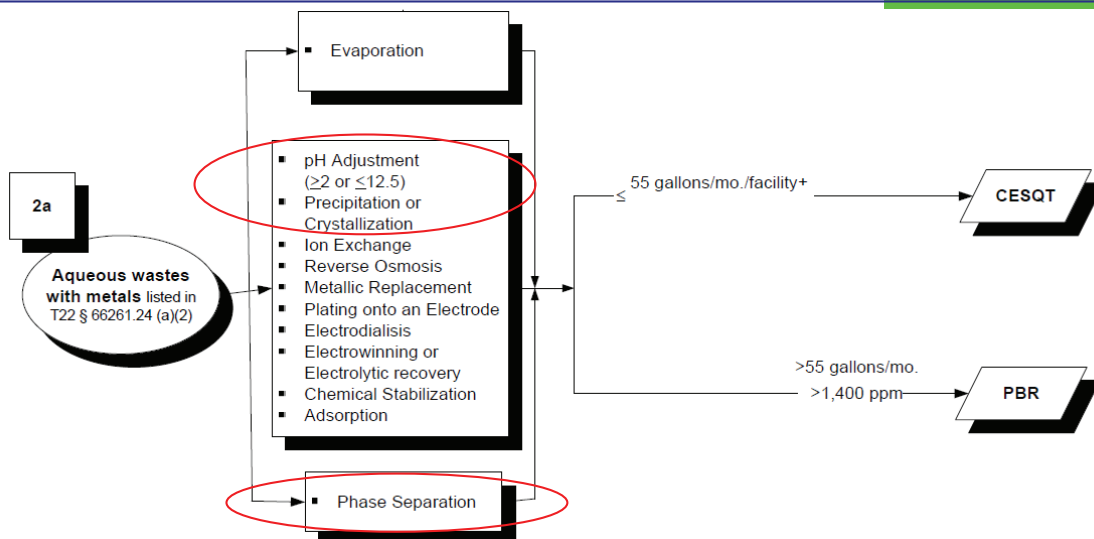
Example 2 – Evaluating a Process



Example 2 – Evaluating a Process



Example 2



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FTU vs. TTU

- Fixed Treatment Unit (FTU) remains at one site
 - 22 CCR 66260.10 – “Fixed Treatment Unit” means any equipment which performs treatment as defined in this section and which is permanently stationed, or which is periodically assembled for use, at a single facility for the purpose of performing treatment, regardless of the period or frequency of treatment.
- Transportable Treatment Unit (TTU) can move from one site to another



Another Definition

- 22 CCR 66260.10 – “Unit” means *a tank, a container, or a combination of tanks or tank systems and/or containers located together that are used in sequence to treat or accumulate one or more compatible hazardous waste streams. The devices are either plumbed together or otherwise linked so as to form one system.* This definition only applies to Conditional Exemption, Conditional Authorization, and Permit By Rule operations.

TTU Summary

- CE or PBR obtained by TTU owner/operator
- TTU notification forms sent to **DTSC**, not CUPA
- Must adhere to same waste stream, treatment method, and volume limits in TPP Flowchart
- Annual notification by March 1st or as specified

TTU Summary

- Site-specific notifications to DTSC
 - 21 days prior to work on each site (Form 1197)
 - Includes certification that local CUPA has been notified
 - Submitted by certified mail
- Follows same general standards for PBR or CE units
- Must only treat on-site generated waste

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PBR Requirements (22 CCR 67450)

■ Notification

- 60 days before first treatment
- Complete forms in CERS
 - Business Activities Page
 - Owner/Operator Identification Page
 - On-Site Haz Waste Treatment Notification – Facility Page and Unit Page (one for each)
- Notify property owner if different



PBR Requirements (22 CCR 67450)

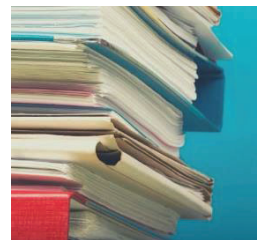
- Annual notification by March 1st (or per CUPA)
- Prepare annual report [Section 67450.3(c)(10)] when requested by CUPA
 - Owner name, address, EPA ID #, etc.
 - ID of each FTU operated
 - # of days each FTU operated
 - Amount of hazardous waste treated and waste composition and characteristics
 - Composition and characteristics of wastewater and residuals and where managed

PBR Requirements

- Generator Operating Standards
 - Must comply with 22 CCR Ch. 15, Generator Standards
 - Time limits for waste accumulation
 - LQG Tank Systems must be certified by P.E. at least every 5 years
 - Uploaded in CERS for PBR units
 - Containers meet Section 66264.175, which includes secondary containment

PBR Requirements

- Recordkeeping
 - Waste Analysis Plan [Section 66265.13(b)]
 - Parameters to be monitored
 - Test methods
 - Sampling frequency and techniques
 - Methods to determine effective treatment
 - Inspection Schedule [Section 66265.15(b)]
 - What, when, and how equipment will be inspected



PBR Requirements

- Recordkeeping (cont.)
 - Training documents [Section 66265.16(d)]
 - SB 673 enhanced training – includes emergency response training, all facility awareness training, and function specific training; DOT training, if offsite shipments are DOT HazMat
 - Contingency Plan (Section 66265.52)
 - Most recent CUPA Notification [Section 67450.2(b)(2)]
 - Air District Permit – if required [Section 67450.3(c)(8)(f)]

PBR Requirements

- Recordkeeping (cont.)
 - Documentation related to Environmental Investigation (Section 67450.7) within 1 year
 - Phase 1 Environmental Assessment to document past releases, spills, etc. from facility (DTSC Form 1151)
 - Corrective action workplan within 90 days
 - Documentation of any convictions, judgements, settlements, or orders resulting from environmental violations concerning the operation of the facility within previous 3 years [Section 67450.2(b)(3)(F)]

PBR Requirements

■ Recordkeeping (cont.)

■ Closure Plan [Section 67450.3(c)(11)(B)]

- Describes how and when each unit will be closed considering maximum operation
- Refers to applicable Ch. 15 standards
 - Closure General (Section 66265.114)
 - Containers (Section 66265.178)
 - Tanks (Section 66265.197)

PBR Requirements

■ Recordkeeping (cont.)

■ Closure Plan [Section 67450.3(c)(11)(B)]

- Maximum inventory of waste in unit at any time
- Estimate of when closure will occur
- Closure schedule (at least total time to close each unit)
- Maintain closure plan (modify as required)

PBR Requirements

■ Closure Details

- Within 90 days of treating last volume of HW; treat or remove all HW per the Closure Plan
 - OR demonstrate that longer than 90 days is required
- Complete closure within 180 days
- Notify CUPA at least 15 days **prior to completing** closure (often overlooked)
- Continue to comply until closure certification is submitted after being signed by P.E. and owner/operator

PBR Closure



PBR Closure



Before Closure

After Closure



PBR Closure

Another Unit – Before Closure



PBR Closure

Another Unit – Before Closure



Actually 3-4 years after equipment was dismantled but before CUPA was notified

PBR Closure – Report

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PBR Requirements

- Financial Assurance (Section 67450.13)
 - Prepare written closure cost estimate for each unit
 - Actual cost to close (adjust for changes)
 - May consider using own staff/equipment and salvage value of wastes/treatment equipment
 - Estimate is submitted in CERS
 - Adjusted annually for inflation by March 1st

PBR Requirements

| Closure Cost Calculations | | | | |
|---------------------------|--|---|-------------|--------------------------------|
| Item No. | Activity | Comment | Cost 2013 | Cost 2020 (Adj. for inflation) |
| 1 | Removal, Treatment, or Disposal of Waste Inventories | Removal will be performed in-house. -Treatment of remaining waste streams will be performed in-house. -Treated water will be discharged to sewer. -Waste sludge to be hauled off-site. | \$ 2,328.00 | \$ 2,481.06 |
| 2 | Removal and disposal of any residual grit, sand, and debris. -The main area (and adjacent) is entirely concrete, with 6" concrete berms, thus there is no exposed soil that needs to be removed. -Waste water treatment sump will be emptied of both sediment and water. | Removal will be performed in-house. -No exposed soil is present, sub-concrete contamination is likely minimal/non-existent. -(based on contractor estimate) | \$ 975.00 | \$ 1,039.11 |
| 2 | Decontamination of equipment and infrastructure by pressure washing. | Decontamination of equipment will be performed in-house (approximately 2 days). | \$ 500.00 | \$ 532.87 |

(Note – multiplier is 1.071 for 2022 to 2023)

| Price Deflator Calculations | | | |
|-----------------------------|---------|----------------|--------------------|
| Year | Q3 GDP | Increase Ratio | Comments |
| 2012 | 105.629 | - | From 4Q 2012 |
| 2019 | 112.574 | 1.065748989 | Accessed 2/12/2020 |

PBR Requirements

- Financial Assurance (cont.)
 - If estimate <\$10,000 – submit statement certifying facility can fund closure needs
 - If estimate >\$10,000 – obtain financial assurance for closure naming CUPA
 - Closure trust fund, surety bond, closure letter of credit, closure insurance, corporate financial test

PBR Requirements

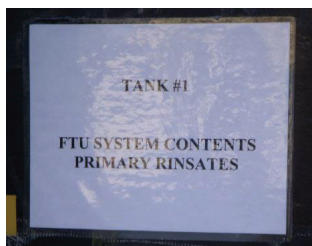
- Fees – \$4,600* each year (or partial year) plus local CUPA fees (optional)
- Plot Plan showing PBR Unit location on site
- Mark exterior with owner/operator Generator ID # and Unit Identifier
- Security – Prevent unknowing entry, minimize unauthorized entry
 - 24-hour surveillance (guards, personnel, video)
 - Gates or barriers to control entry

*To be set by Board of Environmental Safety for '23-'24 up to \$9,200 and then escalates annually by Cost of Living

PBR Requirements – Cyanide Waste Treatment

- Total cyanide limited to 5,000 mg/L after dilution
- Written approval from POTW required
- Residual solids are recycled for metals recovery
 - Justification required by Jan. 30th if not recycled
- Comply with Best Management Requirements (e.g., holding racks, countercurrent rinsing, evaluate non-cyanide alternatives every 4 years)
- Initial and annual training for handlers of cyanide solutions, rinse waters, or wastes

PBR Requirements



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Conditional Authorization Requirements (HSC 25200.3)

Mostly Similar to PBR

- Treat only identified wastes, by listed treatment methods, in specified quantities
 - Generally limited to no more than 5,000 gallons or 45,000 pounds per month
- Notification via CERS at least 60 days prior
- Maintain record of any environmental violations for previous 3 years **(with initial notification)**
- **No annual notification required**

*Not listed for PBR

Conditional Authorization Requirements (Similar to PBR)

- Generator standards in 22 CCR Ch.15, accumulation time limits, marking/labeling, etc.
- LQG Tank Systems must be certified by P.E. (every 5 years)
- Containers meet Section 66264.175, which includes secondary containment
- Recordkeeping
 - Inspection Schedule
 - **Written Operating Instructions**
 - Record data on waste concentrations, amounts

*Not listed for PBR

Conditional Authorization Requirements (Similar to PBR)

- If discharge to sewer, records that show compliance with permit
- Annual Waste Minimization Statement
- Tanks must have secondary containment and have P.E. integrity assessment (5 years)
- Ancillary equipment not required to have containment if integrity assessed every 2 years



Conditional Authorization Requirements (Similar to PBR)

- Maintain Closure Cost Estimate
- Financial Assurance
 - Prepare written closure cost estimate for each unit
 - Actual cost to close (adjust for changes)
 - May consider using own resources and salvage value of wastes/treatment equipment
 - Submit estimate in CERS, adjust annually by March 1st

Conditional Authorization Requirements (Similar to PBR)

- Financial Assurance (cont.)
 - If estimate <\$10,000 – submit statement certifying facility can fund closure needs
 - If estimate \geq \$10,000 obtain financial assurance for closure naming CUPA using mechanisms listed under PBR

Conditional Authorization Requirements (Similar to PBR)

- Security provisions as in PBR
- Closure
 - Closure Plan not required
 - Comply with proper closure in HSC 25200.3
 - Minimizes need for further maintenance and eliminates release of hazardous waste or constituents to the environment
 - Notify CUPA in writing when operations cease

*Not listed for PBR

Conditional Authorization Requirements (Similar to PBR)

- Documentation related to Environmental Investigation within 1 year
 - Phase 1 Environmental Assessment to document past releases, spills, etc. from facility (DTSC Form 1151)
 - Corrective action workplan within 90 days if needed
- Fees – \$4,600* each year plus local fees

*To be set by Board of Environmental Safety for '23-'24 up to \$9,200 and then escalates annually by Cost of Living

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Conditional Exemption [HSC 25201.5(a) and (c) and 25144.6(c)]

- CE – Small Quantity Treatment
 - No more than 500 pounds or 55 gallons/month
- CE – Specified Waste Streams
 - No volume limits except for oil/water mixtures and separation sludges (<1,050 gals./mo. oil)
- CE – Limited
 - No volume limit but must be collection of used oil from water and oil must be transported to off-site oil recycler

Conditional Exemption [HSC 25201.5(a) and (c) and 25144.6(c)]

- CE – Commercial Laundries
 - Requires following management methods
 - Sound construction of containers and wash water conveyances (inspected twice a year)
 - Sludge collected and managed appropriately
 - Written operating instructions/treatment record
 - Inspection schedule and log
 - Perform proper closure
 - Fees

Conditional Exemption Requirements

- Treat only identified wastes by listed methods or waste in limited quantities
- Notification via CERS at least 60 days prior
- **No annual notification**
- Generator operating standards in 22 CCR Ch. 15, accumulation time limits, marking/labeling, etc.
 - LQG Tank Systems must be certified by P.E. (5 years)
 - Containers meet Section 66264.175, which includes secondary containment

Conditional Exemption Requirements

■ Recordkeeping

- Inspection schedule and log
- Written operating instructions
 - Record data on waste concentrations, amounts
- If discharge to sewer, records that show compliance with permit



Conditional Exemption Requirements

- **Exempt** from Financial Assurance Requirements
- No formal Closure Plan required
- Follow closure per HSC 25201.5(d)(8)
 - Remove waste and decontaminate residues, containment system, soils, structures
 - Notify CUPA you ceased operation and properly closed unit

Conditional Exemption Requirements

- LQG – Tanks must have secondary containment and have P.E. integrity assessment (5 years)
- SQG – Follow federal tank standards (secondary containment and P.E. certification **not required**)
- Ancillary equipment not required to have containment if integrity assessed every 2 years
- Record of any environmental violations for previous 3 years – **not required**

Conditional Exemption Requirements

- Fees
 - \$180* per unit (not adjusted for inflation) under DTSC
 - Or as billed by CUPA

*To be set by Board of Environmental Safety for '23-'24 up to \$360 and then escalates annually by Cost of Living

Into the Home Stretch



Tiered Permitting Overview – Agenda

- Background
- Overview of Tiers
- The Wastes and Treatment Processes
- Assessing Systems for Applicability
- FTU vs. TTU
- Compliance Requirements – PBR
- Compliance Requirements – CA
- Compliance Requirements – CEL/CESW/CESQT
- **Common Violations/Issues and Suggestions**

Tiered Permitting – Common Violations

| Category | Description/Examples |
|------------------------|--|
| Unauthorized Treatment | Non-filer or incorrect tier, change in equipment |
| Documentation | Not maintaining required documents (waste analysis plan, contingency plan, training, etc.) |
| Tank Certifications | No assessment or 5-year reassessment, or assessment is inadequate (lacks information) |
| FTU Markings | Not marking exterior with O/O, facility ID, unit ID |

Tiered Permitting – Common Violations

| Category | Description/Examples |
|-----------------------|--|
| Records and Documents | Make documents available where FTU operates; submit signature page; maintain records for 3 years |

Oftentimes, each facility had more than one violation

Suggested Actions - Industry

- Validate if ‘treatment’ of a hazardous waste is occurring
- Determine the point(s) of generation for each waste
- Confirm if an allowable treatment method is being employed for one of the specified waste streams
- Verify the treatment volume
- Validate that all the statutory/regulatory requirements to operate in the specified tier are being met
- Check date for recertification of hazardous waste tank(s)

Suggested Actions - Regulators

Before you go on site:

- Review chemical inventory for treatment chemicals or wastes

When on site:

- Look for wastewater discharge points and then work upstream
- Review wastewater discharge permit application
- Look for treatment chemicals (caustic, acid, flocculants, etc.)
- Equipment types – filter presses, oil/water separators
- Are filter cake solids sent off site as a hazardous waste?
- Verify that activity is not exempt from definition of “treatment”
- Try to determine extent of treatment operation (what tanks, piping, etc. are included)

Tiered Permitting Overview – Agenda




- Background
- Overview of Tiers
- The Wastes and Treatment Processes
- FTU vs. TTU
- Compliance Requirements – PBR
- Compliance Requirements – CA
- Compliance Requirements – CEL/CESW/CESQT
- Common Violations/Issues and Suggestions
- Supplemental Info – CERS Screens

CERS Examples – PBR

Business Activities Page

Hazardous Waste

Does your Facility...

| | |
|---|--------------------------------------|
| Does your facility generate Hazardous Waste?  | <input checked="" type="radio"/> Yes |
| If yes, provide an EPA Identification Number (EPA ID): | |
| Does your facility treat hazardous waste on-site?  | <input checked="" type="radio"/> Yes |
| Is your facility's treatment subject to financial assurance requirements (for Permit by Rule or Conditional Authorization)?  | <input checked="" type="radio"/> Yes |

CERS Examples – PBR

After hitting Start, the required pages become visible



CERS Examples – PBR

Populates Automatically

The screenshot shows a permit application form. The 'Permit Status (Check all that apply)' section has several checkboxes: Facility Permit, Interim Status, Standardized Permit, Variance, and Consent Agreement. The 'Number of Units at Facility' section has a table with columns for '#', 'Unit Type / Tier', and a description. The 'TOTAL UNITS' field is highlighted with an arrow from the text 'Populates Automatically'. The 'Certification' section contains text about waste minimization and permit requirements, followed by fields for 'Owner/Operator Name' (Mike Dudasko), 'Date Certified' (2/18/2019), and a 'Request for Shortened Review Period' checkbox.

| # | Unit Type / Tier | |
|---|---|--|
| 0 | Conditionally Exempt – Small Quantity Treatment (CESQT) | With the exception of CE-CL Units, the Number of Units for this facility are automatically calculated based on each populated Unit Page. Filling out the appropriate Unit Pages for this Facility will automatically update these numbers. |
| 0 | Conditionally Exempt Specified Wastestream (CESW) | |
| 0 | Conditionally Authorized (CA) | |
| 0 | Permit by Rule (PBR) | |
| 0 | Conditionally Exempt – Limited (CEL) | |
| 0 | Number of CE-CL Units | |
| 0 | TOTAL UNITS | |

CERS Examples – PBR

Instructions/Help

Complete a separate Onsite Hazardous Waste Treatment Notification - Unit form for each treatment unit operating at this facility. Commercial Laundries (CE-CL Units) are not required to complete unit specific pages, provided that laundering is the only hazardous waste treatment activity conducted by the facility.

Save Cancel

Treatment Unit Identification and Details

Unit Type/Tier CESQT CESW CA PBR CEL

Unit ID#

Unit Name

Number of Tanks

Number Of Containers/Treatment Areas

Monthly Treatment Volume

Unit Of Measure Pounds Gallons

Specific Waste Type Treated (Narrative)

Treatment Process Description (Narrative)

Basis for Not Needing Federal Permit (Check all that apply)

a. Treated Waste is not a Hazardous Waste under Federal Law (California-only waste)

b. Treated in Waste Water Treatment Units (Tanks) and Discharged to a Publicly Owned Treatment Works (POTW)/Sewering Agency or under an NPDES Permit

c. Treatment in Elementary Neutralization Units

d. Treatment in a Totally Enclosed Treatment Facility

e. Federal Conditionally Exempt Small Quantity Generator (generated 100kg, approximately 27 gallons, or less of hazardous waste in a calendar month)

f. Treatment in an accumulation tank or container within 90 days for over 1000 kg/month generators and 180 or 270 days for generators of 100 to 1000 kg/month.

g. Recyclable Materials are Reclaimed to Recover Silver or other Precious Metals

h. Empty Container Rinsing and/or Treatment

i. Other Basis (specify below)

Residuals Management Description (Check all that apply)

a. Discharge non-hazardous aqueous waste to POTW or sewer

b. Discharge non-hazardous aqueous waste under a NPDES permit

c. Dispose of Non-hazardous Solid Waste Residues at an Offsite Location

d. Offsite Recycling

e. Thermal Treatment

f. Disposal to Land

g. Further Treatment

h. Other Method of Disposal (specify below)

Secondary Containment Installation Date (If Required)

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CERS Examples – PBR

Save Cancel

Treatment Unit Identification and Details

Unit Type/Tier CESQT CESW CA PBR CEL

Unit ID#

Unit Name

Number of Tanks

Number Of Containers/Treatment Areas

Monthly Treatment Volume

Unit Of Measure Pounds Gallons

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Secondary Containment Installation Date (If Required)

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CERS Examples – PBR

The TPP Flowchart in text form (sort of)



At least one Waste and Treatment Combination must be provided.

Permit by Rule (PBR) - Waste and Treatment Process Combinations

- Aqueous wastes containing hexavalent chromium may be treated by the following process:
 - Reduction of hexavalent chromium to trivalent chromium with sodium bisulfite, sodium metabisulfite, sodium thiosulfite, ferrous sulfate, ferrous sulfide, or sulfur dioxide provided both pH & addition of the reducing agent are automatically controlled
- Aqueous wastes containing metals listed in Title 22, CCR, Section 66261.24(a)(2) and/or fluoride salts may be treated by the following technologies:
 - pH Adjustment / Neutralization
 - Precipitation or Crystallization
 - Phase Separation by Filter, Centrifuge, or Gravity Settling
 - Ion Exchange
 - Reverse Osmosis
 - Metallic Replacement
 - Plating onto an Electrode
 - Electrodialysis
 - Electrowinning or Electrolytic Recovery
 - Chemical Stabilization Using Silicates or Cementitious Reactions
 - Evaporation
 - Adsorption
- Aqueous wastes with total organic carbon less than 10% as measured by EPA Method 9060 and less than 1% total volatile organic compounds as measured by EPA Method 8240 may be treated by the following technologies:
 - Phase separation by filter, centrifuge, or gravity setting, but excluding super critical fluid extraction
 - Adsorption
 - Distillation
 - Biological processes conducted in tanks or containers and utilizing naturally occurring microorganisms
 - Photodegradation using ultraviolet light, with or without the addition of hydrogen peroxide or ozone, provided the treatment is conducted in an enclosed system
 - Air stripping or steam stripping

CERS Examples – PBR

Type of Operation / Unit Type
 Type of Operation / Unit Type
 PBR-FTU CA

Estimated Closure Costs
 Estimated Closure Costs
 23275
 Estimate must be accompanied by a written Estimate of Closure Costs download.

Exemption from Financial Assurance Requirements

- I am not required to provide a mechanism because:
 - I certify that my closure cost estimate is less than or equal to \$10,000, or
 - Exemption From Financial Assurance - Other
- Exemption From Financial Assurance - <30 Days Per Year

Closure Financial Assurance Mechanism

Closure Assurance Mechanism Type
 Closure Trust Fund
 Surety Bond
 Closure Letter of Credit
 Closure Insurance
 Financial Test and Corporate Guarantee
 Alternative Mechanism
 Multiple Financial Mechanisms
 Certificate of Deposit
 Savings Account

Effective Date
 5/1/2019

Financial Institution, Insurance or Surety Company / Other Organization
 Legbreak Lending

Financial Institution Or Surety Address
 2 Pay Lane

Mechanism ID Number(s)

Financial Institution Or Surety City State Zip Code
 Concrete Shoes CA 98765

Financial Institution Or Surety Country
 United States For International Address

Owner or Operator Certification

I certify under penalty of law 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. (22 CCR §66270.11)

Owner/Operator Name
 Owner/Operator Title
 Date Certified
 Signer Of Certification
 Owner
 Operator

Save Cancel



CERS Examples – PBR

Tiered Permitting DRAFT Feb. 18, 2019 Submit

Tiered Permitting Facility Ready to Submit Edit Discard

Units Add Unit Not required for Conditionally Exempt Commercial Laundry Facilities (CE-CL)

Tiered Permitting Unit PBR - Metal Precipitation (ID: FTU-1) Review Needed Edit Discard

Tiered Permitting Unit: Plot Plan/Map New

Tiered Permitting Unit: Prior Enforcement History New

Tiered Permitting Unit: Tank and Container Certification New

Tiered Permitting Unit: Local Agency Notification New

Tiered Permitting Unit: Property Owner Notification New

Financial Assurance Add Certification Required for Facilities with PBR and CA Units Only

Tiered Permitting Unit: Financial Assurance Certification - Mechanism Type: (Savings Account) Ready to Submit Edit Discard

Tiered Permitting: Estimate of Closure Costs New

Tiered Permitting: Financial Assurance Closure Mechanism New

Discard Draft Submittal Miscellaneous State-Required Documents Add Comment To Regulator

Must submit P.E. tank certification for PBR Units

Any Questions?

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