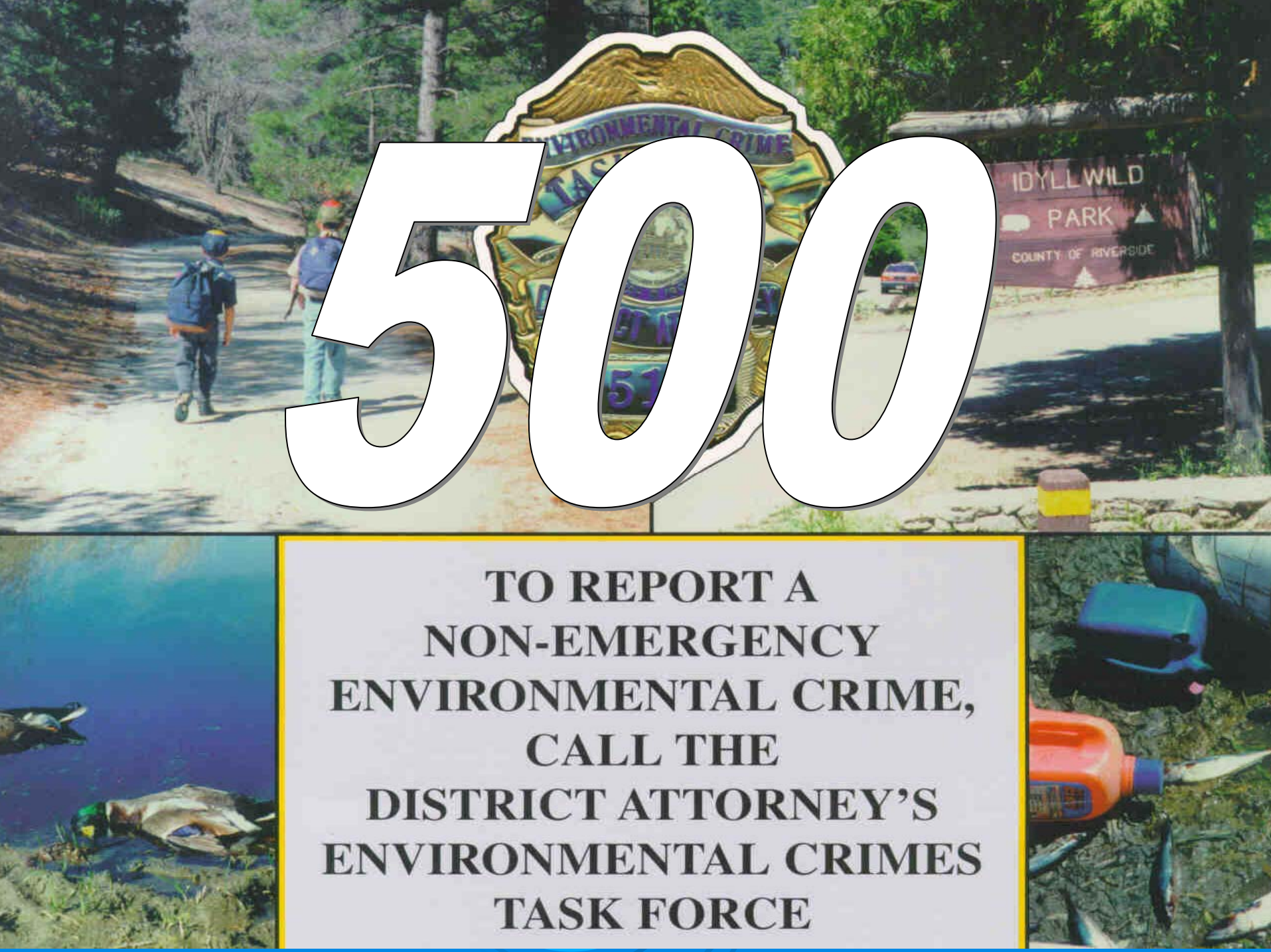
Riverside County

Waste Management Department

Riverside County

Waste Management Department

Old Uniform

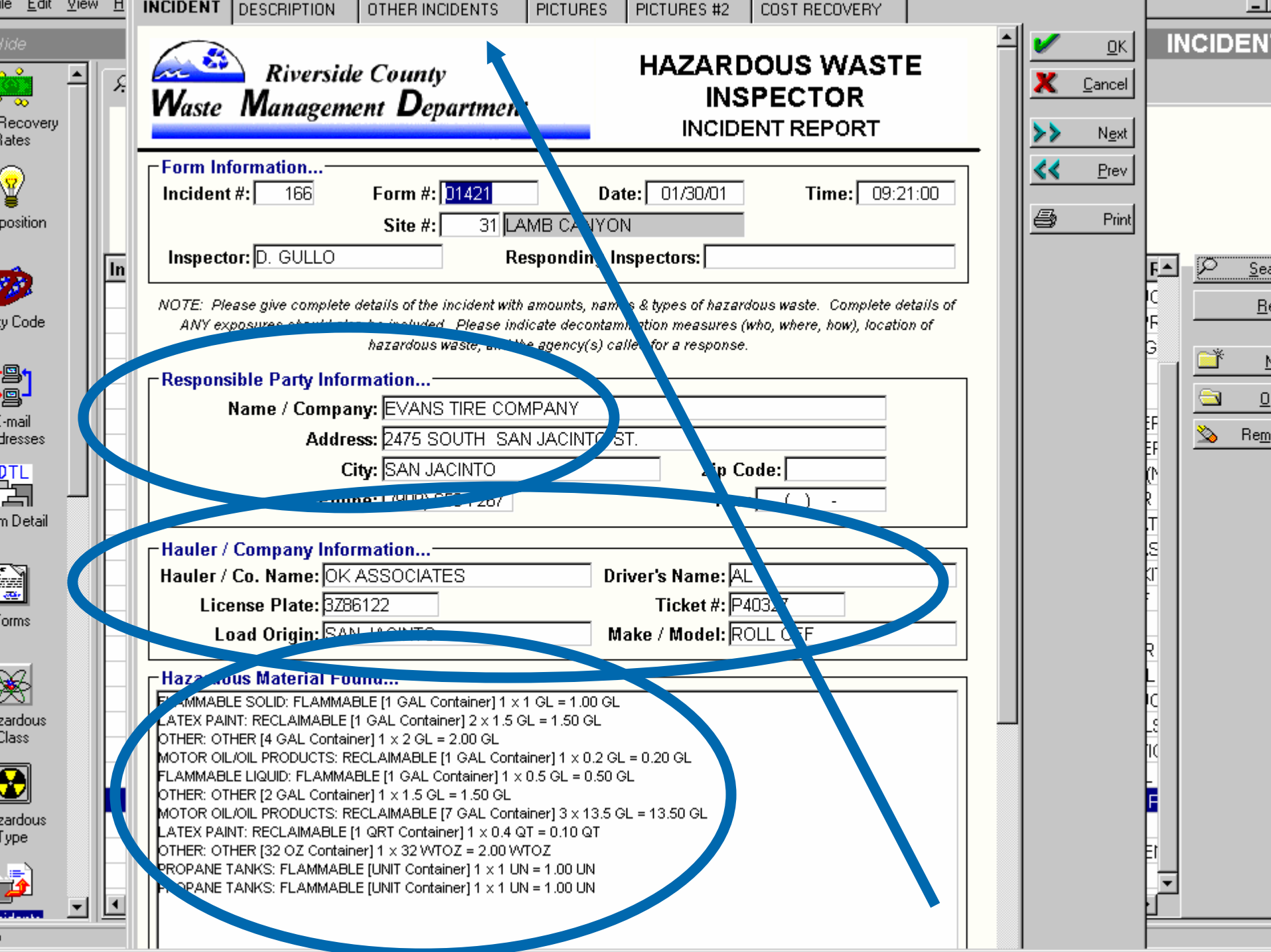

500
IDYLLWILD
PARK
COUNTY OF RIVERSIDE
TO REPORT A
NON-EMERGENCY
ENVIRONMENTAL CRIME,
CALL THE
DISTRICT ATTORNEY'S
ENVIRONMENTAL CRIMES
TASK FORCE

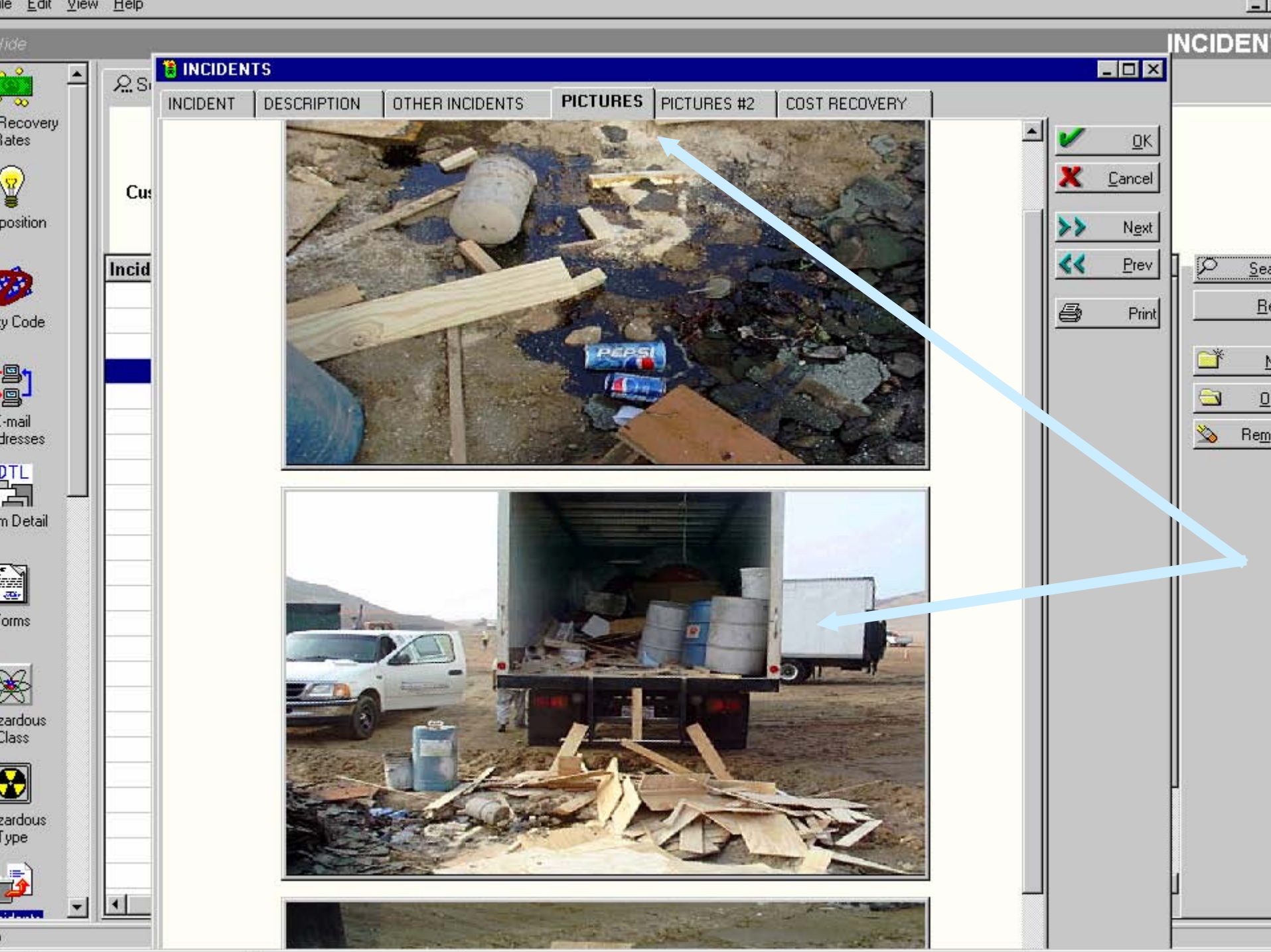
RIVERSIDE COUNTY'S HAZARDOUS WASTE PROBLEM

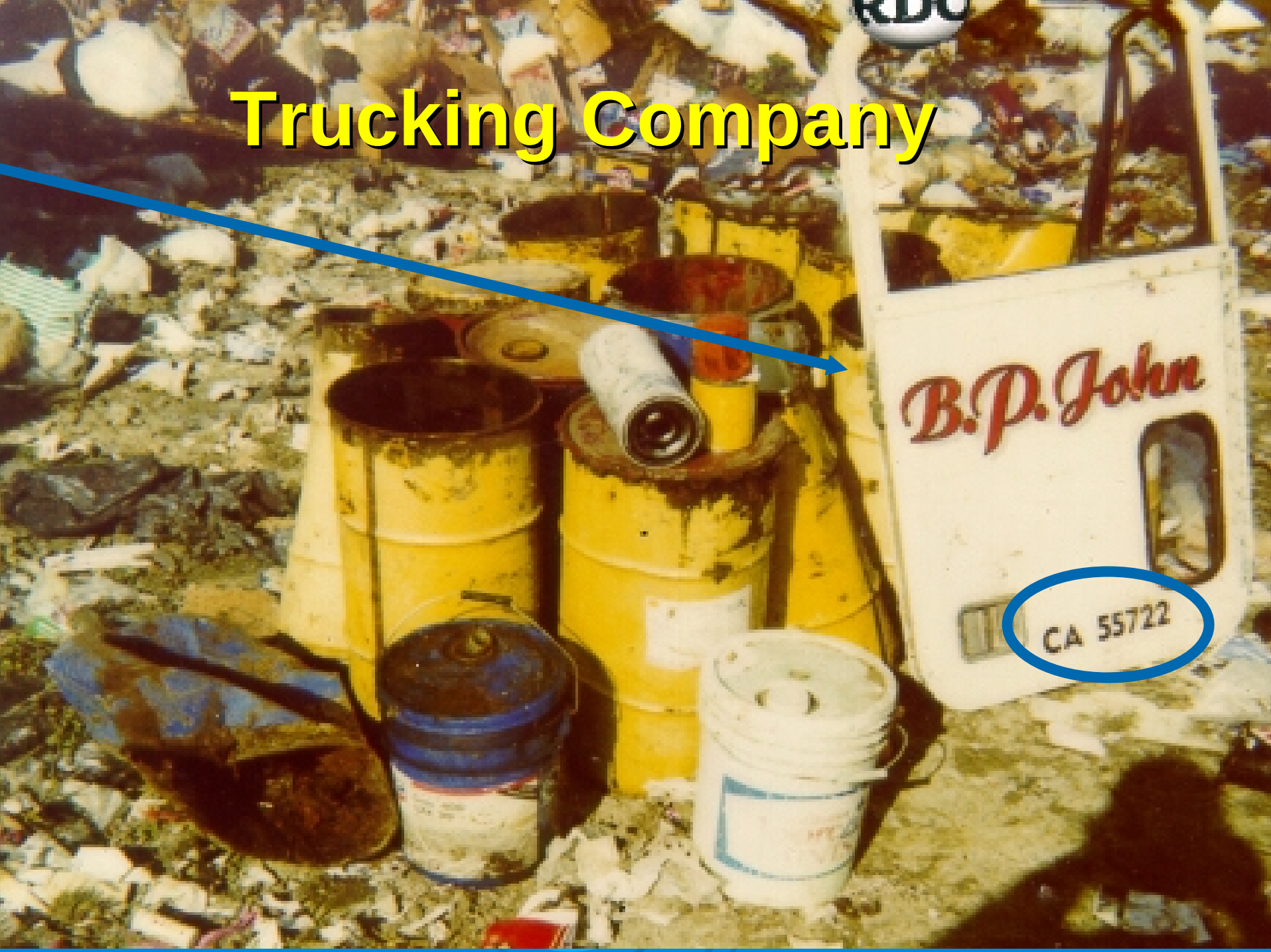
WHY DON'T OTHER COUNTIES HAVE THE SAME PROBLEM?

WHAT NEEDS TO BE DONE

Trailer Manufacturer


INCIDENT
DESCRIPTION
OTHER INCIDENTS
PICTURES
PICTURES #2
COST RECOVERY
Riverside County
Waste Management Department
HAZARDOUS WASTE
INSPECTOR
INCIDENT REPORT
OK
Cancel
Next
Prev
Print
Form Information...
Incident #: 166
Form #: 01421
Date: 01/30/01
Time: 09:21:00
Site #: 31 LAMB CANYON
Inspector: D. GULLO
Responding Inspectors:
NOTE: Please give complete details of the incident with amounts, names & types of hazardous waste. Complete details of ANY exposures should also be included. Please indicate decontamination measures (who, where, how), location of hazardous waste, and the agency(s) called for a response.
Responsible Party Information...
Name / Company: EVANS TIRE COMPANY
Address: 2475 SOUTH SAN JACINTO ST.
City: SAN JACINTO
Zip Code:
Hauler / Company Information...
Hauler / Co. Name: OK ASSOCIATES
Driver's Name: AL
License Plate: 3Z86122
Ticket #: P4032
Load Origin: SAN JACINTO
Make / Model: ROLL OFF
Hazardous Material Found...
FLAMMABLE SOLID: FLAMMABLE [1 GAL Container] 1 x 1 GL = 1.00 GL
LATEX PAINT: RECLAIMABLE [1 GAL Container] 2 x 1.5 GL = 1.50 GL
OTHER: OTHER [4 GAL Container] 1 x 2 GL = 2.00 GL
MOTOR OIL/OIL PRODUCTS: RECLAIMABLE [1 GAL Container] 1 x 0.2 GL = 0.20 GL
FLAMMABLE LIQUID: FLAMMABLE [1 GAL Container] 1 x 0.5 GL = 0.50 GL
OTHER: OTHER [2 GAL Container] 1 x 1.5 GL = 1.50 GL
MOTOR OIL/OIL PRODUCTS: RECLAIMABLE [7 GAL Container] 3 x 13.5 GL = 13.50 GL
LATEX PAINT: RECLAIMABLE [1 QRT Container] 1 x 0.4 QT = 0.10 QT
OTHER: OTHER [32 OZ Container] 1 x 32 WTOZ = 2.00 WTOZ
PROPANE TANKS: FLAMMABLE [UNIT Container] 1 x 1 UN = 1.00 UN
PROPANE TANKS: FLAMMABLE [UNIT Container] 1 x 1 UN = 1.00 UN


INCIDENTS
INCIDENT
DESCRIPTION
OTHER INCIDENTS
PICTURES
PICTURES #2
COST RECOVERY
OK
Cancel
Next
Prev
Print
PEPSI


Trucking Company
B.P. John
CA 55722

Mad Home Owner

High School Auto Shop

Handyman

Movie Theater

INCIDENTS
INCIDENT
DESCRIPTION
OTHER INCIDENTS
PICTURES
PICTURES #2
COST RECOVERY
OK
Cancel
Next
Prev
Print
PEPSI

Drug Rehab

Hi, I'm Dan from Environmental Crimes
FLORIDA
RIGHT EQUIPMENT / LOWEST COST
Gentle-Ride Van
www.uhaul.com
10 2:24 PM

Environmental Science
College Professor

Environmental Science
College Professor

Hotel
CAUTION
POISON

Hotel

Nationwide Sport Gear Company

Nationwide Home Improvement Company
7 10:07 AM

Nationwide Home Improvement Company

Worldwide Department Store

Worldwide Department Store

Nationwide Department Store

BIG K mart
FIRE

Methamphetamine Producer

Farmer

Eclom Hill
Landfill 1997

Soldier of Fortune
24 3:52 PM

UNEXPLODED GRENADE IN BOMB CONTAINMENT TRAILER.

SPONTANEOUSLY
COMBUSTIBLE
4
O_2
PYROPHORIC
Movie Producer

DANGER!
USED NEEDLES
CONTAMINATED
BIOHAZARD
Authorized
Personnel
Only
SAGE
PRODUCTS INC

Community
Hospital

Community
Hospital

Regional Hospital

Regional Medical Center
MAY 3 2002

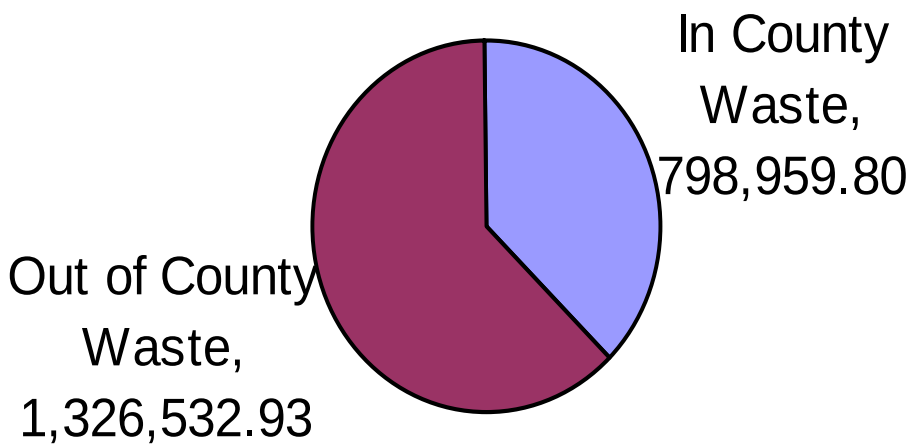
Regional Medical Center
MAY 14 2002

Nationwide HMO

November 2006

Transfer Stations In Riverside County

OUT OF COUNTY WASTE



The Impossible Task

Transfer Station Load Check Audits

- **MINIMAL TO NO LOAD CHECK ACTIVITIES**
- **UNTRAINED EMPLOYEES**
- **IMPROPERLY STORED HAZARDOUS WASTE**
- **LITTLE OR NO ENFORCEMENT FOR PROHIBITED WASTE**
- **NUMEROUS WASTE INSPECTIONS SHOWING “NONE FOUND”**

Same Transfer Station With Our Waste Inspectors

- **3 DAYS OF INSPECTIONS**
- **4 HOURS EACH DAY**
- **23 WASTE LOADS INSPECTED**
- **13 CONTAINING HAZARDOUS WASTE**
- **4 WASTE LOADS TURNED OVER TO ENVIRONMENTAL CRIMES INVESTIGATING TASK FORCE**

Department Store

Auto Painting Facility

Cosmetic Laboratory

Cosmetic Laboratory Returns Hazardous Waste the Next Day

One Week Later

Hazardous Waste Contractor
Registered Transporter

zep
GREEN STUFF
ABSORBENT

This Landfill Liner System
= $10 Million

Another Transfer Station With Our Waste Inspectors

- **1 Day of Inspections**
- **6 Hours**
- **18 Waste Loads Inspected**
- **14 Containing Hazardous Waste**
- **6 Waste Loads Turned Over to Environmental Crimes Investigating Task Force**

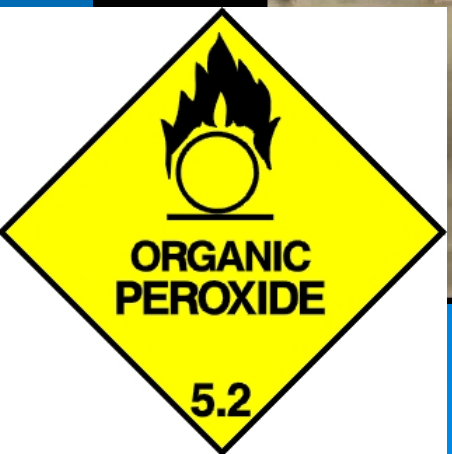
FLAMMABLE ADHESIVES FROM MANUFACTURER

PALLET OF HAZARDOUS
WASTE FROM
HARDWARE STORE
FIXALL
FIXALL
FIXALL
JUN 13 2002
SALE

1100 FULL AEROSOLS
FROM DOLLAR STORE
MAY 7 2002

ORGANIC PEROXIDE FROM MOBILE HOME MANUFACTURING

Same Stuff



ACID FROM
MANUFACTURING
COMPANY
4 3:27 PM

ASBESTOS FROM SCHOOLS

DRUG LAB WASTE FROM TWEEKERS

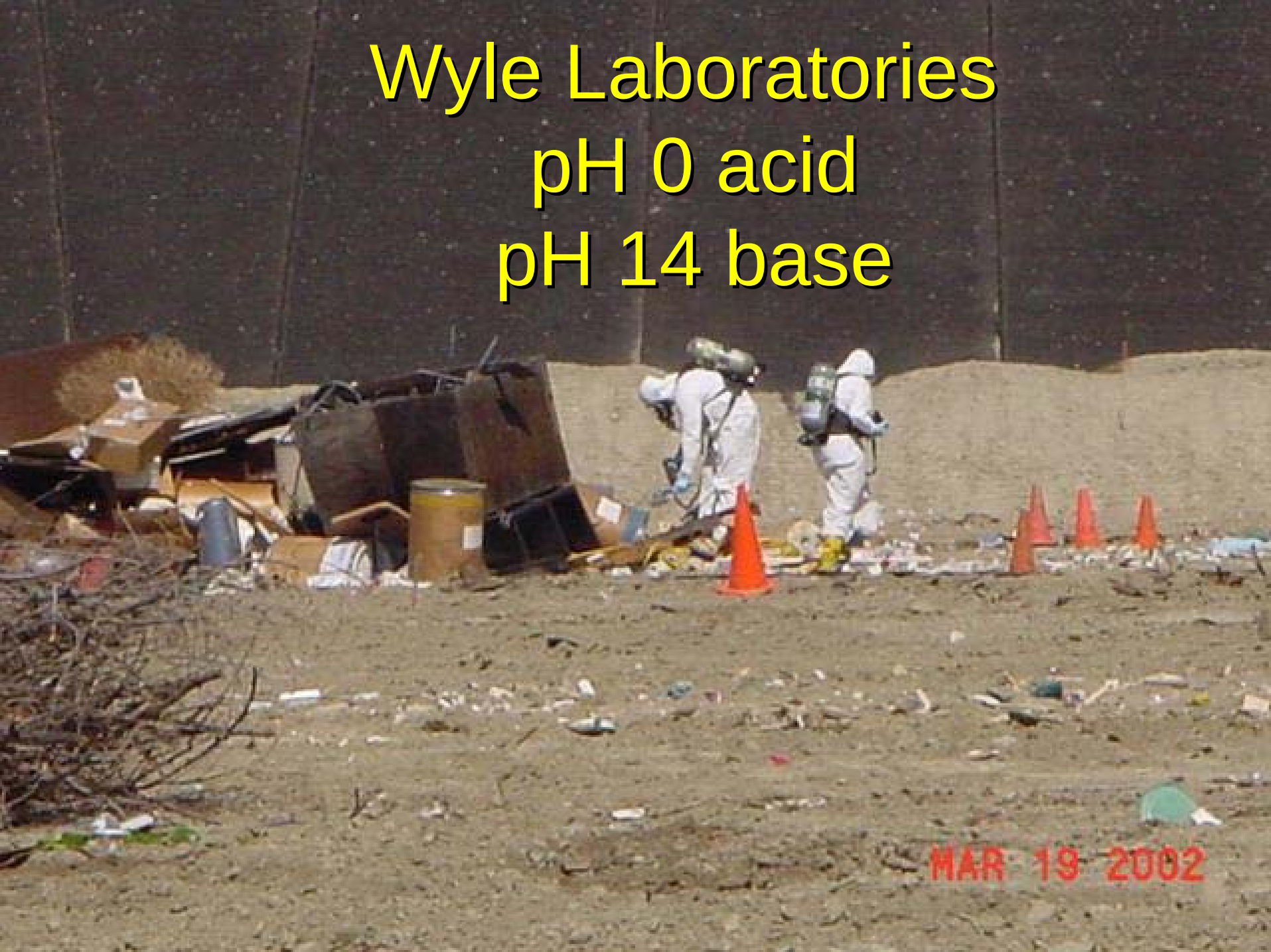
Home Clean-Up Companies

Union Pacific

Union Pacific

Union Pacific

Construction Company


Wyle Laboratories
pH 0 acid
pH 14 base
MAR 19 2002

Construction Company
APR 19 2002

Painting Contractor
03. 10. 2006

CHEMICAL SUPPLY
Strong Acid
Strong Base
05.24.2005

Flooring Contractor
HENRY
BBB

Horse Ranch
19 11:37AM

Trailer Park

Pool Supply
SEP 17 2002

General Contractor
Henry
12. 14. 2004

SHERWIN-WILLIAMS PAINTS
International
Worldwide Paint & Powder
Coat Manufacturer
AUG 1 2002

RIVERSIDE COUNTY'S HAZARDOUS WASTE PROBLEM

WHY DON'T OTHER COUNTIES HAVE THE SAME PROBLEM?

WHAT NEEDS TO BE DONE

RIVERSIDE COUNTY'S HAZARDOUS WASTE PROBLEM

WHY DON'T OTHER COUNTIES HAVE THE SAME PROBLEM?

WHAT NEEDS TO BE DONE

WHAT MUST BE DONE

- Enforcement agencies must be provided new tools to enforce effective load check programs.

OR

- Enforcement agencies must be provided new direction to use present tools more effectively.

STATE MINIMUM STANDARDS FOR LOAD CHECKING

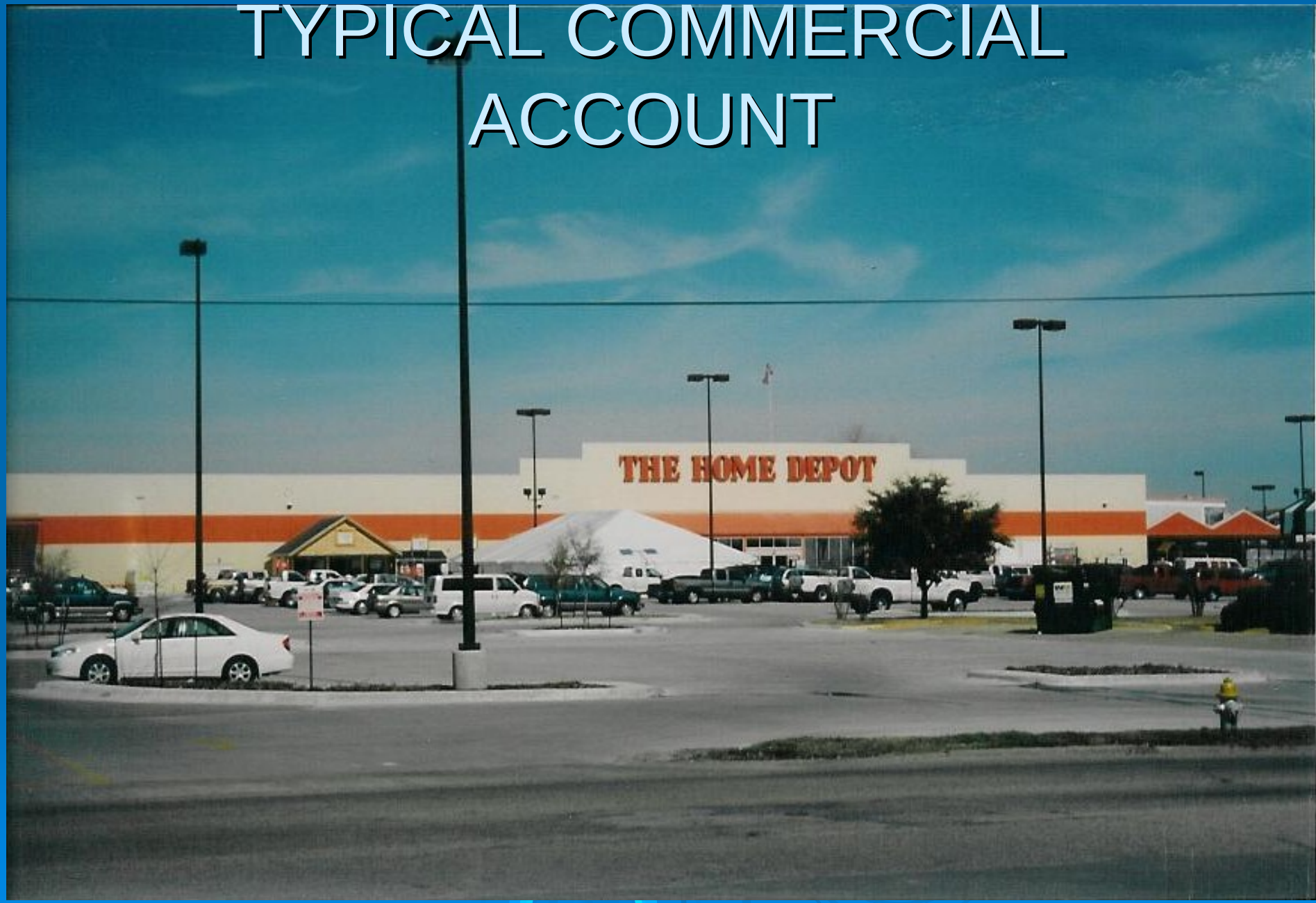
- VAGUE
- MISINTERPRETED
- INEFFECTIVE
- ENCOURAGES CONTINUED DUMPING OF HAZARDOUS WASTE INTO THE SOLID WASTE STREAM
- DIFFICULT TO ENFORCE

Title 14

Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

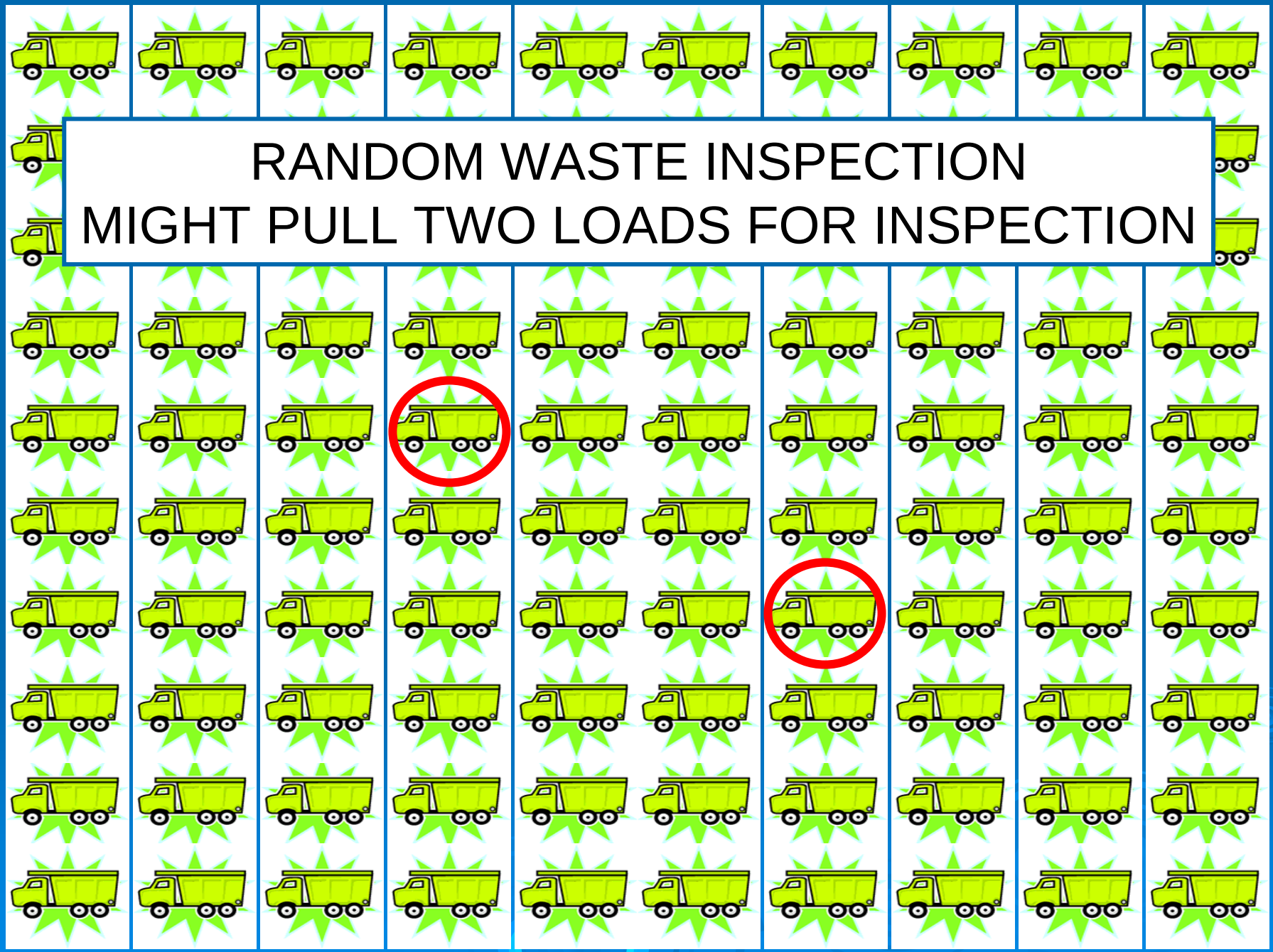
17409.5. Loadchecking.
(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

TYPICAL COMMERCIAL ACCOUNT



2 WASTE LOADS PER WEEK
104 LOADS PER YEAR

PALLET OF HAZARDOUS
WASTE FROM
HARDWARE STORE
FIXALL
FIXALL
FIXALL
JUN 13 2002
SALE


RANDOM WASTE INSPECTION
MIGHT PULL TWO LOADS FOR INSPECTION

Industry's SOPs

- LOAD SELECTED FOR LOAD CHECK
- HAZARDOUS WASTE FOUND
- HAZARDOUS WASTE STORED IN ON SITE STORAGE
- HAZARDOUS WASTE PROPERLY DISPOSED OF BY SOLID WASTE FACILITY

Industry's SOPs

- NO CONTACT MADE TO RESPONSIBLE PARTY
- HAZARDOUS WASTE ACCEPTED BY SOLID WASTE FACILITY
- INCIDENT NOT REPORTED TO AUTHORITIES
- RESPONSIBLE PARTY CONTINUES TO THROW HAZARDOUS WASTE IN THE SOLID WASTE LOADS ACCEPTED BY SOLID WASTE FACILITY!

HAZARDOUS WASTE
ACCEPTED

State Minimum Standards for Load Checking

Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

17409.5. Loadchecking.
(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

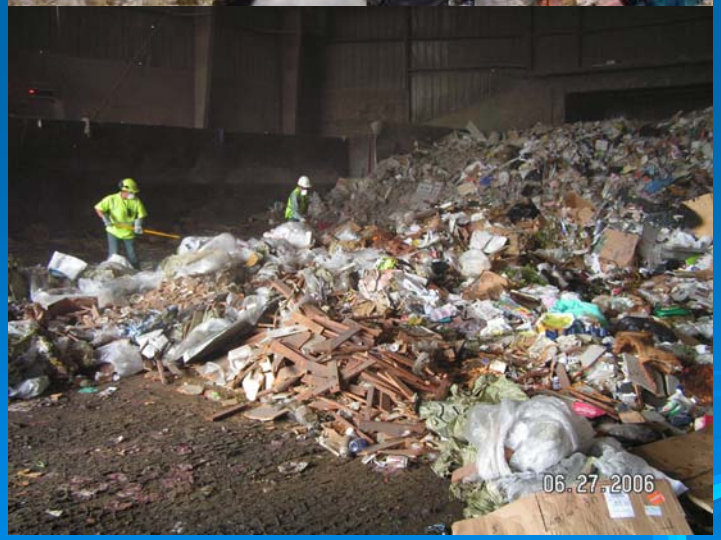
What Laws Apply

- Accepting hazardous waste at a facility not authorized to accept it (Health and Safety Code §25191 (b) (6);
- In violation of Hazardous Waste Release/Spill Reporting (Health and Safety Code §25507).
- Causing the disposal of any hazardous waste, at a facility which does not have a permit from DTSC=Felony (Health and Safety Code §25189.5)

(1) The number of inspections to be performed

- Who decides what number?
- Random inspection alone don’t work!

IT'S NOT THE QUANTITY
IT'S THE QUALITY



- DON'T WASTE TIME
- WALK AROUND THE LOAD
- NO SIGN OF HAZARDOUS WASTE
- MOVE ON TO THE NEXT LOAD
- TARGET LOADS

SAFE VANTAGE POINT

- GET IN A SAFE PLACE AND WATCH
- SEE HAZARDOUS WASTE
- ASK EQUIPMENT TO STOP
- INSPECT THAT LOAD

MOST LOADS REQUIRING INSPECTION ARE EASY TO SPOT WHEN DUMPED

DESERVES A CLOSER LOOK

State Minimum Standards for Load Checking

Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

17409.5. Loadchecking.
(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

(2) a location for the storage of prohibited wastes removed during the loadchecking process that is separately secured or isolated;

IS IT ADEQUATE?

EQUIPPED TO STORE ALL COMMON CLASSES OF WASTE

- FLAMMABLE LIQUIDS
- FLAMMABLE SOLIDS
- CORROSIVE ACIDS
- CORROSIVE BASE
- OXIDIZER
- POISON
- LATEX PAINT
- OIL BASE PAINT
- COMPRESSED GAS
- MOTOR OIL
  - Should not mix with facility equipment maintenance oil
- BATTERIES
  - All Types
- UNKNOWNS

WHAT LAWS APPLY

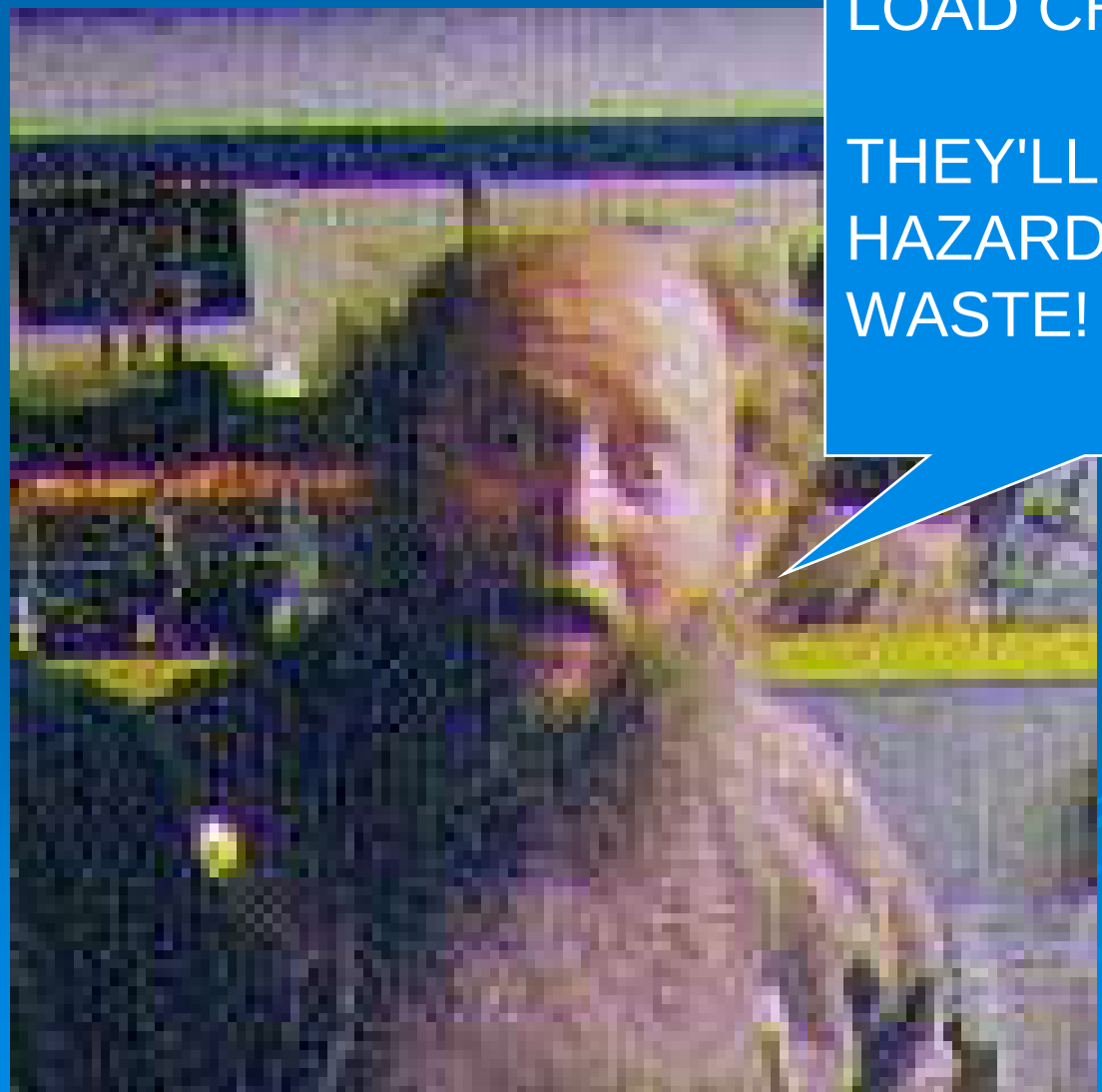
- T22 66262.34 STORAGE/ACCUMULATION
- T22 25244.19-21 STORAGE OF IGNITABLE
- T22 66265.34, 66265.171-174. 66265.190-194 MANAGEMENT OF CONTAINERS

State Minimum Standards for Load Checking

Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

(3) records of loadchecks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste. A copy of the loadchecking program and copies of the loadchecking records for the last year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.

TRAINING



DON’T TRAIN THE LOAD CHECKERS!

THEY'LL FIND HAZARDOUS WASTE!

TRAINING

- FORMAL TRAINING IS NEEDED
  - SAFETY TAIL GATE MEETINGS ARE NOT ENOUGH
- ALL FACILITY STAFF
  - HAZ WASTE RECOGNITION
- LOAD CHECKERS
  - DETAILED HAZARDOUS WASTE TRAINING
  - HEALTH AND SAFETY TRAINING

STORING & PACKAGING

WHAT'S MISSING

CCR Title 14

Chapter 3. Minimum Standards for Solid Waste Handling and Disposal

17409.5. Loadchecking.

(a) The operator of an attended operation or facility shall implement a loadchecking program to prevent the acceptance of waste which is prohibited by this Article. This program must include at a minimum:

(1) The number of inspections to be performed

(2) a location for the storage of prohibited wastes removed during the loadchecking process that is separately secured or isolated;

(3) records of loadchecks and the training of personnel in the recognition, proper handling, and disposition of prohibited waste. A copy of the loadchecking program and copies of the loadchecking records for the last year shall be maintained in the operating record and be available for review by the appropriate regulatory agencies.

- REQUIREMENT FOR AN ADEQUATE NUMBER OF INSPECTION
- REQUIREMENT TO ACT WHEN HAZARDOUS WASTE IS SPOTTED IN ANY LOAD
- REQUIREMENT TO REPORT ILLEGAL DISPOSAL TO THE EA/CUPA
  - RECORD RESPONSIBLE PARTY INFORMATION

REPORTING REQUIREMENTS

Title 27

- **Chapter 3 Criteria for All Waste Management Units, Facilities, and Disposal Sites**
- **Subchapter 4. Criteria for Landfills and Disposal Sites**
- **Article 3. CIWMB - Handling, Equipment and Maintenance**

DOES NOT APPLY TO TRANSFER FACILITIES

Article 3. CIWMB - Handling, Equipment and Maintenance

- (4) Notification of the EA, the Director of the California Department of Toxic Substances Control (**DTSC**) or its delegated agent, and the Regional Water Quality Control Board (**RWQCB**), if a regulated hazardous waste or PCB waste is discovered at the facility.

DOES APPLY TO TRANSFER FACILITIES

- Health and Safety Code §25507

(a) Except as provided in subdivision (b), the handler or any employee, authorized representative, agent, or designee of a handler shall, upon discovery, immediately report any release or threatened release of a hazardous material to the administering agency, and to the office, in accordance with the regulations adopted pursuant to Section 25503.

FACILITY INSPECTIONS

- DON'T BELIEVE!
  - THE DRIVERS INSPECT THE LOADS BEFORE THEY PICK THEM UP.

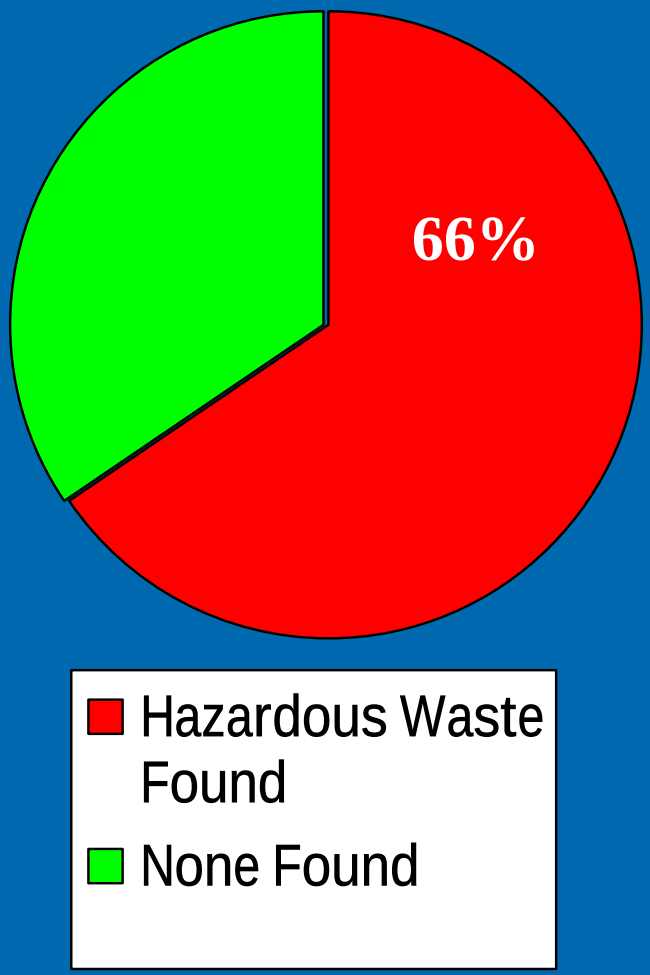
HIDDEN ON THE BOTTOM

FACILITY INSPECTIONS

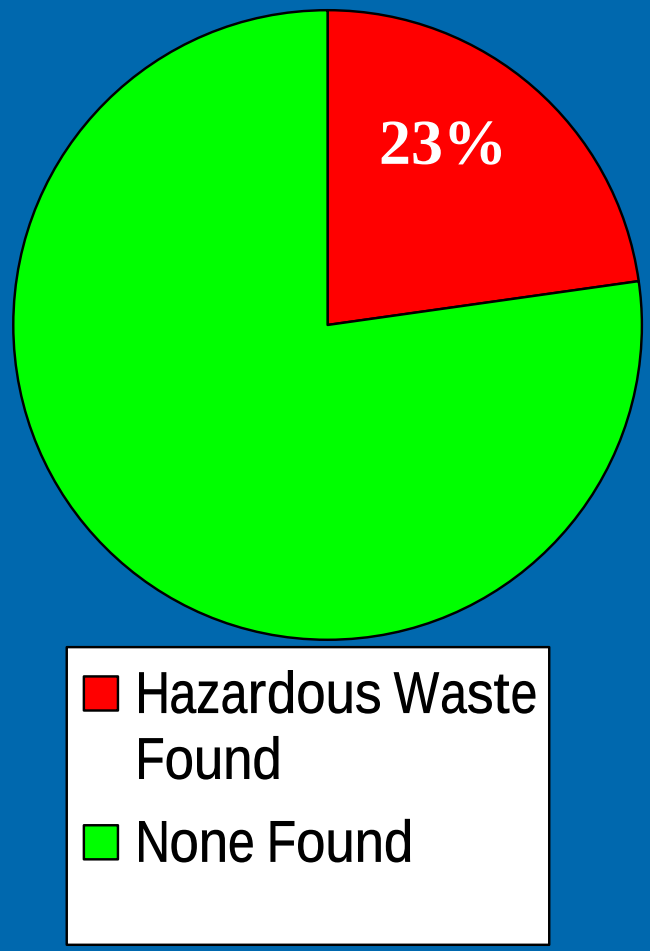
- DON'T BELIEVE!
  - WE'VE NEVER HAD ANY HAZARDOUS WASTE DUMPED HERE.

Waste Load Inspections

1993



2005



What Laws Apply

- California's Business and Professions Code section 17200, unfair business practices

  - any "unlawful, unfair or fraudulent business act or practice is a violation of Business and Professions Code section 17200.

Riverside County

Waste Management Department

No Hazardous Waste
The End