DEPARTMENT OF ENVIRONMENTAL HEALTH

HAZARDOUS MATERIALS DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261

PHONE: (858) 505-6700; FAX: (858) 505-6848; Email: hmdutych@sdcovmty.ca.gov

CERS ACCESS/I.D. REQUEST FORM

All Certified Unified Program Security (CUPA) regulated businesses are required by law (Assembly Bill 2286) to submit business information electronically through the California Environmental Reporting System (CERS). This includes information related to your:

- Unified Program Facility Permit
- Hazardous Materials Business Plan
- Hazardous Waste
- Hazardous Waste Onsite Treatment
- Hazardous Waste Tank Closures

- Remote Waste Consolidation
- Recyclable Materials Reports
- Underground Storage Tanks
- Aboveground petroleum storage over 1,320 gallons
- Medical Waste**

A CERS LD, is required in order to obtain or maintain a valid Unified Program Facility Permit. Please send your completed form to the County of San Diego Hazardous Materials Division (address above). When your CERS account is established, your designated lead users will receive an email with directions to begin electronic reporting.

** In San Diego County, Medical Waste Generators are required to report in CPRS in	order to receive a valid pe	ermit. ,	
I. IDENTIF	TCATION		
Change of Owner: a business is sold to a new owner.		1	PERMIT/RECORD NUMBER
Relocation: a business moves to a new address and owner remains the s	amc.	2	DEH 2003-HUPFP-
New Business: a business opens in a vacant or newly constructed buildi	ng.	3	CERS ID NUMBER
CERS Assistance Requested: none of the above are applicable. I need a	ccess to my CERS ac	count.	10365076 BUSINESS PHONE*
BUSINESS NAME (Same as PACILITY NAME or DBA - Doing Business As)*		1	
Cottonwood Golf Club @ RS.D		10	ag) 447-0012
SITE ADDRESS*		1	SUITE NUMBER*
3121 Willow GLen Dr.	· · · · · · · · · · · · · · · · · · ·		
EL CATON	9	CA	ZIP CODE*92019
BUSINESS OWNER PIRST AND LAST NAME OF CORPORATE NAME	191100)	BUSINESS OWNER PHONE
PREMIER GOLF PROPERTIE	<u>S</u>		
1. PREVIOUS ADDRES	SS (IF APPLICAB)		
PREVIOUS SITE ADDRESS		I	PREVIOUS PERMIT/RECORD NUMBER
SAME			
PREVIOUS CITY		CA.	PREVIOUS ZIP CODE
III. CERS LE	AD USERS		
-PRIMARY-	larra em	_SEC	CONDARY-
NAME*	NAME	- 0	0 ~~
GERRY Ruiz	TAVIE	sk r	WIZ
Superintendent BUSINESS PHONE	IIILE	04.5	40.10
Superince your	ASSI = 1	1 per	intendent
BUSINESS FROMB			
619) 447-0012		17-0	
Cliska e Cottonwood quib. Com	Clistae	COHON	wood golf-com
*Required	CHICAGO	COUVII	and quif com
I authorize the Hazardous Materials Division to create my CERS ID. I understand that I	am responsible for comp	leting and ma	aintaining my facility information in CERS as
required by law. I certify under penalty of law that I have personally examined and am fan accurate, and complete.	niliar with the information	n submitted of	n this form and believe the information is true,
SIGNATURE OF OWNER OR OPERATOR June Collinia	DATE*	3.31.	15
NAME OF SIGNER (print). C. Idler	TITLE	OF SIGNER*	ing Para Darther
OFFICE USE Transfer past submittals? no [] yes []	HUPFP#:		
ONLY PLAN CHECK: no yes	HHMBP#:		

County of San Diego CUPA Department of Environmental Health - Hazardous Materials Division

HM-907 (01/14)

1



County of San Diego

ELIZABETH A. POZZEBON DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261 Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6786 www.sdcdeh.org AMY HARBERT ASSISTANT DIRECTOR

NOTICE OF VIOLATION

June 2, 2015

COTTONWOOD GOLF COURSE PREMIER GOLF PROPERTIES, LP 3121 WILLOW GLEN DR EL CAJON, CA 92019

Dear Sir or Madam:

COTTONWOOD GOLF COURSE, DEH2003-HUPFP-202521, 10365076

The Hazardous Materials Division (HMD) of the Department of Environmental Health is the Certified Unified Program Agency (CUPA) for the County of San Diego. The CUPA inspects your facility to ensure compliance with various State and Federal environmental laws and regulations.

As of January 1, 2013 State law requires that you submit facility and hazardous materials inventory information into the California Environmental Reporting System (CERS). To help facilities comply with this requirement since the summer of 2012, this department has reached out to facility operators multiple times and in various ways, providing information and a video tutorial through its website, sending mail communications, hosting multiple workshops and CERS labs, and offering technical assistance and a dedicated CERS phone line for facility operators.

OUR RECORDS INDICATE THAT YOU HAVE NOT MET THE REQUIREMENT TO ELECTRONICALLY SUBMIT YOUR FACILITY INFORMATION AND/OR HAZARDOUS MATERIALS INVENTORY AND BUSINESS PLAN INFORMATION INTO CERS.

Not meeting this requirement is a violation of one or more of the following sections of California Laws and Regulations: California Health and Safety Code (HSC) §25404(e)(4); California Code of Regulations (CCR) Title 27, §15188; and the San Diego County Code of Regulatory Ordinances, Division 8, §68.904; HSC §25508.

WITHIN 30 DAYS of receipt of this Notice of Violation, submit your facility information into CERS for the HMD to review and accept. The CERS submittal must be complete and accurate in order to be accepted. The HMD is ready and willing to provide assistance. Please contact the HMD CERS Help Desk at 858-505-6990 or visit the HMD website at www.hmdCERSreporting.org for more CERS information.

Failure to comply with this Notice of Violation will lead to further enforcement action, which could result in substantial penalties of up to \$25,000 per day for missing facility information and up to \$5,000 per day for missing hazardous materials inventory and business plan information.

Sincerely.

GLORIA ESTOLANO, Interim Chief Hazardous Materials Division

) Esse

Certified Mail/RRR



MA DO OCK	COMPLAINCE INSPECTION APPORT	SPECIALIST M. K.
N. Co.		INSPECTION CONTACT
FACILITY NA	AMIE COTTONWOOD GOLF CHER	- GELLY RUTE
ADDRESS	3121 Whereas Gred De.	TITLE SUPERINTENDENT
		PHONE (618) 933 7300
CITY/ZIP	he County inspected your facility under the authority of the California Health and S	
violations. Minor Minor violations. Minor violations. The remarks below report within 30 d reason for any distant other violation. Y' N/A' NC S Un	1.2) for any minor violations as defined in III & SC 25404 and 25117.6. It violations do not include repeat violations or violations remaining do not include knowing, willfull, intentional, or chronic violations; nor do ware intended to provide guidance to correct any violations indicated on the ays (or as specified below) demonstrating that all violations have been computed violations. Prompt correction can protect you from penaltics for a "ms seven if they are corrected promptly. However, correction within 30 days of the program fees will be charged if additional insperified Program Facility Permit current your arguments are disposal records available for review nergency contacts current Updated today temical inventory/map current Updated today spect granted by: Inspection Contact Other:	y unacomirected for immere than 30 days (or as specified below), othey include violations showing a pattern of neglect or disregard, eattached violation report. You must submit a virigen response to this eattach or include a written notice of disagreement that clearly stakes the inor violation". Penalties can be imposed for each day in violation for (or as specified below) will make a penalty less likely.
GROW	ROUTINE INSPECT Y IS A GOLF COURSE WITH AN SDS MANTENANCE FACILITY. PE DS, FACILITY IS OFFIRETING AT OMASTITY CHAFKATOK LEVEL.	EQUIPMENT AND
VIOLA	TIONS!	
	FACILITY FAILED TO PREPARE A SPCC	PLAN,
1) 1		
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0	BSELVATIONS - FACILITY IS EQUIPTED IN SASOLINE TANK AND ONE 1000 GA OFFICIAL ACTION - WITHIN 30 DAYS C	DIFFER A SPEC PLAN AND
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0	BSELVATIONS - FACILITY IS EQUIPTED IN SASOLINE TANK AND ONE 1000 GA OFFICIAL ACTION - WITHIN 30 DAYS C	DIFFER A SPEC PLAN AND

plan) is required by law to be certified online through the California Environmental Reporting System (CERS). For additional information about bazardous materials business plans and CERS, go to: http://www.sdcounty.ca.gov/dely/bazarat/hmd-cers-info.html

PRINTED NAME OF FACILITY REPRESENTATIVE SIGNATURE CLUMATIVE REPRESENTATINE

DATTE STONED 1124 115

TITUE OF HACILITY REPRESENTATIVE

PAGE 1 OF 3 DATE

Swperin tem don't Universital Health, Hazandhus Matenials Division, P.O. Box 129261, San Diggo, CA 92112-9261 Phone: (HSB) 505-6000 http://www.shaddhorg

X

HM-9110 (06/11) NCR White: HMD Yellow: Facility

COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

PERMIT # 20252[

DATE 2 / 24 / 265

PAGE 2 OF 3

DEH-Hazardous Matterials Division, P.O. Box 129261, San Diego, CA 92112-9261

FACILITY ADDRESS: 3121 WILLOW GEENS DE	ZIP CODE: 92019
"HOW TO PREPARE YOUR OWN SPCC PLAN" FO PLAN PREPARATION.	DR ASSISTANCE IN
2) WITHIN 30 DAYS	
Observation: The facility has not submitted Unified Program Facility information through the Colfiornia Environmental Reporting System (CERS). Violation: Unified Program Facilities are required to submit facility information through CERS per section 25404(e)(4) of the California Health and Safety Code. Failure to correct violations could result in an erforcement action and significant penalties.	
Corrective action: Submit your facility information electronically at https://cersbusinass.caleoa.ca.gov within the time specified on this report. OR Contact the HMD at 258-505-6990 within 10 days of this inspection for assistance in submitting your facility information electronically.	WITHIN 30 DAYS
DISCUSSED REMOVAL OF USED BATTELIES. FROM INVENTORY IN CERS DUE TO REL DISCUSSED THRESHOLDS AND EXEMPTIONS. LLSS THAN HALF FILL 55 GALLON DI	OBSELVED TWO
REMARKS -	
- ONE SOILED HAZAKNOUS WASTE LABER C REPLACED DURING INSPECTION. ONE - PAKES WASHERS OBSERVED TO BE IN	EXTRA LABOR PLOVIDES
- FERTILIZER NOT OBSERVED ABOVE THAT INSPECTION. ML RUIZ STATED FERTILIZED AND DROTHEN BY THE TON WHEN PURC	SHOLD LEVELS DURINGE L IS APPLIFA SEASONAMY
- HARDCORY OF BUSINESS PLAN ON SITE. - RECEDT PAINWATER (NO SHEEN) IN ART AREA TAI LLL SIGNATURE OF FACILITY REPRESENTATIVE DATE SIGNED	Superintendant

COMPLIANCE INSPECTION REPORT
Small and Large Quantity Generators of Hazardous Waste
Handlers of Hazardous Materials

PAGE 3 OF 3

FACILITY ADDRESS: 2121 WILLOW GLEN DR. EL CATON

ZIP: 92019

**IOLATION REPORT: The stems checked below refer to specific section members of Titles 19, 22 & 27 of the California Code of Regulations (CCR), Chapters 6.5, 6.67 & 6.95 of the Health and Seject Code, and/or the San Diego County Code (SDCC), Small Quantity Hazardous Weste Generator=(SOG); Large Hazardous Waste Quantity Generator=(LOG); Code 40 of Federal Regulations=(CFR). All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Your Specialist can provide this form. Please call (858) 505-6880 or your Specialist if you have any questions.

			liance. Your Specialist can provide this form. Please call (858) 505-688		-		
-	-	HAZ	ARDOUS MATERIALS REQUIREMENTS	H	AZ	WA	ASTE REQUIREMENTS FOR LQGs & SQGs
Viel	#	V	VIOLATION DESCRIPTION	Viel#		V	VIOLATION DESCRIPTION
		1001	UPF permit not obtained for hazardous materials. SDCC 68.905	STO	RAC		ND HANDLING
		1002	Hazardous Materials Business Plan (HMBP) not established/ implemented in CERS. 25507			214	Used oil intentionally contaminated with HW. 25250.7(a)
		1004	HMBP not submitted to the CUPA in CERS. 25508			215	Used oil filters improperly managed. 66266_130
		1005	Emergency contact not provided or current. 25506(a)(7) &/or 25508.1(f)			216	Failed to label hazardous materials within 10 days or less 25124(b)(3)(A) & 66262.34(f)
		1007	Highly toxic gas (TLV≤10 ppm) not disclosed. 68.1113(b)			217	Failed to repackage damaged/deteriorated hazardous material
		1008	Did not submit annual carcinogen/reproductive toxin list. 68.1113(c)	-			container within 96 hours. 25124(b)(3)(B) & 66262.34(f)
		1009	Site map is not sufficient or complete. 25505(a)(2)	N.		218	Failed to label &/or close drained □ used oil filters &/or □ used fuel filters. 25250.22 & 66266, 130(e)(3)
		1010	Did not report release or threatened release. 25510, 19 CCR 2703			219	Failed to properly segregate used oil &/or fuel drained from filters.
1	M	1012	SPCC Plan not prepared. 25270.3 & 25270.4.5(a)		_		66266.130(c)(6) or 25250 22(b)(4)
		1014	HMBP is incomplete/inadequate/not amended to reflect changes. 25505, 25506, 25508, 25508.1 &/or 19 CCR 2729 & 2729.1	1			Spent lead acid batteries not properly managed. 66266 81
		1015	Did not have adequate employee training program 2732 &/or 25505(a)(4)	4			Failed to comply with satellite regulations. 66262 34(e)
	-		Failed to have an adequate emergency response plan 25505(a)(3); 2731	1		222	Failed to properly label ERM. 25143.9(a)
	The Contract	1017	Business Plan not certified in CERS at least once every 12 months. 25508.2)223	Failed to properly manage non-empty container or inner liner removed from a container. 66261.7(b), (d) &/or (r) Failed to mark date on empty container larger than 5 gallons &/or
		1018	Inventory not amended for 100% increase of hazardous material onsite or inventory is incomplete. 25508.1				manage it within one year. 66261.7(e) & (f)
	Īn.	1019	SPCC Plan amendment not prepared within 6 months of change.	1		1237	Failed to properly dispose of UW within one year. 66273.35(a) &/or (b)
-	-	1019	25270.4.5(a) [ref. CFR 112.1(b) & CFR 112.5] Failed to submit Unified Program Facility information in CERS to the	1121		238	Failed to manage UW in a manner to prevent release(s) to the environment. 66273.33 & 66273.33.5
2	NO.	1020	CUPA for regulated activity or change of information. HSC 25508(a)(1), 25508.1 &/or SDCC 68.906; 68.909; &/or 68.908.2			239	Failed to properly label or mark UW (non-CESQUWG). 66273.34
			ASTE REQUIREMENTS FOR LOGs & SOGS				ASTE REQUIREMENTS FOR SQGs ONLY ND HANDLING Pursuant to 66262.34(d)
1	7		Unified Program Facility (UPF) permit not obtained. SDCC 68.905			225	Accumulated waste too long (>180 or 270 days), 66262.34(d), CFR 262.34(e) & (f), &/or 25201(a) [>90 days for an AHW waste]
			Failed to obtain & maintain a valid EPA ID Number. 66262.12(a)	-			
	_		Failed to send manifest copy to DTSC. 66262.23(a)(4)				Did not accumulate waste in container or tank, 66262.34(d)(2)
			Failed to file Exception Report with DTSC 66262.42			228	Failed to properly label/date hazardous waste container &/or tank. 66262.34(f)
		A13#	Failed to keep hazardous waste manifests/receipts for 3 years available		=		Failed to keep container closed. CFR 265.173 Failed to conduct weekly inspections. CFR 265.174
			for inspection. 66262.40(a) & 25160.2(b)(3), 25185(a)(4)	-			Failed to maintain aisle space. CFR 265.35
			Did not have records of battery disposal. 66266.81(a)(4)(B)				Failed to properly separate incompatible wastes. CFR 265.177
-			Failed to complete manifest properly 66262.23(a)				Waste accumulated in a container in poor condition. CFR 265.171
-			Manifest signed by the TSDF not available for inspection 66262.40(a)				Failed to use a lined/compatible container, CFR 265,172
			Failed to have LDR documentation onsite. 66268.7(a)(8) Failed to obtain approval for TSDF. 25201(a)				Did not maintain &/or operate facility to prevent release or fire. CFR 265.31
			Failed to notify CUPA for eligible onsite treatment. 25201(a)	TRA			CONTINGENCY PLAN & ER PROCEDURES
	_		ERM reporting not submitted biennially &/or available. 25143.10			_	6262.34(d)(2)
		0146	Failed to have adequate records demonstrating claim of exemption for			407	Employee training program not adequate. CFR 262.34(d)(5)(iii)
_			Excluded Recyclable Material (ERM). 25143.2(f) & 66261.2(g) Failed to keep records of offsite universal waste (UW) shipment(s)			408	Failed to post ER plan by phone. CFR 262.34(d)(5)(ii)
		0147	available for inspection for 3 years. 66273.39(c) & (d)(2); 25185(a)(4)			409	Spill/fire control equip not available. CFR 265.32(c)
	0	0148	Failed to keep copies of analytical results, waste analysis records, or waste determination results. (3 years) 66262.40(c)			410	Failed to equip facility with internal communication or alarm. CFR 265.32(a) & (b)
		0149	Failed to keep disposal receipts (3 years) for drained used oil filters &/or drained fuel filters. 25250.22 & 66266.130(c)(5)			411	Failed to carry out contingency plan during an emergency. CFR 262.34(d)(5)(iv)
DIS	-		AND TRANSPORTATION			412	Failed to have an emergency coordinator on call or available during
		0301	Unauthorized disposal of hazardous waste. 25189.5(a) or 25189(c) or (d) or 25189.2(c)	HAZ			emergency. CFR 262.34(d)(5)(i)
		0302	Unlawful transportation of hazardous waste (HW) 25163(a)	HAZ			S WASTE TANK SYSTEMS Pursuant to 66262.34(d)(2)
	-	0303	Did not use HW manifest for disposall. 66262.20(a): 25160(b)(1) or (2), 25160.2(b)(9)			612	Hazardous waste improperly stored in a tank system causing ☐ leaks, ☐ corrosion, or ☐ failure. CFR 265.201(b)(2) Failed to comply with tank standards which include: two (2) feet of
			Failed to make a proper waste determination. 66262.11 & 66260.200(c)			613	freeboard (where applicable), shut off for waste feed line, and daily
	0		Disposed of vised oil illegally. 25250.5(a) & 25189.5(a) or 25189(c) or (d) or 25189.2(c)	-			and weekly inspections. CFR 265.201(b) & (c) Failed to properly complete &/or document closure for a hazardous
_	0	0306	Disposed of latex paint illegally. 25217.1			614	waste tank. CFR 265.201(d) & 67383.3
	0	0307	Disposed of UW to an unauthorized point. 25189.5(a) or 25189(c) or (d) or 25189.2(c); 66273.31(a)	-	D 1		C1 K 203.201(C)
_		0308	Impermissible dilution of hazardous waste. 66268.3(a)			616	Failed to safely manage incompatible waste in a tank. CFR 265.201(f)

SIGNATURE OF FACILITY REPRESENTATIVE

HM-923 (04/14) NCR

DATE SIGNED

Superinten dant
TITLE OF FACILITY REPRESENTATIVE



County of San Diego

ELIZABETH A. POZZEBON DIRECTOR DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION

P.O. BOX 129261, SAN DIEGO, CA 92112-9261 Phame: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6766 www.sdcdeh.org AMY HARBERT ASSISTANT DIRECTOR

NOTICE OF VIOLATION

June 2, 2015

COTTONWOOD GOLF COURSE PREMIER GOLF PROPERTIES, LP 3121 WILLOW GLEN DR EL CAJON, CA 92019

Dear Sir or Madam:

COTTONWOOD GOLF COURSE, DEH2003-HUPFP-202521, 10365076

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Sincerely.

GLORIA ESTOLANO, Interim Chief

Hazardous Materials Division

Certified Mail/RRR

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# C 60	For delivery inform	ilion visit our website	at www.usps.cc/ing
	Postage Certified Fee	s	
2000	Return Receipt Fee (Endorsement Required)		Postmark Here
	DEH	S ID: 10365076 2003-HUPFP=202	2521
1776		TONWOOD GOLI N: PREMIER GOL	F COURSE F PROPERTIES, LP
7008	Street, Apr. No. 312:	I WILLOW GLEN AJON, CA 92019	
	PS Form 38CC, August 20		See Heverse for Instructions

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7. Transporter 2 Company Name Transporter 2 Company Name						U.S. EPAT	D'Number			
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COTTOHWOOD GOLF COURSE

3121 WILLOW GLEN DRIVE

EL CAJON CA 92020

(619) 447-0012

SERRIVEDORDER ASSERVED NICE SPEAKER OF SPEAKER



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WWWWWDBDDDDCORRCOM TRANSPORTERERA #CANDO22770866 3121 WILLOW GLEN DRIVE

EL CAJON, CA 92020

							(019) 447-0	012	
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By signing below I hereby certify that

(Waste-oilingenerates/quisteoner/MussTicheekloome-offineer6albowingertheee-boxes)

□#1) I have not mixed any of the waste described above with any other razidos waste the total analysis the total analysis and the master described above with any other razidos waste the total analysis and the master described above with any other razidos waste the total analysis and the master described above with any other razidos waste the total analysis and the master described above with any other razidos waste the total analysis and the master described above with any other razidos waste the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total analysis and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above waster described above with any other razidos waster the total and the master described above with any other razidos waster the total and the master described above with any other razidos waster the total an

#21 have not mixed any of the waste described above with any other Pratificts Waste the Pratific Waste the Was

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Customer Signature Customer Signature

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Driver of Gionature

PriPrirotravevenaName

Print Name Print Name

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G: Pagingram descriptions of in Marians Hales Aports			H. Handling Codes	for Wastes Listed Abov	/8
15. Special Handling Instructions and Additional Information EMERGENCY CONTACT; CHEMTREC 1-800-424-9 00033402 * APPROPRIATE PERSONAL PROTECTIV SITE:	1300 ° PROFILE # 981 : COT: /E EQUIPMENT / // ///)	303-147174 ' 7 ₆	7 FLUORESCE	ENT LAMPS PS	10-
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FOR SERVICE CALL:
FOR SERVICE CALL:
1-800 974 4495
FOR ACCOUNTING CALL:
FOR 2669 YNGING CALL:
562-231-1550

COTTOFAVOOD SCLE COURS

3121 WILLOW GLEN CHIVE

EL CAJON CA 92/02

Customer Signature Customer Signature

Print Name

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SHIPPED

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3121 WILLOW GLEN DRIVE

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DESIGNATED T ACTION ATTENDATES	DF:	HANTENE GTACOF.	SOFMILIONE)	NFORMATION		STATE CODE	321	
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By signing below I hereby cer By signing below I hereby co #1) I have not mixed any of t the applicable Cal form a use the applicable Cal form a use #2 I have not mixed any of the Trave provided by specifications.	tify that: ert fy that (Waste eil pg) the waste described above with any other farm waste described above with any other farm waste described above with any other ed oil management regulations to described	WWASTECERTHING PRESENTATION	nae MWSSTche Belgherendere lees eelgheradsibilitaabaha	ekloons oofise Shahin ooogyaaranereh geseof on et uspisaararef	FEALOWIE	GANGE OBOXES) ye complied with the complied with the complied with the complied with the complied about this waste.	ne requirements of LEGUHEMENTS of Is incorrect
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CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS:

3121 WILLOW GLEN DR

CITY/ZIP:

EL CAJON

/92019

INSPECTION DATE: 04/07/2017

RECORD ID #: DEH2003-HUPFP-202521

SPECIALIST: Alaaeddine Zahra INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintendent PHONE: (619) 933-7300 E-MAIL: Gruiz@wgolfp.com

	VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)	DUE DATE
#1	3010001	May 5, 2017	EPA # WAS 15 UED MAY 5, 2017. WE WILL COMPLETE THE UPFP AS SOON AS THE APPLICATION IS RECEIVED.	05/07/2017
#2	HMD1001	May 5, 2017	ASBURY ENVIRONMENTAL SERVICES CONTACTED TO REMOVE ITEMS HOW THAT EPA # 15 AVAILABLE. MANIFEST TO BE PROVIDED.	05/07/2017
#3	3030010	MAY 5. 2017	ASBURY ENVIRONMENTAL SERVICES CONTACTED TO REMOVE ITEMS NOW THAT EPARTS ISSUED, MAKINEST TO BE PROVIDED UPON DISPOSAL	05/07/2017
#4	3030011	MAY 5. 2017	ASSURG ENVIRONMENTAL SERVICES CONTROTED TO REMOVE ITEMS. NOW THAT ALL EPA IT HAS BEEN ISSUED, MANIFEST TO BE PROVIDED UTON DISPOSAL	05/07/2017
#5	HMD0217	APR 17, 2017	OLD FERTILIZER WAS ATTHED TO COLF COURSE FAIR WAYS WEEK OF ATTLIL 17, 2017. ALL MATERIAL WAS USED.	05/07/2017
#6	3030036	APRIL 21, 2017	THE STORAGE ROOM WAS CLEANED OUT & REDREANIZED,	05/07/2017
#7	3030017	APRIL 20, 2017	WORLD DIL EMMRONMENTAL SERVICES EMPTIED USED OIL BARREL: A NEW STICKER WAS ATTACHED. THE LID IS KEPT ON THE BARREL AT ALL TIMES.	05/07/2017
#8	3030007	ATRIL 21,	WASTE CONTAINER IS NOW LABOURD.	05/07/2017
#9	4010001	APRIL 28;	SPCC IS ATTACHED.	05/07/2017
#10	4010002	APRIL 28, 2017	COTTONWOOD GOLF CLUB IS COMMITTIED TO TRAINING, CREAN- IZATION, AND RESPONSIBLY MANAGING ITS SPEC FOR HALARD- BUS MATTERIALS	05/07/2017
#11	1010004	APICIL 17, 2017	LIQUID IRON WAS APPLIED TO THE COURSE. HARRELL'S FERTILIZER IS NOW LISTED IN THE FERTILIZER INVINIORY	05/07/2017
‡12	4030007	APRIL 16.	CERARDO RUIZ PROPERLY DRAINED THE RHINWATER FROM THE BASIN UNDER THE STORAGE TANK	05/07/2017

l certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.

PRINTED NAME OF FACILITY REPRESENTATIVE	SICMATURE)	DATE SIGNED
TITLE OF FACILITY REPRESENTATIVE OPERATIONS SPECIALIST	SIGNATURE	Rick Submil	Hlay 21, 2017

SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW



INSSPECTION ODATE 0**4/07/2017** RECORD DH# **DEH 2003 HJ96 P**P2**22331**1

CORRECTIME ACTION HORM TO DOCUMENT RETURN TO COMPLIANCE

COUNTY OF SAN DIFFOUNTS ONLY

DATE:
ed by Specialist on:
ed by Office Assistant on:

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 http://www.sdcdeh.org 858-505-6880



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 09/11/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 12:40 PM END: 1:40 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT:Jackie Ellett
TITLE: Area Operations Manager
PHONE: (619) 933-7300
E-MAIL: Jhill@wgolfp.com

ACILITY REFERENCE DATA		CERS
RECORD STATUS: Permit Suspended		EPA ID NUMBER: CAL000427444
PERMIT EXPIRATION DATE: 03/31/2017		FACILITY CERS ID NUMBER: 10365076
BALANCE DUE: \$0.00		CERS LEAD USER: Rick Adams
INSPECTOR: Alaaeddine Zahra		LAST CERS SUBMITTAL DATE: 05/05/2017
INSPECTION TYPE: Re-inspection		ENVIRONMENTAL CONTACT EMAIL: radams@wgolfp.com
INSPECTION STATUS: Pending Corrective Action		ENVIRONMENTAL CONTACT PHONE: 9496329557
ACILITY INFORMATION	YES NO	YES NO
INACTIVATION INSPECTION:	_ x	HAZARDOUS MATERIALS:
CHANGE OF OWNER:		HAZARDOUS WASTE:
CHANGE IN BUSINESS TYPE:	_ x	ABOVEGROUND PETROLEUM STORAGE ACT:*
BUSINESS TYPE: Landscape Maintenance		TOTAL SHELL CAPACITY APSA: 1610
ISSUE INITIAL INVOICE:	x	UNDERGROUND STORAGE TANK:
ASSESS NON-NOTIFICATION FEE:	_ x	CALARP PROGRAM (CERS):
ASSESS RE-INSPECTION FEE:		CALARP PROGRAM LEVEL: 1 2 3 N/A
FACILITY SUBJECT TO BASE FEE:	x 🗆	MEDICAL WASTE:
FACILITY SUBJECT TO CUPA FEE:	x 🗆	MW FACILITY GENERATING OVER 200 LBS PER MONTH:
UPDATE FACILITY ADDRESS IN AA:	_ x	EPIC PARTICIPANT:
BUSINESS CLOSE DATE:		NUMBER OF TLV GASES AT THE FACILITY: 0
HW GENERATOR STATUS : LQG	SQG	CESQG RCRA LQG N/A
TIERED PERMIT LEVEL(S) : CESQT	CESW	E-L CE-CL HHW PBR CA N/A
PRIMARY BILLING CODE		SECONDARY BILLING CODE TERTIARY BILLING CODE
Not Applicable		Not Applicable Not Applicable
NSPECTION SCOPE:		
HAZARDOUS MATERIALS: GEN HAZMAT	APSA	UST HAZARDOUS WASTE: SQG LQG
MEDICAL WASTE: SQG SQG - TR	EATS	CALARP: 1 2 3
LQG LQG - ABI	BREVIATED LQG -	TREATS TIERED PERMITTING: CESOT CESW CF-I CF-CI
	120	TREATS TIERED PERMITTING: CESQT CESW CE-L CE-CL
		CA PBR HHW
CONSENT TO CONDUCT INSPECTION GRANTED E	Y: INSPECTION CONT	TACT NAME: Jackie Ellett TITLE: Area Operations Manager
REMOVE BLANK CHECKLISTS FROM FINAL INSPEC	TION REPORT	REFUSED TO SIGN
TIME ACCOUNTING (Re-inspection)		TOTAL TIME ENTERED: 1.3
Date Time Group		Туре
09/11/2017 0.2 Record		Drive Time
09/11/2017 1 Record		Report Writing
09/11/2017 0.1 Record		HazMat HazWaste



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 09/11/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 12:40 PM END: 1:40 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT:Jackie Ellett
TITLE: Area Operations Manager
PHONE: (619) 933-7300

E-MAIL: Jhill@wgolfp.com

INSPECTION REPORT EMAILS:	
Alaaeddine.Zahra@sdcounty.ca.gov	
RECORD COMMENT:	
REGOLD COMMENT.	



NOTICE OF VIOLATION

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 09/11/2017 PAGE 1 OF 6
RECORD ID #: DEH2003-HUPFP-202521

TIME START: 12:40 PM END: 1:40 PM

SPECIALIST: Alaaeddine Zahra

INSPECTION CONTACT: Jackie Ellett
TITLE: Area Operations Manager

PHONE: (619) 933-7300 E-MAIL: Jhill@wgolfp.com

OWNER'S NAME Western Golf Properties CITY/ZIP El Cajon /92020

ADDRESS 3121 Willow glen Dr PHONE (619) 933-7300

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations. This notice requires a formal written response and corrective action within the times specified.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: Jackie Ellett

TITLE: Area Operations Manager

INTRODUCTION:

The Hazardous Materials Division (HMD) is the Certified Unified Program Agency (CUPA) for the County of San Diego, regulating businesses that manage hazardous waste, hazardous materials, aboveground petroleum storage tanks, and underground storage tanks. The HMD also acts as the local enforcement agency for the Medical Waste Management Act (MWMA).

An initial inspection was conducted at this facility on 04/07/17. The facility recieved mulitple hazardous materials/waste handling violations and was notified of the need to obtain a hazardous materials permit after a recent change of ownership. In order to obtain the permit the facility had to submit an acceptable hazardous materials business plan through CERS. I was in correspondence with Mr. Rick Adams who submitted corrective action documentation for some of the violations however the latest HMBP inventory in CERS was not accepted on 05/30/17. I contacted Mr. Adams to request that the facility update the inventory to indicate the presence of the fertilizer that was observed during the inspection on multiple occasions including an email sent on 06/05/17 and 06/26/17. I also informed Mr. Rick that a re-inspection would be conducted if facility failed to return to compliance for the violations within 30 days.

As of today this facility does not have an accepted CERS submittal and therefore the facility has not been issued a hazardous materials permit. Ms. Jackie Ellett assisted with the re-inspection, I discussed the requirements to obtain a hazardous materials permit and the reason this facility has not been issued one yet. Ms. Ellett contacted Mr. Adams who spoke with me over the phone and stated that he will make the reviews by tomorrow after verifying the inventory.

VIOLATION # 1

HMD1001 Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905; 68.906, 68.907

Classification: Class I

Observations:

This facility handles hazardous materials in above reportable quantities and is required to obtain and maintain a hazardous materials permit. As of today this facility has not completed the necessary steps to obtain a permit and is therefore operating without one.

This is the second Class I violation that this facility is issued for operating without obtaining a permit. Be advised that further delays may result in formal environmental law enforcement.

Corrective Action Due By:10/11/2017

For a new permit, begin by submitting an acceptable HMBP submittal in CERS. Contact HMD for any questions.

VIOLATION # 2

HMD0131 Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905

INSPECTION DATE: **09/11/2017** PAGE **2** OF **6**

RECORD ID #: **DEH2**003-HUPFP-202521

Classification: Class I

Observations:

This facility generates hazardous waste in above reportable quantities and is required to obtain and maintain a hazardous waste permit. As of today this facility has not completed the necessary steps to obtain a permit and is therefore operating without one.

This is the second Class I violation that this facility is issued for operating without obtaining a permit. Be advised that further delays may result in formal environmental law enforcement.

Corrective Action Due By:10/11/2017

For a new permit, begin by submitting an acceptable HMBP submittal in CERS. Contact HMD for any questions.

INSPECTION REMARKS:

Helpful Websites:

- For guidance documents on hazardous materials-related topics,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (CERS),
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html
- If you have questions on: permit fees, business plan requirements, or hazardous waste regulations,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html
- To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails: https://public.govdelivery.com/accounts/CASAND/subscriber/new

Specialist should verify the identification of facility representative using a standard form of ID (e.g., CDL#, CA ID# or DOB).

PRINTED NAME OF ENV. HEALTH SPECIALIST			DATE SIGNED
Alaaeddine Zahra	SIGNATURE		09/11/2017
	SIGNATIONE		
PRINTED NAME OF FACILITY REPRESENTATIVE		21	DATE SIGNED
Jackie Ellett	SIGNATURE	/ Kal Lot	09/11/2017
TITLE OF FACILITY REPRESENTATIVE	SIGNATURE		
Area Operations Manager			

You must submit a written response within 30 days (or as specified) addressing all violations noted. The written response must demonstrate all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. The County may initiate formal enforcement action including the imposition of substantial penalties for any significant violations addressed in this notice. Any violations that are not promptly corrected will result in liability for additional days in violation and additional penalties. Any failure to provide the information requested will also be a factor in determining penalties. For these purposes, "significant violations" include violations that represent a significant threat to human health or safety or the environment, chronic violations, violations committed by a recalcitrant violator and Class I hazardous waste violations (CCR 66260.10 and H&SC 25110.8.5).



COMPLIANCE INSPECTION REPORT

FACILITY NAME: COTTONWOOD GOLF COURSE ADDRESS: **3121 WILLOW GLEN DR EL CAJON** /92019 CITY/ZIP:

INSPECTION DATE: 09/11/2017		PAGE 3 OF 6		
RECORD ID #: DEH2 003-HUPFP-202521				
TIME START:	12:40 PM	END:	1:40 PM	
SPECIALIST: Alaaeddine Zahra				
INSPECTION CONTACT: Jackie Ellett				
TITLE: Area Operations Manager				
PHONE: (619) 933-7300				
E-MAIL: Jhill@wgolfp.com				

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or

chronic violations; nor do they include violations showing a pattern of neg indicated on the attached violation report. You must submit a written respon corrected or include a written notice of disagreement that clearly states the violation". Penalties can be imposed for each day in violation for all other v below) will make a penalty less likely.	nse to this report within reason for any disputed	30 days (or as specified below) demons I violations. Prompt correction can prote	trating that all violations have been ect you from penalties for a "mino
NOTE: Reinspection fees will be charged if additional in	spections are req	uired to determine complian	ice.
Yes N/A	Yes N	I/A	
☐ ☐ Unified Program Facility Permit Current		Contingency Plan Availab	ole 🗌 LQG 🔲 SQG
☐ Hazardous Materials Business Plan Available		Employee Training Recor	ds Available
☐ Employee Training is Adequate		Universal Waste Manage	d Properly
☐ ☐ Waste Disposal Records Available for Review		☐ Waste Containers ☐ Cl	osed 🗌 Labeled
☐ ☐ Emergency Contacts Current ☐ Updated too	day 🔲 🛚	☐ Waste Containers in Goo	d Condition
☐ Chemical Inventory/Map Current ☐ Updated	d today	Permit Expires On 03/3	1/2017
CONSENT TO CONDUCT INSPECTION GRANTED BY: Jackie If you have any questions regarding this inspection, pleas Alaaeddine.Zahra@sdcounty.ca.gov			Operations Manager
*** Please Refer to Notice of Violation ***			
INSPECTION PHOTOS None			
All regulated businesses are required by law to submonline through the California Environmental Reporting www.sandiegocounty.gov/deh/hazmat/hmd_cers.html	System (CERS). F	_	
PRINTED NAME OF FACILITY REPRESENTATIVE Jackie Ellett	SIGNATURE	Sull	DATE SIGNED 09/11/2017
TITLE OF FACILITY REPRESENTATIVE Area Operations Manager	SIGIVITORE		

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 Phone: (858) 505-6880 http://www.sdcdeh.org



HM-923 (06-17)

COUNTY OF SAN DIEGO

INSPECTION DATE: <u>09/11/2017</u>

RECORD ID #: **DEH2003-HUPFP-202521**

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COMPLIANCE INSPECTION REPORT

Handlers of Hazardous Materials and Small and Large Quantity Generators of Hazardous Waste

FACILITY NAME: *COTTONWOOD GOLF COURSE

ADDRESS: * 3121 WILLOW GLEN DR CITY/ZIP: *EL CAJON 92019

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. Incorporated provisions of Title 40 of the Code of Federal regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator;

LIAZADDOLICA MATERIAL C. DE OLUBERATRICO				
	HAZARDOUS MATERIALS REQUIREMENTS			
	VIOLATION DESCRIPTION			
1010001	HMBP not established/ implemented. HSC 25505(a) and 25507(a)			
1010002	HMBP not submitted to the CUPA in CERS. HSC 25508(a)(1)(A); HSC 25404(e)(4); 27 CCR 15188(a),(b),(d)			
1010003	Business Activities &/or Business Owner/Operator page not completed in CERS. 19 CCR 2652(a)(1); HSC 25404(e)(4); SDCC 68.904(b)			
1010004	Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508(a)(1)(A); 25508.1(a-b); 19 CCR 2654 (a) or (d)			
<u> </u>	Site map not submitted in CERS or not sufficient. HSC 25505(a)(2); 25508(a)(1)(A); 25508.1(f); 19 CCR 2652(a)(3)			
☐ 1010006 ☐ 1010008	Failed to update HMBP in CERS within 30 days of a substantial change to any portion of the HMBP, including inventory changes or facility information. HSC 25508.1(a-f); 19 CCR 2654(d); SDCC 68.904(c)(6) HMBP not certified annually as complete and accurate in CERS. HSC 25508(a)(1)(A), 25508.2, 19 CCR 2654(b)			
1010010	Emergency response procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3),			
1010011	25508(a)(1)(A): 19 CCR 2658 Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1			
	Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1			
 1010014	Failure to submit emergency response plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)			
	Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)			
☐ 1010016	HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)(A)			
1020001	Employee training plan for hazardous materials management not adequate, not established or not submitted in CERS. HSC 25505(a)(4) and 25508(a)(1) (A); 19 CCR 2659(a)			
<u> </u>	Initial &/or annual employee training not conducted for hazardous materials management &/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4); 19 CCR 2659(b)			
1040001	Hazardous materials release or threatened release not reported to the CUPA and OES immediately upon discovery. HSC 25510(a); 19 CCR 2631(a)			
I ⋉ HMD1001	Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905; 68.906, 68.907			
☐ HMD1005	Emergency contact not provided or current in CERS. HSC 25508.1(f); SDCC 68.904(b)			
☐ HMD1007	Highly toxic gas (TLV<10 ppm) not disclosed. SDCC 68.1113(b)			
☐ HMD1008	Annual carcinogen/reproductive toxin list not submitted. SDCC 68.1113(c)			
<u> </u>	HMBP not readily available to facility personnel or the CUPA. HSC 25505(c)			
HAZARDOUS WASTE REQUIREMENTS FOR SQGS ONLY				
	<u>VIOLATION DESCRIPTION</u>			
☐ HMD0226	Did not accumulate waste in a container or tank. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2)			
3030007	Failed to properly label/date hazardous waste container &/or tank. 22 CCR 66262.34(f)			
3030010	Accumulated waste too long (>180 or 270 days) or (>90 days). HSC 25201(a); 22 CCR 66262.34(d); 40 CFR 262.34(e) and (f)			
3030013	Failed to accumulate hazardous waste in a container that is in good condition. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.171			
3030015	Failed to accumulate or store hazardous waste in a lined &/or compatible container. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.172			
3030017	Failed to properly close hazardous waste container(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.173			
3030019	Failed to inspect hazardous waste storage area at least weekly. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.174			
3030022	Failed to properly separate incompatible waste. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.177			
3030030	Failed to maintain &/or operate facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.31			
3030036	Failed to maintain adequate aisle space. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4); 265.35			
☐ 3010022 ☐ 3020001	Failed to post, next to the telephone, emergency information containing the location of emergency equipment, contact names and phone numbers. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(ii) Failure to ensure employees are trained on hazardous waste regulations related to proper waste handling and emergency response procedures. 22 CCR			
	66262.34(d)(2); 40 CFR 262.34(d)(5)(iii)			
3030032	Failed to maintain the following emergency response equipment or equivalent: 1) An internal communication or alarm system; 2) A communication device, such as a telephone; 3) Portable fire extinguishers, fire/spill control equipment and decontamination equipment; and 4) Water at adequate volume and pressure. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4); 265.32			
3030039	Failed to have an emergency coordinator on call or available during an emergency. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(i)			
☐ HMD0412	Failed to implement contingency plan during an emergency, spill/release. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(iv)			
	HAZARDOUS WASTE TANK SYSTEMS FOR SQGS ONLY			
	<u>VIOLATION DESCRIPTION</u>			
3030024	Failed to operate uncovered tanks to ensure at least 2 ft. of freeboard to prevent overtopping, unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 2 ft. of the tank. 22 CCR			
	66262.34(d)(2); 40 ČFR 262.34(d)(3), 265.201(b)(c)			



COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 09/11/2017

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RECORD ID #: DEH2003-HUPFP-202521

Haz	ardous Materials and Hazardous Waste (continued)		
3030027	Failed to conduct daily tank inspection of discharge control system, monitoring equipment and waste level. 22 CCR 66262.34(d)(2); 40 CFR 265.201(c)		
3030028	(1-3), 262.34(d)(3) Failed to conduct weekly hazardous waste tank inspection to ensure that the construction materials, fixtures and surrounding areas of the tank are in		
☐ 3050007	good condition. 22 CCR 66262.34(d)(2); 40 CFR 265.201(c)(4-5), 262.34(d)(3) Failed to properly decontaminate and document closure of a hazardous waste tank system. 22 CCR 67383.3; 40 CFR 262.34(d)(3), 265.201(f)		
☐ HMD1612	Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. 22 CCR 66262.34(d)(2); 40 CFR 265.201(b)		
☐ HMD1614	Failed to pre-notify the CUPA in writing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1)		
☐ HMD1615	Failed to properly accumulate ignitable or reactive waste in a tank system. 22 CCR 66262.34(d)(2); 40 CFR 265.201(g)		
	HAZARDOUS WASTE REQUIREMENTS FOR SQGS AND LQGS		
	RECORD KEEPING/OPERATIONAL REQUIREMENTS		
	VIOLATION DESCRIPTION		
! ★ HMD0131	Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905		
☐ HMD0150	Failed to submit complete and accurate Facility Information in CERS. HSC 25404(e)(4); 27 CCR 15188(b-c); SDCC 68.904(b)		
3030053	Failed to maintain waste analysis records, analytical records &/or waste determination results for at least 3 years. 22 CCR 66262.40(c)		
3010002	Failed to obtain &/or maintain an active EPA ID Number. 22 CCR 66262.12(a)		
3010008	Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a)		
3010009	Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 25123.3(h)(2); 22 CCR 66262.42		
3010010	Failed to maintain copies of Uniform Hazardous Waste Manifest, consolidated manifest, or Bills of Lading for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a), 66262.23(a)(3)		
3010011	Failed to send copy of the uniform hazardous waste manifest to DTSC within 30 days of shipment. 22 CCR 66262.23(a)(4)		
3010013	Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2; 22 CCR 66262.40(a)		
3010014	Failed to retain disposal records of spent lead-acid batteries for 3 years. 22 CCR 66266.81(a)(4)(B)		
3030006	Failed to determine if a hazardous waste is restricted or prohibited from land disposal. 22 CCR 66268.7(a)		
☐ 3010016 ☐ HMD0149	Failure of recycler who recycles more than 100 kilograms per month of a recyclable material to submit the biennial Recyclable Materials Report (RMR) ir CERS when claiming exclusion or exemption. HSC 25143.10(a), (c) &/or (d) Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130		
☐ HMD0152	Failed to submit/report in CERS chemical inventory information for hazardous waste and/or medical waste, and keep up to date. SDCC 68.904(a)(2)		
☐ HMD0140	Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66268.7(a)(8)		
3250005	Failed to obtain a Treatment, Storage and Disposal Facility (TSDF) permit or authorization to store/treat/dispose of hazardous waste. HSC 25201(a)		
3050005	Failed to have adequate records demonstrating claim of exemption or exclusion for recyclable materials. HSC 25143.2(f); 22 CCR 66261.2(g)		
☐ HMD0142	Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a)		
☐ HMD0138	Manifest signed by the TSDF not available for inspection. 22 CCR 66262.40(a)		
DISPOSAL AND TRANSPORTATION			
	<u>VIOLATION DESCRIPTION</u>		
3010007	Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a)		
3030005	Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)		
3050001	Failed to use a DTSC registered hazardous waste transporter to transport hazardous waste. HSC 25163(a); 22 CCR 66263.41		
3050002	Failed to properly dispose of hazardous waste at an authorized facility. HSC 25189.5(a); 25189(c),(d); 25189.2(c)		
☐ HMD0308	Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)		
☐ HMD0305	Disposed of used oil illegally. HSC 25250.5(a); 25189.5(a); 25189(c),(d); 25189.2(c)		
☐ HMD0306	Failed to properly dispose of hazardous waste latex paint. HSC 25217.1 STORAGE AND HANDLING		
	VIOLATION DESCRIPTION		
3030001	3030001 Failed to meet the management requirements when handling or storing spent lead-acid batteries. 22 CCR 66266.81(a)		
3030003	Failed to properly manage 'damaged' spent lead acid batteries. 22 CCR 66266.81(b)		
3030004	Failed to properly manage, store, label &/or recycle used oil filters &/or used fuel filters. HSC 25250.22; 22 CCR 66266.130		
3050004	Generator intentionally contaminated used oil with another hazardous waste other than minimal amounts of fuel. HSC 25250.7(a), (c)		
☐ HMD0222	Failed to properly label Excluded Recyclable Materials (ERM) accumulated in a container or tank. HSC 25143.9(a)		
☐ HMD0216	Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3		
☐ HMD0217	(A); 22 CCR 66262.34(f) Failed to repackage damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)		
☐ HMD0219	Failed to properly segregate used oil &/or fuel drained from filters. HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6)		
3030057	Failed to comply with hazardous waste satellite container regulation. 22 CCR 66262.34(e)		
☐ HMD0023	Failed to properly empty container, failed to manage non-empty container, or inner liner removed from a container. 22 CCR 66261.7(b-e) &/or (r)		
3030058	Failed to mark date on empty container larger than 5 gallons &/or manage it within one year. 22 CCR 66261.7(f)		

UNIVERSAL WASTE HANDLER REQUIREMENTS

VIOLATION DESCRIPTION 3010004 Failed to obtain a California ID Number from DTSC or federal ID Number from USEPA prior to accumulating 5,000 kgs or more of Universal Waste. 22 CCR 66273.32(a-b)



HM-923 (06-17)

COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 09/11/2017

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RECORD ID #: DEH2003-HUPFP-202521

Hazardous Materials and Hazardous Waste (continued)

☐ HMD0151	Failed to maintain universal waste handler training records for 3 years. 22 CCR 66273.36(c),(d)
3020003	Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
3030008	Failed to properly label or mark Universal Waste container (excluding CESQUWG) 22 CCR 66273.34
3030011	Failed to properly dispose of Universal Waste within one year. 22 CCR 66273.35(a) &/or (b)
☐ HMD0147	Failed to keep records of offsite Universal Waste shipment(s) available for inspection for 3 years. 22 CCR 66273.39(c),(d)(2)
3030051	Failed to meet accumulation &/or containment standards for Universal Waste aerosol containers. HSC 25201.16(f)
3040004	Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 66273.33; 66273.33.5
☐ HMD0307	Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a), 25189(c), (d); 25189.2(c); 22 CCR 66273.31(a), 66273.8(b)
3010005	Failure of a universal handler of electronic devices or CRTs from an offsite source to notify DTSC 30 days prior to acceptance. 22 CCR 66273.32(c)



CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: COTTONWOOD GOLF COURSE

☐ Based On Information Provided By The Facility

☐ Based On Field Verification By Specialist

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 09/11/2017
RECORD ID #: DEH2 003-HUPFP-202521
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT: Jackie Ellett
TITLE: Area Operations Manager
PHONE: (619) 933-7300
E-MAIL: Jhill@wqolfp.com

	VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)		DUE DATE		
#1	HMD1001						10/11/2017
#2	HMD0131						10/11/2017
fami	I certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.						
PRI	PRINTED NAME OF FACILITY REPRESENTATIVE DATE SIGNED						
TITLE OF FACILITY REPRESENTATIVE		SIGNATURE					
SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW							
COUNTY OF SAN DIEGO USE ONLY							
RE'	REVIEWED BY: DATE:				_		
SPECIALIST'S COMMENTS:							
	All violations	noted on date l	sted above were correct	ted			

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 http://www.sdcdeh.org 858-505-6880

RTC entered by Specialist on:RTC entered by Office Assistant on:

From: Rick Adams

To: Zahra, Alaaeddine
Cc: Jhill@wgolfp.com
Subject: Re: CERS submittal

Date:Friday, September 22, 2017 3:59:09 PMAttachments:Cottonwood CERS Submission 9-22-2017.pdf

Alaaeddine,

I updated my entries into CERS as you described. I also attached the disposal manifest from Asbury Environmental Services and I attached better maps with locations of hazardous materials and waste.

Thank you for your help, and please let me know if you have any questions.

Rick Adams, PGA

Operations Specialist radams@wgolfp.com
949/632-9557

Western Golf Properties
One Spectrum Pointe Drive, Suite 310
Lake Forest, CA 92630
westerngolfproperties.com

On Mon, Sep 18, 2017 at 10:22 AM, Zahra, Alaaeddine <<u>Alaaeddine.Zahra@sdcountv.ca.gov</u>> wrote:

Mr. Adams,

I reviewed your recent CERS submittal and it still could not be accepted. I noticed that you started a submittal from scratch. Please note you can always start a submittal based on a previous submittal that way you do not have to reenter all the information.

Here's why the submittal could not be accepted. Please make necessary reviews as soon as possible. If you want one on one assistance with the submittal you may contact the CERS helpdesk at <u>858-505-6990</u>

1- Oxygen:

- a. reported at 50cuft, during the inspection more than 200cuft were observed on site. One large cylinder is about 200cuft
- b. Days on site not filled out. Please fill out 365
- c. Sotrate temperature and storage pressure not filled out. Fill ambient for temp. and above ambient for pressure

2- Acetylene:

- a. Reported at 50cuft, during the inspection more than 200cuft were observed on site
- b. Days on site not filled out.
- c. Storage pressure must be above ambient not ambient

3- Propane:

- a. Is reported in cuft, you must report in gallons: 1 gallon propane = 35.97 cubic feet propane
- b. Days on site not filled out
- c. Storage pressure is above ambient not ambient

4- Diesel:

- a. Reported at a maximum daily amount of 100 gallons. This is the value of the amount of hazardous materials your facility would have if all designated containers are full. During the inspection I observed a 1000gal diesel tank so if this tank is still on site the maximum daily amount need to be at least 1000gal.
- b. Days on site not filled out

5- Gasoline:

a. Reported at a maximum daily amount of 100 gallons. This is the value of

the amount of hazardous materials your facility would have if all designated containers are full. During the inspection I observed a 500gal diesel tank so if this tank is still on site the maximum daily amount need to be at least 500gal.

b. Days on site reported as 15. If this tank is on site all year long, please change to 365

6-Waste Oil: Your facility handles waste oil however it is not reported in CERS in your last submittal. Add waste oil to the inventory. Ensure that hazmat type is: waste, and annual waste amount is filled out along with the other fields.

Note that maximum daily amount is the amount your facility will handle on site if all containers are full, average daily amount is the average amount of that item that is present on site on an average.

- 6- Furthermore, the sitemap is not acceptable and does not follow requirements as indicated in the inspection report guidance link; Review guidance document for how to prepare an acceptable sitemap and resubmit. Here's the guidance: http://www.sandiegocounty.gov/content/dam/sdc/deh/hmd/pdf/hmbp/hm-952%20(02-16)%20SITEMAP.docx
 - a. I attached a sitemap that was previously submitted for the maintenance area, if everything is still the same you can attach it to the overview page sitemap showing the location of the maintenance area with respect to your facility. More than one page may be needed if there are areas other than the maintenance area where hazmat are stored. Note that only one sitemap must be in the sitemap section so please discard all previous sitemaps.

OTHER OPEN VIOLATIONS:

I attached the corrective action form (CAF) which was submitted by your facility in May.

Please review and update the form (update corrective action for violation 2-4) as the manifests should be available by now. Submit manifests showing proper disposal in order to close the violations

Regards,

Alaaeddine Zahra

Hazardous Materials Division

Department of Environmental Health

Phone: (858) 525-5834

Fax: (858) 505-6786



CEERS & CESSSADIR REQUESTS FOR MM

All Certified Unified Program Agency (CGLRA) general dispresses All Infertifiation electronically through the aliability and information electronically through the aliability in the aliability in the call the permit of the program of the call the permit of the permit	ses ereque poptioning Percent Refere Refere Unide Abdu Modificiel Hologra D) Wheten	incidentenal/Acassilos de la companya de la company	ply Bill 2286) to submit business moly Bill 2286) to submit business includes information related to your: dation per
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Cottonwood Golf Club Cottonwood Golf Club			(A) A) 422-3821 x SUITE NUMBER
SITE ADDRESS* 3121 Willow Glen Drive 3124-Willow Glen Drive			SUITE NUMBER+
El Caion	CA	ZiP*	DATE ASSUMED OWNERSHIP*
BUSINESS ORGANIZATION, CORPORATE NAME, LLC, OF OWNER FIRST AND Western Golf Properties LLC Western Golf Properties LLC H. PREVIOUS APPRE	IDILAST N	920199- AME*	1/2-9-16 10-29-16 10-
Western Golf Properties LLC PREVIOUS SITE ADDRESS H. PREVIOUS ADDR	ESS (IF A	APPLICABLE)	(948) 632-9557 X
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Golf Course Superintendent Bushisswers Euperintendent Bushiss PHONE*	Opport Opport	ations Specialists	ieneral Mer
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NAME OF SIGNER (print)* RNAME OF SIGNER (print)*		4/1/3/2/20-) 7	F.R*
Rick Adams		Open distinguish	Specialist
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HM-907 (12/15) HM-907 (12/15)



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 1:00 PM END: 4:30 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT:Gerry Ruiz
TITLE: Superintendent
PHONE: (619) 933-7300
E-MAIL: Gruiz@wgolfp.com

FACILITY REFERENCE DATA ACCELA	CERS
RECORD STATUS: Expired	EPA ID NUMBER: CAL000273995
PERMIT EXPIRATION DATE: 03/31/2017	FACILITY CERS ID NUMBER: 10365076
BALANCE DUE: \$1,140.00	CERS LEAD USER: Marge August
INSPECTOR: Alaaeddine Zahra	LAST CERS SUBMITTAL DATE: 06/26/2015
INSPECTION TYPE: Routine	ENVIRONMENTAL CONTACT EMAIL:
INSPECTION STATUS: Complete	ENVIRONMENTAL CONTACT PHONE: 619-442-9891
FACILITY INFORMATION YES NO	YES NO
INACTIVATION INSPECTION:	HAZARDOUS MATERIALS:
CHANGE OF OWNER:	HAZARDOUS WASTE:
CHANGE IN BUSINESS TYPE:	ABOVEGROUND PETROLEUM STORAGE ACT:*
BUSINESS TYPE: Landscape Maintenance	TOTAL SHELL CAPACITY APSA: 1500
ISSUE INITIAL INVOICE:	UNDERGROUND STORAGE TANK:
ASSESS NON-NOTIFICATION FEE:	CALARP PROGRAM (CERS):
ASSESS RE-INSPECTION FEE:	CALARP PROGRAM LEVEL: 1 2 3 N/A
FACILITY SUBJECT TO BASE FEE:	MEDICAL WASTE:
FACILITY SUBJECT TO CUPA FEE:	MW FACILITY GENERATING OVER 200 LBS PER MONTH:
UPDATE FACILITY ADDRESS IN AA:	EPIC PARTICIPANT:
BUSINESS CLOSE DATE: 08/24/2016	NUMBER OF TLV GASES AT THE FACILITY: 0
HW GENERATOR STATUS : LQG SQG CESQG	RCRA LQG N/A
TIERED PERMIT LEVEL(S): CESQT CESW CE-L	CE-CL HHW PBR CA N/A
PRIMARY BILLING CODE	SECONDARY BILLING CODE TERTIARY BILLING CODE
Not Applicable	Not Applicable Not Applicable
INSPECTION SCOPE:*	
HAZARDOUS MATERIALS: GEN HAZMAT APSA UST	HAZARDOUS WASTE: SQG LQG
MEDICAL WASTE: SQG SQG - TREATS	CALARP: 1 2 3
LQG - ABBREVIATED LQG - TREATS	TIERED PERMITTING: CESQT CESW CE-L CE-CL
	CA PBR HHW
CONSENT TO CONDUCT INSPECTION GRANTED BY: INSPECTION CONTACT	NAME: Gerry Ruiz TITLE: Superintendent
REMOVE BLANK CHECKLISTS FROM FINAL INSPECTION REPORT	REFUSED TO SIGN



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: <u>04/07/2017</u> RECORD ID #: <u>DEH2003-HUPFP-202521</u>

TIME START: 1:00 PM END: 4:30 PM

SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintendent
PHONE: (619) 933-7300
E-MAIL: Gruiz@wgolfp.com

INSPECTION REPORT EMAILS:
Alaaeddine.Zahra@sdcounty.ca.gov
RECORD COMMENT:
Arrived to conduct a routine inspection on 4/7/17. As per Gerry Luiz facility had recently underwent a change of ownership around August 2016.



COMPLIANCE INSPECTION REPORT

FACILITY NAME:	COTTONWOOD GOLF COURSE	
ADDRESS:	3121 WILLOW GLEN DR	
CITY/7IP·	FI CAION	/92019

INSPECTION DATE: 04/07/2	2017 PAGE 1 OF 4		
RECORD ID #: DEH2003-HU	PFP-202521		
TIME START: 1:00 PM	END: 4:30 PM		
SPECIALIST: Alaaeddine Z	ahra		
INSPECTION CONTACT:Gerry Ruiz			
TITLE: Superintendent			
PHONE: (619) 933-7300			
E-MAIL: Gruiz@wgolfp.com			

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been

violati	on". Pe	include a written notice of disagreement that clearly states the reason for any nalties can be imposed for each day in violation for all other violations even ake a penalty less likely.				
NOT	NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.					
Yes	N/A		Yes	N/A		
	x	Unified Program Facility Permit Current		x	Contingency Plan Available 🔲 LQG	\square SQG
	X	Hazardous Materials Business Plan Available		X	Employee Training Records Available	

X **Employee Training is Adequate** X **Universal Waste Managed Properly** Waste Disposal Records Available for Review Waste Containers ☐ Closed ☐ Labeled X X

X Emergency Contacts Current Updated today X Waste Containers in Good Condition Chemical Inventory/Map Current Updated today Permit Expires On 03/31/2017 X

CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz TITLE: Superintendent

INTRODUCTION:

Arrived to conduct a routine hazardous materials inspection at this facility, as per Gerry Ruiz this facility underwent a change of ownership around August 2016. Old owner was Premier Golf Properties. New facility operator is Western Golf Properties.

This report will serve as closure report for old operator facility record. Another inspection report will be issued for observations for initial inspection of new facility/operator actions.

INSPECTION REMARKS:

Helpful Websites:

• For guidance documents on hazardous materials-related topics,

go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html

• For information on the California Environmental Reporting System (CERS),

go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html

• If you have questions on: permit fees, business plan requirements, or hazardous waste regulations,

go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html

• To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails:

https://public.govdelivery.com/accounts/CASAND/subscriber/new

If you have any questions regarding this inspection, please contact Alaaeddine Zahra, 858-525-5834, Alaaeddine.Zahra@sdcounty.ca.gov

INSPECTION PHOTOS

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: http:// www.sandiegocounty.gov/deh/hazmat/hmd cers.html

PRINTED NAME OF FACILITY REPRESENTATIVE			DATE SIGNED
Gerry Ruiz	SIGNATURE		04/07/2017
TITLE OF FACILITY REPRESENTATIVE	SIGNATURE	B	
Superintendent			



INSPECTION DATE: 04/07/2017 RECORD ID #: **DEH2**003-HUPFP-202521

PAGE 2 OF 4

SUPPLEMENTAL COMPLIANCE **INSPECTION REPORT**

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 Phone: (858) 505-6880 http://www.sdcdeh.org



INSPECTION DATE: <u>04/07/2017</u>

RECORD ID #: **DEH2003-HUPFP-202521**

PAGE 3 OF 4

COMPLIANCE INSPECTION REPORT

Handlers of Hazardous Materials and Small and Large Quantity Generators of Hazardous Waste

FACILITY NAME: *COTTONWOOD GOLF COURSE

ADDRESS: * 3121 WILLOW GLEN DR CITY/ZIP: *EL CAJON 92019

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in Italics. Incorporated provisions of Title 40 of the Code of Federal regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator; LQG = Large Quantity Hazardous Waste Generator

Hazardous Materials Requirements	Hazardous Waste Requirements for SQGs ONLY (continued)
VIOLATION DESCRIPTION	# <u>VIOLATION DESCRIPTION</u>
1010001 HMBP not established/ implemented. HSC 25505(a) and 25507(a)	3030007 Failed to properly label/date hazardous waste container and/or tank. 22 CCR 66262.34(f)
1010002 HMBP not submitted to the CUPA in CERS. HSC 25508(a)(1)(A); HSC 25404(e)(4); 27 CCR 15188(a), (d) 1010003 Business Activities and/or Business Owner/Operator Identification not	3030010 Accumulated waste too long (>180 or 270 days) (>90 days for an acutely hazardous waste). (40 CFR 262.34(e) and (f).) HSC 25201(a); 22 CCR 66262.34(d)
completed in CERS. 19 CCR 2729.2(a)(1); HSC 25404(e)(4) 1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a) (1); 25506; 25507; and 25508(a)(1)(A)	2020012 Failed to accumulate hazardous waste in a container that is in good
1010005 Site map not submitted in CERS or not sufficient. HSC 25505(a)(2) and 25508(a)(1)(A)	container. (40 CFR 262.34(d)(2); 265.172) 22 CCR 66262.34(d)(2) 3030017 Failed to properly close hazardous waste and a line to ontainer (s). (40 CFR
1010006 HMBP not updated to reflect inventory changes or facility information. HSC 25508.1(a-e)	262.34(d)(2); 265.173.) 22 CCR 66262.34(d)(2)
1010007 HMBP not updated to reflect substantial change to the handler's operations. HSC 25508.1(f)	3030019 Failed to inspect hazardous waste storage area at least weekly. (40 CFR 262.34(d)(2); 265.174.) 22 CCR 66262.34(d)(2)
1010008 HMBP not certified annually as complete and accurate in CERS. HSC 25508.2	3030022 Failed to properly separate incompatible waste. (40 CFR 262.34(d)(2); 265.177.) 22 CCR 66262.34(d)(2)
1010010 Emergency response procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3) and 25508(a)(1)(A)	3030030 Failed to maintain and/or operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. (40 CFR 262.34(d)(4), 265.31.) 22 CCR 66262.34(d)(2)
1010011 Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1	3030036 Failed to maintain adequate aisle space. (40 CFR 262.34(d)(4); 265.35.) 22 CCR 66262.34(d)(2)
1010012 Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1	3010022 Failed to post, next to the telephone, emergency information
1010014 Failure to submit emergency response plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)	numbers. (40 CFR 262.34(d)(5)(ii).) 22 CCR 66262.34(d)(2) 3020001 Failed to ensure employees are trained for hazardous waste handling,
1010015 Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)	compliance with regulations, and emergency response procedures. (40 CFR 262.34(d)(5)(iii).) 22 CCR 66262.34(d)(2)
1010016 HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)(A)	3030032 Failed to maintain or have emergency equipment, supplies, or equivalents. 1) An internal communication or alarm system; 2) A
1020001 Employee training plan for hazardous materials management not adequate, not established or not submitted in CERS. HSC 25505(a)(4) and 25508(a)(1)(A)	device, such as a telephone; 3) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and 4) Water at adequate volume and pressure (40 CFR 262.34(d)(4);
1020002 Initial and/or annual employee training not conducted for hazardous materials management and/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4)	265.32) 22 CCR 66262.34(d)(2) 3030039 Failed to implement contingency plan during an emergency, spill/release. (40 CFR 262.34(d)(5)(iv).) 22 CCR 66262.34(d)(2)
1040001 Hazardous materials release or threatened release not reported to the CUPA and OES immediately upon discovery. HSC 25510(a)	Hazardous Waste Tank Systems for SQGs ONLY
4010001 Failed to prepare and implement a written Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 (sec. 112.3). HSC 25270.4.5(a)	prevent overtopping unless the tank is equipped with a containment
HMD Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905	structure, a drainage control system or a diversion structure with a capacity that equals or exceeds the volume of the top 2 ft of the tank.
HMD to05 HMC Emergency contact not provided or current. HSC 25508.1(f)	(40 CFR 62.34(d)(3); 265.201(b)(c).) 22 CCR 66262.34(d)(2) 3030025 Failed to provide an overfill protection device on continuously fed
HMD Highly toxic gas (TLV<10 ppm) not disclosed. SDCC 68.1113(b)	hazardous waste tank. (40 CFR 262.34(d)(3); 265.201(b)(4).) 22 CCR 66262.34(d)(2)
HMD Annual carcinogen/reproductive toxin list not submitted. SDCC 68.1113(c)	3030027 Failed to conduct daily tank inspection of the discharge system, monitoring equipment, and tank level. (40 CFR 265.201(c)(1),
HMD HMBP not readily available for review. HSC 25505(c) 1013	265.201(c)(2), 265.201(c)(3), 262.34(d)(3).) 22 CCR 66262.34(d)(2) 3030028 Failed to conduct weekly inspections of the construction materials,
Hazardous Waste Requirements for SQGs ONLY	fixtures, and surrounding areas of the hazardous waste tank. (40 CFR 265.201(c)(4); 265.201(c)(5); 262.34(d)(3).) 22 CCR 66262.34(d)(2)
HMD Did not accumulate waste in a container or tank. (40 CFR 262.34(d)(2).) 22 CCR 66262.34(d)(2)	hazardous waste tank system. (40 CFR 265.201(f).) 22 CCR 67383.3
HMD Material Failed to have an emergency coordinator on call or available during an emergency. (40 CFR 262.34(d)(5)(i).) 22 CCR 66262.34(d)(2)	HMD Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. (40 CFR 265.201(b).) 22 CCR 66262.34(d)
M-923 (03-15)	HMD Failed to pre-notify the CUPA in writing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1)
	HMD Failed to properly accumulate ignitable or reactive waste in a tank system. (40 CFR 265.201(g).) 22 CCR 66262.34(d)(2)



COMPLIANCE INSPECTION REPORT

Hazardous Materials and Hazardous Waste (continued)

Hazardous Waste Requirements for SQGs and LQGs RECORD KEEPING/OPERATIONAL REQUIREMENTS

3130002 Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)

Disposed of used oil illegally. HSC 25250.5(a); 25189.5(a); 25189(c),(d); 25189.2(c)
Disposed of hazardous waste latex paint improperly. HSC 25217.1

INSPECTION DATE: 04/07/2017

PAGE 4 OF RECORD ID #: DEH2003-HUPFP-202521

Hazardous Waste Requirements for SQGs and LQGs STORAGE AND HANDLING

<u>VIOLATION DESCRIPTION</u>	# <u>VIOLATION DESCRIPTION</u>
3010001 Unified Program Facility (UPF) permit not obtained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905	3030001 Failed to meet requirements, when handling, and storing spent lead acid batteries. 22 CCR 66266.81(a)(1)
3010029 The facility has not submitted complete and accurate facility information in CERS. HSC 25404(e)(4): 27 CCR 15188(b)	3030003 Failed to properly manage 'damaged' spent lead acid batteries. 22 CCR 66266.81(b)
3010002 Failed to obtain and/or maintain an active EPA ID. 22 CCR 66262.12	3030004 Failed to properly manage, store, label, and/or recycle used oil filters
3010008 Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a)	and/or used fuel filters. HSC 25250.22; 22 CCR 66266.130 3050004 Failed to properly manage contaminated used oil as a hazardous waste. HSC 25250.7(a), (c)
3010009 Failed to complete the hazardous waste manifest Exception Requirement. 22 CCR 66262.42	HMD Failed to properly label Excluded Recyclable Materials (ERM). HSC 25143.9(a).
3010010 Failed to maintain uniform hazardous waste manifest, consolidated manifest, or bills of lading copies for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a)	HMD Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3)(A); 22 CCR 66262.34(f)
3010011 Failed to send hazardous waste manifest copies to the Department of Toxic Substances Control (DTSC). 22 CCR 66262.23(a)(4)	HMD Failed to repackage damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)
3010013 Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2; 22 CCR 66262.40(a)	HMD Failed to properly segregate used oil &/or fuel drained from filters. HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6)
3010014 Failed to retain disposal records of spent lead batteries for 3 years. 22 CCR 66266.81(a)(4)(B)	HMD Failed to comply with hazardous waste satellite container regulation. 22 CCR 66262.34(e)
3030006 Failed to determine if a hazardous waste is restricted or prohibited from land disposal. 22 CCR 66268.7(a)	HMD Failed to properly empty container, failed to manage non-empty
3010016 Failure of recycler who recycles more than 100 kilograms per month of recyclable material under a claim that the material qualifies for	(d) and/or (r); 66262.34(f)
exclusion or exemption to provide and submit in CERS the required information. HSC 25143.10(a), (c), and/or (d)	HMD Failed to mark date on empty container larger than 5 gallons and/or manage it within one year. 22 CCR 66261.7(e),(f)
HMD 0149 Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130	Universal Waste Handler Requirements
HMD 0148 Failed to have copies of analytical records, waste analysis records, and/or waste determination results for 3 years. 22 CCR 66262.40(c)	3010004 Failed to obtain an EPA ID number from DTSC or US EPA prior to storing 5,000 kg or more of universal waste. 22 CCR 66273.32(a),(b)
HMD Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66268.7(a)(8)	3020002 Failed to maintain universal waste handler training records for 3 years. 22 CCR 66273.36(c),(d)
3250005 Failed to obtain a Treatment, Storage and Disposal Facility (TSDF)	3020003 Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
permit or authorization to store/treat/dispose of hazardous waste. HSC 25201(a)	3030008 Failed to properly label or mark a universal waste (non-Conditionally
3050005 Failed to have adequate records demonstrating claim of exemption for Excluded Recyclable Materials. HSC 25143.2(f); 22 CCR 66261.2(g)	Exempt Small Quantity Universal Waste Generator). 22 CCR 66273.34 3030011 Failed to properly dispose of universal waste within one year. 22 CCR
3210001 Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a)	66273.35(a) and/or (b) 3030046 Failed to keep records of offsite universal waste (UW) shipment(s)
HMD Manifest signed by the TSDF not available for inspection. 22 CCR 66262.40(a)	available for inspection for 3 years. HSC 25185(a); 22 CCR 66273.39(c), (d)(2)
Hazardous Waste Requirements for SQGs and LQGs	3030051 Failed to meet the accumulation standards for universal waste aerosol containers and waste handling. HSC 25201.16(f)
DISPOSAL AND TRANSPORTATION	3040004 Failed to manage universal waste in a manner to prevent release(s) to
3010007 Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a)	the environment. 22 CCR 66273.33; 66273.33.5 3050003 Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a), 25189(c),(d); 25189.2(c); 22 CCR 66273.31(a)
3030005 Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)	
3050001 Failed to use a California registered hazardous waste transporter to transport hazardous waste. HSC 25163(a); 22 CCR 66263.41	
3050002 Failed to properly dispose of hazardous waste at an authorized facility. HSC 25189.5(a); 25189(c),(d); 25189.2(c)	

HM-923 (03-15)

☐ HMD 0305 ☐ HMD 0306



NOTICE OF VIOLATION

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

This notice requires a formal written response and corrective action within the times specified.

INSPECTION DATE: 04/07/2017 PAGE 1 OF 19
RECORD ID #: DEH2003-HUPFP-202521

TIME START: 1:00 PM END: 4:30 PM

SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintendent
PHONE: (619) 933-7300

E-MAIL: Gruiz@wgolfp.com

OWNER'S NAME Western Golf Properties CITY/ZIP EL CAJON /92019
ADDRESS 3121 WILLOW GLEN DR PHONE 619-442-9891

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz

TITLE: Superintendent

INTRODUCTION:

Initial compliance inspection conducted at this facility, this is a golf course that operates a maintenance yard on site. Facility generates hazardous waste and handles hazardous materials and is subject to the hazardous materials business plan and the hazardous waste program requirements.

Consent to conduct inspection and take photos was granted by Gerry Ruiz, Superintendent.

Facility underwent a change of ownership in August 2016 and new owner is Western Golf Properties.

During the inspection I observed that the facility handles the following hazardous materials and waste:

- 1- Waste Oil
- 2-Oxygen
- 3-Acetylene
- 4-Fertilizers:
- a- Approximately 50x 50LBS bags of Harrols Professional Fertilizer
- b- More than 500LBS boxes of Ecosol Systems fertilizers that were in deteriorating boxes.
- 5-55 gallon liquid iron
- 6-1000 Gallon Diesel Tank
- 7-500 Gallon Unleaded fuel tank

A summary of violations will be issued today, and a full inspection report will be issued within 7 business days.

VIOLATION # 1

3010001 Unified Program Facility (UPF) permit not obtained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905

Classification: Class I

Observations:

As of today's inspection this facility had not obtained a UPFP permit from the CUPA. Note that facilities that generate hazardous waste in any amount are required to obtain and maintain a UPFP permit. New Facility assumed ownership around August 2016 and has not obtained required permit.

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure you submit proper application for obtaining a UPFP permit for generation of hazardous waste.



INSPECTION DATE: 04/07/2017

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RECORD ID #: **DEH2003-HUPFP-202521**

SUPPLEMENTAL NOTICE OF VIOLATION

VIOLATION # 2

HMD1001 Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905

Classification: Class I

Observations:

Facility handles reportable quantities of hazardous materials and has not obtained a hazardous materials permit from HMD. New Facility assumed ownership around August 2016 and has not obtained required permit. Previous facility owner had a UPFP permit, however it is expired

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure you submit proper application for obtaining a UPFP permit for handling of hazardous materials.

Specialist should verify the identification of facility representative using a standard form of ID (e.g., CDL#, CA ID# or DOB).

, , ,	<u>o</u>	ι υ,	,	•
PRINTED NAME OF ENV. HEALTH SPECIALIST			DATE SIGNED	
Alaaeddine Zahra	Alaud		04/12/2017	
PRINTED NAME OF FACILITY REPRESENTATIVE			DATE SIGNED	
Rick Adams	and - land		04/12/2017	
TITLE OF FACILITY REPRESENTATIVE	ant house	\		
Operations Specialist				

You must submit a written response within 30 days (or as specified) addressing all violations noted. The written response must demonstrate all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. The County may initiate formal enforcement action including the imposition of substantial penalties for any significant violations addressed in this notice. Any violations that are not promptly corrected will result in liability for additional days in violation and additional penalties. Any failure to provide the information requested will also be a factor in determining penalties. For these purposes, "significant violations" include violations that represent a significant threat to human health or safety or the environment, chronic violations, violations committed by a recalcitrant violator and Class I hazardous waste violations (CCR 66260.10 and H&SC 25110.8.5).



COMPLIANCE INSPECTION REPORT

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

PAGE 3 OF 19			
21 — —			
4:30 PM			
INSPECTION CONTACT:Gerry Ruiz			
PHONE: (619) 933-7300			

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Painchaction fo	os will be charged if addition	nal incrections are requi	red to determine compliance.
NOTE. Remspection le	es will be charged if addition	ilai ilispections are requi	ieu to determine compnance.

Yes	N/A		Yes	N/A	
		Unified Program Facility Permit Current	X		Contingency Plan Available LQG SQG
X		Hazardous Materials Business Plan Available			Employee Training Records Available
		Employee Training is Adequate			Universal Waste Managed Properly
X		Waste Disposal Records Available for Review	X		Waste Containers Closed Labeled
		Emergency Contacts Current			Waste Containers in Good Condition
		Chemical Inventory/Map Current Updated today			Permit Expires On 03/31/2017
CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz TITLE: Superintendent			TITLE: Superintendent		

VIOLATION #3

3030010 Accumulated waste too long (>180 or 270 days) (>90 days for an acutely hazardous waste). (40 CFR 262.34(e) and (f).) HSC 25201(a); 22 CCR 66262.34(d)

Classification: Class II

Observations:

Inside the room between the office and the facility garage of the maintenance area, I observed numerous paints and paint related material contianers that appeared to be rusted and labels pealed off, per Gerry Ruiz many of those containers have no use and are a waste. As per Gerry Ruiz those paint material have been on site and ready to be disposed for more than a year.

Note that facilities that have deemed a waste to be hazardous must ensure disposal within 180 days. See Photo #1 and Photo #2

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, sort out all the paint related containers with material and other materials that may be hazardous and accumulating for more than 180 days and ensure disposal within 30 days.

Submit proof of corrective action that the containers observed during this inspection have been properly disposed using a registered hazardous waste hauler

VIOLATION # 4

3030011 Failed to properly dispose of universal waste within one year. 22 CCR 66273.35(a) and/or (b)

Classification: Class II

Observations:

During this inspection I observed more than 20 Flourescent light bulbs that were accumulating in the maintenence area room between the office and the open garage. Gerry Ruiz stated he was not sure who would pick up those bulbs, Mr. Gerry Ruiz stated that those bulbs have been accumulating for over 3 years. Note that fluorescent light bulbs are universal waste (hazardous waste) and must be handled as such. Waste fluorescent bulbs are hazardous when disposed therefore they must be disposed through proper means (registered hauler). Universal waste may not be accumulated for more than 1 year and must be stored in proper labeled container.

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See Photo #3, #4, #5

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure that all universal waste that have been accumulating for more than 1 year are properly disposed and manifests are kept on site. Submit proof of corrective action within 30 days. Universal waste include fluorescent bulbs and electronic waste.

VIOLATION # 5

HMD0217 Failed to repackage damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)

Classification: Class II

Observations:

Inside the fertilizer storage area I observed more than 500LBS of fertilizer that was labaled as ECO SOL systems. Package label indicated that the contents included Calcium Acetate and Calcium Nitrate. As per Gerry Ruiz the facility has not used this material in a long time. About 5 of the cardboard containers were observed to be deteriorating and not in good condition. Mr Ruiz stated that this is due to Rats eating the package.

Be advised that hazardous materials containers that are deteriorating or damaged must be repackagded within 96 hours.

See photos: #6 #7 #8 #9

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure all deteriorating packages are repackaged into good ones, the material is used in your normal process, or a hazardous waste determination is conducted for the packages to determine of the material is now a hazardous waste and then handle is as such. Mr. Ruiz stated that the facility may just use the material for their facility.

Ensure all staff responsible for maintaining the maintenance area are familiar with this requirement.

VIOLATION #6

3030036 Failed to maintain adequate aisle space. (40 CFR 262.34(d)(4); 265.35.) 22 CCR 66262.34(d)(2)

Classification: Class II

Observations:

Around the hazardous waste area I observed that the facility has multiple items blocking access to drums (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure aisle space is maintained around the hazardous waste area and that there is easy access to the hazardous waste drums.

VIOLATION #7

3030017 Failed to properly close hazardous waste container(s). (40 CFR 262.34(d)(2); 265.173.) 22 CCR 66262.34(d)(2)

Classification: Class II

Observations:

Observed a 5 gallon container that as per Mr. Ruiz contained waste oil. The bucket was observed to be open and no lid was found around it. Note that all hazardous waste containers must be closed at all times when not in active use. (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure that you obtain a lid for the 5 gallon container and that facility staff are familiar with the requirement.

HM-924(01/15)

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VIOLATION #8

3030007 Failed to properly label/date hazardous waste container and/or tank. 22 CCR 66262.34(f)

Classification: Class II

Observations:

Observed the two hazardous waste drums that the facility stores to not be labeled with a proper hazardous waste label. All labels were observed to be pealed off or faded. (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

Immediately begin labeling the containers with the required hazardous waste labeling. Within 30 days, submit documentation to the HMD that this violation was corrected.

VIOLATION #9

4010001 Failed to prepare and implement a written Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 (sec. 112.3). HSC 25270.4.5(a)

Classification: Class II

Observations:

Facility handles above 1320 gallons of petroleum based product (1000 gallons of diesel, 500 gallons of unleaded fuel, and 110 gallons of waste oil) and failed to prepare and implement a written spill prevention control and countermeasures (SPCC) Plan in accordance with 40 CFR Part 112. HSC 25270.4.5(a), CFR 112.3

This plan is made to ensure facility has set proper procedures to prevent spills or in case of a spill that the facility is prepared to respond properly.

During the inspection Mr. Ruiz was not aware of presence of an SPCC plan on site.

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, documentation that a valid SPCC plan has been prepared. A template can be found here: https://www.epa.gov/sites/production/files/2014-05/documents/tier1template.pdf

VIOLATION # 10

4010002 Failed to obtain facility management approval to commit resources to fully implement the SPCC Plan. (40 CFR 112.7.) HSC 25270.4.5(a)

Classification: Class II

Observations:

Failure to have full approval of management at a level of authority to commit the necessary resources to fully implement the SPCC Plan CFR 112.7 pursuant to 25270.4.5(a)

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, evidence the SPCC plan includes the approval of management to commit the necessary resources to fully implement the plan.

VIOLATION # 11

1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25506; 25507; and 25508(a)(1)(A)

Classification: Class II

Observations:

Observed facility handles the following that were not on hazardous materials inventory:

1-55 gallon drum of Liquid iron

HM-924(01/15)



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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

2- approximately 50x 50lbs fertilizer bags. (Harrols Professional Fertilizer).

Note that facilities that handle hazardous materials in above reportable quantities are required to ensure inventory section of hazardous materials business plan which is part of your facility HMBP is updated. Any changes to the inventory (more than 100% increases or removal of any reported item or any addition of new item) must be reported within 30 days.

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure that your facility submits an up to date inventory that reflects what your facility handles on site. (reportable hazardous materials or any amounts of hazardous waste)

VIOLATION # 12

4030007 Failed to open and close bypass valve to drain rainwater under responsible supervision. (40 CFR 112.8(c)(3)(iii).) HSC 25270.4.5(a)

Classification: Class II

Observations:

Observed liquid accumulating in the secondary containment of the disesl tank, it appeared like the liquid has been accumulating for a long period (see photo) as per Gerry Ruiz, this is rainwater accumulating. Note t that secondary containment is designed to hold a specific amount of the primary containment capacity and therefore having rainwater inside may impede proper prevention of spills to the environment due to leaks in primary containment. Facilities must ensure to drain rainwater properly after making sure that the liquid is not contaminated.

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, proof of corrective action that the secondary containment does not contain any left over rainwater observed during this inspection.

INSPECTION REMARKS: APSA/SPCC Program

More information on SPCC/ APSA program: http://www.sandiegocounty.gov/deh/hazmat/hmd_apsa.html Ensure Plan is reviewed every 5 years or within 30 days of a technical change (Increase of APSA reportable Petroleum products) Ensure facility staff is annually trained (annual briefings on SPCC) and records maintained for 3 years, facility must use the appendix form for keeping track of training records.

Ensure inspections of APSA tanks are being conducted in accordance with the SPCC plan and records maintained for 3 years.

Hazardous Waste Program:

Facilities that generate any amounts of hazardous waste are subject to the Hazardous Waste Program

- -All hazardous waste containers must be closed when not in use, hazardous waste containers of 5 gallon capacity and above storing hazardous waste must be labeled with a hazardous waste label.
- -Hazardous waste disposal manifests must be maintained on site for the past 3 years.
- -Small quantity generators of hazardous waste that generate less than 1000kg (or 275 Gallons) of hazardous waste per month may accumulate waste for a maximum period of 180 days.
- -EPA Id number must be active for facilities that generate hazardous waste (annual renewal may be done on-line).
- -For Small Quantity Generators of Hazardous Waste, Hazardous Waste Accumulation areas must be inspected weekly.
- -Contingency plan must be posted next to a telephone line.

Hazardous Materials Business Plan:

Facilities that handle hazardous materials in quantities of (and above): 55 gallons for liquids, 200 cuft for gases, 500 LBS for solids are subject to the hazardous materials business plan program requirements.

-Note that facilities subject to the hazardous materials business plan are required to conduct annual employee training as per



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the employee training plan which is part of the hazardous materials business plan.

- -Furthermore facilities are required to maintain records for training for 3 years.
- -Information in CERS must be annually re-certified if no changes occur or within 30 days of change of information.
- -Hazardous materials business plan must be available/accesssible on site.

Helpful Websites:

- For guidance documents on hazardous materials-related topics,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (CERS),
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd cers.html
- If you have questions on: permit fees, business plan requirements, or hazardous waste regulations,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html
- To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails:

https://public.govdelivery.com/accounts/CASAND/subscriber/new

If you have any questions regarding this inspection, please contact Alaaeddine Zahra, 858-525-5834, Alaaeddine.Zahra@sdcounty.ca.gov

INSPECTION PHOTOS



Photo #1: Showing paint related material and aerosol cans which as per Gerry Ruiz were not being used anymore



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Photo #2 : Showing paint related material which as per Gerry Ruiz were not being used anymore. These buckets container liquid one of them was dried out paint.



Photo #3: Fluorescent light bulbs which as per Gerry Ruiz were waste being accumulated for over 3 years.



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Photo #4: Fluorescent light bulbs which as per Gerry Ruiz were waste being accumulated for over 3 years.



Photo #5: Fluorescent light bulbs which as per Gerry Ruiz were waste being accumulated for over 3 years.



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Photo #6 showing deteriorating cardboard containers which as per Gerry **Ruiz were fertilizers**



Photo #7 showing deteriorating cardboard containers which as per Gerry **Ruiz were fertilizers**



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Photo #8: Showing label of items inside the deteriorating package. Ecosol Systems.



Photo #9: Showing Inside the package observed from photo #8



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Photo # 10: showing hazardous waste area and Waste Oil drums not Labaled



Photo # 11: showing hazardous waste area with no Aisle Space and Waste Oil drums not Labeled



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Photo # 12: showing hazardous waste area and Waste Oil drums not Labaled



Photo #13: Showing Diesel Tank



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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT



Photo # 14: showing secondary containment of diesel tank containing liquid. As per Gerry Ruiz this is rainwater.

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Photo #15 showing view of tank and secondary containment.

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: http:// www.sandiegocounty.gov/deh/hazmat/hmd_cers.html



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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

PRINTED NAME OF FACILITY REPRESENTATIVE Rick Adams	lade bond	DATE SIGNED 04/12/2017
TITLE OF FACILITY REPRESENTATIVE	book was	
Operations Specialist		

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 Phone: (858) 505-6880 http://www.sdcdeh.org



COMPLIANCE INSPECTION REPORT

Handlers of Hazardous Materials and Small and Large Quantity Generators of Hazardous Waste INSPECTION DATE: 04/07/2017

RECORD ID #: **DEH2003-HUPFP-202521**

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FACILITY NAME: *COTTONWOOD GOLF COURSE

ADDRESS: * 3121 WILLOW GLEN DR CITY/ZIP: *EL CAJON 92019

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. Incorporated provisions of Title 40 of the Code of Federal regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator;

		Hazardous Materials Requirements	H	<u> lazardous</u>	Waste Requirements for SQGs ONLY (continued)
#		VIOLATION DESCRIPTION	#		VIOLATION DESCRIPTION
[1010001	HMBP not established/ implemented. HSC 25505(a) and 25507(a)	8	× 3030007	Failed to properly label/date hazardous waste container and/or tank.
[HMBP not submitted to the CUPA in CERS. HSC 25508(a)(1)(A); HSC 25404(e)(4); 27 CCR 15188(a), (d)	3	× 3030010	22 CCR 66262.34(f) Accumulated waste too long (>180 or 270 days) (>90 days for an acutely hazardous waste). (40 CFR 262.34(e) and (f).) HSC 25201(a); 22
l	1010003	Business Activities and/or Business Owner/Operator Identification not completed in CERS. 19 CCR 2729.2(a)(1); HSC 25404(e)(4)			CCR 66262.34(d)
11 [X 1010004	Chemical inventory incomplete or not submitted in CERS. HSC 25505(a) (1); 25506; 25507; and 25508(a)(1)(A)			Failed to accumulate hazardous waste in a container that is in good condition. (40 CFR 262.34(d)(2); 265.171.) 22 CCR 66262.34(d)(2) Failed to accumulate or store hazardous waste in a lined/compatible
[_	Site map not submitted in CERS or not sufficient. HSC 25505(a)(2) and 25508(a)(1)(A) $$	7		container. (40 CFR 262.34(d)(2); 265.172) 22 CCR 66262.34(d)(2) Failed to properly close hazardous waste container(s). (40 CFR
[HMBP not updated to reflect inventory changes or facility information. HSC 25508.1(a-e) $$	•		262.34(d)(2); 265.173.) 22 CCR 66262.34(d)(2) Failed to inspect hazardous waste storage area at least weekly. (40 CFF
[HMBP not updated to reflect substantial change to the handler's operations. HSC 25508.1(f)			262.34(d)(2); 265.174.) 22 CCR 66262.34(d)(2) Failed to properly separate incompatible waste. (40 CFR 262.34(d)(2);
[1010008	HMBP not certified annually as complete and accurate in CERS. HSC 25508.2			265.177.) 22 CCR 66262.34(d)(2) Failed to maintain and/or operate the facility to minimize the
[_	Emergency response procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3) and 25508(a)(1)(A)		3030030	possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. (40 CFR 262.34(d)(4), 265.31.) 22 CCR 66262.34(d)(2)
[Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1	6	× 3030036	Failed to maintain adequate aisle space. (40 CFR 262.34(d)(4); 265.35.) 22 CCR 66262.34(d)(2)
[_	Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1		3010022	Failed to post, next to the telephone, emergency information containing the location of emergency equipment, contact names, and
Į		Failure to submit emergency response plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)		□ 3020001	numbers. (40 CFR 262.34(d)(5)(ii).) 22 CCR 66262.34(d)(2) Failed to ensure employees are trained for hazardous waste handling,
[_	Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)			compliance with regulations, and emergency response procedures. (40 CFR 262.34(d)(5)(iii).) 22 CCR 66262.34(d)(2)
[1010016	HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)(A)		3030032	Failed to maintain or have emergency equipment, supplies, or equivalents. 1) An internal communication or alarm system; 2) A
[1020001	Employee training plan for hazardous materials management not adequate, not established or not submitted in CERS. HSC 25505(a)(4) and 25508(a)(1)(A)			device, such as a telephone; 3) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and 4) Water at adequate volume and pressure (40 CFR 262.34(d)(4);
[1020002	Initial and/or annual employee training not conducted for hazardous		_	265.32) 22 CCR 66262.34(d)(2)
1	□ 1040001	materials management and/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4) Hazardous materials release or threatened release not reported to the		3030039	Failed to implement contingency plan during an emergency, spill/release. (40 CFR 262.34(d)(5)(iv).) 22 CCR 66262.34(d)(2)
ı	_	CUPA and OES immediately upon discovery. HSC 25510(a)		Haza	ardous Waste Tank Systems for SQGs ONLY
9 [× 4010001	Failed to prepare and implement a written Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 (sec.		3030024	Failed to maintain sufficient freeboard of 2 ft in uncovered tanks to prevent overtopping unless the tank is equipped with a containment
2 [⋉ HMD	112.3). HSC 25270.4.5(a) Unified Program Facility permit not obtained for hazardous materials.			structure, a drainage control system or a diversion structure with a
	1001	SDCC 68.905			capacity that equals or exceeds the volume of the top 2 ft of the tank. (40 CFR 62.34(d)(3); 265.201(b)(c).) 22 CCR 66262.34(d)(2)
[☐ HMD 1005	Emergency contact not provided or current. HSC 25508.1(f)		3030025	Failed to provide an overfill protection device on continuously fed
[☐ HMD 1007	Highly toxic gas (TLV<10 ppm) not disclosed. SDCC 68.1113(b)		_	hazardous waste tank. (40 CFR 262.34(d)(3); 265.201(b)(4).) 22 CCR 66262.34(d)(2)
[☐ HMD 1008	Annual carcinogen/reproductive toxin list not submitted. SDCC 68.1113(c)		3030027	Failed to conduct daily tank inspection of the discharge system, monitoring equipment, and tank level. (40 CFR 265.201(c)(1),
[☐ HMD 1013	HMBP not readily available for review. HSC 25505(c)		3030028	265.201(c)(2), 265.201(c)(3), 262.34(d)(3).) 22 CCR 66262.34(d)(2) Failed to conduct weekly inspections of the construction materials,
	<u>Haza</u>	ordous Waste Requirements for SQGs ONLY			fixtures, and surrounding areas of the hazardous waste tank. (40 CFR 265.201(c)(4); 265.201(c)(5); 262.34(d)(3).) 22 CCR 66262.34(d)(2)
[☐ HMD 0226	Did not accumulate waste in a container or tank. (40 CFR 262.34(d)(2).) 22 CCR $66262.34(d)(2)$		3050007	Failed to properly decontaminate and document closure of a hazardous waste tank system. (40 CFR 265.201(f).) 22 CCR 67383.3
[☐ HMD 0412	Failed to have an emergency coordinator on call or available during an emergency. (40 CFR 262.34(d)(5)(i).) 22 CCR 66262.34(d)(2)		☐ HMD 1612	Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. (40 CFR 265.201(b).) 22 CCR 66262.34(d)
HM-9	923 (03-15)	Z		☐ HMD 1614	Failed to pre-notify the CUPA in writing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1)
				☐ HMD 1615	Failed to properly accumulate ignitable or reactive waste in a tank system. (40 CFR 265.201(g).) 22 CCR 66262.34(d)(2)



HM-923 (03-15)

COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Hazardous Materials and Hazardous Waste (continued)

INSPECTION DATE: 04/07/2017

RECORD ID #: **DEH2003-HUPFP-202521**

PAGE **17** OF **19**

<u>Hazardous Waste Requirements for SQGs and LQGs</u> RECORD KEEPING/OPERATIONAL REQUIREMENTS Hazardous Waste Requirements for SQGs and LQGs STORAGE AND HANDLING

#			VIOLATION DESCRIPTION	#			VIOLATION DESCRIPTION
1	×	3010001	Unified Program Facility (UPF) permit not obtained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905			3030001	Failed to meet requirements, when handling, and storing spent lead acid batteries. 22 CCR 66266.81(a)(1)
		3010029	The facility has not submitted complete and accurate facility information in CERS. HSC 25404(e)(4); 27 CCR 15188(b)			3030003	B Failed to properly manage 'damaged' spent lead acid batteries. 22 CCI 66266.81(b)
			2 Failed to obtain and/or maintain an active EPA ID. 22 CCR 66262.12			3030004	Failed to properly manage, store, label, and/or recycle used oil filters and/or used fuel filters. HSC 25250.22; 22 CCR 66266.130
			3 Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a)			3050004	Failed to properly manage contaminated used oil as a hazardous waste. HSC 25250.7(a), (c)
	Ш	3010009	Failed to complete the hazardous waste manifest Exception Requirement. 22 CCR 66262.42			HMD 0222	Failed to properly label Excluded Recyclable Materials (ERM). HSC
			Failed to maintain uniform hazardous waste manifest, consolidated manifest, or bills of lading copies for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a)			HMD 0216	25143.9(a). Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3)(A); 22 CCR 66262.34(f)
		3010011	L Failed to send hazardous waste manifest copies to the Department of Toxic Substances Control (DTSC). 22 CCR 66262.23(a)(4)	5	×	HMD	Failed to repackage damaged/deteriorated hazardous material
		3010013	3 Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2; 22 CCR 66262.40(a)			0217 HMD	container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f) Failed to properly segregate used oil &/or fuel drained from filters.
		3010014	Failed to retain disposal records of spent lead batteries for 3 years. 22 CCR 66266.81(a)(4)(B)			0219 HMD	HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6) Failed to comply with hazardous waste satellite container regulation.
		3030006	5 Failed to determine if a hazardous waste is restricted or prohibited from land disposal. 22 CCR 66268.7(a)			0221 HMD	22 CCR 66262.34(e) Failed to properly empty container, failed to manage non-empty
		3010016	Failure of recycler who recycles more than 100 kilograms per month of recyclable material under a claim that the material qualifies for		_	0223	container, or inner liner removed from a container. 22 CCR 66261.7(b (d) and/or (r); 66262.34(f)
			exclusion or exemption to provide and submit in CERS the required information. HSC 25143.10(a), (c), and/or (d)		Ш	HMD 0224	Failed to mark date on empty container larger than 5 gallons and/or manage it within one year. 22 CCR 66261.7(e),(f)
		HMD 0149	Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130				Universal Waste Handler Requirements
	П	HMD 0148	Failed to have copies of analytical records, waste analysis records, and/ or waste determination results for 3 years. 22 CCR 66262.40(c)			3010004	Failed to obtain an EPA ID number from DTSC or US EPA prior to storing 5,000 kg or more of universal waste. 22 CCR 66273.32(a),(b)
	П	HMD 0140	Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66262.40(c) years. 22 CCR 66268.7(a)(8)			3020002	2. Failed to maintain universal waste handler training records for 3 years 22 CCR 66273.36(c),(d)
			Failed to obtain a Treatment, Storage and Disposal Facility (TSDF) permit or authorization to store/treat/dispose of hazardous waste.			3020003	B Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
	\Box	2050005	HSC 25201(a) 5 Failed to have adequate records demonstrating claim of exemption for			3030008	B Failed to properly label or mark a universal waste (non-Conditionally Exempt Small Quantity Universal Waste Generator). 22 CCR 66273.34
			Excluded Recyclable Materials. HSC 25143.2(f); 22 CCR 66261.2(g)	4	×	3030011	Failed to properly dispose of universal waste within one year. 22 CCR 66273.35(a) and/or (b)
			I. Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a)			3030046	Failed to keep records of offsite universal waste (UW) shipment(s)
	Ш	HMD 0138	Manifest signed by the TSDF not available for inspection. 22 CCR 66262.40(a)				available for inspection for 3 years. HSC 25185(a); 22 CCR 66273.39(c) (d)(2)
		Hazaro	dous Waste Requirements for SQGs and LQGs		Ш		I. Failed to meet the accumulation standards for universal waste aeroso containers and waste handling. HSC 25201.16(f)
		2010007	DISPOSAL AND TRANSPORTATION		Ш	3040004	I Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 66273.33; 66273.33.5
	Ш	3010007	7 Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a)			3050003	B Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a), 25189(c),(d); 25189.2(c); 22 CCR 66273.31(a)
		3030005	Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)				
		3050001	Failed to use a California registered hazardous waste transporter to transport hazardous waste. HSC 25163(a); 22 CCR 66263.41				
		3050002	2 Failed to properly dispose of hazardous waste at an authorized facility. HSC 25189.5(a); 25189(c),(d); 25189.2(c)				
		3130002	2 Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)				
		HMD 0305	Disposed of used oil illegally. HSC 25250.5(a); 25189.5(a); 25189(c),(d); 25189.2(c)				
	П	HMD 0306	Disposed of hazardous waste latex paint improperly. HSC 25217.1				



auestions.

COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Aboveground Petroleum Storage Act (APSA) Program

INSPECTION DATE: **04/07/2017**

RECORD ID #: **DEH2003-HUPFP-202521**

GENERAL SPCC REQUIREMENTS

PAGE **18** OF **19**

GENERAL APSA FACILITY REQUIREMENT (Chapters 6.67 and 6.11 of Division 20 of the HSC)

BASED UPON 40 CFR 112.7 (continued) VIOLATION DESCRIPTION **VIOLATION DESCRIPTION** 4010001 Failed to prepare and implement a written spill prevention control and countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 (sec. 4010017 Plan does not contain procedures for reporting a discharge if facility has no Facility Response Plan. (40 CFR 112.7(a)(4).) HSC 25270.4.5(a) 112.3). HSC 25270.4.5(a) 4010018 Discharge procedures are not adequately addressed if facility has no 4010013 Plan does not conform to and/or facility is not fully implementing, the Facility Response Plan. (40 CFR 112.7(a)(5).) HSC 25270.4.5(a) latest version of the regulations in 40 CFR Part 112. HSC 25270.4.5(a) 4010019 Failed to include prediction of the direction, rate of flow, and total quantity of oil which could be discharged from facility as a result of 4010032 Failed to submit a tank facility statement or update/certify business each type of equipment failure in the SPCC Plan. (40 CFR 112.7(b).) plan annually. HSC 25270.6(a)(1) or (a)(2) HSC 25270.4.5(a) 4010033 Failed to pay the APSA program fee or obtain Unified Program Facility Permit. HSC 25270.6(b), SDCC 68.905 4010020 General Containment: Failed to provide, or discuss within the plan, appropriate containment/diversionary structures/equipment designed 4040001 Failed to immediately, upon discovery, report a one-barrel (42 gallons) to address the typical failure, so that any discharge will not escape or greater release of petroleum. HSC 25270.8 containment before cleanup occurs. (40 CFR 112.7(c).) HSC 4010038 Failed to report required program data electronically. HSC 25404(e)(4), 25270.4.5(a) HSC 25270.6(b), SDCC 68.905 4010004 Failed to have a professional engineer clearly denote and demonstrate the impracticability of appropriate containment/diversionary 4010037 Failed to meet provisions of APSA exemption for oil-filled electrical structures. (40 CFR 112.7(d).) HSC 25270.4.5(a) equipment including containment and visual inspection. HSC 4010005 Failed to prepare an Oil Spill Contingency Plan following the provisions 25270.2(a)(4) of 40 CFR Part 109 for impracticability claim. This is not required if facility has a Facility Response Plan. (40 CFR 112.7(d)(1).) HSC REQUIREMENTS BASED ON 40 CFR 112.1-112.6 25270.4.5(a) 4010035 Failed to meet the conditions of a Qualified Facility. (40 CFR 112.3(a) 4010006 Failed to provide a written commitment of manpower, equipment, (1), 112.3(g), 112.6.) HSC 25270.4.5(a) materials for impracticability claim. (40 CFR 112.7(d)(2).) HSC 4010003 Failed to have a professional engineer certify and review the SPCC 25270.4.5(a) Plan. (40 CFR 112.3(d).) HSC 25270.4.5(a) 4010021 Failed to address in SPCC plan/maintain complete records of: 4010008 Failed to maintain a copy of the Plan on site (applies if facility is inspections, tests/procedures for 3 years. (40 CFR 112.7(e), 112.8(c) manned at least 4 hours/day). (40 CFR 112.3(e)(1).) HSC 25270.4.5(a) (6).) HSC 25270.4.5(a) 4010010 Failed to make SPCC plan technical amendment(s) when the facility has 4020001 Failed to train oil-handling personnel on operation/maintenance of had a change in: design, construction, operation, or maintenance equipment to prevent discharges; discharge procedure protocols; applicable laws, rules, and regulations; general facility operations; AND which affects the facility's discharge potential. (40 CFR 112.5(a).) HSC the contents of the SPCC Plan. (40 CFR 112.7(f)(1).) HSC 25270.4.5(a) 4010009 Failed to perform a 5-year review of the SPCC Plan. (40 CFR 112.5(b).) 4010022 Failed to designate person accountable for discharge prevention who HSC 25270.4.5(a) reports to facility management. (40 CFR 112.7(f)(2).) HSC 25270.4.5(a) 4010011 Failed to have a professional engineer certify technical amendments. 4010023 Failed to conduct annual discharge prevention briefings to ensure (40 CFR 112.5(c). HSC 25270.4.5(a) understanding of SPCC plan. (40 CFR 112.7(f)(3).) HSC 25270.4.5(a) **GENERAL SPCC REQUIREMENTS** 4030001 Failed to address security of oil handling areas/valves, prevent unauthorized access to starter controls, cap/blank flange connections BASED UPON 40 CFR 112.7 not in service and provide appropriate lighting to prevent vandalism 4010012 Failed to prepare a SPCC plan that follows the sequence of rule and/or and assist in discovery of discharges. (40 CFR 112.7(g).) HSC to cross-reference; failed to prepare plan in writing; failed to prepare a 25270.4.5(a) plan that addresses additional procedures/methods/equipment not 4030002 Failure of the secondary containment, and/or rack drainage to flow to fully operational. (40 CFR 112.7 and 112.7(a)(1).) HSC 25270.4.5(a) a catchment basin, treatment system, or quick drainage system and 10 🗷 4010002 Failed to obtain facility management approval to commit resources to hold at least the maximum capacity of the largest single compartment fully implement the SPCC Plan. (40 CFR 112.7.) HSC 25270.4.5(a) of any tank car or tank truck. (40 CFR 112.7(h)(1).) HSC 25270.4.5(a) 4010014 Failed to discuss alternative environmental protection to SPCC 4030003 Failed to provide system to prevent vehicular departure before disconnect from transfer lines. (40 CFR 112.7(h)(2).) HSC 25270.4.5(a) requirements within SPCC Plan. (40 CFR 112.7(a)(2).) HSC 25270.4.5(a) 4010015 Failed to have an adequate facility diagram, including location of oil 4030004 Failed to inspect lowermost drains and outlets prior to filling and storage/transfer areas and connecting pipes, or no facility diagram departure of tank car or tank truck. (40 CFR 112.7(h)(3).) HSC included in SPCC plan. (40 CFR 112.7(a)(3).) HSC 25270.4.5(a) 25270.4.5(a) 4010016 Failed to adequately describe the physical layout of facility, including 4030016 Failed to evaluate field-constructed storage tank for brittle fracture location of oil storage/transfer areas/connecting pipes or no and take appropriate action. (40 CFR 112.7(i).) HSC 25270.4.5(a) description of physical layout included in SPCC Plan. (40 CFR 112.7(a) 4010007 Failed to include discussion of conformance with requirements listed in (3), 112.7(a)(3)(i-vi).) HSC 25270.4.5(a) 40 CFR Part 112. (40 CFR 112.7(j).) HSC 25270.4.5(a)

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC) or San Diego County Code ("SDCC") indicated in italics. Incorporated provisions of Title 40 of the Code of Federal Regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use a DEH Corrective Action Form (HM-926) or other correspondence to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any

HM-950 APSA (02-15)



COMPLIANCE INSPECTION REPORT

APSA Program (continued)

INSPECTION DATE: **04/07/2017**

PAGE **19** OF **19**

RECORD ID #: **DEH2003-HUPFP-202521**

SPCC REQUIREMENTS BASED UPON 40 CFR 112.8 Refer to APSA (HSC Chapter 6.67) for definition of "storage tank"

VIOLATION DESCRIPTION

4010027 Failure to restrain drainage from diked storage areas by valves to prevent discharge. (40 CFR 112.8(b)(1).) HSC 25270.4.5(a) 4030005 Failure to use valves of manual, open and closed design, for drainage of diked areas. (40 CFR 112.8(b)(2).) HSC 25270.4.5(a) 4030008 Facility drainage system from undiked areas not designed/equipped to retain oil or return to facility and/or failed to ensure catchment basin not in an area subject to flooding. (40 CFR 112.8(b)(3), 112.8(b)(4).) HSC 25270.4.5(a) 4030009 Failed to provide at least two lift pumps and permanently install one pump where drainage waters are treated in more than one treatment unit and such treatment is continuous. (40 CFR 112.8(b)(5).) HSC 4030012 Storage tanks not compatible with materials stored or conditions such as pressure/temperature. (40 CFR 112.8(c)(1).) HSC 25270.4.5(a) 4030010 (Sized Containment) Secondary containment not sized to contain the entire capacity of the largest single storage tank plus freeboard for precipitation. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) 4030013 Failure to ensure diked areas are sufficiently impervious to contain discharged oil. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) 4030011 Failed to keep containment bypass valves closed when not draining rainwater. (40 CFR 112.8(c)(3)(i).) HSC 25270.4.5(a) 4030006 Failed to inspect retained rainwater prior to discharge. (40 CFR 112.8(c)(3)(ii).) HSC 25270.4.5(a) 12 🗷 4030007 Failed to open and close bypass valve to drain rainwater under responsible supervision. (40 CFR 112.8(c)(3)(iii).) HSC 25270.4.5(a) 4010026 Failed to maintain adequate records (or NPDES permit records) of drainage from diked areas. (40 CFR 112.8(c)(3)(iv).) HSC 25270.4.5(a) 4030017 Failed to provide corrosion protection for partially buried storage tanks. (40 CFR 112.8(c)(5).) HSC 25270.4.5(a) 4030015 Failed to test or inspect each storage tank for integrity, in accordance with industry standards that take into account size, configuration, and design, on a regular schedule or after material repairs. (40 CFR 112.8(c) (6).) HSC 25270.4.5(a) 4030014 Failed to perform scheduled storage tank tests and inspections by appropriately qualified personnel. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) 4010028 Failed to frequently inspect the outside of each storage tank for signs of deterioration, discharges, accumulation of oil in diked areas, including supports/foundations; failed to keep records of inspections, tests and comparison records. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) 4030018 Failure of steam return/exhaust of internal heating coils, which discharge into an open water course, to be monitored, passed through a settling tank, skimmer, or other separation system. (40 CFR 112.8(c) (7).) HSC25270.4.5(a) 4030019 Failed to provide each storage tank with a high level monitoring device, or implement procedures to prevent discharges caused by overfills, in compliance with 40 CFR Part 112. (40 CFR 112.8(c)(8)(i-iv).) HSC 25270.4.5(a) 4030022 Failed to regularly test liquid level sensing devices to ensure proper operation. (40 CFR 112.8(c)(8)(v).) HSC 25270.4.5(a) 4030023 Failure to frequently observe effluent treatment facilities, which discharge directly to navigable waters, to detect oil spills. (40 CFR 112.8(c)(9).) HSC 25270.4.5(a) 4030021 Failed to promptly correct visible discharges and/or remove accumulations of oil in diked areas. (40 CFR 112.8(c)(10).) HSC 25270.4.5(a) 4030024 (For mobile or portable storage tanks AND mobile refuelers) Failed to locate mobile or portable containers to prevent discharge. (40 CFR 112.8(c)(11).) HSC 25270.4.5(a) 4030020 (For mobile or portable storage tanks EXCEPT mobile refuelers) Failed to provide secondary containment sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard for precipitation. (40 CFR 112.8(c)(11).) HSC 25270.4.5(a)

SPCC REQUIREMENTS BASED UPON 40 CFR 112.8 (continued)
Refer to APSA (HSC Chapter 6.67) for definition of "storage tank"

#		VIOLATION DESCRIPTION
	4030025	Failed to inspect buried piping when exposed for any reason; failed to do additional examination or take corrective action if corrosion damage is identified. (40 CFR 112.8(d)(1).) HSC 25270.4.5(a)
	4030027	Failed to provide corrosion protection for buried piping. (40 CFR 112.8(d)(1).) HSC 25270.4.5(a)
	4030028	Failed to cap/blank-flange piping connection at transfer point and mark its origin if not in service. (40 CFR 112.8(d)(2).) HSC 25270.4.5(a)
	4030029	Failed to design pipe supports to minimize abrasion/corrosion and to allow for expansion/contraction. (40 CFR 112.8(d)(3).) HSC 25270.4.5(a)
	4030026	Failed to regularly inspect aboveground valves, piping, and appurtenances. (40 CFR 112.8(d)(4).) HSC 25270.4.5(a)
	4030030	Failed to conduct integrity and leak test on buried piping at installation, modification, construction, relocation or replacement. (40 CFR 112.8(d)(4).) HSC 25270.4.5(a)
	4030031	Failed to adequately warn vehicles entering facility to protect piping and other transfer operations. (40 CFR 112.8(d)(5).) HSC 25270.4.5(a)

HM-950 APSA (02-15)



CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: **3121 WILLOW GLEN DR**

EL CAJON /92019 CITY/ZIP:

INSPECTION DATE: 04/07/2017

RECORD ID #: **DEH2003-HUPFP-202521**

SPECIALIST: Alaaeddine Zahra INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintendent PHONE: (619) 933-7300 E-MAIL: Gruiz@wgolfp.com

	VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)	DUE DATE
#1	3010001			05/07/2017
#2	HMD1001			05/07/2017
#3	3030010			05/07/2017
#4	3030011			05/07/2017
#5	HMD0217			05/07/2017
#6	3030036			05/07/2017
# 7	3030017			05/07/2017
#8	3030007			05/07/2017
#9	4010001			05/07/2017
#10	4010002			05/07/2017
#11	1010004			05/07/2017
#12	4030007			05/07/2017

I certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.

PRINTED NAME OF FACILITY REPRESENTATIVE		DATE SIGNED
	SIGNATURE	
TITLE OF FACILITY REPRESENTATIVE	SIGNATORE	

SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW



INSPECTION DATE: **04/07/2017**RECORD ID #: **DEH2003-HUPFP-202521**

CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

COUNTY OF SAN DIEGO USE ONLY	
REVIEWED BY:	DATE:
SPECIALIST'S COMMENTS:	
All violations noted on date listed above were corrected	
☐ Based On Information Provided By The Facility	RTC entered by Specialist on:
☐ Based On Field Verification By Specialist	☐ RTC entered by Office Assistant on:

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 http://www.sdcdeh.org 858-505-6880



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 1:00 PM END: 4:30 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT:Gerry Ruiz
TITLE: Superintentdent
PHONE: (619) 933-7300
E-MAIL: Gruiz@wgolfp.com

FACILITY REFERENCE DATA ACCELA RECORD STATUS: Expired	CERS EPA ID NUMBER: CAL000273995
PERMIT EXPIRATION DATE: 03/31/2017	FACILITY CERS ID NUMBER: 10365076
BALANCE DUE: \$1,140.00	CERS LEAD USER: Marge August
INSPECTOR: Alaaeddine Zahra	LAST CERS SUBMITTAL DATE: 06/26/2015
INSPECTION TYPE: Initial	ENVIRONMENTAL CONTACT EMAIL:
INSPECTION STATUS: Pending Corrective Action	ENVIRONMENTAL CONTACT PHONE: 619-442-9891
FACILITY INFORMATION YES NO	YES NO
INACTIVATION INSPECTION:	HAZARDOUS MATERIALS:
CHANGE OF OWNER:	HAZARDOUS WASTE:
CHANGE IN BUSINESS TYPE:	ABOVEGROUND PETROLEUM STORAGE ACT:*
BUSINESS TYPE: Landscape Maintenance	TOTAL SHELL CAPACITY APSA: 1610
ISSUE INITIAL INVOICE:	UNDERGROUND STORAGE TANK:
ASSESS NON-NOTIFICATION FEE:	CALARP PROGRAM (CERS):
ASSESS RE-INSPECTION FEE:	CALARP PROGRAM LEVEL: 1 2 3 N/A
FACILITY SUBJECT TO BASE FEE:	MEDICAL WASTE:
FACILITY SUBJECT TO CUPA FEE:	MW FACILITY GENERATING OVER 200 LBS PER MONTH:
UPDATE FACILITY ADDRESS IN AA:	EPIC PARTICIPANT:
BUSINESS CLOSE DATE:	NUMBER OF TLV GASES AT THE FACILITY: 0
HW GENERATOR STATUS : LQG SQG CESQG	RCRA LQG N/A
TIERED PERMIT LEVEL(S): CESQT CESW CE-L	CE-CL HHW PBR CA N/A
PRIMARY BILLING CODE	SECONDARY BILLING CODE TERTIARY BILLING CODE
Not Applicable	Not Applicable Not Applicable
INSPECTION SCOPE:*	
HAZARDOUS MATERIALS: GEN HAZMAT APSA UST	HAZARDOUS WASTE: SQG LQG
MEDICAL WASTE: SQG SQG - TREATS	CALARP: 1 2 3
LQG - ABBREVIATED LQG - TREATS	TIERED PERMITTING: CESOT CESW CE-L CE-CL
	CA PBR HHW
CONSENT TO CONDUCT INSPECTION GRANTED BY: INSPECTION CONTACT 🗷	NAME: Gerry Ruiz TITLE: Superintentdent
REMOVE BLANK CHECKLISTS FROM FINAL INSPECTION REPORT	REFUSED TO SIGN



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

3121 WILLOW GLEN DR ADDRESS:

EL CAJON /92019 CITY/ZIP:

INSPECTION DATE: 04/07/2017 RECORD ID #: **DEH2**003-HUPFP-202521 TIME START: 1:00 PM END: **4:30 PM**

SPECIALIST: Alaaeddine Zahra

INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintentdent PHONE: (619) 933-7300 E-MAIL: Gruiz@wgolfp.com

aaeddine.Zahra@sdcounty.ca.gov ECORD COMMENT: Trived to conduct a routine inspection on 4/7/17. As per Gerry Luiz facility had recently underwent a change of ownership around August 2016. New facility owner is festern Golf properties.
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lestern Golf properties.



NOTICE OF VIOLATION

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017 PAGE 1 OF 11
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 1:00 PM END: 4:30 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT: Gerry Ruiz
TITLE: Superintentdent
PHONE: (619) 933-7300

E-MAIL: Gruiz@wgolfp.com

OWNER'S NAME Western Golf Properties CITY/ZIP EL CAJON /92019
ADDRESS 3121 WILLOW GLEN DR PHONE 619-442-9891

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). The following statements describe significant violations. This notice requires a formal written response and corrective action within the times specified.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz

TITLE: Superintentdent

INTRODUCTION:

THIS IS A COPY OF THE ORIGINAL FULL INSPECITON REPORT ISSUED TO FACILITY ON 4/12/17, ORIGINAL REPORT INCLUDES PHOTOS TAKEN AND FACILITY REPRESENTATIVE SIGNATURES.

Initial compliance inspection conducted at this facility, this is a golf course that operates a maintenance yard on site. Facility generates hazardous waste and handles hazardous materials and is subject to the hazardous materials business plan and the hazardous waste program requirements.

Consent to conduct inspection and take photos was granted by Gerry Ruiz, Superintendent.

Facility underwent a change of ownership in August 2016 and new owner is Western Golf Properties.

During the inspection I observed that the facility handles the following hazardous materials and waste:

- 1- Waste Oil
- 2-Oxygen
- 3-Acetylene
- 4-Fertilizers:
- a- Approximately 50x 50LBS bags of Harrols Professional Fertilizer
- b- More than 500LBS boxes of Ecosol Systems fertilizers that were in deteriorating boxes.
- 5-55 gallon liquid iron
- 6-1000 Gallon Diesel Tank
- 7-500 Gallon Unleaded fuel tank

A summary of violations will be issued today, and a full inspection report will be issued within 7 business days.

VIOLATION # 1

3010001 Unified Program Facility (UPF) permit not obtained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905

Classification: Class I

Observations:

As of today's inspection this facility had not obtained a UPFP permit from the CUPA. Note that facilities that generate hazardous waste in any amount are required to obtain and maintain a UPFP permit. New Facility assumed ownership around August 2016 and has not obtained required permit.

Corrective Action Due By:05/07/2017

INSPECTION DATE: **04/07/2017** PAGE **2** OF **11**

RECORD ID #: **DEH2**003-HUPFP-202521

As soon as possible but within 30 days ensure you submit proper application for obtaining a UPFP permit for generation of hazardous waste.

VIOLATION # 2

HMD1001 Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905

Classification: Class I

Observations:

Facility handles reportable quantities of hazardous materials and has not obtained a hazardous materials permit from HMD. New Facility assumed ownership around August 2016 and has not obtained required permit. Previous facility owner had a UPFP permit, however it is expired

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure you submit proper application for obtaining a UPFP permit for handling of hazardous materials.

Specialist should verify the identification of facility representative using a standard form of ID (e.g., CDL#, CA ID# or DOB).

, , , , , , , , , , , , , , , , , , , ,	J	, 9,	•
PRINTED NAME OF ENV. HEALTH SPECIALIST		11 A	DATE SIGNED
Alaaeddine Zahra	SIGNATURE	1 - () \	04/13/2017
	0.0.0.0.0.0		
PRINTED NAME OF FACILITY REPRESENTATIVE			DATE SIGNED
Rick Adams (Signature on original report sent to file)	SIGNATURE	1 / \	04/13/2017
TITLE OF FACILITY REPRESENTATIVE	SIGNATURE	JKE / /	
Operations Specialist			

You must submit a written response within 30 days (or as specified) addressing all violations noted. The written response must demonstrate all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. The County may initiate formal enforcement action including the imposition of substantial penalties for any significant violations addressed in this notice. Any violations that are not promptly corrected will result in liability for additional days in violation and additional penalties. Any failure to provide the information requested will also be a factor in determining penalties. For these purposes, "significant violations" include violations that represent a significant threat to human health or safety or the environment, chronic violations, violations committed by a recalcitrant violator and Class I hazardous waste violations (CCR 66260.10 and H&SC 25110.8.5).



COMPLIANCE INSPECTION REPORT

FACILITY NAME: COTTONWOOD GOLF COURSE
ADDRESS: 3121 WILLOW GLEN DR
CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/20	
RECORD ID #: DEH2003-HUPF	P-202521
TIME START: 1:00 PM	END: 4:30 PM
SPECIALIST: Alaaeddine Zah	nra
INSPECTION CONTACT: Gerry	Ruiz
TITLE: Superintentdent	
PHONE: (619) 933-7300	
E-MAIL: Gruiz@wgolfp.com	

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOT	IOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.						
Yes	N/A		Yes	N/A			
		Unified Program Facility Permit Current			Contingency Plan Available ☐ LQG ☐ SQG		
		Hazardous Materials Business Plan Available			Employee Training Records Available		
		Employee Training is Adequate			Universal Waste Managed Properly		
		Waste Disposal Records Available for Review			Waste Containers ☐ Closed ☐ Labeled		
		Emergency Contacts Current Updated today			Waste Containers in Good Condition		
		Chemical Inventory/Map Current Updated today			Permit Expires On 03/31/2017		
CON	SENT	TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz			TITLE: Superintentdent		

VIOLATION # 3

3030010 Accumulated waste too long (>180 or 270 days) (>90 days for an acutely hazardous waste). (40 CFR 262.34(e) and (f).) HSC 25201(a); 22 CCR 66262.34(d)

Classification: Class II

Observations:

Inside the room between the office and the facility garage of the maintenance area, I observed numerous paints and paint related material contianers that appeared to be rusted and labels pealed off, per Gerry Ruiz many of those containers have no use and are a waste. As per Gerry Ruiz those paint material have been on site and ready to be disposed for more than a year.

Note that facilities that have deemed a waste to be hazardous must ensure disposal within 180 days. See Photo #1 and Photo #2

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, sort out all the paint related containers with material and other materials that may be hazardous and accumulating for more than 180 days and ensure disposal within 30 days.

Submit proof of corrective action that the containers observed during this inspection have been properly disposed using a registered hazardous waste hauler

VIOLATION # 4

3030011 Failed to properly dispose of universal waste within one year. 22 CCR 66273.35(a) and/or (b)

Classification: Class II

Observations:

During this inspection I observed more than 20 Flourescent light bulbs that were accumulating in the maintenence area room between the office and the open garage. Gerry Ruiz stated he was not sure who would pick up those bulbs, Mr. Gerry Ruiz stated that those bulbs have been accumulating for over 3 years. Note that fluorescent light bulbs are universal waste (hazardous waste) and must be handled as such. Waste fluorescent bulbs are hazardous when disposed therefore they must be disposed through proper means (registered hauler). Universal waste may not be accumulated for more than 1 year and must be stored in proper labeled container.

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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

See Photo #3, #4, #5

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure that all universal waste that have been accumulating for more than 1 year are properly disposed and manifests are kept on site. Submit proof of corrective action within 30 days. Universal waste include fluorescent bulbs and electronic waste.

VIOLATION # 5

HMD0217 Failed to repackage damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f)

Classification: Class II

Observations:

Inside the fertilizer storage area I observed more than 500LBS of fertilizer that was labaled as ECO SOL systems. Package label indicated that the contents included Calcium Acetate and Calcium Nitrate. As per Gerry Ruiz the facility has not used this material in a long time. About 5 of the cardboard containers were observed to be deteriorating and not in good condition. Mr Ruiz stated that this is due to Rats eating the package.

Be advised that hazardous materials containers that are deteriorating or damaged must be repackagded within 96 hours.

See photos: #6 #7 #8 #9

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure all deteriorating packages are repackaged into good ones, the material is used in your normal process, or a hazardous waste determination is conducted for the packages to determine of the material is now a hazardous waste and then handle is as such. Mr. Ruiz stated that the facility may just use the material for their facility.

Ensure all staff responsible for maintaining the maintenance area are familiar with this requirement.

VIOLATION # 6

3030036 Failed to maintain adequate aisle space. (40 CFR 262.34(d)(4); 265.35.) 22 CCR 66262.34(d)(2)

Classification: Class II

Observations:

Around the hazardous waste area I observed that the facility has multiple items blocking access to drums (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure aisle space is maintained around the hazardous waste area and that there is easy access to the hazardous waste drums.

VIOLATION # 7

3030017 Failed to properly close hazardous waste container(s). (40 CFR 262.34(d)(2); 265.173.) 22 CCR 66262.34(d)(2)

Classification: Class II

Observations:

Observed a 5 gallon container that as per Mr. Ruiz contained waste oil. The bucket was observed to be open and no lid was found around it. Note that all hazardous waste containers must be closed at all times when not in active use. (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days ensure that you obtain a lid for the 5 gallon container and that facility staff are familiar with the requirement.

HM-924(01/15)

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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

VIOLATION #8

3030007 Failed to properly label/date hazardous waste container and/or tank. 22 CCR 66262.34(f)

Classification: Class II

Observations:

Observed the two hazardous waste drums that the facility stores to not be labeled with a proper hazardous waste label. All labels were observed to be pealed off or faded. (See photo 10, 11, 12)

Corrective Action Due By:05/07/2017

Immediately begin labeling the containers with the required hazardous waste labeling. Within 30 days, submit documentation to the HMD that this violation was corrected.

VIOLATION #9

4010001 Failed to prepare and implement a written Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 (sec. 112.3). HSC 25270.4.5(a)

Classification: Class II

Observations:

Facility handles above 1320 gallons of petroleum based product (1000 gallons of diesel, 500 gallons of unleaded fuel, and 110 gallons of waste oil) and failed to prepare and implement a written spill prevention control and countermeasures (SPCC) Plan in accordance with 40 CFR Part 112. HSC 25270.4.5(a), CFR 112.3

This plan is made to ensure facility has set proper procedures to prevent spills or in case of a spill that the facility is prepared to respond properly.

During the inspection Mr. Ruiz was not aware of presence of an SPCC plan on site.

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, documentation that a valid SPCC plan has been prepared. A template can be found here: https://www.epa.gov/sites/production/files/2014-05/documents/tier1template.pdf

VIOLATION # 10

4010002 Failed to obtain facility management approval to commit resources to fully implement the SPCC Plan. (40 CFR 112.7.) HSC 25270.4.5(a)

Classification: Class II

Observations:

Failure to have full approval of management at a level of authority to commit the necessary resources to fully implement the SPCC Plan CFR 112.7 pursuant to 25270.4.5(a)

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, evidence the SPCC plan includes the approval of management to commit the necessary resources to fully implement the plan.

VIOLATION # 11

1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25506; 25507; and 25508(a)(1)(A)

Classification: Class II

Observations:

Observed facility handles the following that were not on hazardous materials inventory:

1-55 gallon drum of Liquid iron

HM-924(01/15)



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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

2- approximately 50x 50lbs fertilizer bags. (Harrols Professional Fertilizer).

Note that facilities that handle hazardous materials in above reportable quantities are required to ensure inventory section of hazardous materials business plan which is part of your facility HMBP is updated. Any changes to the inventory (more than 100% increases or removal of any reported item or any addition of new item) must be reported within 30 days.

Corrective Action Due By:05/07/2017

As soon as possible but within 30 days, ensure that your facility submits an up to date inventory that reflects what your facility handles on site. (reportable hazardous materials or any amounts of hazardous waste)

VIOLATION # 12

4030007 Failed to open and close bypass valve to drain rainwater under responsible supervision. (40 CFR 112.8(c)(3)(iii).) HSC 25270.4.5(a)

Classification: Class II

Observations:

Observed liquid accumulating in the secondary containment of the disest tank, it appeared like the liquid has been accumulating for a long period (see photo) as per Gerry Ruiz, this is rainwater accumulating. Note t that secondary containment is designed to hold a specific amount of the primary containment capacity and therefore having rainwater inside may impede proper prevention of spills to the environment due to leaks in primary containment. Facilities must ensure to drain rainwater properly after making sure that the liquid is not contaminated.

Corrective Action Due By:05/07/2017

Within 30 days submit to my attention, proof of corrective action that the secondary containment does not contain any left over rainwater observed during this inspection.

INSPECTION REMARKS:

APSA/SPCC Program

More information on SPCC/ APSA program: http://www.sandiegocounty.gov/deh/hazmat/hmd_apsa.html Ensure Plan is reviewed every 5 years or within 30 days of a technical change (Increase of APSA reportable Petroleum products) Ensure facility staff is annually trained (annual briefings on SPCC) and records maintained for 3 years, facility must use the appendix form for keeping track of training records.

Ensure inspections of APSA tanks are being conducted in accordance with the SPCC plan and records maintained for 3 years.

Hazardous Waste Program:

Facilities that generate any amounts of hazardous waste are subject to the Hazardous Waste Program

- -All hazardous waste containers must be closed when not in use, hazardous waste containers of 5 gallon capacity and above storing hazardous waste must be labeled with a hazardous waste label.
- -Hazardous waste disposal manifests must be maintained on site for the past 3 years.
- -Small quantity generators of hazardous waste that generate less than 1000kg (or 275 Gallons) of hazardous waste per month may accumulate waste for a maximum period of 180 days.
- -EPA Id number must be active for facilities that generate hazardous waste (annual renewal may be done on-line).
- -For Small Quantity Generators of Hazardous Waste, Hazardous Waste Accumulation areas must be inspected weekly.
- -Contingency plan must be posted next to a telephone line.

Hazardous Materials Business Plan:

Facilities that handle hazardous materials in quantities of (and above): 55 gallons for liquids, 200 cuft for gases, 500 LBS for solids are subject to the hazardous materials business plan program requirements.

-Note that facilities subject to the hazardous materials business plan are required to conduct annual employee training as per



INSPECTION DATE: 04/07/2017

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SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

the employee training plan which is part of the hazardous materials business plan.

- -Furthermore facilities are required to maintain records for training for 3 years.
- -Information in CERS must be annually re-certified if no changes occur or within 30 days of change of information.
- -Hazardous materials business plan must be available/accesssible on site.

Helpful Websites:

- For guidance documents on hazardous materials-related topics, go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (CERS),
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html
- If you have questions on: permit fees, business plan requirements, or hazardous waste regulations, go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html
- To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails: https://public.govdelivery.com/accounts/CASAND/subscriber/new

If you have any questions regarding this inspection, please contact Alaaeddine Zahra, 858-525-5834, Alaaeddine. Zahra@sdcounty.ca.gov

INSPECTION PHOTOS None

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: http://www.sandiegocounty.gov/deh/hazmat/hmd_cers.html

PRINTED NAME OF FACILITY REPRESENTATIVE Rick Adams (Signature on original report sent to file)	SIGNATURE		DATE SIGNED 04/13/2017
TITLE OF FACILITY REPRESENTATIVE	SIGNATORE	, , , , , , , , , , , , , , , , , , , ,	
Operations Specialist			

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 Phone: (858) 505-6880 http://www.sdcdeh.org



INSPECTION DATE: 04/07/2017

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COMPLIANCE INSPECTION REPORT

Handlers of Hazardous Materials and Small and Large **Quantity Generators of Hazardous Waste**

FACILITY NAME: *COTTONWOOD GOLF COURSE

ADDRESS: * 3121 WILLOW GLEN DR CITY/ZIP: *EL CAJON 92019

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in Italics. Incorporated provisions of Title 40 of the Code of Federal regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator; LQG = Large Quantity Hazardous Waste Generator

Hazardous Materials Requirements	Hazardous Waste Requirements for SQGs ONLY (continued)
<u>VIOLATION DESCRIPTION</u>	# <u>VIOLATION DESCRIPTION</u>
1010001 HMBP not established/ implemented. HSC 25505(a) and 25507(a)	8 x 3030007 Failed to properly label/date hazardous waste container and/or tank. 22 CCR 66262.34(f)
 1010002 HMBP not submitted to the CUPA in CERS. HSC 25508(a)(1)(A); HSC 25404(e)(4); 27 CCR 15188(a), (d) 1010003 Business Activities and/or Business Owner/Operator Identification not completed in CERS. 19 CCR 2729.2(a)(1); HSC 25404(e)(4) 	3 🗷 3030010 Accumulated waste too long (>180 or 270 days) (>90 days for an acutely hazardous waste). (40 CFR 262.34(e) and (f).) HSC 25201(a); 22 CCR 66262.34(d)
 11 \(\mathbb{X} \) 1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a) (1); 25506; 25507; and 25508(a)(1)(A) 1010005 Site map not submitted in CERS or not sufficient. HSC 25505(a)(2) and 25508(a)(1)(A) 1010006 HMBP not updated to reflect inventory changes or facility information. 	 3030013 Failed to accumulate hazardous waste in a container that is in good condition. (40 CFR 262.34(d)(2); 265.171.) 22 CCR 66262.34(d)(2) 3030015 Failed to accumulate or store hazardous waste in a lined/compatible container. (40 CFR 262.34(d)(2); 265.172) 22 CCR 66262.34(d)(2) 3030017 Failed to properly close hazardous waste container(s). (40 CFR 262.34(d)(2); 265.173.) 22 CCR 66262.34(d)(2)
HSC 25508.1(a-e) 1010007 HMBP not updated to reflect substantial change to the handler's operations. HSC 25508.1(f)	3030019 Failed to inspect hazardous waste storage area at least weekly. (40 CFR 262.34(d)(2); 265.174.) 22 CCR 66262.34(d)(2) 3030022 Failed to properly separate incompatible waste. (40 CFR 262.34(d)(2);
 1010008 HMBP not certified annually as complete and accurate in CERS. HSC 25508.2 1010010 Emergency response procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3) and 25508(a)(1)(A) 	265.177.) 22 CCR 66262.34(d)(2) 3030030 Failed to maintain and/or operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. (40 CFR
1010011 Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1	262.34(d)(4), 265.31.) 22 CCR 66262.34(d)(2) 6 3030036 Failed to maintain adequate aisle space. (40 CFR 262.34(d)(4); 265.35.) 22 CCR 66262.34(d)(2)
 1010012 Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1 1010014 Failure to submit emergency response plan in CERS, when not meeting 	3010022 Failed to post, next to the telephone, emergency information containing the location of emergency equipment, contact names, and numbers. (40 CFR 262.34(d)(5)(ii).) 22 CCR 66262.34(d)(2)
agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A) 1010015 Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)	3020001 Failed to ensure employees are trained for hazardous waste handling, compliance with regulations, and emergency response procedures. (40 CFR 262.34(d)(5)(iii).) 22 CCR 66262.34(d)(2)
 ☐ 1010016 HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)(A) ☐ 1020001 Employee training plan for hazardous materials management not adequate, not established or not submitted in CERS. HSC 25505(a)(4) and 25508(a)(1)(A) ☐ 1020002 Initial and/or annual employee training not conducted for hazardous 	3030032 Failed to maintain or have emergency equipment, supplies, or equivalents. 1) An internal communication or alarm system; 2) A device, such as a telephone; 3) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and 4) Water at adequate volume and pressure (40 CFR 262.34(d)(4); 265.32) 22 CCR 66262.34(d)(2)
materials management and/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4) 1040001 Hazardous materials release or threatened release not reported to the	3030039 Failed to implement contingency plan during an emergency, spill/release. (40 CFR 262.34(d)(5)(iv).) 22 CCR 66262.34(d)(2)
CUPA and OES immediately upon discovery. HSC 25510(a)	Hazardous Waste Tank Systems for SQGs ONLY
 9 4010001 Failed to prepare and implement a written Spill Prevention Control and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 (sec. 112.3). HSC 25270.4.5(a) 2 HMD Unified Program Facility permit not obtained for hazardous materials. 	3030024 Failed to maintain sufficient freeboard of 2 ft in uncovered tanks to prevent overtopping unless the tank is equipped with a containment structure, a drainage control system or a diversion structure with a
Third Space 1091 and 1092 and 1093 and 1094 and 1094 and 1095 and	capacity that equals or exceeds the volume of the top 2 ft of the tank. (40 CFR 62.34(d)(3); 265.201(b)(c).) 22 CCR 66262.34(d)(2) 3030025 Failed to provide an overfill protection device on continuously fed hazardous waste tank. (40 CFR 262.34(d)(3); 265.201(b)(4).) 22 CCR 66262.34(d)(2)
HMD Annual carcinogen/reproductive toxin list not submitted. SDCC 68.1113(c) HMD HMBP not readily available for review. HSC 25505(c)	3030027 Failed to conduct daily tank inspection of the discharge system, monitoring equipment, and tank level. (40 CFR 265.201(c)(1), 265.201(c)(2), 265.201(c)(3), 262.34(d)(3).) 22 CCR 66262.34(d)(2)
Hazardous Waste Requirements for SQGs ONLY	3030028 Failed to conduct weekly inspections of the construction materials, fixtures, and surrounding areas of the hazardous waste tank. (40 CFR
	265.201(c)(4); 265.201(c)(5); 262.34(d)(3).) 22 CCR 66262.34(d)(2)
HMD Did not accumulate waste in a container or tank. (40 CFR 262.34(d)(2).) 22 CCR 66262.34(d)(2)	hazardous waste tank system. (40 CFR 265.201(f).) 22 CCR 67383.3 HMD Hazardous waste improperly stored in a tank system causing leaks,
HMD 0412 Failed to have an emergency coordinator on call or available during an emergency. (40 CFR 262.34(d)(5)(i).) 22 CCR 66262.34(d)(2)	1612 corrosion, or failure. (40 CFR 265.201(b).) 22 CCR 66262.34(d) HMD Failed to pre-notify the CUPA in writing prior to closing a hazardous
HM-923 (03-15)	HMD Failed to pre-noting the COPATH withing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) HMD Failed to pre-noting the COPATH withing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) Failed to pre-noting the COPATH withing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) Failed to pre-noting the COPATH withing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) Failed to pre-noting the COPATH withing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1) Failed to properly accumulate ignitiable or reactive waste in a tank system. (40 CFR 265.201(g).) 22 CCR 66262.34(d)(2)



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COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

Hazardous Materials and Hazardous Waste (continued)

Hazardous Waste Requirements for SQGs and LQGs RECORD KEEPING/OPERATIONAL REQUIREMENTS

INSPECTION DATE: 04/07/2017
RECORD ID #: DEH2003-HUPFP-202521

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Hazardous Waste Requirements for SQGs and LQGs STORAGE AND HANDLING

	<u>VIOLATION DESCRIPTION</u>	#			<u>VIOLATION DESCRIPTION</u>
× 3010001	Unified Program Facility (UPF) permit not obtained for the generation of hazardous waste. HSC 25404.1; SDCC 68.905			3030001	Failed to meet requirements, when handling, and storing spent lead acid batteries. 22 CCR 66266.81(a)(1)
3010029	The facility has not submitted complete and accurate facility information in CERS. HSC 25404(e)(4); 27 CCR 15188(b)			3030003	Failed to properly manage 'damaged' spent lead acid batteries. 22 CCR 66266.81(b)
	Failed to obtain and/or maintain an active EPA ID. 22 CCR 66262.12			3030004	Failed to properly manage, store, label, and/or recycle used oil filters and/or used fuel filters. HSC 25250.22; 22 CCR 66266.130
<u> </u>	Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a)			3050004	Failed to properly manage contaminated used oil as a hazardous waste. HSC 25250.7(a), (c)
3010009	Failed to complete the hazardous waste manifest Exception Requirement. 22 CCR 66262.42] HMD 0222	Failed to properly label Excluded Recyclable Materials (ERM). HSC
3010010	Failed to maintain uniform hazardous waste manifest, consolidated manifest, or bills of lading copies for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a)			HMD 0216	25143.9(a). Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled.
3010011	Failed to send hazardous waste manifest copies to the Department of Toxic Substances Control (DTSC). 22 CCR 66262.23(a)(4)	5	×	HMD	HSC 25124(b)(3)(A): 22 CCR 66262.34(f) Failed to repackage damaged/detriorated hazardous material
3010013	Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2; 22 CCR 66262.40(a)			d 0217 ☐ HMD 0219	container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f) Failed to properly segregate used oil &/or fuel drained from filters.
3010014	Failed to retain disposal records of spent lead batteries for 3 years. 22 CCR 66266.81(a)(4)(B)] HMD	HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6) Failed to comply with hazardous waste satellite container regulation.
3030006	Failed to determine if a hazardous waste is restricted or prohibited from land disposal. 22 CCR 66268.7(a)			0221 HMD 0223	22 CCR 66262.34(e) Failed to properly empty container, failed to manage non-empty
3010016	Failure of recycler who recycles more than 100 kilograms per month of recyclable material under a claim that the material qualifies for		_		container, or inner liner removed from a container. 22 CCR 66261.7(b), (d) and/or (r); 66262.34(f)
	exclusion or exemption to provide and submit in CERS the required information. HSC 25143.10(a), (c), and/or (d)		L] HMD 0224	Failed to mark date on empty container larger than 5 gallons and/or manage it within one year. 22 CCR 66261.7(e),(f)
☐ HMD 0149	Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130			<u> </u>	Universal Waste Handler Requirements
☐ HMD 0148	Failed to have copies of analytical records, waste analysis records, and/or waste determination results for 3 years. 22 CCR 66262.40(c)	•		3010004	Failed to obtain an EPA ID number from DTSC or US EPA prior to storing 5,000 kg or more of universal waste. 22 CCR 66273.32(a),(b)
☐ HMD 0140	Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66268.7(a)(8)			3020002	Failed to maintain universal waste handler training records for 3 years. 22 CCR 66273.36(c),(d)
	Failed to obtain a Treatment, Storage and Disposal Facility (TSDF) permit or authorization to store/treat/dispose of hazardous waste.			3020003	Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
☐ 20E000E	HSC 25201(a)			3030008	Failed to properly label or mark a universal waste (non-Conditionally Exempt Small Quantity Universal Waste Generator). 22 CCR 66273.34
	Failed to have adequate records demonstrating claim of exemption for Excluded Recyclable Materials. HSC 25143.2(f); 22 CCR 66261.2(g)	4	×	3030011	Failed to properly dispose of universal waste within one year. 22 CCR 66273.35(a) and/or (b)
_	Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a)			3030046	Failed to keep records of offsite universal waste (UW) shipment(s)
☐ HMD 0138	Manifest signed by the TSDF not available for inspection. 22 CCR 66262.40(a)			7 0000054	available for inspection for 3 years. HSC 25185(a); 22 CCR 66273.39(c), (d)(2)
<u>Hazaro</u>	dous Waste Requirements for SQGs and LQGs		L	_	Failed to meet the accumulation standards for universal waste aerosol containers and waste handling. HSC 25201.16(f)
	DISPOSAL AND TRANSPORTATION] 3040004	Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 66273.33; 66273.33.5
3010007	Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a)			3050003	Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a), 25189(c),(d); 25189.2(c); 22 CCR 66273.31(a)
3030005	Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c)				
3050001	Failed to use a California registered hazardous waste transporter to transport hazardous waste. HSC 25163(a); 22 CCR 66263.41				
3050002	Failed to properly dispose of hazardous waste at an authorized facility. HSC 25189.5(a); 25189(c),(d); 25189.2(c)				
	Impermissible dilution of hazardous waste. 22 CCR 66268.3(a)				
☐ HMD 0305	Disposed of used oil illegally. HSC 25250.5(a); 25189.5(a); 25189(c),(d); 25189.2(c)				
☐ HMD 0306	Disposed of hazardous waste latex paint improperly. HSC 25217.1				

HM-923 (03-15)



COMPLIANCE INSPECTION REPORT

Aboveground Petroleum Storage Act (APSA) Program

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC) or San Diego County Code ("SDCC") indicated in italics. Incorporated provisions of Title 40 of the Code of Federal Regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use a DEH Corrective Action Form (HM-926) or other correspondence to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions.

INSPECTION DATE: 04/07/2017

PAGE 10 OF 11

RECORD ID #: DEH2003-HUPFP-202521

GENERAL SPCC REQUIREMENTS BASED UPON 40 CFR 112.7 (continued)

VIOLATION DESCRIPTION

GEN	IERA	L AF	PSA	FAC	ILI	TΥ	REQ	UIR	EME	:NT
Cha	oters	6.67	and	6.11	of	Divi	sion	20 of	f the	HSC)

4010001 Failed to prepare and implement a written spill prevention control and

VIOLATION DESCRIPTION

			112.3). HSC 25270.4.5(a)
		4010013	Plan does not conform to and/or facility is not fully implementing, the latest version of the regulations in 40 CFR Part 112. HSC 25270.4.5(a) (see detail below)
		4010032	Failed to submit a tank facility statement or update/certify business
		4010033	plan annually. HSC 25270.6(a)(1) or (a)(2) Failed to pay the APSA program fee or obtain Unified Program Facility Permit. HSC 25270.6(b), SDCC 68.905
		4040001	Failed to immediately, upon discovery, report a one-barrel (42 gallons)
		4010038	or greater release of petroleum. HSC 25270.8 Failed to report required program data electronically. HSC 25404(e)(4), HSC 25270.6(b), SDCC 68.905
		4010037	Failed to meet provisions of APSA exemption for oil-filled electrical equipment including containment and visual inspection. HSC 25270.2(a)(4)
		REQ	UIREMENTS BASED ON 40 CFR 112.1-112.6
		4010035	Failed to meet the conditions of a Qualified Facility. (40 CFR 112.3(a) (1), 112.3(g), 112.6.) HSC 25270.4.5(a)
		4010003	Failed to have a professional engineer certify and review the SPCC Plan. (40 CFR 112.3(d).) HSC 25270.4.5(a)
		4010008	Failed to maintain a copy of the Plan on site (applies if facility is manned at least 4 hours/day). (40 CFR 112.3(e)(1).) HSC 25270.4.5(a)
		4010010	Failed to make SPCC plan technical amendment(s) when the facility has had a change in: design, construction, operation, or maintenance which affects the facility's discharge potential. (40 CFR 112.5(a).) HSC
		4010009	25270.4.5(a) Failed to perform a 5-year review of the SPCC Plan. (40 CFR 112.5(b).) HSC 25270.4.5(a)
		4010011	Failed to have a professional engineer certify technical amendments. (40 CFR 112.5(c). HSC 25270.4.5(a)
			GENERAL SPCC REQUIREMENTS BASED UPON 40 CFR 112.7
		4010012	Failed to prepare a SPCC plan that follows the sequence of rule and/or to cross-reference; failed to prepare plan in writing; failed to prepare a plan that addresses additional procedures/methods/equipment not fully operational. (40 CFR 112.7 and 112.7(a)(1).) HSC 25270.4.5(a)
0	×	4010002	Failed to obtain facility management approval to commit resources to fully implement the SPCC Plan. (40 CFR 112.7.) HSC 25270.4.5(a)
		4010014	Failed to discuss alternative environmental protection to SPCC requirements within SPCC Plan. (40 CFR 112.7(a)(2).) HSC 25270.4.5(a)
		4010015	Failed to have an adequate facility diagram, including location of oil storage/transfer areas and connecting pipes, or no facility diagram included in SPCC plan. (40 CFR 112.7(a)(3).) HSC 25270.4.5(a)
		4010016	Failed to adequately describe the physical layout of facility, including location of oil storage/transfer areas/connecting pipes or no description of physical layout included in SPCC Plan. (40 CFR 112.7(a) (3), 112.7(a)(3)(i-vi).) HSC 25270.4.5(a)
M	-950	APSA (02-	15)

U 4010017 Plan does not contain procedures for reporting a discharge if facility has no Facility Response Plan. (40 CFR 112.7(a)(4).) HSC 25270.4.5(a)

4010018 Discharge procedures are not adequately addressed if facility has no Facility Response Plan. (40 CFR 112.7(a)(5).) HSC 25270.4.5(a)

4010019 Failed to include prediction of the direction, rate of flow, and total quantity of oil which could be discharged from facility as a result of each type of equipment failure in the SPCC Plan. (40 CFR 112.7(b).) HSC 25270.4.5(a)

4010020 General Containment: Failed to provide, or discuss within the plan, appropriate containment/diversionary structures/equipment designed to address the typical failure, so that any discharge will not escape containment before cleanup occurs. (40 CFR 112.7(c).) HSC 25270.4.5(a)

4010004 Failed to have a professional engineer clearly denote and demonstrate the impracticability of appropriate containment/diversionary structures. (40 CFR 112.7(d).) HSC 25270.4.5(a)

4010005 Failed to prepare an Oil Spill Contingency Plan following the provisions of 40 CFR Part 109 for impracticability claim. This is not required if facility has a Facility Response Plan. (40 CFR 112.7(d)(1).) HSC 25270.4.5(a)

4010006 Failed to provide a written commitment of manpower, equipment, materials for impracticability claim. (40 CFR 112.7(d)(2).) HSC 25270.4.5(a)

4010021 Failed to address in SPCC plan/maintain complete records of: inspections, tests/procedures for 3 years. (40 CFR 112.7(e), 112.8(c) (6).) HSC 25270.4.5(a)

4020001 Failed to train oil-handling personnel on operation/maintenance of equipment to prevent discharges; discharge procedure protocols; applicable laws, rules, and regulations; general facility operations; AND the contents of the SPCC Plan. (40 CFR 112.7(f)(1).) HSC 25270.4.5(a)

4010022 Failed to designate person accountable for discharge prevention who reports to facility management. (40 CFR 112.7(f)(2).) HSC 25270.4.5(a)

4010023 Failed to conduct annual discharge prevention briefings to ensure understanding of SPCC plan. (40 CFR 112.7(f)(3).) HSC 25270.4.5(a)

4030001 Failed to address security of oil handling areas/valves, prevent unauthorized access to starter controls, cap/blank flange connections not in service and provide appropriate lighting to prevent vandalism and assist in discovery of discharges. (40 CFR 112.7(g).) HSC 25270.4.5(a)

4030002 Failure of the secondary containment, and/or rack drainage to flow to a catchment basin, treatment system, or quick drainage system and hold at least the maximum capacity of the largest single compartment of any tank car or tank truck. (40 CFR 112.7(h)(1).) HSC 25270.4.5(a)

4030003 Failed to provide system to prevent vehicular departure before disconnect from transfer lines. (40 CFR 112.7(h)(2).) HSC 25270.4.5(a)

4030004 Failed to inspect lowermost drains and outlets prior to filling and departure of tank car or tank truck. (40 CFR 112.7(h)(3).) HSC 25270.4.5(a)

4030016 Failed to evaluate field-constructed storage tank for brittle fracture and take appropriate action. (40 CFR 112.7(i).) HSC 25270.4.5(a)

4010007 Failed to include discussion of conformance with requirements listed in 40 CFR Part 112. (40 CFR 112.7(j).) HSC 25270.4.5(a)

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COMPLIANCE INSPECTION REPORT

APSA Program (continued)

INSPECTION DATE: **04/07/2017**

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RECORD ID #: DEH2003-HUPFP-202521

SPCC REQUIREMENTS BASED UPON 40 CFR 112.8 Refer to APSA (HSC Chapter 6.67) for definition of "storage tank"

VIOLATION DESCRIPTION 4010027 Failure to restrain drainage from diked storage areas by valves to prevent discharge. (40 CFR 112.8(b)(1).) HSC 25270.4.5(a) □ 4030005 Failure to use valves of manual, open and closed design, for drainage of diked areas. (40 CFR 112.8(b)(2).) HSC 25270.4.5(a) □ 4030008 Facility drainage system from undiked areas not designed/equipped to retain oil or return to facility and/or failed to ensure catchment basin not in an area subject to flooding. (40 CFR 112.8(b)(3), 112.8(b)(4).) HSC 25270.4.5(a) 4030009 Failed to provide at least two lift pumps and permanently install one pump where drainage waters are treated in more than one treatment unit and such treatment is continuous. (40 CFR 112.8(b)(5).) HSC 4030012 Storage tanks not compatible with materials stored or conditions such as pressure/temperature. (40 CFR 112.8(c)(1).) HSC 25270.4.5(a) 4030010 (Sized Containment) Secondary containment not sized to contain the entire capacity of the largest single storage tank plus freeboard for precipitation. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) 4030013 Failure to ensure diked areas are sufficiently impervious to contain discharged oil. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) du30011 Failed to keep containment bypass valves closed when not draining rainwater. (40 CFR 112.8(c)(3)(i).) HSC 25270.4.5(a) 4030006 Failed to inspect retained rainwater prior to discharge. (40 CFR 112.8(c)(3)(ii).) HSC 25270.4.5(a) 12 🗷 4030007 Failed to open and close bypass valve to drain rainwater under responsible supervision. (40 CFR 112.8(c)(3)(iii).) HSC 25270.4.5(a) 4010026 Failed to maintain adequate records (or NPDES permit records) of drainage from diked areas. (40 CFR 112.8(c)(3)(iv).) HSC 25270.4.5(a) 4030017 Failed to provide corrosion protection for partially buried storage tanks. (40 CFR 112.8(c)(5).) HSC 25270.4.5(a) 4030015 Failed to test or inspect each storage tank for integrity, in accordance with industry standards that take into account size, configuration, and design, on a regular schedule or after material repairs. (40 CFR 112.8(c) (6).) HSC 25270.4.5(a) 4030014 Failed to perform scheduled storage tank tests and inspections by appropriately qualified personnel. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) 4010028 Failed to frequently inspect the outside of each storage tank for signs of deterioration, discharges, accumulation of oil in diked areas, including supports/foundations; failed to keep records of inspections, tests and comparison records. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) 4030018 Failure of steam return/exhaust of internal heating coils, which discharge into an open water course, to be monitored, passed through a settling tank, skimmer, or other separation system. (40 CFR 112.8(c) (7).) HSC25270.4.5(a) 4030019 Failed to provide each storage tank with a high level monitoring device, or implement procedures to prevent discharges caused by overfills, in compliance with 40 CFR Part 112. (40 CFR 112.8(c)(8)(i-iv).) HSC 25270.4.5(a) 4030022 Failed to regularly test liquid level sensing devices to ensure proper operation. (40 CFR 112.8(c)(8)(v).) HSC 25270.4.5(a) 4030023 Failure to frequently observe effluent treatment facilities, which discharge directly to navigable waters, to detect oil spills. (40 CFR 112.8(c)(9).) HSC 25270.4.5(a) 4030021 Failed to promptly correct visible discharges and/or remove accumulations of oil in diked areas. (40 CFR 112.8(c)(10).) HSC 25270.4.5(a) 4030024 (For mobile or portable storage tanks AND mobile refuelers) Failed to locate mobile or portable containers to prevent discharge. (40 CFR 112.8(c)(11).) HSC 25270.4.5(a) 4030020 (For mobile or portable storage tanks EXCEPT mobile refuelers) Failed to provide secondary containment sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard for precipitation. (40 CFR 112.8(c)(11).) HSC 25270.4.5(a)

fo HM-950 APSA (02-15)

SPCC REQUIREMENTS BASED UPON 40 CFR 112.8 (continued) Refer to APSA (HSC Chapter 6.67) for definition of "storage tank"

#	# <u>VIOLATION DESCRIPTION</u>	
	4030025 Failed to inspect buried piping when exposed for do additional examination or take corrective actic damage is identified. (40 CFR 112.8(d)(1).) HSC 25	on if corrosion
	4030027 Failed to provide corrosion protection for buried μ 112.8(d)(1).) HSC 25270.4.5(a)	oiping. (ÀÓ CFR
	4030028 Failed to cap/blank-flange piping connection at tra mark its origin if not in service. (40 CFR 112.8(d)(2	ansfer point and 2).) HSC 25270.4.5(a)
	4030029 Failed to design pipe supports to minimize abrasic allow for expansion/contraction. (40 CFR 112.8(d) 25270.4.5(a)	
	4030026 Failed to regularly inspect aboveground valves, pi appurtenances. (40 CFR 112.8(d)(4).) HSC 25270.4	ping, and ł.5(a)
	4030030 Failed to conduct integrity and leak test on buried installation, modification, construction, relocation CFR 112.8(d)(4).) HSC 25270.4.5(a)	l piping at 1 or replacement. (40
	4030031 Failed to adequately warn vehicles entering facility	y to protect piping



CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: ADDRESS:

FACILITY NAME: COTTONWOOD GOLF COURSE

3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017

RECORD ID #: DEH2003-HUPFP-202521

SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT: Gerry Ruiz

TITLE: Superintentdent
PHONE: (619) 933-7300
E-MAIL: Gruiz@wgolfp.com

	VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)	DUE DATE
#1	3010001			05/07/2017
#2	HMD1001			05/07/2017
#3	3030010			05/07/2017
#4	3030011			05/07/2017
#5	HMD0217			05/07/2017
#6	3030036			05/07/2017
# 7	3030017			05/07/2017
#8	3030007			05/07/2017
#9	4010001			05/07/2017
#10	4010002			05/07/2017
#11	1010004			05/07/2017
#12	4030007			05/07/2017

I certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.

PRINTED NAME OF FACILITY REPRESENTATIVE		DATE SIGNED
TITLE OF FACILITY REPRESENTATIVE	SIGNATURE	

SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW



INSPECTION DATE: 04/07/2017 RECORD ID #: DEH2003-HUPFP-202521

CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

COUNTY OF SAN DIEGO USE ONLY	
REVIEWED BY:	DATE:
SPECIALIST'S COMMENTS:	
☐ All violations noted on date listed above were corrected	
☐ Based On Information Provided By The Facility	☐ RTC entered by Specialist on:
☐ Based On Field Verification By Specialist	☐ RTC entered by Office Assistant on:

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 http://www.sdcdeh.org 858-505-6880

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		OTHER (Specify):	OII.	C12,

NOTHERATIONS TO NEIGHBORING PACILITIES THAT MAY HE ARRECTED BY AN OFF SITE RELEASE WHIL OCCURBY—Checkone commerce of the choses to indicate bloowness boing facilities will be not if refrester eleases.

LLOCALLUMFIED PROGRAMIACE INCX PRIONE - Homeon the phome nountier of fitted accallupations implements the Hazardous Materials Business Flan (HWBP) and hazardous was see generator Unified program elterents. If there is more than the UPA, identify the second according C4.

OFFIER ACTINCY NAME - If applicable, used this space to center the name of another conceptory response agency.

OFFIER ACTINCY PHONE-I framplicable, contentie phone number of the agonoy reasonation C4.

NEAREST MEDICAL FACILITY //HOSPITAL NAWE—Hitter the name of the hospital or one egency medical facility closest £6.

NEARLIST MEDICAL FACILITY // HOSPITAL PHONE — Enter the phone number of the hospital or emergency medical

Gasility named in C6.

£8. REGIONAL WATER QUALITY CONTROL BOARD HHONE—Enter the phone number of the local RWOCE. OTHER ACTINCY NAME - If applicable, use this space to enter the name of another agency requiring notification.

ENO. OTHER AGENCY PHONE - Happlicable, enter the phone number of the agency named in Co.

CIT. OTHER ACENCY NAME - If applicable, use this space to enter the name of another agency requiring notification.

OTHER ACENCY PHONE - If applicable, enter the phone number of the agency named in C11.

SPILL PREVENTION, CONTAINMENT, AND CLEANUP PROCEDURES - Check all applicable boxes to identify procedures used by your facility.

SPECIFY - Briefly specify other spill prevention, containment, and cleamup procedures if you checked Box DI-21.

THE FOLLOWING ALARM SIGNAL(S) WILL BE USED TO BEGIN EVACUATION OF THE FACILITY - Check all applicable boxes to indicate how facility evacuation will be communicated.

SPECIFY - Briefly specify other evacuation signals if you checked Box E1-4.

THE FOLLOWING LOCATION(S) ISVARE EVACUEE ASSEMBLY AREA(S) - Briefly identify of describe the assembly

E4: EVACUATION ROUTE MAP(S) POSTED AS REQUIRED - Check the box to indicate that the evacuation routes have been posted as required.

FI ADVANCE ARRANGEMENTS FOR LOCAL EMERGENCY SERVICES - Check the box to indicate if advance attangements have been made or they have been determined not to be necessary.

SPECIFY = If you checked Box F1-2, briefly describe the advance arrangements.

EQUIPMENT AVAILABLE - Check all applicable boxes in the second column of the table to identify emergency equipment available at your facility.

LOCATION - Briefly describe the location(s) where the emergency equipment is kept. (Repeat for other rows in table.)

CAPABILITY - Where applicable, briefly describe the capability of the emergency equipment. (Repeat for other fows in

册: VULNERABLE AREAS - Cheek all applicable boxes to identify areas at risk of bazardous materials releases or spills due to earthquakes.

LOCATIONS - If you checked Box HI-1, briefly describe the location. (Repeat for H3 through H5, if applicable).

报. VULNERABLE SYSTEMS - Check all applicable boxes to identify areas at nisk of mechanical systems vulnerable to hazardous materials releases or spills due to earthquakes.

4.0CATIONS—If you clasked box 46.1, britily describe the location. (Respect for H7 through H12, if applicable).

孙. ENDICATE HOW EMPLOYEE TRAINING PROGRAM IS ADMINISTERED - Check all applicable boxes to identify how William of the state of the sta

SPECIFY - If you checked Box II-4, list the titles of the study guides or manuals.

SPECIFY - If you checked Box III-5, briefly describe the other ways training is administered.

AFFACHMENTS - Check one of the boxes to indicate whether or mutatilitional pages/aboumants are attached as part of this Energency Response Continuous Plan.

SPICIFY - In your checked Box J1-2, list the attendance is in the sention.

验. PATE SIGNED - Enter the date that the certification section was signed by the owner toporator or authorized consessmentive.

NAME OF STONER - Topse or print the fall mance of the person signing beautifying the plan.

THE OFSIONER - Enter the title of the person signing boutifying the plan.

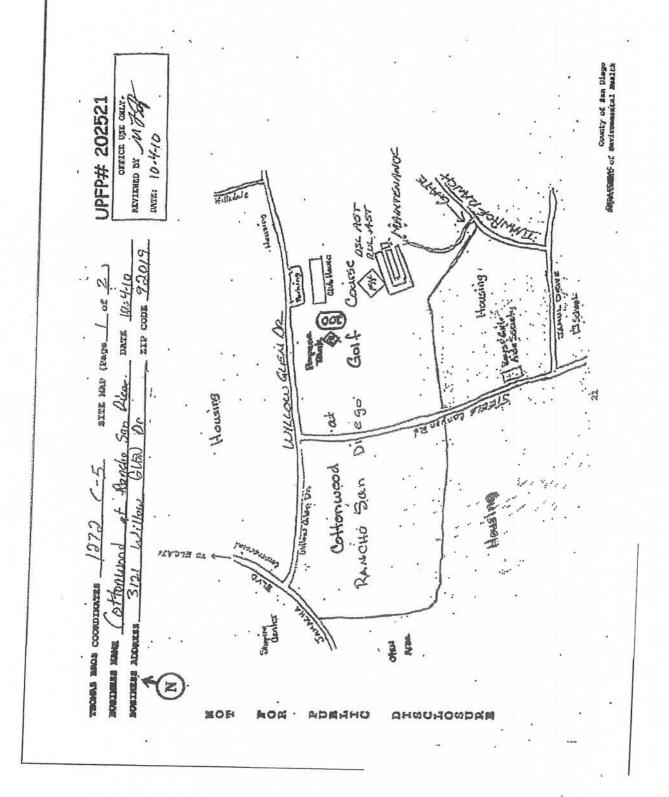
D. EMERGENCY CONTAINMENT AND CHEANUP PROCEDURES
SPILL PREVENTION, CONTAINMENT, AND CLEANUPPROCEDURES: (Clecke all boxes that poply too indicate, your precedence to containing spiris, releases, after of explicitude and integrated and are containing spiris, releases, and open containing and are containing spiris, releases, and open containing and are containing and are contained to the containing and are containing and are contained to the containing and are contained to the containing and the containing are contained to the containing and are contained to the containing and are contained to the containing and are contained to the containing are co
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E. FACILITY EVACUATION
THE FOLLOWING ALARM SIGNAL(S) WILL BE USED TO BEGIN EVACUATION OF THE FACILITY (CHECK ALL THAT APPLY): 1. BELLS: 2. HORNS/SIRENS; 3. HORNS/SIRENS; 4. OTHER (Specify): 14. OTHER (Specify): 15. VERBAL (I.E., SHOUTING); 14. OTHER (Specify): 15. FIRE FOLLOWING LOCATION(S) IS/ARE EVACUEE EMERGENCY ASSEMBLY AREA(S) (i.e., Front parking lot, specific street corner, etc.) 15. ESC. 15. ESC. 15. ESC. 15. ESC. 16. NOTIFICATION SIMPLE AND WILL EVACUATE TO STAGING A PEA 16. SUST NOTIFICATION SIMPLE AND WILL EVACUATE TO STAGING A PEA 16. SUST NOTIFICATION SIMPLE AND SIMPLE AND STAGING A PEA 16. SUST NOTIFICATION SIMPLE AND SIMPLE AND STAGING A PEA
Note: The Emergency Caerdinator must account for all on site employees and/or site visitors after evacuation. 2 EVACUATION ROUTE MAR(S) POSTED AS REQUIRED E4: Note: The mar(s) must show primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas, and must be prominently posted proushout the facility in locations where it with be visible to employees and visitors.
F. ARRANGEMENTS FOR EMERGENCY SERVICES
Explanation of Requirement: Advance arrangements with local fine and police departments, hospitals, and/or consegency services contractors should be made as explanative for your facility. You may determine that such arrangements are not necessary.
BVANCE ARRANGEMENTS FOR LOCAL EMERGENCY SERVICES (Check one of the following) 1. HAVE HEIN DETERMINED NOT NECESSARY; or 2. THE FOLLOWING ARRANGEMENTS HAVE BEEN MADE (Specific): 1. BES = Small= fires will be Handled with fire Extlinguisher if possible LARGE = The fire department will be Call. I m med i ately.
Spill= Small spill will be Cleaned-up with absorbants and disPosed Property. LARGE The fire department will be notified, Try to Spills Contain and Clean-up if Possible and CAll HAZMATE
If Possible and call Hazmate

Check o	Il boxes that apply to list an army	TRANKHUGGTSZZZZZZ	
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afety	TOURMENT AVAILABLE G	IGI. LOCOCATORON	CAPARILLY (f applicable)
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First Aid irst Aid	2 CHEMICAL PROTECTIVE GLOVES	JY LLOUCKEERR "	54. SMAILE LARGE EXPOSU
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	15: FIRE ALARM BOXES OR STATIONS	OFFILE / REPAIR AREA	WILL HANDLE LARGE FIRES
	16: A STHER	632	G3 G3
ļ	17: S ALL-IN-8NE SPILL RIF	*****	G3.
l trol trol	18: ABSORBENT MATERIAL	Pesticide Storage	Will Clean a Small Spill
n-Up	19. E-CONTAINER FOR USED ABSORBENT	CART REPAIR AREA	& OIL Spille Fluids
F		G38:	639
g.	28. H BERNING/BIKING EQUIRMENT 21. H-BROOM	S40.	G41 G41
		TOOL ROOM G42	G43 G43
	22 SHOVEL	G44.	G45,
-	23. SHOP VAC	IN BACK OFFICE G46.	FOR SPITT UP TO BENTO
	24. EXHAUST HOOD	G48.	G49.
-	225. EMERGENCYSUM/HOLDINGTANK	MIXING & LOADING AREA	G51,
-		G92.4	G53, G53,
-	27- GASCYLINGER LEAK REPARKATT	G\$4.*	G55 G55.
-	28 SPILL OVERPACK BRUMS	G\$6.	GS7.
	29 OTHER 29 OTHER	G\$85	G59.
	0. TELEPHONES (Includes Cellular)	INSIde office 6600	C6 G61.
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MUNERABLE ABBAS (Cherkal hartapply) 1. HAZABOUS MATERIALS / WASTESTORACE ABBA 1. LOCATIONS (e.g., shop, outdoor shed, forensic lab) 1. PESTICE STORACE ABBA 1. ABORATORY 1. A WASTETBEATMENT AREA
Identify mechanical systems, vulnerable to releases/spills due to certifiquation. Thesess secons require immediate isolation and inspection.
THE REPORT OF CHECK AND RACKS 1. STEELVES, CABINETS AND RACKS 1. 2-TANKS (EMERGENCY STUTTOES)
PORPABLE CAS CALINDERS A EMERCENCY SHUTOUT AND/OR UTILITY VALVES D 5 SPRINKLER SYSTEMS D 6 STATIONARY PRESSUREED CONTAINERS (e.g., Propers dispensing tents) WELL TO CART DAY
I. EMPLOYEE TRAINING
Explanation of Requirement: Employee training is required for all employees handling bazandous materials and lazendous westes in day-to-day or clean-up operation including volunteers and/or contractors. Training must be: Provided within 6 months for new thires; Amended as necessary prior to change in process or work assignment; Given upon modification to the Emergency Response / Contingency Plan, and updated/refreshed annually for all employees.
Required content includes all of the following: Material Safety Data Sheets; Hazard communication related to health and safety; Methods for safe handling of hazardous substances; Fire hazards of materials / processes; Conditions likely to worsen emergencies; Control and containment procedures; Applicable laws and regulations; Communication and alarm systems; Personal protective equipment; Use of emergency response equipment (e.g. Five extinguishers, respirators, etc.); Decontamination procedures; Evacuation procedures; Control and containment procedures; UST monitoring system equipment and procedures (if applicable).
INDICATE HOW EMPLOYEE TRAINING PROGRAM IS ADMINISTERED (Check all that apply) 1. FORMAL CLASSROOM; 2. VIDEOS; 25. SAFETY / TAILGATE MEETINGS; 5. STUDY GUIDES / MANUALS (Specify): 5. OTHER (Specify): 5. OT
Large Quantity Generator (LQG) Training Records: Large quantity hazardous waste generators (i.e., who generate more than 270 gallons/1,000 kilograms of hazardous waste per month) must retain written decumentation of employee hazardous waste management training sessions which includes: A written outline/agenda of the type and amount of both introductory and continuing training that will be given to persons filling each job position having the summand of the type and amount of the position management training session given to an employee filling such a job position; and The name, job title, and date of training for each hazardous waste management training session given to an employee filling such a job position; and A written job description for each of the above job positions that describes job duties and the skills, education, or other qualifications required of personnel assigne to the position. Current employee training records must be retained at least three years after termination of employment.
J. LIST OF ATTACHMENTS
Checkone of the following) 1 NO ATTACHMENTS ARE REQUIRED; OF THE FOLLOWING DOCUMENTS ARE ATTACHED: THE COMMON COL REPORTUNITY. Charages.
IK. SIGNATURE // CERHIFICATION
Certification: Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete, and that a copy is available on site.
SIGNATURE OF OWNER/OPERATOR JULY 3 3 3 15
NAME OF SIGNER (print) CIALLY YOUNGING PARTY

Chemical Reporting Changes (Jan, 1200)5):
http://www.sannelgeocoling.com/content/acle/dah/branatab/aranatab/modelchem/septing-changes.html

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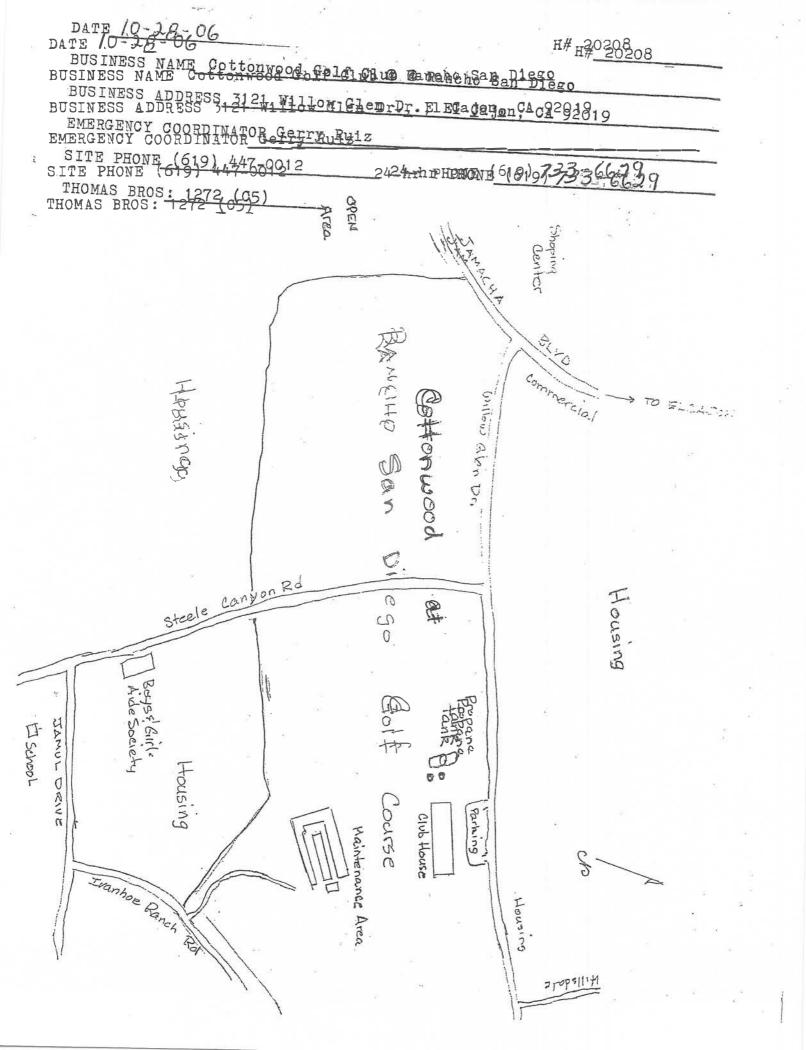
Department of Eurio mane to be delibered by the construction of th THOMAS BROS COORDINATES (035) SKTEMARP(Page 2 of 2) UPFP## BUSINESS NAME (1 FOR WOOD GOLF CILLY OF PROSED) DATE 03-200-2015 OFFICE USE ONLY BUSINESS ADDRESS 3 BUWILLOW GLEW DR ZIPODIE 9201A REVIEWED BY: REVIEWED BY: DATE: MAINTENANCE AREA CAST TOPPET TOOL Storage 阳村山村田 FINDHARD HELDER 200 XXO BERNOOK 哥的特色 Post of Base of Co. EVACUATE STORY OF PAR 日本でののる BEAL NE GACAGE 0 Charact-Ko FFICE 本でるの EVACUATE ROUTE -**EVACUATE** EQUIPMENT PARKING 475 SANO 1000 DIESEL GASOLINE FUEL HM-952 (02/11) HM 952 (02/11) 31

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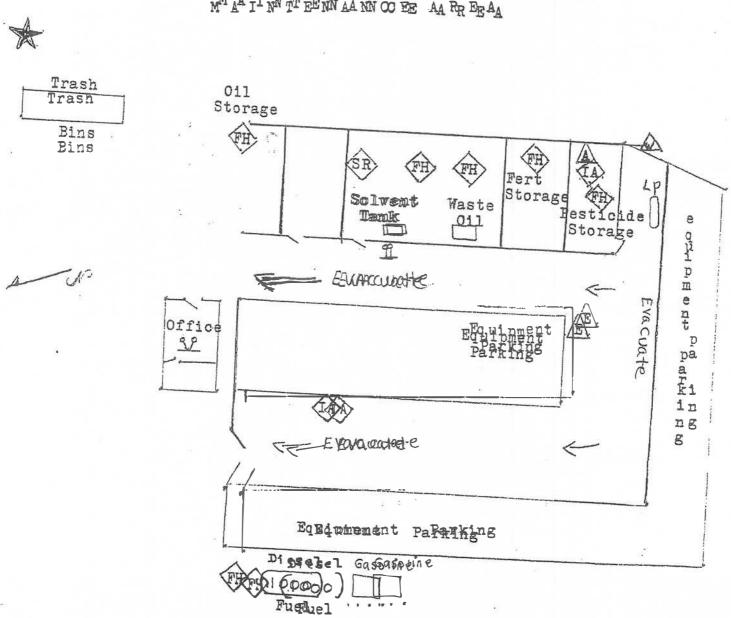
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TTEM TTEM	NAME OF EMERGENCY COORDINATOR
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15	21
TITLE	WORK PHONE HOME/24-HR PHONE
SUPER	INTENDENT 4470012 619933 7300
NUMBER	71 78
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265	JAMACHA RD EL CAJON
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ITEM	NAME OF ALTERNATE
002	JAVIER RUIZ
15	21
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DATE October 28-706	H# 20208
BUSINESS NAME Ranche Sani Dice	Goas191ghub
BUSINESS ADDRESS 12121111110616	hebror Flegadagon OA 092010
EMERGENCY COORDINATOR CEFFER WILL	1z
SITE PHONE (61619), 4476,9912	HONOM PHONEN E 6(8) 9733 26239

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II. INVENIDORY

LIST HAZARDOUS MATERIALS YOUR ESTABLISHMENT USES OR HANDLES AS POHLOUS:
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(OFFICE USE ONLY) ESTAB NUMBER

HAZARDOUS MATERIALS BUSINESS PLAN

HE58

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EMERGENCY RESPONSE PLAN

EMERGENCY COORDINATOR INFORMATION

2 PHRASE LIST THE NAME, TITLE/POSITION AND PHONE NUMBERS (OFFICE AND HOME/24-HR) OF THE EMERGENCY COORDINATOR AND ALTERNATES WHO ARE QUALIFIED AND AUTHORIZED TO ASSIST EMERGENCY RESPONSE PERSONNEL (FOR EXAMPLE, FIRE PERSONNEL) IN THE EVENT OF AN EMERGENCY. ITEM NAME OF EMERGENCY COORDINATOR 001 GERRY RUIZ 15 TITLE WORK PHONE HOME/24-HR PHONE ERINTENDENT 00 12 51 71 NUMBER STREET CITY 92 2650 JAMACHA RD CAJON 019 88 93 110 ITEM NAME OF ALTERNATE JAV1 ER RUIZ 15 21 ש.וידות WORK PHONE HOME/24-HR PHONE SUPERINTENDENT 455 447 00 51 71 78 NUMBER STREET CITY E LA 6 OM 88 93 110 ITEM NAME OF ALTERNATE John 100 5 e 5 15 21 TITLE WORK PHONE HOME/24-HR PHONE Mechanic 12 00 61 51 71 78 NUMBER STREET CITY 8627 Side Lake 2040 Gandena

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HAZARDOUS PENERI BUE INTERNESSANDLAN

Submit to HMMD Number: Number:

III EMPENDES PER MENUNIOS DESCRIPTION

The following describes the employee atradaing opided for all employees that handle e following upstables the employee tradaing opided for all employees that handle hazardous substances.

Training Topic - Procedures for managed things readers materials, including hazardous

1. Training Topic - Procedures for managed things readers materials, including hazardous wastersons Trained: Assistant Superiateedsnehemical Applicator-Mechanic regransition name: One hour Refresher Frequency: Yearly Refresher Time: One hour Refresher Frequency: Yearly Refresher Time: Omin plus

Traiping Sentent Proper methological testers non-file & fiazardous wastedures
Proper methods and type of formulation to to wear in clean-up proceedures

Training Topic - Procedures for 600 ordination with the mergency response agencies:

The sons Trained: Coordinator and Assistant Coordinator

Persons Trained: Coordinator and Assistant Coordinator

The sons Trained: Coordinator and Assistant Coordinator

Training Time: One hour assistant Coordinator

Training Content: Review of Coordinator and Coordinator

Training Content: Review of Coordinator and Coordinator

Solid or Fire. How to matthy unappear authorities and coordinator agencies responding to problem. 2.3 PECCEACHES omtilined of fer proper handing agencies responding to problems.

Training Topic - Use of emergency response equipment and materials under the business Fersons Trained: Assistant Superintendemt-Chemical Applicator -Mechanical Applicator -Mechanical Applicator -Mechanical Applicator -Mechanical Applicator -Mechanical Applicator -Mechanical Time: One hour Refresher Framework: Yearly Refresher Time: Phr-1hr Refresher: Oheck condition of Suffetty Faringment and review proceed-Refresher Time: Shr-1hr Refresher Time: Shr-1hr and review proceed-The sing content: Oheck condition of Safety Fouldment and review process of evacuation. Notification & Oleanupp. Instructions: Use and Storage of equipment property.

Training Topic - Emergency Response Planaiming Language - Emergency Response Planaiming Language - Emergency Response Planaiming Language - Employees - Planaiming Language - Emergency Response - Planaiming Language - Planaiming - Pl Training Time: One hour Refresher Time: \$hr-in Refresher Time: \$hr-in Refresher Time: \$hr-inr Training Time: One hour Research research and Evacuation proceedures Content: Review emergency research and Evacuation proceedures and Air and responsi-Totation Content: Review Creses of seasons solahan Evacuation proceeds bilities of all employees.

bilities of all employees.

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1#3) This waste is from a tank which collects waste pill from household lided you self in the internal possible in the

(A) GERREBES/S/VEIDMAN MUST Traddite Colluming deex and Check Heast Seried Box.)

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Customer Signature Customer Signature
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Date

Print Name Print Name

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UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 1:00 PM END: 4:30 PM
SPECIALIST: Alaaeddine Zahra
INSPECTION CONTACT:Gerry Ruiz
TITLE: Superintentdent
PHONE: (619) 933-7300
E-MAIL: Gruiz@wgolfp.com

FACILITY REFERENCE DATA ACCELA	CERS
RECORD STATUS: Expired	EPA ID NUMBER: CAL000273995
PERMIT EXPIRATION DATE: 03/31/2017	FACILITY CERS ID NUMBER: 10365076
BALANCE DUE: \$1,140.00	CERS LEAD USER: Marge August
INSPECTOR: Alaaeddine Zahra	LAST CERS SUBMITTAL DATE: 06/26/2015
INSPECTION TYPE: Closure	ENVIRONMENTAL CONTACT EMAIL:
INSPECTION STATUS: Complete	ENVIRONMENTAL CONTACT PHONE: 619-442-9891
FACILITY INFORMATION YES NO	YES NO
INACTIVATION INSPECTION:	HAZARDOUS MATERIALS:
CHANGE OF OWNER:	HAZARDOUS WASTE:
CHANGE IN BUSINESS TYPE:	ABOVEGROUND PETROLEUM STORAGE ACT:*
BUSINESS TYPE: Landscape Maintenance	TOTAL SHELL CAPACITY APSA: 1610
ISSUE INITIAL INVOICE:	UNDERGROUND STORAGE TANK:
ASSESS NON-NOTIFICATION FEE:	CALARP PROGRAM (CERS):
ASSESS RE-INSPECTION FEE:	CALARP PROGRAM LEVEL: 1 2 3 N/A
FACILITY SUBJECT TO BASE FEE:	MEDICAL WASTE:
FACILITY SUBJECT TO CUPA FEE:	MW FACILITY GENERATING OVER 200 LBS PER MONTH:
UPDATE FACILITY ADDRESS IN AA:	EPIC PARTICIPANT:
BUSINESS CLOSE DATE:* 08/01/2016	NUMBER OF TLV GASES AT THE FACILITY: 0
HW GENERATOR STATUS : LQG SQG CESQG	RCRA LQG N/A
TIERED PERMIT LEVEL(S): CESQT CESW CE-L	CE-CL HHW PBR CA N/A
PRIMARY BILLING CODE	SECONDARY BILLING CODE TERTIARY BILLING CODE
Not Applicable	Not Applicable Not Applicable
INSPECTION SCOPE:	
HAZARDOUS MATERIALS: GEN HAZMAT APSA UST	HAZARDOUS WASTE: SQG LQG
MEDICAL WASTE: SQG SQG - TREATS	CALARP: 1 2 3
LQG - ABBREVIATED LQG - TREATS	TIERED PERMITTING: CESQT CESW CE-L CE-CL
	CA PBR HHW
CONSENT TO CONDUCT INSPECTION GRANTED BY: INSPECTION CONTACT	NAME: Gerry Ruiz TITLE: Superintentdent
REMOVE BLANK CHECKLISTS FROM FINAL INSPECTION REPORT	REFUSED TO SIGN



UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 04/07/2017
RECORD ID #: DEH2003-HUPFP-202521
TIME START: 1:00 PM END: 4:30 PM
SPECIALIST: Alaaeddine Zahra

INSPECTION CONTACT:Gerry Ruiz
TITLE: Superintentdent
PHONE: (619) 933-7300
E-MAIL:Gruiz@wgolfp.com

INSPECTION REPORT EMAILS:
Alaaeddine.Zahra@sdcounty.ca.gov
RECORD COMMENT:



COMPLIANCE INSPECTION REPORT

FACILITY NAME: COTTONWOOD GOLF COURSE

ADDRESS: 3121 WILLOW GLEN DR

CITY/ZIP: EL CAJON /92019

17 PAGE 1 OF 2
P-202521
END: 4:30 PM
ra
Ruiz

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6. This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charg	ged if additional inspections are red	quired to determine compliance.

Yes	N/A		Yes	N/A	
	x	Unified Program Facility Permit Current		x	Contingency Plan Available LQG SQG
	X	Hazardous Materials Business Plan Available		X	Employee Training Records Available
	X	Employee Training is Adequate		X	Universal Waste Managed Properly
	X	Waste Disposal Records Available for Review		X	Waste Containers Closed Labeled
	x	Emergency Contacts Current Updated today		X	Waste Containers in Good Condition
	X	Chemical Inventory/Map Current Updated today			Permit Expires On 03/31/2017

CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz

TITLE: Superintentdent

INTRODUCTION:

Copy of the Closure inspection which was submitted as a routine inspection on 04/07/17. Original report contains signatures

Arrived to conduct a routine hazardous materials inspection at this facility, as per Gerry Ruiz this facility underwent a change of ownership around August 2016. Old owner was Premier Golf Properties. New facility operator is Western Golf Properties. This report will serve as closure report for old operator facility record. Another inspection report will be issued for observations for initial inspection of new facility/operator actions.

INSPECTION REMARKS:

Helpful Websites:

- For guidance documents on hazardous materials-related topics,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (CERS),
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd cers.html
- If you have questions on: permit fees, business plan requirements, or hazardous waste regulations,
- go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html
- To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails:

https://public.govdelivery.com/accounts/CASAND/subscriber/new

If you have any questions regarding this inspection, please contact Alaaeddine Zahra, 858-525-5834, Alaaeddine.Zahra@sdcounty.ca.gov

INSPECTION PHOTOS None

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: http://www.sandiegocounty.gov/deh/hazmat/hmd_cers.html

PRINTED NAME OF FACILITY REPRESENTATIVE	SIGNATURE	Report Sond	DATE SIGNED
Gerry Ruiz (signature on inspection report sent to file)			04/11/2017
TITLE OF FACILITY REPRESENTATIVE			
Superintentdent			



INSPECTION DATE: 04/07/2017 PAGE 2 OF 2 RECORD ID #: DEH2003-HUPFP-202521

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261 Phone: (858) 505-6880 http://www.sdcdeh.org