



RCRA Hazardous Waste Generator Program Inspection Report

Facility Name: TESLA - MEGAFACTORY		Facility Phone: (209) 403-5638	Date: May 20, 2025
Facility Address: 700 DARCY PKWY, Lathrop			CERS ID: 10661524
Inspection Contact: Anali Gonzalez		Title: Senior Environmental Engineer	Phone: (619) 770-5920
Inspection Type: Routine		Program: 2254 - RCRA GEN 500<1000 TONS	
Consent For: ☒ Inspection ☐ Photos ☐ Samples		Consent Given By: Anali Gonzalez, Senior Environmental Engineer	
Amount of hazardous waste generated in the last calendar year (January - December): 744.05 tons			EPA/State ID: CAR000328229
OUT = Violation R = Repeat Violation COS = Corrected on site during inspection			
1	CA Code of Regulations 66262.12	3110001 - Obtained an Identification Number (unless exempted HSC 25143.13)	☐ OUT ☐ R ☐ COS
2	CA Code of Regulations 66265.51	3130018 - Contingency Plan prepared and implemented	☐ OUT ☐ R ☐ COS
3	CA Code of Regulations 66265.53	3110012 - Contingency Plan and all revisions maintained at the facility	☐ OUT ☐ R ☐ COS
4	CA Code of Regulations 66265.52	3110011 - Contingency plan contains all required content	☐ OUT ☐ R ☐ COS
5	CA Code of Regulations 66265.16	3120001 - Trained facility personnel annually and maintained required documentation until closure	☒ OUT ☐ R ☐ COS
6	CA Code of Regulations 66262.20	3110002 - Prepared a Uniform Hazardous Waste Manifests for transportation of hazardous waste	☐ OUT ☐ R ☐ COS
7	CA Code of Regulations 66262.23(a)	3110003 - Properly completed all Uniform Hazardous Waste Manifests	☐ OUT ☐ R ☐ COS
8	CA Code of Regulations 66262.42	3110004 - Completed all Uniform Hazardous Waste Manifest exception reporting requirements	☐ OUT ☐ R ☐ COS
9	CA Code of Regulations 66262.40(a)	3110005 - Signed copy of Uniform Hazardous Waste Manifest kept for 3 years	☐ OUT ☐ R ☐ COS
10	CA Code of Regulations 66262.23(a)(4)	3110006 - Sent a legible copy of each Uniform Hazardous Waste Manifest to the DTSC within 30 days of shipment	☐ OUT ☐ R ☐ COS
11	CA Health and Safety Code 25160.2(b)(4)	3110017 - All consolidated manifest requirements are met	☐ OUT ☐ R ☐ COS
12	CA Health and Safety Code 25250.18, 25250.19	3110018 - Exempt used oil management operating log records are retained for 3 years	☐ OUT ☐ R ☐ COS
13	CA Code of Regulations 66266.81(a)(4)(B)	3110019 - Owner/Operator retained copy of manifest or bill of lading for spent lead acid batteries for 3 years	☐ OUT ☐ R ☐ COS
14	CA Code of Regulations 66262.11	3130001 - Determined if waste generated is hazardous waste	☒ OUT ☐ R ☐ COS
15	CA Code of Regulations 66262.40(c)	3130028 - Kept records of any test results, waste analyses, or other determinations	☐ OUT ☐ R ☐ COS
16	CA Code of Regulations 66268.7(a)	3130002 - Determined land disposal restrictions for hazardous waste	☐ OUT ☐ R ☐ COS
17	CA Health and Safety Code 25404(e)(4)	3110020 - Program data reported electronically when required	☒ OUT ☐ R ☒ COS
18	CA Health and Safety Code 25143.10	3110021 - Submitted Recyclable Materials Report every two years	☐ OUT ☐ R ☐ COS
19	CA Health and Safety Code 25110.10(d)	3110022 - Remote Waste Consolidation Site Annual Notification submitted	☐ OUT ☐ R ☐ COS

RCRA Hazardous Waste Generator Program Inspection Report

Facility Name:		Facility Address:	Date:
TESLA - MEGAFACTORY		700 DARCY PKWY, Lathrop	May 20, 2025
20	CA Code of Regulations 67100.7, 67100.8	3110008 - Prepared a hazardous waste management performance report every four years	☐ OUT ☐ R ☐ COS
21	CA Code of Regulations 67100.9	3110009 - Prepared a summary progress report and submitted it to the DTSC every four years	☐ OUT ☐ R ☐ COS
22	CA Health and Safety Code 25244.19, 25244.21	3110010 - Completed all source reduction evaluation review and plan requirements	☐ OUT ☐ R ☐ COS
23	CA Code of Regulations 66262.40(b), 66262.41	3110007 - Prepared a Biennial Report, submitted to DTSC, and kept for 3 years	☐ OUT ☐ R ☐ COS
24	CA Health and Safety Code 25163(a)	3150001 - Registered hazardous waste transporter used to transport hazardous waste	☐ OUT ☐ R ☐ COS
25	CA Health and Safety Code 25189.5(a)	3150003 - Disposed of hazardous waste at an authorized location	☐ OUT ☐ R ☐ COS
26	CA Health and Safety Code 25187.6	3140002 - Quarantined HW not removed, transferred, or disposed without permission by authorized agent	☐ OUT ☐ R ☐ COS
27	CA Code of Regulations 66262.34(a)	3130004 - Disposed of hazardous waste within 90 days of accumulation start date	☐ OUT ☐ R ☐ COS
28	CA Code of Regulations 66262.34(e)(3)	3130023 - Met all requirements for hazardous waste satellite accumulation	☐ OUT ☐ R ☐ COS
29	CA Code of Regulations 66262.34(f)	3130003 - Labeled all containers or portable tanks containing hazardous waste	☐ OUT ☐ R ☐ COS
30	CA Code of Regulations 66265.171	3130005 - Accumulated hazardous waste in containers that are in good condition	☐ OUT ☐ R ☐ COS
31	CA Code of Regulations 66265.172	3130006 - Hazardous waste accumulated in lined and/or compatible containers	☐ OUT ☐ R ☐ COS
32	CA Code of Regulations 66265.173	3130007 - Containers of hazardous waste closed except when adding or removing waste	☐ OUT ☐ R ☐ COS
33	CA Code of Regulations 66265.174	3130008 - Inspects all hazardous waste containers at least weekly	☐ OUT ☐ R ☐ COS
34	CA Code of Regulations 66265.176	3130009 - Reactive and ignitable waste containers located at least 50 ft from property line	☐ OUT ☐ R ☐ COS
35	CA Code of Regulations 66265.17(b), 66265.177	3130010 - Incompatible waste in containers managed properly to prevent a reaction	☐ OUT ☐ R ☐ COS
36	CA Code of Regulations 66262.34(a)(1), 66262.178	3130025 - Complied with air emission requirements for HW in containers	☐ OUT ☐ R ☐ COS
37	CA Code of Regulations 66261.7	3130024 - Empty containers > 5 gallons properly managed	☐ OUT ☐ R ☐ COS
38	CA Code of Regulations 66262.34(f)	3130022 - Stationary tanks marked as "Hazardous Waste" and marked with accumulation start date	☐ OUT ☐ R ☐ COS
39	CA Code of Regulations 66265.192(a)	3110013 - Written hazardous waste tank system assessment by P.E. completed	☐ OUT ☐ R ☐ COS
40	CA Code of Regulations 66265.192(k)	3110014 - Written hazardous waste tank system assessment meets all requirements	☐ OUT ☐ R ☐ COS
41	CA Code of Regulations 66265.192(h)	3110023 - Written hazardous waste tank system assessment/reassessment by P.E. completed	☐ OUT ☐ R ☐ COS
42	CA Code of Regulations 66265.194	3130011 - Tanks are compatible with hazardous waste and have spill/overflow prevention provided	☐ OUT ☐ R ☐ COS
43	CA Code of Regulations 66265.193	3130019 - Secondary containment provided and meets requirements for all hazardous waste tank systems	☐ OUT ☐ R ☐ COS
44	CA Code of Regulations 66265.195	3130012 - Conducts/documents daily inspections of hazardous waste tank system	☐ OUT ☐ R ☐ COS
45	CA Code of Regulations 66265.195(b-c)	3130020 - Inspect/document the HW tank system cathodic protection system annually/impressed current bimonthly	☐ OUT ☐ R ☐ COS

RCRA Hazardous Waste Generator Program Inspection Report

Facility Name:		Facility Address:	Date:
TESLA - MEGAFACTORY		700 DARCY PKWY, Lathrop	May 20, 2025
46	CA Code of Regulations 66265.192(l)/(m)	3110015 - Obtained approval before replacement of identical/equivalent tank system parts not in 66265.192(l)	☐ OUT ☐ R ☐ COS
47	CA Code of Regulations 66265.196	3140001 - Leaking/unfit HW tank or secondary containment removed from service	☐ OUT ☐ R ☐ COS
48	CA Code of Regulations 66265.197	3150002 - Met all hazardous waste tank system closure requirements	☐ OUT ☐ R ☐ COS
49	CA Code of Regulations 66262.34(a)(1). 66265.202	3130026 - Complied with air emissions requirements for HW in tanks	☐ OUT ☐ R ☐ COS
50	CA Code of Regulations 66262.34(a)(1)(B)	3130027 - In compliance with drip pad requirements	☐ OUT ☐ R ☐ COS
51	CA Health and Safety Code 25143.2, 25173.9	3150004 - Recyclable material is managed properly	☐ OUT ☐ R ☐ COS
52	CA Health and Safety Code 25250.7	3150005 - Generator does not intentionally contaminate used oil with other hazardous wastes	☐ OUT ☐ R ☐ COS
53	CA Code of Regulations 66266.130	3130029 - Properly manages used oil filters and fuel filters	☐ OUT ☐ R ☐ COS
54	CA Code of Regulations 66266.81(a)(1)	3130030 - Meets requirements for handling/storing/transporting lead acid batteries	☐ OUT ☐ R ☐ COS
55	CA Code of Regulations 66266.81(a)(3)	3130031 - Meets all requirements when accepting spent lead-acid batteries	☐ OUT ☐ R ☐ COS
56	CA Code of Regulations 66266.81(b)	3130032 - Properly manages, stores and labels all damaged lead-acid batteries	☐ OUT ☐ R ☐ COS
57	CA Health and Safety Code 25211.4	3110024 - Obtained Certified Appliance Recycler certification (CAR) from the DTSC	☐ OUT ☐ R ☐ COS
58	CA Health and Safety Code 25212	3130033 - CAR properly managed all MSRHS as hazardous waste	☐ OUT ☐ R ☐ COS
59	CA Health and Safety Code 25211.2, 25211.3	3110025 - CAR maintains documentation regarding removal and management of MRSH from appliances	☐ OUT ☐ R ☐ COS
60	CA Health and Safety Code 25144.6(b)	3130034 - Properly managed reusable soiled textile materials prior to being sent for laundering	☐ OUT ☐ R ☐ COS
61	CA Health and Safety Code 25200.3.1(b)	3130035 - Laboratory waste managed in accordance with HSC 25200.3.1(b)	☐ OUT ☐ R ☐ COS
62	CA Health and Safety Code 25200.3.1(c)	3130036 - Laboratory waste treated in accordance with HSC 25200.3.1(c)	☐ OUT ☐ R ☐ COS
63	CA Code of Regulations 66262.34(a)(4), 66265.55	3130037 - Emergency coordinator on the premises or on call	☐ OUT ☐ R ☐ COS
64	CA Code of Regulations 66265.32	3130014 - Facility equipped with all required emergency equipment	☐ OUT ☐ R ☐ COS
65	CA Code of Regulations 66265.33	3130015 - Tests and maintains all required safety equipment at the facility	☒ OUT ☐ R ☐ COS
66	CA Code of Regulations 66265.35	3130016 - Maintains adequate aisle space	☐ OUT ☐ R ☐ COS
67	CA Code of Regulations 66265.31	3130013 - Maintains and operates the facility to minimize the possibility of fire/explosion/release	☐ OUT ☐ R ☐ COS
68	CA Code of Regulations 66273.32(a)	3110026 - UWH notified the EPA and obtained a federal ID number prior to storing 5,000 kg or more of RCRA UW	☐ OUT ☐ R ☐ COS
69	CA Code of Regulations 66273.32(c)	3110027 - UWH of PV modules/e-devices/CRTs/CRT glass that doesn't treat waste submitted required info to DTSC	☐ OUT ☐ R ☐ COS
70	CA Code of Regulations 66273.32(d), (f)	3110028 - Accepts 100 kg or generates 5000 kg/yr of E-waste/CRTs/PV modules & reports to DTSC Feb 1 annually	☐ OUT ☐ R ☐ COS
71	CA Code of Regulations 66273.40(a)(3)(4)	3110029 - UWH sending devices/CRTs/CRT glass to any foreign destination completed and submitted notification	☐ OUT ☐ R ☐ COS

RCRA Hazardous Waste Generator Program Inspection Report

Facility Name:		Facility Address:	Date:
TESLA - MEGAFACTORY		700 DARCY PKWY, Lathrop	May 20, 2025
72	CA Code of Regulations 66273.34	3130038 - UWH labeled all universal waste	☐ OUT ☐ R ☐ COS
73	CA Code of Regulations 66273.35	3130039 - UWH accumulated universal waste for no longer than 1 year	☐ OUT ☐ R ☐ COS
74	CA Health and Safety Code 25201.16(f)	3130040 - UWH meets all accumulation standards for universal waste aerosol cans	☐ OUT ☐ R ☐ COS
75	CA Health and Safety Code 25201.16(e)	3130041 - Universal waste aerosol cans managed to prevent fire, explosion and unauthorized release	☐ OUT ☐ R ☐ COS
76	CA Health and Safety Code 25201.16(j)	3110030 - Notified UPA of aerosol can processing procedures prior to starting this process	☐ OUT ☐ R ☐ COS
77	CA Code of Regulations 66273.38	3130042 - UWH properly prepares, handles and retains shipping papers for all universal waste shipped	☐ OUT ☐ R ☐ COS
78	CA Code of Regulations 66273.8(b)	3150006 - UWH transfers or disposes all universal waste to an appropriate destination facility	☐ OUT ☐ R ☐ COS
79	CA Code of Regulations 66273.33.5, .6	3140003 - UWH properly cleaned up and contained spills of PV modules, electronic devices, CRTs and CRT glass	☐ OUT ☐ R ☐ COS
80	CA Code of Regulations 66273.36	3120002 - UWH complied with all universal waste training requirements	☐ OUT ☐ R ☐ COS
81	CA Health and Safety Code 25404.1.2	3110 - Administration/Documentation - General	☐ OUT ☐ R ☐ COS
82		3115 - Administration/Documentation - General Local Ordinance	☐ OUT ☐ R ☐ COS
83	See below	3120 - Training - General	☐ OUT ☐ R ☐ COS
84		3125 - Training - General Local Ordinance	☐ OUT ☐ R ☐ COS
85	CA Health and Safety Code 25201.16(g)	3130 - Operations/Maintenance - General	☐ OUT ☐ R ☐ COS
86		3135 - Operations/Maintenance - General Local Ordinance	☐ OUT ☐ R ☐ COS
87	See below	3140 - Release/Leaks/Spills - General	☐ OUT ☐ R ☐ COS
88		3145 - Release/Leaks/Spills - General Local Ordinance	☐ OUT ☐ R ☐ COS
89	CA Health and Safety Code 25189.5(c)	3150 - Abandonment/Illegal Disposal/Unauthorized Treatment - General	☐ OUT ☐ R ☐ COS
90		3155 - Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance	☐ OUT ☐ R ☐ COS

RCRA Hazardous Waste Generator Program Inspection Report

Facility Name: TESLA - MEGAFACTORY	Facility Address: 700 DARCY PKWY, Lathrop	Date: May 20, 2025
--	---	------------------------------

SUMMARY OF VIOLATIONS
(CLASS I, CLASS II, or MINOR - Notice to Comply)

Item #	Remarks
5	CA Code of Regulations 66265.16 3120001 - Trained facility personnel annually and maintained required documentation until closure OBSERVATION: The following was observed during the inspection: 1) One 5 gallon can holding dark stained rags, gloves, and other debris, and one 55 gallon drum containing cutting fluid waste was observed in the maintenance area. A hazardous waste determination had not been observed during the inspection. Per Senior Environmental Engineer Anali Gonzalez, maintenance staff are supposed to notify the hazmat team to make a hazardous waste determination and have the waste properly disposed of. Per the conversation with the maintenance shop worker on site at the time of inspection, they appeared unfamiliar with the hazardous waste determination requirements for the observed waste streams. 2) Near the wash area, one JB Weld Epoxy syringe was observed inside a red container for storage of aerosol cans as universal waste. Per Anali Gonzalez, the tube should not have been thrown away into that container. Per Anali, the tube was empty. REGULATION GUIDANCE: New employees shall be trained within 180 days of hire and annually thereafter as specified in Title 22 California Code of Regulations section 66265.16. The owner or operator shall maintain training records on current personnel until closure of the facility and training records on former employees for at least three years from the date the employee last worked at the facility. CORRECTIVE ACTION: Immediately train all employees who work with hazardous waste in compliance within the time frames and training materials required by this section. Ensure training covers Tesla's hazardous waste determination procedures and proper hazardous waste handling and disposal. Provide training documentation to the San Joaquin County Environmental Health Department (EHD) within 30 days. This is a (Class 2) Violation.
14	CA Code of Regulations 66262.11 3130001 - Determined if waste generated is hazardous waste OBSERVATIONS: The facility was not able to provide evidence showing a hazardous waste determination had been made for the following wastes: In the maintenance shop: 1) One white 55 gallon poly drum containing cutting fluid was observed in a container. Per the maintenance worker, the cutting fluid was non-reusable and a waste. 2) Dark stained rags, gloves, and other debris were observed inside a metal 5 gallon bucket. Near the wash area: 3) An unknown fluid was observed inside a secondary containment pallet. 4) One empty JB Weld Epoxy syringe was observed inside a red container for storage of aerosol cans as universal waste. REGULATION GUIDANCE: Any person who generates a waste shall determine if the waste is a hazardous waste as specified in Title 22 California Code of Regulations (CCR). CORRECTIVE ACTION: Immediately make a hazardous waste determination for each waste, and manage it according to Title 22 CCR. Use Safety Data Sheets (SDS), waste sampling and test results or other knowledge to support your hazardous waste determination. Waste testing must be done using methods specified in Title 22 CCR including sections 66261.20-24. Submit a statement and supporting documentation with your hazardous waste determination. Demonstrate current storage and labeling for wastes determined to be hazardous wastes. This is a (Class 2) Violation.

RCRA Hazardous Waste Generator Program Inspection Report

Facility Name: TESLA - MEGAFACTORY	Facility Address: 700 DARCY PKWY, Lathrop	Date: May 20, 2025
--	---	------------------------------

17	CA Health and Safety Code 25404(e)(4) 3110020 - Program data reported electronically when required OBSERVATION: This business's hazardous waste activities have not been reported on the California Environmental Reporting System (CERS) website. The facility marked no in CERS to being a large RCRA generator. REGULATION GUIDANCE: Each regulated business shall report program data electronically on the CERS website. CORRECTIVE ACTION: A correct CERS submittal was made during the inspection. The violation was corrected on site. This is a (Class 2) Violation.
65	CA Code of Regulations 66265.33 3130015 - Tests and maintains all required safety equipment at the facility OBSERVATION: Liquid was observed inside a secondary containment pallet near the wash area. REGULATION GUIDANCE: All facility spill control equipment shall be maintained as necessary to assure its proper operation in time of emergency. CORRECTIVE ACTION: Bring the secondary containment into proper working order by removing the liquid in the secondary containment and placing in the proper waste container. Provide a corrective action statement to the San Joaquin County Environmental Health Department within 30 days. This is a (Class 2) Violation.

Overall Inspection Comments

The inspection was conducted on May 5, 2025. A checklist was left on site during the inspection. The report was completed on June 23, 2025. Complete and submit a copy of the Return to Compliance Certification form to the EHD with a statement documenting the corrective actions that have been or will be taken for each violation, and any supporting paperwork, by July 23, 2025.

The checklist was amended and the following violations were added:
 3120001 - Trained facility personnel annually and maintained required documentation until closure
 3130015 - Tests and maintains all required safety equipment at the facility

The following wastes were observed during this inspection: acetone rags, universal waste (aerosol cans), epoxy waste

The final report was emailed to Senior Environmental Engineer Anali Gonzalez at <elbbrown@tesla.com>.

Note: Permission to take photos was not granted during the inspection. Photos taken during the inspection was done by Anali.

AFTER THE COMPLIANCE DATE, EHD WILL BILL FOR ALL TIME AND ACTIVITIES ASSOCIATED WITH BRINGING THIS FACILITY BACK INTO COMPLIANCE.
THIS FACILITY IS SUBJECT TO REINSPECTION AT ANY TIME AT EHD'S CURRENT HOURLY RATE.

Received by: Date: May 20, 2025 Printed Name and Title: Anali Gonzalez, Senior Environmental Engineer	Inspector: John Alaniz, Lead Senior REHS	Inspector Phone: (209) 616-3053
---	--	---