

Permit. rera. 915244

1986-04-28. Permit-

App- and- Tech- Comp-

Check list

GENERAL  ELECTRIC

APPARATUS AND ENGINEERING SERVICES OPERATIONS
GENERAL ELECTRIC COMPANY • 175 MILENS ROAD • TONAWANDA, NEW YORK 14150 • (716) 876-1200

April 28, 1986

RECEIVED

MAY 23 1986

BUREAU OF
HAZARDOUS WASTE TECHNOLOGY
DIVISION OF SOLID AND
HAZARDOUS WASTE

New York State
Department of Environmental Conservation
Division of Regulatory Affairs
600 Delaware Avenue
Buffalo, N. Y. 14202-1073


ATTENTION: Mr. Paul D. Eismann
Alternate Permit Administrator

Dear Mr. Eismann:

Enclosed please find copies of permit application and technical completeness checklist.

As a matter of record, we agree to the suspension of application processing timeframes outlined in Part 621 Uniform Procedures. A expedient application is respectfully requested.

Sincerely,


Richard W. Conway
Manager

General Electric Company
EPA ID No. NYD 067539940
Application 90-84-1218

RWC/ehj

(Encl.)

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APR 30 1986

N.Y.S. DEPT. OF
ENVIRONMENTAL CONSERVATION
REGION 9

PART 373 TECHNICAL COMPLETENESS CHECKLIST FOR NON-COMMERCIAL HAZARDOUS WASTE TANK/CONTAINER STORAGE/TREATMENT FACILITIES

Facility Name GENERAL ELECTRIC CO.
 Address 175 MILENS ROAD
TONAWANDA, N.Y.

Contact Name T. HEJMANOWSKI
 Contact Phone Number (716) 876-1200
 Date Application Received _____

EPA I.D. Number NYD 067539940
 Permit Review Team _____

Date Review Completed _____

Subject requirement	40 CFR section Nos.	6 NYCRR Part 373	Location in application	Comments
PART A - APPLICATION	270.11(a) and (b) 270.10(d) 270.13	373-1.4 (a) (5)(i) & (ii) 373-1.4 (a) (5) 373-1.3 (d)		
FORM 1				
A-1 Label Items				
<ul style="list-style-type: none"> • EPA ID number ✓ • Facility name ✓ • Facility mailing address ✓ • Facility location ✓ 			COVER PAGE	
A-2 Pollutant Characteristics				
A-3 Name of facility				"DESCRIPTION OF SERVICES" SECTION COVER PAGE
A-4 Facility Contact				COVER PAGE
<ul style="list-style-type: none"> • Name and title 				
A-5 Facility Mailing Address				COVER PAGE
A-6 Facility Location				"FACILITY OPERATION PLAN" SECTION COVER PAGE
A-7 SIC Code(s)				
<ul style="list-style-type: none"> • Four digits 				
A-8 Operator Information				
<ul style="list-style-type: none"> • Name • Address • Status • Phone 				COVER PAGE
A-9 Indian Land				N/A
A-10 Existing Environmental Permits				
<ul style="list-style-type: none"> • NPDES • UIC 				"FACILITY OPERATION PLAN" SECTION

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Subject requirement	41) CFR section Nos.	373 References	Location in application	Comments
A-10 (continued) <ul style="list-style-type: none">• RCRA• PSD• Other				
A-11 <u>Map</u> <ul style="list-style-type: none">• One mile beyond property line• Outline of facility• Location of existing and proposed intake and discharge structures• Hazardous waste treatment, storage, and disposal facilities• Underground injection wells• Springs, rivers, and other surface water bodies			"SPILL PREVENTION" SECTION	
A-12 <u>Nature of the Business</u>			"DESCRIPTION OF SERVICES" SECTION	
A-13 <u>Certification</u> <ul style="list-style-type: none">• Name, title, and date• Acceptable signature			COVER PAGE	
FORM 3			COVER PAGE	
A-14 <u>EPA ID Number</u>				
A-15 <u>First or Revised Application</u> <ul style="list-style-type: none">• Existing New & PROPOSED ADDITIONS• Interim/Permitted				
A-16 <u>Process - Codes and Design Capacities</u> <ul style="list-style-type: none">• Process codes• Amount• Unit of measure			"FACILITY & OPERATION PLAN" SECTION "PROPOSED ADDITION" SECTION	
A-17 <u>Description of Hazardous Wastes</u> <ul style="list-style-type: none">• EPA hazardous waste number• Estimated annual quantity• Unit of measure• Process code• Process description			"DESCRIPTION OF SERVICES" SECTION	
A-18 <u>Facility Drawing</u>			"FACILITY & OPERATION PLAN" SECTION	
A-19 <u>Facility Photograph</u>				
A-20 <u>Latitude and Longitude</u>				

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
A-21 Facility Owner <ul style="list-style-type: none">• Name• Address• Telephone			COVER PAGE	
A-22 Owner Certification <ul style="list-style-type: none">• Name, signature, date				
A-23 Operator Certification <ul style="list-style-type: none">• Name, signature, date				
PART B - FACILITY DESCRIPTION				
B-1 General Description <p>A general description of the facility. Include the nature of the business. Offsite facilities should identify the types of industry served; on-site facilities should briefly describe the process(es) involved in the generation of hazardous waste.</p>	270.14(b)(1) Guidance	373-1.5(a)(2)(i)	"DESCRIPTION OF SERVICES" SECTION	
B-2 Topographic Map	270.14(b)(19)	373-1.5(a)(2)(ix)		
B-2a General Requirements <p>A topographic map showing the facility and a distance of 1000 feet around it. The following information is required:</p> <ul style="list-style-type: none">• Scale 1 in = 200 ft• Contours sufficient to show surface water flow• Extend 1000 ft beyond property• Map scale• Map date• 100-yr floodplain• Surface waters• Surrounding land use• Wind rose• Map orientation• Legal boundaries• Location of access control• Injection and withdrawal wells• Buildings• Structures• Sewers• Loading and unloading areas• Fire control facilities• Flood control or drainage barriers• Run-off control systems• Location of hazardous waste units• Access and internal roads			"SPILL PREVENTION" SECTION	

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>B-2a (continued)</p> <p>For large facilities the use of other scales may be acceptable on a case-by-case basis.</p> <p>B-2b <u>Additional Topographic Requirements for Land Storage, Treatment and Disposal Facilities</u></p> <p>Unless exempt from groundwater monitoring requirements, surface impoundments, waste piles, land treatment, and landfill facilities must include the following information on the topographic map:</p> <ul style="list-style-type: none"> • Groundwater flow direction (isometric graph) • Groundwater flow rate • Boundaries of uppermost aquifer • Underlying interconnection between uppermost aquifer and lower aquifer • Point of compliance • Groundwater monitoring wells • The extent of any plume • Hazardous waste management area <p>(Although many of these items can be shown on a single map, it is allowable to use additional maps to display some of the information. Presentation of all of this information on a single map may sacrifice clarity.)</p>			N/A	
<p>B-3 <u>Location Information</u></p>	<p>270.14(b)(11)</p>	<p>373-1.5 (a)(2)(xi)</p>		
<p>B-3a <u>Seismic Considerations</u></p> <p>For new facilities only, applicant must identify the political jurisdiction (county, township, or election district) in which facility will be located. If located in any of the political jurisdictions specified in Part 264 Appendix VI, the applicant must prove that the facility is located at least 3000 ft from any fault where movement has taken place in Holocene time or that no such faults pass within 200 ft of the portions of the facility used for treatment, storage, or disposal of hazardous waste. Proof may come from geologic studies, aerial photographs, field observations or subsurface investigations. All information gathered must be acceptable by a geologist experienced in evaluating seismic activity.</p>	<p>270.14(b)(11)(i) and (ii) 264.18(a) 264 Appendix VI</p>	<p>Not Applicable</p>	N/A	N/A ↓

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
B-3b Floodplain Standard Documentation of whether or not the facility is located within a 100-yr floodplain including the source of data (Federal Insurance Administration Map or other maps and calculations). If map other than FIA map is used demonstration of equivalent mapping technique should be provided. If located in 100-yr floodplain include: <ul style="list-style-type: none">• 100-yr floodplain level• Other special flooding factors (e.g., wave action) that must be considered to prevent washout	270.14(b)(11)(iii) 264.18(b)	373-1.5 (a)(2)(xi)(a) 373-2.2(j)	N/A	
B-3b(1) Demonstration of Compliance For facilities located within the 100-yr floodplain, a description of how the facility is designed, constructed, operated, and maintained to prevent washout of any hazardous waste during a flood. Either of the following may be used:	270.14(b)(11)(iv) 264.18(b)	373-1.5(a)(2)(xi)(b) 373-2.2(j)	N/A	
B-3b(1)(a) Flood Proofing and Flood Protection A structural or other engineering study showing how design of the tanks, containers, or waste piles and the flood proofing and protection devices at the facility will prevent washout including: <ul style="list-style-type: none">• Engineering analysis of hydrodynamic and hydrostatic forces• Structural or other engineering studies of hazardous waste units and flood protection devices	270.14(b)(11)(iv) (A) and (B)	373-1.5(a)(2)(xi)(b) (1) & (2)	N/A	
B-3b(1)(b) Flood Plan Description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded. The plan must address the following: <ul style="list-style-type: none">• Timing related to flood levels• Estimated time to move the waste• Description of the location to which the waste will be moved and proof of the receiving facility's eligibility to receive hazardous waste	270.14(b)(11)(iv)(C)	373-1.5(a)(2)(xi) (b)(3)	N/A	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>B-3b(1)(h) (continued)</p> <ul style="list-style-type: none">• Procedures, equipment, and personnel to be used and the means to ensure that these resources will be available• Potential for accidental discharge of the waste.			N/A	
<p>B-3b(2) <u>Plan for future Compliance with floodplain Standard</u></p> <p>for facilities located within the 100-yr floodplain that do not comply with the floodplain standard, a plan showing how and when the facility will be brought into compliance. A compliance schedule must be included.</p>	270.14(b)(11)(v)	373-1.5(a)(2)(xi)(c)		
<p>B-4 <u>Traffic Information</u></p> <p>A description of the means of transporting hazardous wastes.</p> <p>All facilities should describe movement of waste on the facility. Description must include:</p> <ul style="list-style-type: none">• Estimated volume• Traffic pattern	270.14(b)(10)	373-1.5(a)(2)(x)	N/A	

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>B-4 (continued)</p> <ul style="list-style-type: none">Traffic controlAccess road(s) surfacing and load-bearing capacity <p>Off-site facilities (only) should also describe movement of waste to the facility from the point where it leaves nearest major highway</p>	Guidance		N/A	
<p>PART C - WASTE CHARACTERISTICS</p>				
<p>C-1 <u>Chemical and Physical Analyses</u></p> <p>For each hazardous waste treated, stored or disposed at the facility, the following information should be provided:</p> <ul style="list-style-type: none">General description of the wasteHazardous characteristicsBasis for hazard designationLaboratory report on analyses resultsExisting published or documented data on hazardous waste or hazardous waste from a similar process (new facilities only) <p>At a minimum, the analyses should include all the information which must be known to treat, store, or dispose of the waste in accordance with 264 requirements.</p>	270.14(b)(2) 264.13(a) 270.62(b)(7)(1) Guidance	373-1.5(a)(2)(ii) 373-2.2(e)(1)	"WASTE ANALYSIS" SECTION	
<p>C-1a <u>Containers</u></p> <ul style="list-style-type: none">Free liquidsWaste specific parameters based on hazardous designationOther information required for safe operation	Guidance			
<p>C-1b <u>Tanks</u></p> <ul style="list-style-type: none">Specific gravityWaste specific parameters based on hazardous designationOther information required for safe operation	Guidance		"PROPOSED ADDITIONS" SECTION	
<p>C-2 <u>Waste Analysis Plan</u></p> <p>A copy of the waste analysis plan required by 264.13(b) and, if applicable, 264.13(c). The Waste Analysis Plan should describe the procedures used to obtain chemical and physical information and data on the wastes to insure proper storage, treatment, and disposal. Minimum requirements include</p>	270.14(c) 264.250	373-1.5(a)(2)(ii) 373-2.2(e)(2)(13)	"WASTE ANALYSIS" SECTION	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
C-2a <u>Parameters and Rationale</u> A list of parameters chosen for analysis and an explanation of the rationale for their selection.	264.13(b)(1)	373-2.2(e)(2)(i)	"WASTE ANALYSIS SECTION"	
C-2b <u>Test Methods</u> A description of the test methods used to test for parameters chosen.	264.13(b)(2)	373-2.2(e)(2)(ii)	"WASTE ANALYSIS SECTION"	
C-2c <u>Sampling Methods</u> A list of the sampling methods used to obtain a representative sample of each waste to be analyzed.	264.13(b)(3)	373-2.2(e)(2)(iii)	"WASTE ANALYSIS SECTION"	
C-2d <u>Frequency of Analysis</u> A description of the frequency at which the analyses will be repeated. The frequency must be sufficient to ensure that the analysis is accurate and up-to-date. (For an on-site facility this will be whenever there is a process change. For an incinerator, this will be as often as required to verify consistency of the waste feed.)	264.13(b)(4) Guidance	373-2.2(e)(2)(iv)	"WASTE ANALYSIS SECTION"	
C-2e <u>Additional Requirements for Wastes Generated Offsite</u> A description of the procedures used to inspect and/or analyze wastes generated off-site that includes procedures to determine their identity, sampling frequency, and sampling methods used. Also, waste analysis information supplied by generator.	264.13(b)(5) 264.13(c)	373-2.2(e)(2)(v) 373-2.2(e)(3)	"FACILITY AND OPERATION PLAN SECTION"	
C-2f <u>Additional Requirements for Facilities Handling Ignitable, Reactive, or Incompatible Waste</u> If the facility stores or treats ignitable, reactive, or incompatible waste, a description of methods which will be used to meet the additional waste analysis requirements necessary for complying with the regulatory requirements specified in Section 1-5.	264.13(b)(6) 264.17	373-2.2(e)(2)(vi) 373-2.2(i)		

PART D - PROCESS INFORMATION

D-1 Containers

D-1a Containers with Free Liquids

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
D-1a (continued)				
<u>Description of System</u> A description of the containment system to demonstrate compliance with 264.175. Show at least the following:	270.15(a)	373-1.5(b)(i)		
D-1a(1) <u>Basic Design Parameters, Dimensions, and Materials of Construction</u> Base must underly containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.	270.15(a)(1) 264.175(b)(1)	373-1.5(b)(i)(i) 373-2.9(f)(i)(i)	FACILITY AND OPERATION PLAN; PROPOSED ADDITIONS; SPILL PREVENTION SECTIONS	
D-1a(2) <u>Description of How Design Promotes Drainage or How Containers are Kept From Contact With Standing Liquids In Containment System</u> Base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids. For this requirement, the applicant should address where applicable: • Describe handling and stacking practices • Grading of base • Drainage design and removal system	270.15(a)(2) 264.175(b)(2) Guidance	373-1.5(b)(i)(ii) 373-2.9(f)(i)(ii)		
D-1a(3) <u>Capacity of the Containment System Relative to the number and Volume of Containers to be Stored</u> Sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Information that should be included to satisfy this requirement is:	270.15(a)(3) 264.175(b)(3) Guidance	373-1.5(b)(i)(iii) 373-2.9(f)(i)(iii)	FACILITY AND OPERATION PLAN; PROPOSED ADDITIONS; SPILL PREVENTION SECTIONS.	

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>D-1a(3) (continued)</p> <ul style="list-style-type: none">• Volume of largest container• Total volume of containers• Containment structure capacity• Capacity of run-off collection system• Geographic storm intensity/frequency data				
<p>D-1a(4) <u>Provisions for Preventing or Managing Run-on</u></p> <p>Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to the 10 percent minimum to contain any run-on which might enter the system. The applicant should discuss structures used to control run-on such as:</p> <ul style="list-style-type: none">• Containment system auxiliary structures (curbs, dikes, etc.)• Engineering grading design• Collection and removal system design capacity• Potential run-on	270.15(a)(4) 264.175(i)(4) Guidance	373-1.5(b)(7)(iv) 373-2.9(f)(1)(iv)	"PROPOSED ADDITIONS" SECTION	
<p>D-1a(5) <u>How Accumulated Liquids Can be Analyzed and Removed to Prevent Overflow</u></p> <p>Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner as is necessary to prevent overflow of the collection system. Information that should be included is:</p> <ul style="list-style-type: none">• How liquids will be analyzed• Removal equipment and methods (sump pump design, piping specifications, location, discharge point, and capacity)• Management of accumulated liquid including prevention of overflow.	270.15(a)(5) 264.175(b)(5) Guidance	373-1.5(b)(1)(v) 373-2.9(f)(1)(v)		
<p>D-1b <u>Containers Without Free Liquids</u></p> <p>For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with 264.175(c) including:</p>	270.15(b)	373-1.5(b)(2)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments	
D-1b(1) <u>Test for Free Liquids</u> Test procedures and results or other documentation or information to show that the wastes do not contain free liquids.	270.15(b)(1)	373-1.5(b)(2)(i)	N/A		
D-1b(2) <u>Description of Storage Area Design and Operation to Drain and Remove Liquids or How Containers Are Kept from Contact With Standing Liquids</u> Containment system <u>not</u> required if:	270.15(b)(2)	373-1.5(b)(2)(ii)			
• Storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation, or	264.175(c)(1)	373-2.9(f)(2)(i)			
• Containers elevated or otherwise protected from contact with accumulated liquid	264.175(c)(2)	373-2.9(f)(2)(ii)			
D-1c <u>Requirements for Ignitable or Reactive Wastes and Incompatible Wastes</u>	270.15(c)	373-1.5(b)(3)	"FACILITY AND OPERATION PLAN" SECTION (BUFFALO SERVICE SHOP DRAWING)		
• Sketches, drawings, or data demonstrating compliance with 264.176 and 264.177(c), where applicable	264.176	373-2.9(g)			
• Containers holding ignitable or reactive waste located at least 15 meters (50 feet) from facility property line	264.177(c)	373-2.9(h)(3)			
• Containers holding hazardous wastes incompatible with waste or materials stored nearby must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device	270.15(d)	373-1.5(b)(4)			
• Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with 264.177(a) and (b) and 264.17(b) and (c)	264.177(a)	373-2.9(h)(1)			
• Incompatible wastes must not be placed in same container unless 264.17(b) complied with	264.177(b)	373-2.9(h)(2)			
• Hazardous waste must not be placed in unwashed container that previously held incompatible waste or material	264.17(b)	373-2.2(i)(2)			

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Subject requirement	40 CFR section Nos	373 References	Location in Application	Comments
<p>D-1c (continued)</p> <p>human health or the environment, 3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions, 4) damage the structural integrity of the device or facility, 5) through other means threaten human health or environment</p> <ul style="list-style-type: none">• Documentation of compliance with 264.17(b) based on references to published scientific or engineering literature, data from trial tests, waste analysis, or results of treatment of similar wastes by similar treatment processes and under similar operating conditions	264.17(c)	373-2.2(i)(3)		
<p>D-1d <u>Container Management:</u></p> <ul style="list-style-type: none">• Type of containers and construction material should include liners (if applicable) manufacturer specifications, dimensions• Procedures for handling to avoid rupturing or leaking• Weekly inspections for deterioration caused by corrosion or other factors• Machinery, equipment, procedures used to move containers• Adequate aisle space for machinery, inspections, and to meet applicable codes (i.e., fire)• Maximum number, height, volume, and types of containers in storage area• Waste container always kept closed during storage except when adding or removing waste• Location of ignitable, reactive, and incompatible waste	264.171, 264.172 264.173	373-2.9(b) 373-2.9(c) 373-2.9(d)	"HAZARDOUS WASTE INSPECTION PLAN" SECTION "SPILL PREVENTION" SECTION	
<p>D-2 <u>Tanks</u></p> <p>D-2a <u>Description of Tanks</u></p> <p>Description of design and operation procedures which demonstrate compliance with the requirements of 264.191, 264.192, 264.198 and 264.199 including:</p> <ul style="list-style-type: none">• References to design standards or other available information used in design and construction	270.16	* 373-2.10(a) * 373-1.5(c)	"PROPOSED ADDITIONS" SECTION "SPILL PREVENTION" SECTION "EXHIBITS" SECTION (DRAWINGS)	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
0-2a (continued)				
<ul style="list-style-type: none"> • Design specifications including construction materials and lining materials, including pertinent characteristics such as corrosion or erosion resistance • Tank dimensions, capacity, shell thickness • Diagram of piping, instrumentation, process flow • Description of feed systems, safety cutoff, bypass systems, and pressure controls • Description of procedures for handling incompatible, ignitable, or reactive wastes, including the use of buffer zones • Types and number of tanks • Tank internal pressure and pressure controls • Foundation construction, specifications, and structural supports • Specific gravity of tank liquids • Tank design standard code and year • Specifications on seams (include type) • Operating pressure and temperature • Type of waste contained in tanks • Maximum height of liquid level 	<p>Guidance 264.191(a)</p> <p>264.191(a)</p> <p>264.191(a)</p> <p>Guidance Guidance Guidance Guidance</p>	<p>373-2.10(b)(1)</p> <p>"</p> <p>"</p>		
0-2b <u>Tank Corrosion and Erosion</u>	270.16(b) 264.192(a)	373-1.5(c)(2) 373-2.10(c)(1)		
<p>A review of the pertinent characteristics of the tank construction material and lining materials to determine corrosion or erosion effects with wastes and other materials (i.e., treatment reagents). The applicant should also address:</p> <ul style="list-style-type: none"> • Description of lining and coating materials • Corrosion allowance and corrosion and erosion rates. • Demonstration of how minimum shell thickness will be maintained • Tank construction compatibility with waste and tests or documentation to substantiate compatibility • Description of treatment reagents 	<p>270.16(b), 264.192(a)</p> <p>264.191(a)</p> <p>264.17(c)</p> <p>264.192(a)</p>	<p>373-1.5(c)(2) 373-2.10(c)(1)</p> <p>373-2.10(b)(1)</p> <p>373-1.5(c)(3)</p> <p>373-2.10(c)(1)</p>	<p>"PROPOSED ADDITION" SECTION</p>	
0-2c <u>Tank Management Practices</u>	270.16(d) and (e) 264.192(b)	373-1.5(c)(4)(B) 373-2.10(c)(2)		
<p>A description of the tank owner's or operator's operating practices and controls:</p> <ul style="list-style-type: none"> • Description of controls to prevent overfilling and overflowing such as waste feed cut-off system(s), bypass or standby tank 	264.192(b)(1)	373-2.10(c)(2)(i)	<p>"PROPOSED ADDITION" SECTION</p> <p>"SPILL PREVENTION" SECTION</p>	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
D-2c (continued)				
• Demonstration of maintenance of sufficient freeboard to prevent overtopping by wave or wind action or precipitation for uncovered tanks	264 197(b)(2)	373-2.10(c)(2)(ii)		
• Piping, instrumentation, and process flow diagrams	270 16(d)	373-1.5(c)(4)		
• Description of tank instrumentation such as pressure, temperature, pH, level gauges and monitors	270 16(e)	373-1.5(c)(5)		
• Description of safety devices such as rupture discs and safety vents	270 16(f), 264 191(A)	373-1.5(c)(6) 373-2.10(b)(1)		
D-2d <u>Requirements for Ignitable or Reactive Wastes</u>	264 198	373-2.10(f)		
• Procedures for treating, mixing, rendering before or immediately after placement in tank so that resulting material no longer meets definition of ignitable or reactive waste, or	264 198(a)(1)	373-2.10(f)(1)(i)	"PROPOSED ADDITION" SECTION "EXHIBITS" SECTION DRAWINGS	
• Procedures for storage/treatment to protect from ignition or reaction, or	264 198(a)(2)	373-2.10(f)(1)(ii)		
• Designation of tank solely for emergencies	264 198(a)(3)	373-2.10(f)(1)(iii)		
• Demonstration of buffer zone requirements if stored in covered tanks	264 198(b)	373-2.10(f)(2)		
D-2e <u>Requirements for Incompatible Wastes</u>	264 199	373-2.10(g)		
• Description of procedures to prevent placing incompatible wastes in same tank	264 199(a)	373-2.10(g)(1)		
• Precautions against placing waste in unwashed tank previously holding incompatible waste.	264 199(b)	373-2.10(g)(2)		
D-2f <u>Requirements for Containment</u>		* 373-2.10(h)		

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Subject requirement	40 CFR section Nos	375 References	Location in application	Comments
PART F - PROCEDURES TO PREVENT HAZARDS				
F-1 Security				
F-1a Security Procedures and Equipment	264.14 122.25(a)(4)	373-1.5(a)(2)(iv) 373-2.2(f)	"SECURITY" SECTION	
Unless a waiver is granted, the Part B must include a description of the security procedures and equipment required by 264.14:				
F-1a(1) 24-Hour Surveillance System	264.14(b)(1)	373-2.2(f)(2)(i)		
A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility: • Procedures and personnel to be used • Location and description of equipment	Guidance Guidance			
F-1a(2) Barrier and Means to Control Entry	264.14(b)(2)(i)	373-2.2(f)(2)(ii)(A)		
(In lieu of a 24-hour surveillance system, the applicant may elect to use a barrier and other means to control entry.)				
F-1a(2)(a) Barrier				
An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility: • Height • Material of construction	Guidance Guidance			
F-1a(2)(b) Means to Control Entry	264.14(b)(2)(ii)	373-2.2(f)(2)(ii)(b)		
A means to control entry, at all times, through the gates or other entrances to the active portion of				

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>F-1a(2)(b) (continued)</p> <p>the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility):</p> <ul style="list-style-type: none">• Procedure and personnel to be used• Location and description of equipment	Guidance Guidance			
<p>F-1a(3) <u>Warning Signs</u></p> <p>The facility must have a sign with the legend, "Danger - Unauthorized Personnel Keep Out", which must be posted at each entrance to the active portion of the facility and at other locations, in sufficient numbers to be seen from any approach to the active portion. The legend must be written in English and in any other language predominant in the area surrounding the facility and must be legible from a distance of at least 25 ft. Existing signs with a legend other than "Danger - Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>	264.14(c)	373-2.2(f)(3)		
<p>F-1b <u>Waiver</u></p> <p>If a waiver of these requirements is requested, the owner or operator must demonstrate the following:</p>	264.14(a)	373-2.2(f)(i)		
<p>F-1b(1) <u>Injury to Intruder</u></p> <p>Physical contact with the waste, structure, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock that may enter the active portion of a facility; and</p>	264.14(a)(1)	373-2.2(f)(i)(i)		
<p>F-1b(2) <u>Violation Caused by Intruder</u></p> <p>Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active</p>	264.14(a)(2)	373-2.2(f)(i)(ii)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>F-1b(2) (continued)</p> <p>portion of a facility will not cause a violation of the requirements of 40 CFR Part 264.</p> <p>Note: To address F-1b(1) and F-1b(2) the applicant should include:</p> <ul style="list-style-type: none"> • Nature and duration of hazard potential from wastes • Equipment and structures to minimize potential for an intruder to 1) cause a spill; 2) mix incompatible wastes; 3) ignite ignitable or reactive wastes; 4) damage containment or monitoring systems • Features that prevent contact with waste 	<p>Guidance</p>			
<p>F-2 Inspection Schedule</p> <p>A copy of the general inspection schedule required by 264.15(b) including, where applicable, specific requirements of 264.174, 264.194, 264.226, 264.254, 264.273, 264.303, and 264.347.</p>	<p>270.14(b)(5) 264.15</p>	<p>373-1.5(a)(2)(v) 373-2.2(g)</p>	<p>"HAZ. WASTE INSPECTION PLAN" SECTION</p>	
<p>F-2a General Inspection Requirements</p> <p>A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment:</p> <ul style="list-style-type: none"> • Monitoring equipment • Emergency and safety equipment • Security devices • Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards. • Testing as necessary of communications or alarm systems, fire protection equipment and decontamination equipment 	<p>270.14(b)(5) 264.15(a) and (b)</p> <p>264.15(a) and (b)</p>	<p>373-1.5(a)(2)(v) 373-2.2(g)(1) & (2)</p> <p>373-2.2(g)(1) & (2)</p>	<p>"CONTINGENCY & EMERGENCY PLANS" SECTION</p> <p>"SPILL PREVENTION" SECTION</p>	
<p>Examples of monitoring equipment that should be inspected at treatment, storage, and disposal facilities are:</p> <ul style="list-style-type: none"> • Scales • Flow and liquid level monitors • Hazardous gas detectors • pH monitors • Leachate monitors • Pressure sensors • Temperature gauges 	<p>264.33</p> <p>Guidance</p>	<p>373-2.3(d)</p>		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>1-2a (continued)</p> <p>Examples of monitoring equipment that should be inspected at facilities with Incinerators are:</p> <ul style="list-style-type: none"> • Waste flow monitors and recorders • Auxiliary fuel flow monitors • Combustion air flow monitors • Temperature monitors • Flame sensors • CO monitors and recorders • Pressure differential indicators • Pressure sensors • pH monitors • Ammeters for measuring blower current draw <p>Examples of safety and emergency equipment to be inspected at TSD facilities are:</p> <ul style="list-style-type: none"> • Respirators • Communication systems • Alarm systems • Emergency lighting and power systems • Smoke detectors • Fire protection equipment • First aid equipment and supplies • Decontamination equipment • Protective clothing <p>Examples of security devices to be inspected at TSD facilities are:</p> <ul style="list-style-type: none"> • Surveillance systems • Barrier surrounding facility • Locking devices <p>Examples of operating and structural equipment at TSD facilities are:</p> <ul style="list-style-type: none"> • Spill detection devices • Spill control and collection equipment • Fire and explosion barriers • Ventilation equipment • Sump pumps • Dikes, bases, and foundations <p>In addition, areas such as waste storage, mixing, loading, and unloading areas, which are subject to spills, must be inspected.</p>	<p>Guidance</p> <p>Guidance</p> <p>Guidance</p> <p>Guidance</p>	<p>373 - 2.2 (g)(2)(iii)</p>		
<p>1-2a(1) <u>Types of Problems</u></p> <p>The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration,</p>	<p>264.15(b)(3)</p>	<p>373 - 2.2 (g)(2)(iii)</p>		

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>F-2a(1) (continued)</p> <p>readings out of specified range, missing items or materials, inoperative equipment, etc.).</p>				
<p>F-2a(2) <u>Frequency of Inspection</u></p> <p>A description of the inspection frequency must be provided for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.</p>	264.15(b)(4)	373-2.2 (g)(2)(iv)		
<p>F-2b <u>Specific Process Inspection Requirements</u></p> <p>At a minimum, the inspection schedule must include the terms and frequencies called for in 264.174, 264.194, 264.226, 265.253, 264.254, 264.303 and 264.347, where applicable.</p>	270.14(b)(5) 254.15(b)(4)	373-1.5(a)(2)(v) 373-2.7(g)(2)(iv)	"INSPECTION PLAN" SECTION	
<p>F-2b(1) <u>Container Inspection</u></p> <p>A description of the weekly inspection of containers and container storage areas for leaks in containers or deterioration of containers and the containment system caused by corrosion or other factors.</p>	264.174	373-2.9(e)		
<p>F-2b(2) <u>Tank Inspection</u></p> <ul style="list-style-type: none"> • A description of the daily inspection of overfilling control equipment, monitoring equipment and level of waste in uncovered tanks • A description of the weekly inspection of tank construction materials and the area surrounding the tank 	264.194	373-2.10(d)		

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Subject requirement	40 CFR section Nos	379 References	Location in application	Comments
<p>F-2b(2) (continued)</p> <ul style="list-style-type: none">• A schedule describing the <u>daily</u> monitoring of monitoring equipment (e.g., pressure and temperature gauges) where present to ensure that the tank is operated according to design specifications• A schedule showing the level of waste in uncovered tanks is inspected <u>daily</u>• A schedule and procedure for assessing the condition of the tank, including detection of leaks, cracks, or wall thinning to less than minimum shell thickness• A procedure for emptying a tank to allow entry and inspection when necessary to detect corrosion or erosion of the tank sides and bottom				

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>F-2c Remedial Action</p> <p>A description of procedures for taking remedial actions when inspections reveal problems or when problems are imminent. [These may alternately be described in the contingency plan (see 264.194(c), 264.227, 264.171)].</p>	264.15(c)	373-2.2(g)(3)	"CONTINGENCY PLAN" SECTION	
<p>F-2d Inspection Log</p> <p>A copy or description of the inspection log or summary form including the following:</p> <ul style="list-style-type: none">• Dates and times of inspections• Name(s) of inspector(s)• Observations made• Date and nature of repairs or remedial actions taken	264.73(b)(5) 264.15(d)	373-2.5(d)(2) 373-2.2(g)(4)	"INSPECTION PLAN" SECTION	
<p>F-3 Waiver of Preparedness and Prevention Requirements</p> <p>A justification of any request for a waiver of preparedness and prevention requirements of Part 264, Subpart C.</p>	270.14(b)(6)	373-1.5(d)(2)(vi)		
<p>F-3a Equipment Requirements</p> <p>Unless it can be demonstrated that none of the hazards posed by waste handled at the facility could require a particular kind of</p>	264.32	373-2.3(d)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
F-3a (continued) equipment specified below, the facility must have the following equipment: (these requirements are not specifically listed in 270.14-270.29 for inclusion in a Part B.)				
F-3a(1) Internal Communications An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.	264.32(a)	373 - 2.3(c)(1)		
F-3a(2) External Communications A device such as a telephone (immediately available at the scene of operations) or a handheld two-way radio, for summoning emergency assistance from local police departments, or state or local emergency response teams.	264.32(b)	373 - 2.3(c)(2)		
F-3a(3) Emergency Equipment • Fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals and portable fire extinguishers • Spill control equipment • Decontamination equipment	264.32(c)	373 - 2.3(c)(3)		
F-3a(4) Water for Fire Control One of the following: • Water at adequate volume and pressure to supply water hose streams, or • foam-producing equipment, or • Automatic sprinklers or water spray systems	264.32(d)	373 - 2.3(c)(4)		
F-3b Aisle Space Requirement Requests for a waiver of the aisle space requirement must be accompanied by a demonstration that aisle space is not needed to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency.	264.35	373 - 2.3(f)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
F-4 <u>Preventive Procedures, Structures, and Equipment</u>	270.14(b)(8)	373-1.5(a)(2)(viii)		
A description of procedures, structures, or equipment used at the facility for the following must be included:				
F-4a <u>Unloading Operations</u>				
Prevention of hazards in unloading operations (e.g., use of ramps or special forklifts).	270.14(b)(8)(i)	373-1.5(a)(2)(viii)(a)		
F-4b <u>Runoff</u>				
Prevention of runoff from hazardous waste handling areas to other areas of the facility or environment, or prevention of flooding (e.g., berms, dikes, trenches).	270.14(b)(8)(ii)	373-1.5(a)(2)(viii)(b)		
F-4c <u>Water Supplies</u>				
Prevention of contamination of water supplies.	270.14(b)(8)(iii)	373-1.5(a)(2)(viii)(c)		
F-4d <u>Equipment and Power Failure</u>				
Mitigation of effects of equipment failure and power outages.	270.14(a)(8)(iv)	373-1.5(a)(2)(viii)(d)		
F-4e <u>Personnel Protection Equipment</u>				
Prevention of undue exposure of personnel to hazardous waste (e.g., protective clothing).	270.14(b)(8)(v)	373-1.5(a)(2)(viii)(e)		
F-5 <u>Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes</u>				
F-5a <u>Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste</u>	270.14(b)(9) 264.17(a) and (c)	373-1.5(a)(2)(ix) 373-2.2(i)(1)(3)		
A description of the precautions taken by a facility that handles ignitable, reactive or incompatible waste to demonstrate compliance with 264.17 including documentation demonstrating compliance with 264.17(c). Precautions to prevent actual ignition, including separation from sources of ignition such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., heat producing chemical reactions), and radiant heat. Demonstration that when ignitable or reactive waste is being handled, the owner or				

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Subject requirement	40 CFR Section Nos.	373 References	Location in application	Comments
F-5a (continued)				
operator confines smoking and open flames to specially designated locations. "No Smoking" signs must be conspicuously placed wherever a hazard exists from ignitable or reactive waste.				
<u>F-5b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste</u>	270.14(b)(9) 264.17(b) and (c)	373-1.5(a)(2)(ix), 373-2.2(i)(2)&(3)		
A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.				
Documentation to meet requirements of 264.17(a) or (b) may be based on references to published scientific or engineering literature, data from trial tests, waste analyses, or results of treatment of similar wastes by similar treatment processes and under similar operating conditions.	264.17(c)	373-2.2(i)(3)		
<u>F-5c Management of Ignitable or Reactive Wastes in Containers</u>	270.15(c) 264.176	373-1.5(b)(3) 373-2.9(g)		
Sketches, drawings, or data demonstrating that containers of ignitable or reactive waste are located at least 35 meters (50 feet) from the facility's property line.				
<u>F-5d Management of Incompatible Wastes in Containers</u>	270.15(d) 264.177(a)	373-1.5(b)(4) 373-2.9(h)(i)		
A description of procedures to demonstrate compliance with 264.177(a) and (b) and 264.17(b) and (c).				

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>F-5g (continued)</p> <ul style="list-style-type: none">• The procedures used to ensure that incompatible wastes and materials are not placed in the same container (unless 264.17(b) is complied with) or in an unwashed container that previously held incompatible waste• Dikes, berms, walls, or other devices used to separate wastes in containers, piles, open tanks, or surface impoundments	264.177(b)	373-2.9(h)(2)		
<p>F-5e <u>Management of Ignitable or Reactive Wastes in Tanks</u></p> <p>A description of the procedures for handling incompatible, ignitable, or reactive wastes, including the use of buffer zones. 264 requirements include:</p> <ul style="list-style-type: none">• Waste must be treated, rendered, or mixed before or immediately after placement in the tank so that it is no longer considered ignitable and complies with 264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies• Facilities that treat or store ignitable or reactive waste in covered tanks must comply with the National Fire Protection Association's buffer zone requirements for tanks	270.16(b) 264.198(a) 264.198(b)	373-1.5(c)(6) 373-2.10(f)(1) 373-2.10(f)(2)		
<p>F-5f <u>Incompatible Wastes in Tanks</u></p> <p>A statement that incompatible wastes and materials are not stored in the same tank or in an unwashed tank that previously held an incompatible waste or material (unless 264.17(b) is complied with).</p>	270.16(f) 264.199(b)	373-1.5(c)(6) 373-2.10(g)(2)		

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Subject requirement	40 CFR section Nos.	313 References	Location in application	Comments
	270.20(d)(8) 265.282 264.17(b)			
<p>PART G - CONTINGENCY PLAN</p> <p>A copy of the contingency plan required in Part 264, Subpart D. Include, where applicable, specific requirements in 264.227 and 264.255.</p>	270.14(b)(7) 264.50 through 264.56	373-1.5 (a)(2)(vii) 373-2.4	CONTINGENCY PLAN SECTION	
<p>An existing spill prevention control plan can be amended to incorporate hazardous waste management provisions sufficient to comply with 264, Subpart D requirements.</p>	264(51)(b)	373-2.4(c)(2)		
<p>G-1 General information</p> <ul style="list-style-type: none"> • Facility name and location and owner or operator name • Site plan • Description of facility operations 	264.52	373-2.4(c)		
<p>G-2 Emergency Coordinators</p> <ul style="list-style-type: none"> • Names, addresses, office and home phone numbers, and duties of primary and alternate coordinators in sequence as alternates 	264.52(d) 264.55	373-2.4(c)(4) 373-2.4(f)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
G-2 (continued)				
• A statement authorizing designated coordinators to commit the necessary resources to implement the contingency plan				
G-3 <u>Implementation</u>	264.52(a)	373-2.4(c)(1)		
Criteria for implementation of contingency plan for any potential emergency	264.56(d)	373-2.4(g)(4)		
• Fires/explosions • Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water				
G-4 <u>Emergency Response Procedures</u>				
G-4a <u>Notification</u>	264.56(a)	373-2.4(g)(1)		
Methodology for immediate notification of facility personnel and necessary state or local agencies.			"CONTINGENCY & EMERGENCY PLAN" SECTION	
G-4b <u>Identification of Hazardous Materials</u>	264.56(b)	373-2.4(g)(2)		
Available data and/or procedures for identification of hazardous materials involved in the emergency and quantity and areal extent of release. Include information on:				
• Characteristics of waste • Exact source • Amount • Areal extent of release				
G-4c <u>Hazard Assessment</u>	264.56(c)	373-2.4(g)(2)		
• Procedure for assessment of possible hazards to the environment and human health • Procedure for determining the need for evacuation and notification of authorities. The authorities to be notified must include the On-Scene-Coordinator for that area or the National Response Center	264.56(d)	373-2.4(g)(4)		
G-4d <u>Control Procedures</u>	264.52(a)	373-2.4(c)(1)		
• Specific responses and control procedures to be taken in the event of a fire, explosion, or release of hazardous waste to air, land, or water				

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>G-5 Emergency Equipment</p> <p>Location, description, and capabilities of emergency equipment. This should include:</p> <ul style="list-style-type: none">• Spill control equipment• Fire control equipment• Personnel protective items such as respirators and protective clothing• First aid and medical supplies• Emergency decontamination equipment• Emergency communication and alarm systems	264.52(e)	373-2.4(c)(5)	"CONTINGENCY & EMERGENCY PLAN" SECTION	
<p>G-6 Coordination Agreements</p> <ul style="list-style-type: none">• A description of coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency• A statement indicating that a copy of the contingency plan has been submitted to these organizations• If applicable, documentation of refusal to enter into a coordination agreement	264.37 264.52(c)	373-2.3(g) 373-2.4(c)(3)	"CONTINGENCY & EMERGENCY PLAN" SECTION	
	264.51(b)	373-2.4(d)(2)		
	264.37(b)	373-2.3(g)(2)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
G-7 <u>Evacuation Plan</u> The plan must include: <ul style="list-style-type: none">• Criteria for evacuation• A description of signal(s) to be used to begin evacuation• Primary and alternate evacuation routes	264.52(f)	373-2.4(c)(6)		
G-8 <u>Required Reports</u> <ul style="list-style-type: none">• Provisions for submission of reports of emergency incidents within 15 days of occurrence• Notation of such incidents in the operating record identifying the time, date, and details of these emergency incidents	264.56(j)	373-2.4(g)(10)		
H - PERSONNEL TRAINING				
<u>Outline of Training Program</u>	270.14(h)(12) 264.16	373-1.5(a)(2)(xii) 373-2.2(h)	"TRAINING" SECTION	
An outline of both the introductory and continuing training programs by owners or operators to prepare the personnel to operate and maintain the facility in a safe manner as required to demonstrate compliance with 264.16. Include a brief description of how training will be designed to meet actual job tasks in accordance with requirements in 264.16(a)(3). (Note: On-the-job training may be used to comply with these requirements.)	270.14(b)(12)	373-1.5(d)(2)(xii)		
H-1a <u>Job Titles and Duties</u> For each employee whose position at the facility is related to hazardous waste management, the following must be maintained at the facility: <ul style="list-style-type: none">• Job title• Job duties• Job description	264.16(d)(1) 264.16(d)(2)	373-2.2(h)(4)(i) 373-2.2(h)(4)(ii)	"TRAINING" SECTION	
H-1b <u>Training Content, Frequency, and Techniques</u> In both introductory and continuing training (including an annual review of the initial training) for each employee describe: <ul style="list-style-type: none">• Training content• Frequency of training• Technique(s) used in training	264.16(d)(3) 264.16(c)	373-2.2(h)(4)(iii) 373-2.2(h)(3)	"TRAINING" SECTION	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>H-1c <u>Training Director</u></p> <p>Demonstration that the program is directed by a person trained in hazardous waste management.</p> <ul style="list-style-type: none"> • Credentials of training director 	<p>264.16(a)(2)</p> <p>Guidance</p>	<p>373-2.2(h)(7)(D)</p>		
<p>H-1d <u>Relevance of Training to Job Position</u></p> <p>A brief description of how instructions of facility personnel in hazardous waste management procedures (including contingency plan implementation) is relevant to their positions. [To demonstrate compliance with 264.16(a)(2).]</p>	<p>264.16(a)(2)</p>	<p>373-2.2(h)(1)(ii)</p>		
<p>H-1e <u>Training for Emergency Response</u></p> <p>Documentation that the training program trains facility personnel to respond effectively to emergencies and trains them to be familiar with emergency procedures, emergency equipment, and emergency systems. Include where applicable:</p> <ul style="list-style-type: none"> • Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment • Key parameters for automatic waste feed cutoff systems • Communications or alarm systems • Response to fires or explosions • Response to groundwater contamination incidents • Shutdown of operations 	<p>264.16(a)(3)</p> <p>264.16(a)(3)(i)</p> <p>264.16(a)(3)(ii)</p> <p>264.16(a)(3)(iii)</p> <p>264.16(a)(3)(iv)</p> <p>264.16(a)(3)(v)</p> <p>264.16(a)(3)(vi)</p>	<p>373-2.2(h)(1)(iii)</p> <p>373-2.2(h)(1)(ii)(a)</p> <p>373-2.2(h)(1)(ii)(b)</p> <p>373-2.2(h)(1)(iii)(c)</p> <p>373-2.2(h)(1)(iii)(d)</p> <p>373-2.2(h)(1)(iii)(e)</p> <p>373-2.2(h)(1)(iii)(f)</p>	<p>"TRAINING" SECTION</p> <p>"CONTINGENCY & EMERGENCY PLAN" SECTION</p>	
<p>H-2 <u>Implementation of Training Program</u></p> <ul style="list-style-type: none"> • Indication that training has been and will be successfully completed by facility personnel within 6 months of their employment or assignment to a facility, or transfer to a new position at a facility, whichever is later. (Note: employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements.) • Records documenting that the required training has been given to and completed by facility personnel must be maintained 	<p>264.16(d)(4)</p> <p>264.16(h)</p>	<p>373-2.2(h)(4)(iv)</p> <p>373-2.2(h)(2)</p>	<p>"TRAINING" SECTION</p>	

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments	
PART I - CLOSURE PLANS, POSTCLOSURE PLANS, AND FINANCIAL REQUIREMENTS	270.14(b)(11); 270.14(b)(15); 270.14(b)(16); 270.14(b)(17); 270.14(b)(18); 264.110-264.115; 264.351, 264.178, 264.197	373-1.5(a)(2)(xii) : 373-1.5(a)(2)(xv-xvii) 373-2.7(a)-(f) 373-2.9(c) 373-2.10(e)			
1-1 Closure Plans A copy of the written closure plan required by 264.112 and consistent with Items 1-1a through 1-1f. Where applicable, the specific requirements in 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, and 264.351, must be included.	270.14(b)(13)	373-1.5(a)(2)(xii)	"CLOSURE" SECTION		
1-1a Closure Performance Standard A description of how closure <ul style="list-style-type: none">• Minimizes the need for postclosure maintenance• Minimizes or eliminates releases of hazardous wastes, hazardous waste constituents, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land	264.111 (264.112 requires consistency with 264.111)	373-2.7(b) 373-2.7(c)			
1-1b Partial Closure and Final Closure Activities If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Also, a description of how and when the facility will be finally closed. Description must identify how requirements of 264.111, 264.113, 264.114, 264.115 and applicable requirements of 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, and 264.351 will be met.	264.112(a)(1) (264.112(a)(1) through 264.112(a)(4) outline minimum acceptable plan elements)	373-2.7(c)(1)(i) 373-2.7(c)(1)(i-iv)			
1-1c Maximum Waste Inventory A description of the maximum inventory of wastes that could be in storage, treatment and disposal at any time during the life of the facility.	264.112(a)(2)	373-2.7(c)(1)(ii)			

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>1-1d <u>Inventory Removal, Disposal or Decontamination</u></p> <p>The application must describe the procedures which will be used to remove, treat or dispose the waste inventory, decontamination residuals, and contaminated structures, soil and equipment</p>	<p>264.112(a)(1) 264.114 270.14(b)(13) 270.17(a) 264.228 264.258 264.178 264.197</p>	<p>373-2.7(c)(i)(ii) 373-2.7(e) 373-1.5(d)(2)(xii) 373-2.11(f) 373-2.12(h) 373-2.9(i) 373-2.10(e)</p>		
<p>1-1e <u>Schedule for Closure</u></p> <p>A schedule for final closure including:</p> <ul style="list-style-type: none"> • Estimated expected year of closure • Closure schedule with total time to close, time for intervening closure activities, and inspection schedule during closure 	<p>264.112(a)(4)</p>	<p>373-2.7(c)(i)(iv)</p>		
<p>1-1e(1) <u>Time Allowed for Closure</u></p> <p>The schedule for closure must show</p> <ul style="list-style-type: none"> • All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste • All closure activities will be completed within 180 days from receipt of final volume of waste 	<p>264.113(a) and (b)</p>	<p>373-2.7(d)(1) & (2)</p>		
<p>1-1e(1)(a) <u>Extensions for Closure Time</u></p> <p>A petition made to the Regional Administrator for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the 180 days for completion of closure activities made to the Regional Administrator. One of the following must be demonstrated:</p> <ul style="list-style-type: none"> • Closure activities require longer than 180 days (or facility has capacity to receive additional wastes). • There is a reasonable likelihood that a person other than owner or operator will recommence operation of the site • Closure would be incompatible with continued operation 	<p>264.113(a) 264.113(b)</p>	<p>373-2.7(d)(1) 373-2.7(d)(2)</p>		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
1-1e(1)(a) (continued) Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.				
1-1f <u>Inventory Disposal, Removal or Decontamination of Equipment</u> A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed. The following should be included: • Decontamination procedures • Criteria for determining contamination • List equipment • Disposal of contaminated soil • Decontamination of clean up materials, equipment, and residues • Demonstrate decontamination has been effective	264.114 Guidance	373-2.7(c)		
1-1f(1) <u>Closure of Containers</u> A description of how at closure, all hazardous waste residues will be removed from the containment system, and how remaining containers, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description should address the following: • Hazardous waste removal and disposal • Container decontamination and disposal • Site decontamination and disposal including linings, soil, and washes • Verification of decontamination • Maximum inventory	264.178 Guidance	373-2.9(i)		
1-1f(2) <u>Closure of Tanks</u> A description of how at closure, all hazardous waste residues will be removed from tanks, discharge control equipment, and discharge confinement structure, and the facility will be decontaminated. The description should address the following:	264.197	373-2.10(e)		

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
I-5 (continued)				
compliance with 264.143. The mechanism must be one of the following (I-5(a) through I-5(f)) and include due dates and use standard wording.				
I-5a Closure Trust Fund	264.143(a) 264.151(a)(1)	373-2.8(d)(1) 373-2.8(j)(1)		
A copy of the closure trust fund agreement with the wording required in 264.151(a)(1) and a formal certification of acknowledgment.				
• Bank or approval institution • Mechanics				
- Pay-in period; life of permit or remaining life of facility, whichever is shorter - Annual payment; unfunded liability divided by years left in pay-in period				
I-5b Surety Bond				
A surety bond from a federally acceptable surety company meeting one of the following requirements:	264.143(b) 264.151(b)	* 373-2.8(d)(2) 373-2.8(j)(2)		
• Surety bond guaranteeing payment into a closure trust fund. A copy of the surety bond with the wording required in 264.151(b), a copy of the standby trust fund agreement	264.143(b)	* 373-2.8(d)(2)		
• Surety bond guaranteeing performance of closure. A copy of the surety bond with the wording required in Part 264.151(c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart H				
I-5c Closure Letter of Credit	264.143(d) 264.151(d)	373-2.8(d)(3) 373-2.8(j)(3)		
A copy of a closure letter of credit with the wording required in 264.151(d)				
• Irrevocable letter of credit • At least one year period, automatic renewal • Standby trust fund • Amount reflects current cost estimate				

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>1-5d Closure Insurance</p> <p>To demonstrate that the owner or operator has closure insurance, he or she must submit to the Regional Administrator 60 days before hazardous waste is received a certificate of insurance worded as specified in 264.151(e).</p> <ul style="list-style-type: none"> • Noncancellable policy, automatic renewal • Insurer licensed or eligible surplus lines carrier • Certificate of insurance • Funds available whenever final closure occurs 	264.151(e)	373-2.8(j)(5)		
<p>1-5e Financial Test and Corporate Guarantee for Closure</p> <p>To demonstrate that this test is met, an owner or operator must submit a letter signed by the company's chief financial officer that is worded as specified in 264.151(f) and meets the following criteria:</p> <ul style="list-style-type: none"> • Tangible net worth \$10 million • Tangible net worth 6 x all closure and post-closure costs • U.S. assets at least 90% of total assets or at least six times all closure and post-closure costs • Bond rating requirement or alternative financial ratio tests • Application must include: <ul style="list-style-type: none"> - Copy of a report on the company's latest financial statements drafted by an independent certified public accountant (CPA) - Copy of a report from the owner's or operator's independent CPA to the owner or operator stating that he or she has examined the data in the letter from the chief financial officer and that it is consistent with the amounts in the independently-audited year-end financial statements for the latest fiscal year and that no matters came to attention to cause him to believe that the data should be adjusted 	264.143(f) 264.151(f) 264.151(h)	* 373-2.8(d)(5) 373-2.8(j)(5) 373-2.8(j)(6)		
<p>In lieu of the above items, the owner or operator may submit a corporate guarantee worded as required by 264.151(h). This guarantee provides that the guarantor, which</p>	264.143(f)(10)	*373-2.8(d)(5)(2)		

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>must be the parent company of the owner or operator, will perform final closure in accordance with the closure plan if the owner or operator fails to do so or will establish a closure trust fund for the owner or operator. A copy of these items should be submitted with the Part B for review by the permit writer.</p>				
<p>1-5f Combinations</p>				
<p>1-5f(1) Use of Multiple Financial Mechanisms</p>	264.143(g)	373-2.8(d)(6)		
<p>A copy of a combination of trust fund agreements, surety bond guaranteeing payment into a closure trust fund or letters of credit, insurance, and state assumption of responsibility, which provide financial assurance for the amount of closure. Combined financial assurance must be at least equal to the adjusted closure cost estimate. Financial assurance instruments must meet requirements of 264.143(a),(b),(d), or (e) which include closure trust fund, surety bond guaranteeing payment into a closure trust fund, closure letter of credit, and closure insurance, respectively.</p>	264.149			
<p>1-5f(2) Use of Financial Mechanism for Multiple Facilities</p>	264.143(h)	373-2.8(d)(7)		
<p>A copy of a financial assurance mechanism for more than one facility showing for each facility, the EPA ID number, name, address, and amount of closure funds assured by the mechanism. Total funding must be no less than the sum required for each facility considered separately. Documents must be submitted to each Region where facilities are located. Financial test applies to sum of closure and post-closure costs for all facilities.</p>				

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Subject requirement	40 CFR section Nos	313 References	Location in application	Comments
1-7f Combinations				
1-7f(1) Use of Multiple Financial Mechanisms A copy of a combination of trust fund agreements, surety bond guaranteeing payment into a post-closure trust fund or letters of credit, insurance, and state assumption of responsibility, which provide financial assurance for the amount of post-closure. Combined financial assurance must be at least equal to the adjusted post-closure cost estimate. Financial assurance instruments must meet requirements of 264.143(a),(b),(d), or (e) which include post-closure trust fund, surety bond guaranteeing payment into a post-closure trust fund, postclosure letter of credit, and post-closure insurance, respectively.	264.145(g)	373 - 2.8(f)(6)		
1-7f(2) Use of Financial Mechanism for Multiple Facilities A copy of a financial assurance mechanism for more than one facility showing for each facility, the EPA ID number, name, address, and amount of closure funds assured by the mechanism. Total funding must be no less than the sum	264.145(h)	373-2.8(f)(7)		

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Subject requirement	40 CFR section Nos.	373 References	Location in application	Comments
<p>1-7f(2) continued)</p> <p>required for each facility considered separately. Documents must be submitted to each Region where facilities are located. Financial test applies to the sum of closure and post-closure costs for all facilities.</p>				
<p>1-8 <u>Liability Requirements</u></p> <p>Where applicable, a copy of the insurance policy or other documentation which comprise compliance with the requirements of 264.147. (Coverage is for all facilities owned and operated and applies until certification for closure and post-closure is completed. For facilities in Phase I authorized states, originally signed duplicates of executed instruments or certificates of insurance are not required until the time of permit issuance, except as required by state law.)</p>	<p>270.14(b)(17) 264.147(a) 264.147(b)</p>	<p>373-1.5 (a)(2)(xviii) 373-2.8(h)(1) *373-2.8(i)(2)</p>		
<p>1-8a <u>Sudden Insurance</u></p> <p>Hazardous waste treatment, storage, or disposal facilities must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences.</p> <ul style="list-style-type: none">• Amount of at least \$1 million per occurrence• An annual total of at least \$2 million, exclusive of legal costs• A signed duplicate original of the Hazardous Waste Facility Liability Endorsement worded as specified in 264.151(i), or• A Certificate of Liability Insurance worded as specified in 264.151(j)• Financial test<ul style="list-style-type: none">- letter form CFO- Auditor report- Auditor opinion- Other information requested by R.A.- Acceptable ratios	<p>264.147 (a through d) 264.151 (g, i, j) 264.147(a)</p>	<p>* 373-2.8(h) 373-2.8(j)(1) and (2) 373-2.8(m)(1)</p>		

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Subject requirement	40 CFR section Nos	373 References	Location in application	Comments
<p>1-8c Variance Procedures and RA Adjustments</p> <p>Evaluation of degree and duration of risk sufficient to allow RA to make a judgement on reduction of required liability. The financial responsibility levels specified above for liability insurance for sudden accidental occurrences may be adjusted downward if the owner or operator can prove to the Regional Administrator that these levels are not consistent with the degree and duration of risk at the owner's or operator's facility. Conversely, the Regional Administrator may adjust the levels of financial responsibility up or down, based on the Administrator's assessment of the degree and duration of risk associated with the facility.</p>	<p>264.147(c) and (d)</p>	<p>373-2.8(h)(3) & (4)</p>		
<p>PART J - OTHER FEDERAL LAWS</p> <p>Demonstration of compliance if applicable with the requirements of applicable other federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, Fish and Wildlife Coordination Act.</p>	<p>270.14(b)(20) 270.3</p>			
<p>PART K - CERTIFICATION</p> <ul style="list-style-type: none"> • Certification of application by a principal executive of the company of at least the level of vice president. • Certification by a general partner or proprietor for a partnership or sole proprietorship, respectively. • Certification by a principal executive officer or ranking elected official for a municipality, state, federal, or other public agency. 	<p>270.11</p>	<p>373-1.4(a)</p>		

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