KEY (for internal Agency use only)
▶ = Permitting/Corrective Action
▶ = Engineering
▶ = Chemistry
▶ = Financial Assurance
▶ = Geology

HAZARDOUS WASTE "PART B" OPERATING PERMIT APPLICATION
BASE CHECKLIST

Provide each of the following sections as Permit Application Attachments (i.e., Attachment A, Attachment B, etc.). Insert applicable Permit Application Modules where indicated (e.g., where it states, "reserved for container module," insert the corresponding container module item).

A. ▶ ▶ ▶ **PART A APPLICATION** 329 IAC 3.1-13-3, 40 CFR 270.11(a) and (d), 270.13

To help expedite the review process, please submit the following with the permit application (completed and signed):

Federal Form 8700-12 RCRA Subtitle C Site Identification Form
Federal Form 8000-23 Hazardous Waste Permit Part A Form

B. ▶ ▶ **FACILITY DESCRIPTION**

B-1 General Description: 40 CFR 270.14(b)(1)

Provide a brief description of the facility, including the nature of the business. Off-site facilities should identify the types of industries served; on-site facilities should briefly describe the process(es) involved in the generation of hazardous waste.

B-2 Topographic Map 40 CFR 270.14(b)(19)

B-2(a) General Requirements

Submit a topographic map that shows the facility and a distance of 1,000 feet around it at a scale of 1 inch equal to not more than 200 feet. The map must include contours sufficient to show surface water flow in the vicinity of and from each operational unit (e.g., contours 5 feet if relief is greater than 20 feet; contours of 2 feet if the relief is less than 20 feet). The map must include map date, 100-year floodplain area, surface waters, surrounding land uses, a wind rose, map orientation, and legal boundaries of facility site. The map must also indicate the location of access control, injection, and withdrawal wells, buildings, structures, sewers (storm, sanitary and process), loading and unloading areas, fire control facilities, flood control or drainage barriers, run-off control systems, and (proposed) new and existing hazardous waste management units and solid waste management units.

Note: Multiple maps may be submitted, but all must be at a scale of 1 inch equal to not more than 200 feet.

B-2(b) [Reserved for landfill module.]

B-3 **Floodplain Standard:** 40 CFR 270.14(b)(11)(iii), 264.18(b)

Is the facility located within a 100-year floodplain? Identify the source (FEMA Flood Map Service Center or equivalent maps and calculations).

If yes, continue with checklist items B3(a).
If no, mark B-3 as not applicable, delete B3(a-b), then skip to B4.

B-3(a) Demonstration of Compliance: 40 CFR 270.14(b)(11)(iv), 264.18(b)

For facilities located within the 100-year floodplain, describe how the facility is designed, constructed, operated, and maintained to prevent washout of any hazardous waste during a flood:

B-3b(1) Flood Proofing and Flood Protection Measures:
40 CFR 270.14(b)(11)(iv)(A) and (B)

Provide a structural or other engineering study indicating the various hydrodynamic and hydrostatic forces expected in a 100-year flood and showing how the design of the hazardous waste units and the flood proofing and protection devices at the facility will prevent washout; or

B-3b(2) Flood Plan: 40 CFR 270.14(b)(11)(iv)(C)

Describe the procedures to be followed to remove hazardous waste to safety before the facility is flooded, including timing related to flood levels, estimated time to move the waste, the location to which the waste will be moved, demonstration that those facilities will be eligible to receive hazardous waste, the planned procedures, equipment, and personnel to be used, and the potential for accidental discharge of the waste during movement.

B-3b(2) Plan for Future Compliance with Floodplain Standard: 40 CFR 270.14(b)(11)(v)

For facilities located within the 100-year floodplain that do not comply with the floodplain standard, specify how and when the facility will be brought into compliance.

B-3b(3) ▶ Waiver for Land Storage and Disposal Facilities: 40 CFR 264.18(b)

To apply for a waiver from the flood proofing and flood plain requirements, demonstrate that procedures are in effect to safely remove the waste before flood waters can reach the facility. Note that waste must be moved to a facility that is permitted by IDEM to handle hazardous waste. Demonstrate that washout of land based units will not result in adverse effects to human health or the environment. Take into account the volume and chemical and physical characteristics of the waste; the concentration of hazardous constituents that could potentially effect surface waters and the impact on current or potential uses of and water quality standards established for potentially affected surface waters; and the impact of hazardous constituents on the sediments of potentially affected surface waters and the soils of the 100-year floodplain.

B-4 Traffic Information: 40 CFR 270.14(b)(10)

Provide the following traffic-related information:

- Traffic patterns on-site;
- Estimated volumes, including number and types of vehicles;
- Traffic control signs, signals, and procedures;
- Adequacy of access roadway surfaces and load-bearing capacity for expected traffic on-site.

C. ▶ WASTE CHARACTERISTICS

The following link to guidance is for informational purposes only. Please do not include guidance with the permit application submittal.

Waste Analysis Plan Guidance

C-1 Chemical and Physical Analyses: 40 CFR 270.14(b)(2), 264.13(a), 266.102(a)(2)(ii), 266.102(b)

For each hazardous waste and hazardous debris stored, treated or disposed at the facility, describe the waste, the process generating the waste (in order to determine listed wastes or characterizations based on process knowledge), the hazard characteristics (including EPA Hazardous Waste Number and the classification for the Land Disposal Restriction regulations as wastewater or non-wastewater), and the basis for hazard designation. Provide a laboratory report detailing the chemical and physical analyses of representative samples of the waste streams. The laboratory report must include the quality assurance/quality control (QA/QC) information necessary to validate the data. Additional guidance for providing analytical results and QA/QC may be found in IDEM's "Solid & Hazardous Waste Programs Analytical Data Deliverable Requirements: Supplemental Guidance." (Microsoft Word - SW HW Deliverables Guidance 2022) Also refer to: Hazardous Waste Test Methods / SW-846 | US EPA.
At a minimum, the analyses must include all the information that must be known to treat, store, or dispose of the waste in accordance with 40 CFR 264 and 268 requirements or conditions of a permit issued under 40 CFR 270.

C-1a [Reserved for container module.]

C-1b [Reserved for tank module.]

C-1c [Reserved: waste piles]

C-1d [Reserved for landfill module.]

C-1e [Reserved for incinerator module.]

C-1f [Reserved: land treatment]

C-1g [Reserved: miscellaneous treatment unit]

C-1h [Reserved for BIF module.]

C-2 Waste Analysis Plan: 40 CFR 270.14(b)(3), 264.13(b) and (c), 266.102(a)(2)(ii), 266.104(a)(2), 268.7

Provide a copy of the waste analysis plan that describes the methodologies for conducting the analyses required to properly treat, store, or dispose of hazardous wastes and to comply with the land disposal restriction program. Guidance for developing a Waste Analysis Plan may be found in "Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes," EPA, April 2015.

C-2a Parameters and Rationale: 40 CFR 264.13(b)(1)

Provide a list of parameters used to initially characterize each waste stream and provide the rationale for the parameter selection. Indicate the acceptance criteria for each waste stream.

Provide a list of fingerprint parameters used to analyze off-site wastes received at the facility and the rationale for the parameter selection. The fingerprint analyses should indicate that wastes received at the facility are consistent with the waste stream characterization and waste manifests. Provide the fingerprint acceptance criteria for wastes received at the facility.

C-2b Test Methods: 40 CFR 264.13(b)(2)

Identify and reference (e.g., EPA method number) the test methods used to test for the parameters chosen.

Provide a complete Quality Assurance Project Plan (QAPP) for the Waste Analysis Plan. Guidelines for developing the QAPP are found in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Chapter One.

C-2c Sampling Methods: 40 CFR 264.13(b)(3), Part 261 Appendix I, Part 266 Appendix IX

Identify and reference (e.g., ASTM/SW-846) the specific sampling methods used to obtain a representative sampling of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste. Indicate the decontamination procedures for sampling equipment.

Indicate the sample preservation procedures, sample containers, and holding times. Describe the chain-of-custody procedures.

C-2d Frequency of Analyses: 40 CFR 264.13(a)(3), 264.13(b)(4)

Describe the frequency at which the waste stream will be characterized. The waste streams should be characterized, at a minimum, when the generating processes change, when the waste streams change, or annually.

C-2e Additional Requirements for Wastes Generated Off-Site: 40 CFR 264.13(b)(5) and (c), 264.73(b)

Describe the procedures used to inspect and/or analyze a representative portion of wastes generated off-site for fingerprint parameters. Describe the statistical method used to determine a representative sample of the incoming wastes (e.g., discrete samples will be taken from a minimum of ten percent of incoming containers and one from each rail car or tanker). Indicate how the samples will be representative of the wastes.

C-2f Additional Requirements for Ignitable, Reactive, or Incompatible Wastes:

40 CFR 264.13(b)(6), 264.17

Describe the methods used to meet additional waste analysis requirements necessary for treating, sorting, or disposing of ignitable, reactive or incompatible wastes. Provide the procedures for determining the compatibility of wastes and for separating incompatible wastes.

Waste compatibility guidance may be found in "A Method for Determining the Compatibility of Hazardous Wastes," EPA/600/2-80-076, April 1980.

C-2g [Reserved for BIF module.]

C-2h [Reserved for Containment Building module.]

C-3 Waste Analysis Requirements Pertaining to Land Disposal Restrictions:
40 CFR 262.10, 262.11, 264.13, 264.73, 266.102(a)(2)(ii), 268, 270.14(b)(3)

C-3a Waste Analysis: 40 CFR 261.21 through 261.24, 264.13(a)(1), 268.1, 268.7, 268.9, 268.32 through 268.37, 268.41 through 268.43

For each hazardous waste or each waste treatment residue stored, treated, or disposed at the facility, provide analytical data necessary to determine whether the waste is a restricted waste and whether the waste is being managed properly under the land disposal requirements of 40 CFR 268. Wastes must be characterized by their treatability group (i.e., wastewater or non-wastewater) as defined in 40 CFR 268.2(d) and 268.2(f), and if applicable, by their subcategory within a treatability group (e.g., D003 reactive cyanides). Because treatment standards have been established for both listed and characteristic wastes, treatment, storage and/or disposal facilities that land dispose of restricted wastes are required to determine if the listed wastes also exhibit a hazardous waste characteristic. Process knowledge can be used to determine whether a waste is restricted, but this knowledge must be documented.

For treatment facilities, the waste analysis plan must provide procedures (sampling, analytical, frequency of analysis) for testing wastes or an extract of the waste for compliance with land disposal restrictions.

For land disposal facilities, the owner/operator must provide procedures for testing the waste or treatment residue to demonstrate that land disposed waste complies with applicable prohibitions. The waste analysis plan must present sampling and analytical procedures as well as specify the frequency of analysis.

Wastes that do not meet the treatment standards specified in 40 CFR 268 are prohibited from land disposal unless (1) a national capacity variance has been

granted, (2) an exemption pursuant to 40 CFR 268.6 has been granted, (3) a case-by-case extension has been granted pursuant to 40 CFR 268.5, or (4) a treatability variance has been granted pursuant to 40 CFR 268.44.

C-3a(1) Spent Solvent and Dioxin Wastes: 40 CFR 264.13(a)(1), 268.2(i), 268.40(f), 268.7, 268.31

Describe procedures that will be used to determine whether F001-F005 spent solvent wastes and F020-F023 and F026-F028 dioxin-containing wastes meet the applicable treatment standards or to determine that the waste has been treated by the appropriate specified treatment technology. Process knowledge can be used to make this determination, as appropriate.

C-3a(2) [Reserved: formerly California List Wastes]

C-3a(3) Listed Wastes: 40 CFR 264.13(a)(1), 268.7, 268.33, 268.34, 268.35, 268.36, 268.41, 268.42, 268.43

Describe procedures that will be used to determine whether a listed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. Process knowledge can be used to make this determination, as appropriate. Where treatment standards are based on concentrations in the waste extract (see 40 CFR 268.41), generators and treatment, storage and/or disposal facilities must use TCLP to determine if their waste meets treatment standards. However, arsenic-containing non wastewaters (K031, K084, K101, K102, P010, P011, P012, P036, P038 and U136) may also use the EP toxicity test to determine compliance with treatment standards.

C-3a(4) Characteristic Wastes: 40 CFR 261.3(d)(1), 264.13 (a)(1), 268.7, 268.9, 268.37, 268 Appendix I, 268 Appendix IX

Describe procedures that will be used to determine whether a characteristic waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. Process knowledge can be used to make this determination. Where treatment standards are based on concentration in the waste extract (see 40 CFR 268.41), generators must use TCLP to determine if their wastes meet treatment standards. However, characteristic D008 lead non wastewaters and D004 arsenic non wastewaters may also use the EP toxicity test to determine compliance with treatment standards.

Describe the procedures that will be used to identify the underlying hazardous constituents that are expected to be present in D001 or D002 wastes, as specified in 40 CFR 268.9(a).

Indicate that if, after treatment, a hazardous waste displays a characteristic for the first time, the characteristic waste code will be added to the land disposal notification form and facility records. Describe procedures to make this determination. Indicate wastes will be re-treated, as appropriate, in order to meet characteristic treatment standard prior to land disposal.

C-3a(5) Radioactive Mixed Waste: 40 CFR 268.7, 268.35(c), 268.35(d), 268.36, 268.42(d)

Radioactive mixed wastes are regulated under both RCRA and the Atomic Energy Act. Prior to land disposal, the hazardous waste constituents of mixed waste must comply with the appropriate treatment standards listed in 40 CFR 268.41, 268.42, and Table 2 of 268.43. A subset of radioactive mixed wastes listed in Table 3 of 40 CFR 268.42 are subject to the specific treatment standards identified in Table 3. Hazardous debris is containing radioactive wastes are not subject to the treatment standards of Table 3 but must comply with the treatment standards specified in 40 CFR 268.45.

Describe procedures that will be used to determine whether a mixed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by an appropriate specified treatment technology. Process knowledge can be used to make this determination, as appropriate.

C-3a(6) [Reserved for tank, container, landfill modules.]

C-3a(7) [Reserved for container module.]

C-3a(8) Contaminated Debris: 40 CFR 268.2(g), 268.7, 268.9, 268.36, 268.45, 270.13(n)

Identify the hazardous debris category or categories (i.e., glass, metal, plastic, rubber, brick, cloth, concrete, paper, pavement, rock, wood) and the contaminant category or categories (i.e., toxicity characteristic, contaminated with listed wastes, cyanide reactive debris) associated with type of hazardous debris.

Identify how hazardous debris will be managed. Prior to land disposal the hazardous debris must be treated according to standards provided in 40 CFR 268.45 (except that debris contaminated with wastes having a specified treatment technology listed in 40 CFR 268.42 must be treated as required in 268.42). Alternatively, the hazardous debris may be treated to meet the existing treatment standards for each waste constituent specified in 40 CFR 268.41, 268.42 and 268.43. Note the hazardous debris that exhibits the characteristics of ignitability, corrosivity, or reactivity must be treated using one of the extraction, destruction, or immobilization technologies identified in Table 1 of 40 CFR 268.45.

C-3a(9) Waste Mixtures and Wastes with Overlapping Requirements: 40 CFR 264.13(a), 268.7, 268.41(b), 268.43(b), 268.45(a)

Describe the procedures that will be used to demonstrate that waste mixtures and wastes carrying multiple waste codes are properly characterized and meet treatment standards prior to land disposal. Wastes that carry more than one characteristic or listed waste code must be treated to the most stringent treatment requirement for each hazardous waste constituent of concern prior to land disposal.

When wastes with differing treatment standards are combined solely for purposes of treatment, indicate that the most stringent treatment standard specified will be met for each constituent of concern in the combined waste prior to land disposal.

C-3a(10) Dilution and Aggregation of Wastes: 40 CFR 268.3

Facilities that perform dilution or aggregation of hazardous wastes must demonstrate that these activities are not in violation of land disposal regulations. Listed wastes, if destined for land disposal, may never be diluted. Characteristic wastes that are not toxic (i.e., D001 through D003) may be diluted. Characteristic wastes that are toxic (i.e., D004 through D043) may be diluted only if: (1) the waste is to be underground injected and the characteristic is to be removed prior to injection, (2) the waste has a concentration-based and not a technology-based treatment standard, is not a D003 reactive waste, and is being treated in a system pursuant to the Clean Water Act, or (3) the waste is not destined for land disposal.

A facility cannot dilute or partially treat a listed waste to switch treatability categories (e.g. switch from non-wastewater to wastewater), to comply with different treatment standards. Note that IDEM does not consider dewatering technologies (i.e., filtration, centrifugation, etc.) that produce a wastewater fraction and a non-wastewater fraction to be impermissible category switching.

Aggregation of wastes for treatment is not considered impermissible dilution, if wastes are all legitimately amenable to the same type of treatment to be performed.

C-3b Notification, Certification, and Recordkeeping Requirements: 40 CFR 264.73, 268.7, 268.9(d)

The waste analysis plan must present procedures for preparing and/or maintaining applicable notifications and certifications to comply with land disposal restrictions. A treatment facility that generates treatment residues must prepare applicable notifications and certifications. Any facility receiving wastes from off-site must provide procedures in the waste analysis plan for ensuring proper certifications are submitted prior to accepting land disposal restricted wastes.

C-3b(1) Retention of Generator Notices and Certifications: 40 CFR 268.7(a)

The owner/operator of a treatment, storage or disposal facility managing any waste subject to land disposal restrictions must demonstrate that the following notices and certifications submitted by the initial generator of the waste will be re-reviewed and maintained:

- Notices of restricted wastes not meeting treatment standards or RCRA Section 3004(d), including the information listed in 40 CFR 268.7(a)(1).
- Notices of restricted wastes meeting applicable treatment standards and prohibition levels, including the information in 40 CFR 268.7(a)(2).
- Notices of waste receiving a case-by-case extension under 40 CFR 268.5, and exemption under 268.6, or a nationwide variance, including the information in 268.7(a)(3).

C-3b(2) Notification and Certification Requirements for Treatment Facilities: 40 CFR 268.7(b)

The treatment facility must submit a notice and certification to the land disposal facility with each shipment of restricted waste or treatment residue of a restricted

waste. The notice must include the information listed in 40 CFR 268.7(b)(4) and 268.7(b)(5).

If the waste or treatment residue will be further managed at a different treatment or storage facility, the facility sending the waste or treatment residue off-site must comply with the notice and certification requirements applicable to generators, as specific in 40 CFR 268.7(a).

C-3b(3) [Reserved for landfill module.]

C-3b(4) Wastes Shipped to Subtitle C Facilities: 40 CFR 268.7(a), 268.7(b)(6)

For restricted wastes or waste treatment residues that will be further managed at a Subtitle C (hazardous waste management) facility, the owner/operator of the facility shipping the waste off-site must submit notifications and certifications in compliance with the notice and certification requirements applicable to generators under 40 CFR 268.7(a). Each shipment of waste that is to be transported off-site to a RCRA permitted Subtitle C treatment, storage, and/or disposal facility, must include a written notification and certification that the waste either meets or does not meet applicable treatment standards or prohibition levels.

C-3b(5) Wastes Shipped to Subtitle D Facilities: 40 CFR 268.7(d), 268.9(d)

A one-time notification and certification is required for characteristic wastes (or listed wastes that are listed only because they exhibit a characteristic) that have been treated to remove the hazardous characteristic and are no longer considered hazardous. The owner/operator must place a certification (and all treatment records) in the facility's files and send a notification and certification to IDEM describing the wastes and applicable treatment standards and identifying the Subtitle D (solid waste management) disposal facility receiving the waste. On an annual basis, the notification and certification must be updated and refiled if the process or operation generating the waste and/or if the Subtitle D facility receiving the waste changes.

A one-time notification and certification is required for hazardous debris that has been treated by an extraction or destruction technology provided by Table 1 of 40 CFR 268.45 or debris that IDEM has determined does not contain hazardous waste. The notification and certification must be placed in the facility's operating record and must be sent to IDEM identifying the Subtitle D facility receiving the waste, a description of the hazardous debris as initially generated including EPA waste ID numbers; and the technology used to treat the debris. This notice must be updated whenever the facility accepting the debris, the type of debris, or the type of treatment technology changes.

C-3b(6) Recyclable Materials: 40 CFR 268.7(b)(6)

For waste that are recyclable materials used in a manner constituting disposal, in accordance with 266.20(b), the owner/operator of a storage or treatment facility must submit a notice and certification to IDEM with each shipment of waste describing the waste and applicable treatment standards and identifying the facility receiving the waste product.

C-3b(7) Recordkeeping: 40 CFR 264.73, 268.7(a)(5), 268.7(a)(6), 268.7(a)(7), 268.7(d)

Treatment, storage, and/or disposal facilities that manage wastes generated on-site (1) determine if the waste is restricted from land disposal and keep documentation of that determination, and (2) maintain documentation to indicate where restricted wastes were treated, stored, and/or disposed.

Facilities managing wastes generated on-site that use only process knowledge to determine compliance with land disposal restrictions, must retain all data used to make this determination. If the owner/operator tests a representative sample of the waste to determine compliance with land disposal restrictions, all waste analysis data must be retained on-site in the facility's files.

The owner/operator of a treatment, storage and/or disposal facility managing any waste subject to land disposal restrictions must demonstrate that all notifications and certifications submitted by waste generators or other treatment, storage and/or disposal facilities will be reviewed and will be maintained as part of the operating record until closure of the facility, in accordance with recordkeeping requirements of 40 CFR 264.73.

Land disposal facilities are required to keep records of the quantities and date of placement of each shipment of waste placed in a land disposal unit under an extension to the effective date of any land disposal restriction pursuant to 40 CFR 268.5, or a no-migration petition pursuant to 268.6.

Recycling facilities must keep records of the name and location of each entity receiving a hazardous waste derived product.

Facilities managing a restricted waste that is excluded from the definition of a hazardous or solid waste or exempt from Subtitle C regulations, must place a one-time notice in the facility files describing the generation, basis for exclusion or exemption, and disposition of the waste. (Exclusions and exemptions are detailed in 329 IAC 3.1-6-2, 40 CFR 261.2 through 261.6.) For each shipment of treated debris, the owner/operator must place a certification of compliance with applicable treatment standards in the facility's files.

C-3c Requirements Pertaining to the Storage of Restricted Wastes: 40 CFR 268.50

The owner/operator of a treatment, storage and/or disposal facility storing hazardous wastes that are restricted from land disposal must demonstrate that (1) they are storing such wastes in tanks, containers, or containment buildings on-site and (2) such storage is solely for the purpose of accumulating sufficient quantities of waste to facilitate proper treatment, recovery, or disposal.

If prohibited wastes are stored beyond one year, the owner/operator has the burden of proving, in the event of an enforcement action, that storage is for allowable reasons. Prior to one year, IDEM maintains the burden of proving that storage has occurred for the wrong reason.

Storage requirements do not apply to restricted wastes that:

- Meet the applicable treatment standards; or
- Have received a nationwide variance; or

- Have received an exemption under 268.6; or
- Have received a case-by-case extension under 268.5

C-3c(1) [Reserved for container module.]

C-3c(2) [Reserved for tank module.]

C-3c(3) Storage of Liquid PCB Wastes: 40 CFR 268.50(f)

If liquid hazardous waste containing concentrations of PCBs greater than or equal to 50 ppm will be stored at the facility, the owner/operator must demonstrate that the facility meets the requirements of 40 CFR 761.65(b). The owner/operator must describe procedures for removal of these wastes from storage within one year and treatment or disposal of the wastes in compliance with land disposal restrictions.

C-3d Exemptions, Extensions, and Variances to Land Disposal Restrictions

C-3d(1) Case-by-Case Extensions to an Effective Date: 40 CFR 268.5, 270.14(b)(21), 329 IAC 3.1-12-2, 3.1-5-6

The owner/operator of a treatment, storage and/or disposal facility requesting an extension to the effective date of any restriction in Subpart C of 40 CFR 268 must submit an application to the Regional Administrator containing the information and certification described in 40 CFR 268.5(a) and 268.5(b). If a case-by-case extension has been approved under 40 CFR 268.5, the owner/operator must submit a copy of the notice of approval.

C-3d(2) Exemption from Prohibition: 40 CFR 268.6, 270.14(b)(21), 329 IAC 3.1-12-2, 3.1-5-6

The owner/operator of a treatment, storage and/or disposal facility requesting an exemption from a prohibition for the disposal of a restricted waste in a particular unit or units must submit a petition to the Regional Administrator demonstrating that there will be no migration of hazardous constituents from the disposal unit(s) or injection zone for as long as the waste remains hazardous. The petition must include the demonstration and certification specified in 40 CFR 268.6(a) through 268.6(d). If a petition has been approved under 40 CFR 268.6, the owner/operator must provide a copy of the notice of approval.

C-3d(3) Variance from a Treatment Standard: 40 CFR 268.44, 329 IAC 3.1-12-2, 3.1-5-6

A treatment facility may petition the Regional Administrator for a site-specific variance from a specific treatment standard if a waste cannot be treated to the specified level or if the treatment technology is not appropriate to the waste. The applicant must demonstrate that, because the physical or chemical properties of the waste differ significantly from wastes analyzed in developing the treatment standard, the waste cannot be treated to specified levels or by the specified methods. The variance petition must establish alternative treatment standard(s).

D. **PROCESS INFORMATION**

Insert relevant unit-specific modules:

Container Module
Tank Module
Landfill Module
Land Treatment Module
Miscellaneous Unit Module
Incinerator Module
Boilers and Industrial Furnace (BIF) Module
Containment Building Module

E. **GROUNDWATER MONITORING**

Groundwater Monitoring Module is for facilities with a groundwater monitoring program.

F. ▶ ▶ **PROCEDURES TO PREVENT HAZARDS**

F-1 Security: 40 CFR 264.14, 270.14(b)(4)

F-1a Security Procedures and Equipment: 40 CFR 270.14(b)(4), 264.14

Unless a waiver is granted, the facility must have **either** a 24-hour surveillance system **or** a barrier **and** a means to control entry.

F-1a(1) 24-Hour Surveillance System: 40 CFR 264.14(b)(1)

Demonstrate that the facility has 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; **or**

F-1a(2)(a) Barrier: 40 CFR 264.14(b)(2)(i)

Demonstrate that the facility has 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; **and**

F-1a(2)(b) Means to Control Entry: 40 CFR 264.14(b)(ii)

A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility).

F-1a(3) Warning Signs: 40 CFR 264.14(c)

The facility must have a sign with the legend, "Danger - Unauthorized Personnel Keep Out," that 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 this 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 feet. 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.

F-1b Waiver: 40 CFR 264.14(a)

If a waiver of the security procedures and equipment requirements is requested, the owner or operator must demonstrate the following:

F1b(1) Injury to Intruder: 40 CFR 264.14(a)(1)

Physical contact with the waste, structure, or equipment within the active portion of the facility will not injure unknowing or unauthorized people or livestock that may enter the active portion of a facility; **and**

F-1b(2) Violation Caused by Intruder: 40 CFR 264.14(a)(2)

Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility will not cause a violation of the requirements of this part.

F-2 Inspection Schedule: 40 CFR 264.15, 270.14(b)(5)

F-2a General Inspection Requirements: 40 CFR 270.14(b)(5), 264.15(a) and (b), 264.33

Describe the facility schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards. The schedule must be kept at the facility.

F-2a(1) Types of Problems: 40 CFR 264.15(b)(3)

The schedule must identify the types of problems to look for during the inspection.

F-2a(2) Frequency of Inspections: 40 CFR 264.15(b)(4)

Describe the frequency of inspection 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, and major features of the site (such as dikes, retention pond conditions, storage conditions, application rates and general site appearance) must be inspected daily when in use.

F-2b(1) [Reserved for container module.]

F-2b(2) [Reserved for tank module.]

F-2b(3) [Reserved: formerly for waste piles]

F-2b(4) [Reserved: formerly for surface impoundments]

F-2b(5) [Reserved for incinerator module.]

F-2b(6) [Reserved for landfill module.]

F-2b(7) [Reserved for land treatment module.]

F-2b(8) [Reserved for miscellaneous unit module.]

F-2b(9) [Reserved for BIF module.]

F-2b(10) [Reserved for containment building module.]

F-3 Waiver of Documentation of Preparedness and Prevention Requirements: 40 CFR 270.14(b), 264.32(a) through 264.32(d)

F-3a Equipment Requirements: 40 CFR 270.14(b), 264.32

All facilities must be equipped with the following, unless it can be demonstrated that none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

F-3a(1) Internal Communications: 40 CFR 264.32(a)

Describe the internal communications or alarm system used to provide immediate emergency instruction (voice or signal) to facility personnel.

F-3a(2) External Communications: 40 CFR 264.32(b)

Describe the device, such as a telephone (immediately available at the scene of operations) or a hand held two-way radio, for summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

F-3a(3) Emergency Equipment: 40 CFR 264.32(c)

Demonstrate that portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment are available at the facility.

F-3a(4) Water for Fire Control: 40 CFR 264.32(d)

Demonstrate that the facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

F-3b Aisle space Requirements: 40 CFR 264.35

Demonstrate that the facility maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency. Requests for a waiver of the aisle space requirements must be accompanied by a demonstration that aisle space is not needed for any, or all, of these purposes.

F-4 Preventive Procedures, Structures, and Equipment: 40 CFR 270.14(b)(8)

F-4a Unloading Operations: 40 CFR 270.14(b)(8)(i)

Describe the procedures, structures, or equipment used to prevent hazards in unloading operations (e.g., use of ramps or special forklifts).

F-4b Run-off: 40 CFR 270.14(b)(8)(ii)

Describe the procedures, structures or equipment used to prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or prevention of flooding (e.g., berms, dikes, trenches).

F-4c Water Supplies: 40 CFR 270.14(b)(8)(iii)

Describe procedures, structures, or equipment to prevent contamination of water supplies.

F-4d Equipment and Power Failure: 40 CFR 270.14(b)(8)(iv)

Describe the procedures, structures, or equipment used to mitigate the effects of equipment failure and power outage.

F-4e ▶ Personnel Protective Equipment: 40 CFR 270.14(b)(8)(v)

Describe the procedures, structures, or equipment used to prevent undue exposure of personnel to hazardous waste (e.g., protective clothing).

F-5 ▶ Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste: 40 CFR 270.14(b)(9)

F-5a ▶ Precaution to Prevent Ignition or Reaction of Ignitable or Reactive Waste: 40 CFR 270.14(b)(9), 264.17(a)

Describe the precautions taken by a facility that handles ignitable or reactive waste 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 reaction), and radiant heat. Demonstrate that when ignitable or reactive waste is being handled, the owner or 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.

F-5b ▶ General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste: 40 CFR 270.14(b)(9), 264.17(b)

Describe 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 that: (1) generate extreme heat of 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.

F-5c, F-5d [Reserved for container module.]

F-5e, F-5f [Reserved for tank module.]

F-5g, F-5h [Reserved: waste piles.]

F-5i, F-5j [Reserved: surface impoundments.]

F-5k, F-5l [Reserved for landfill module.]

F-5m, F-5n [Reserved: land treatment.]

F-5o [Reserved for containment building module.]

G. ▶ CONTINGENCY PLAN
40 CFR 270.14(b)(7), 264.50 through 264.56, 264.52(b)

Provide a copy of the Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management to describe the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

G-1 General Information:

Provide the facility name and location, operator, site plan, and description of facility operations.

G-2 Emergency Coordinators: 40 CFR 264.52(d), 264.55

Provide names, address, office and home phone numbers, and duties of primary and alternate coordinators and statement of authorization of coordinator to commit necessary resources to plan.

G-3 Implementation: 40 CFR 264.52(a), 264.56(d), 329 IAC 3.1-9-2(3)

Describe how and when the contingency plan will be implemented.

G-4 Emergency Actions: 40 CFR 264.56

G-4a Notification: 40 CFR 264.56(a)

Describe the methodology for immediate notification of facility personnel and necessary state or local agencies.

G-4b ▶ Identification of Hazardous Materials: 40 CFR 264.56(b)

Describe procedures for identification of hazardous materials involved in the emergency.

G-4c Assessment: 40 CFR 264.56(c), 264.56(d), 329 IAC 3.1-9-2(3)

Describe the criteria used to assess the possible hazards to human health and the environment as a result of a fire, release, or explosion, and the need for evacuation and notification of authorities. The authorities to be notified should include the on-scene coordinator for that area or the National Response Center.

G-4d Control Procedures: 40 CFR 264.52(a)

Specify control procedures to be taken in the event of a fire, explosion, or release.

G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases: 40 CFR 264.56(e)

Describe the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, recur or spread to other hazardous waste at the facility.

G-4f Storage and Treatment of Released Material: 40 CFR 264.56(g)

Provide for treatment, storage, or disposal of any material that results from a release, fire, or explosion at the facility.

G-4g ▶ ▶ Incompatible Waste: 40 CFR 264.56(h)(1)

Describe provisions for prevention of incompatible waste from being treated, stored, or located in the affected areas until clean-up procedures are completed.

G-4h Post-Emergency Equipment Maintenance: 40 CFR 264.56(h)(2)

Describe procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

G-4i [Reserved for container module.]

G-4j [Reserved for tank module.]

G-4k [Reserved: surface impoundments.]

G-4l [Reserved for containment building leaks.]

G-5 Emergency Equipment: 40 CFR 264.52(e)

Describe the location and specifications of the emergency equipment.

G-6 Coordination Agreements: 40 CFR 264.52(c), 264.37

Describe the 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. Document refusal to enter into a coordination agreement.

G-7 Evacuation Plan: 40 CFR 264.52(f)

Describe signal(s) to be used to begin evacuation routes, and planned and alternate evacuation routes.

G-8 Required Reports: 40 CFR 264.56(j), 329 IAC 3.1-9-2(4)

Describe the provisions for submission of reports of emergency incidents within 15 days of occurrence, and maintenance of records identifying the time, date, and details of an emergency incident.

H. **PERSONNEL TRAINING**: 40 CFR 270.14(b)(12), 264.16

H-1 Outline of the Training Program: 40 CFR 264.16(a)(1)

Provide an outline of both the introductory and continuing training programs by owners or operators to prepare personnel to operate or maintain the facility in a safe manner. Include a brief description on how training will be designed to meet actual job tasks.

On-the-job training may be used to comply with these requirements.

H-1a Job Title/Job Description: 40 CFR 264.16(d)(1), 264.16(d)(2)

Provide the job title and job description of each employee whose position at the facility is related to hazardous waste management.

H-1b Training Content, Frequency, and Techniques: 40 CFR 264.16(c) and (d)(3)

Describe the content, frequency, and techniques used in both introductory and continuing training (including an annual review of the initial training) for each employee.

H-1c Training Director: 40 CFR 264.16(a)(2)

Demonstrate that the program is directed by a person trained in hazardous waste management.

H-1d Relevance of Training to Job Position: 40 CFR 264.16(a)(2)

Demonstrate that facility personnel are instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions.

H-1e Training for Emergency Response: 40 CFR 264.16(a)(3)

Demonstrate that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency system. The training program should include the following, if applicable:

- Procedures for Using, Inspecting, Repairing, and Replacing Facility Emergency and Monitoring Equipment;
- Key Parameters for Automatic Waste Feed Cut-off Systems;
- Communications or Alarm Systems;
- Response to Fires;
- Response to Groundwater Contamination Incidents; and
- Shutdown of Operations.

H-2 Implementation of Training Program: 40 CFR 264.16(b), (d)(4) and (e)

Indicate that training has been successfully completed by facility personnel within six months of their employment or assignment to the facility or transfer to a new position within the facility, whichever is later. 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.

I. CLOSURE PLANS, POST-CLOSURE PLANS, AND FINANCIAL REQUIREMENTS: 40 CFR 270.14(b)(13) and (15) through (18), 264.110 through 264.120, 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, and 264.351 and 329 IAC 3.1-15

I-1 ▶ Closure Plans: 40 CFR 270.14(b)(13), 264.112(a)(1) and (2)

Include a copy of a written closure plan consistent with I-1a through I-1g as applicable. The plan must include a description of how each hazardous waste management unit will be closed and a description of how final facility closure will be conducted. Describe the maximum extent of operations that will be left unclosed during the active life of the facility. Include maps of the facility and each unit to be closed.

Guidance for developing a Closure Plan may be found in IDEM's RCRA Closure and Corrective Action Program Guide (NPD #Waste-0015).

I-1a ▶ Closure Performance Standard: 40 CFR 264.111

Describe how closure:

- Minimizes the need for further maintenance;
- Controls, minimizes, or eliminates the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and
- Complies with the closure requirements of 40 CFR 264 Subpart G and unit-specific closure requirements.

I-1b ▶ Partial Closure and Final Closure Activities: 40 CFR 264.112(b)(1) through 264.112(b)(7)

Describe the time and all activities required for:

- Partial closure, if applicable;
- Final closure; and
- Maximum extent of operation that will be active during life of facility.

This description must identify how requirements of 40 CFR 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.

I-1c ▶ ▶ Maximum Waste Inventory: 40 CFR 264.112(b)(3)

Describe the maximum inventory of hazardous wastes that could be in storage, treatment, and disposal at any time during the active life of the facility. Provide a list of hazardous wastes managed at the facility and include their EPA hazardous waste code(s). Preferably, this list of waste codes should be in a table as an appendix to Attachment I. Describe the sequence in which units will be operated during the active life of the facility, and the order in which they will be closed.

I-1d ▶ Schedule for Closure: 40 CFR 264.112(b)(6)

Provide a schedule for closure of each hazardous waste management unit and for final closure of the facility. The schedule must include the total time required to close each hazardous waste management unit and the time required for intervening closure activities. This will allow tracking of the progress of closure. For facilities that use trust funds to establish financial assurance under 329 IAC 3.1-15-4(b) or 3.1-15-6(b), and that are expected to close prior to the expiration of the permit, provide an estimate of the expected year of final closure.

I-1(d)(1) ▶ Time Allowed for Closure: 40 CFR 264.112(b)(2), 264.113(a) and (b)

The schedule for closure must show:

- All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of the final volume of waste at the unit or facility; and
- All closure activities will be completed within 180 days from receipt of the final volume of waste at the unit or facility.

I-1d(1)(a) ▶ Extension for Closure Time: 40 CFR 264.113(a) and (b)

If the planned closure is expected to exceed the 90 days for treatment, removal or disposal of wastes and/or the 180 days for completion of closure activities, submit a petition for a schedule for closure that justifies that a longer period of closure time is required.

One of the following must be demonstrated:

- Closure activities require longer than 90 or 180 days;
- Unit or facility has capacity to receive additional wastes;
- There is a reasonable likelihood that another person other than owner or operator will recommence operation of the site within one year; and
- Closure would be incompatible with continued operation.

Demonstrate that all steps have and will be taken to prevent threats to human health and the environment from the unclosed but inactive facility.

I-1e ▶▶▶ Closure Procedures: 40 CFR 264.112, 264.114

I-1e(1) ▶▶ Inventory Removal: 40 CFR 264.112(b)(3)

Discuss methods for removing, transporting, treating, storing or disposing of all hazardous wastes and identify the type(s) of off-site hazardous waste management units to be used.

I-1e(2) ▶▶▶ Disposal or Decontamination of Equipment, Structures, and Soils: 40 CFR 264.112(b)(4), 264.114

Associated with the closure of each hazardous waste management unit, provide a detailed description of the steps needed to decontaminate or dispose of all facility equipment and structures. The following must be included:

- List of equipment, structures, and soils;
- Decontamination procedures;
- Criteria for determining decontamination;
- Disposal of contaminated soil and residues;
- Decontamination of clean-up materials and equipment;
- Sampling procedures;
- Analytical methods and their expected quantitation limits; and
- Demonstration that decontamination has been effective.

Demonstrate that any hazardous constituents (i.e., 40 CFR 261 Appendix VIII) left at the unit will not impact any environmental media in excess of Agency-established exposure levels and that direct contact will not pose a threat to human health and the environment.

Provide a complete Quality Assurance Project Plan (QAPP) for the Closure Plan. Guidelines for developing the QAPP are found in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Chapter One.

Indicate that analytical results submitted to the IDEM will include the reportables listed in IDEM's "Solid & Hazardous Waste Programs Analytical Data Deliverable Requirements: Supplemental Guidance."

I-1e(3) [Reserved for closure in place units and contingent (tank, surface impoundment, waste pile, Subpart X) closures.]

I-1e(4) [Reserved for container module.]

I-1e(5) [Reserved for tank module.]

I-1e(6) [Reserved: waste piles.]

I-1e(7) [Reserved: surface impoundments.]

I-1e(8) [Reserved for incinerator module.]

I-1e(9) [Reserved for landfill module.]

I-1e(10) [Reserved: land treatment.]

I-1e(11) [Reserved for miscellaneous unit module.]

I-1e(12) [Reserved for BIF module.]

I-1e(13) [Reserved for containment building module.]

I-2 [Reserved for landfill module, miscellaneous unit module and other units requiring post-closure.]

I-3 [Reserved for landfill module and other units requiring post-closure.]

I-4 ▶▶▶ Closure Cost Estimate: 329 IAC 3.1-15-3

Provide a copy of the most recent closure cost estimate, considering the following factors:

- The estimate must equal the cost of final closure at the point at which facility closure would be most costly;
- The cost estimate must be based on having a third party close the facility;
- The estimate may use costs of on-site disposal if capacity will exist at all times over the life of the facility;
- The estimate may not incorporate salvage value realized from the site of hazardous wastes, facility structures/equipment, land, or other facility assets;
- The estimate may not assume zero costs for handling of hazardous wastes with potential economic value; and
- The cost estimate must be adjusted annually for inflation pursuant to 329 IAC 3.1-15-3(b).

The closure cost estimate should include costs for the following activities:

- Removal of waste inventory;

- Decontamination and/or removal of facility equipment;
- Disposal of wash water/cleaning waste;
- Sampling and analysis;
- Restoration of facility equipment and site;
- Certification of closure;
- Remediation of contaminated soil;
- Disposal of facility equipment; and
- Contingency fee (10 - 25% depending on unit type and number).

I-5 ▶ Financial Assurance Mechanism for Closure and Corrective Action
329 IAC 3.1-15-4

The financial assurance mechanism(s) must cover the closure and/or corrective action cost estimate and must be worded as required by 329 IAC 3.1-15-10. Indicate which of the following mechanism(s) are used to demonstrate financial assurance and provide a copy of the established mechanism(s). **Options listed below with an asterisk require a standby trust agreement.**

(If using multiple financial mechanisms, refer to 329 IAC 3.1-15-4(h). If using a financial mechanism for multiple facilities, refer to 329 IAC 3.1-15-4(i).)

a. Trust Fund: 329 IAC 3.1-15-4(b), 3.1-15-10(a)

b. *Surety Bond Guaranteeing Payment: 329 IAC 3.1-15-4(c), 3.1-15-10(b)

c. *Surety Bond Guaranteeing Performance: 329 IAC 3.1-15-4(d), 3.1-15-10(c)

d. *Letter of Credit: 329 IAC 3.1-15-4(e), 3.1-15-10(d)

e. Insurance: 329 IAC 3.1-15-4(f), 3.1-15-10(e)

f. Financial Test: 329 IAC 3.1-15-4(g), 3.1-15-10(f)

g. Corporate Guarantee: 329 IAC 3.1-15-4(g)(10), 3.1-15-10(f, h)

I-6 [Reserved for landfill module and other units requiring post-closure financial assurance.]

I-7 [Reserved for landfill module and other units requiring post-closure financial assurance.]

I-8 ▶ Liability Requirements: 329 IAC 3.1-15-8

Provide copies of the required items documenting compliance with applicable liability requirements for sudden accidental occurrences (all TSDFs) and non-sudden accidental occurrences (land disposal units).

I-8a ▶ Coverage for Sudden Accidental Occurrences: 329 IAC 3.1-15-8(a),

For hazardous waste treatment, storage, or disposal facilities, liability coverage must be maintained for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million. From

the following list, indicate which option(s) are utilized to demonstrate liability coverage for sudden accidental occurrences:

____ Endorsement of Certification: 329 IAC 3.1-15-8(a)(1), 3.1-15-10(i)

____ Certificate of Liability Insurance: 329 IAC 3.1-15-8(a)(1), 3.1-15-10(j)

____ Financial Test: 329 IAC 3.1-15-8(e)

____ Corporate Guarantee: 329 IAC 3.1-15-8(f)

[Other options under 329 IAC 3.1-15-8 are not commonly utilized. If permittee wishes to utilize one of these other options, please contact the permit manager.]

I-8b [Reserved for landfill module and other units requiring non-sudden liability coverage.]

J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

[Note: Section E should be used for review of groundwater monitoring and related corrective actions for regulated landfills, surface impoundments, waste piles, and land treatment units. For corrective actions at other solid waste management units, use Section J.]

J-1 ▶ Solid Waste Management Units: 40 CFR 270.14(d)(1), 264.101

Identify all solid waste management units at the facility including hazardous and non-hazardous waste units, as well as active and inactive units, if known. Examples of a solid waste management units include:

- Landfill;
- Surface impoundment;
- Waste pile;
- Land treatment unit;
- Tank (including 90-day accumulation tank);
- Injection well;
- Incinerator;
- Wastewater treatment tank;
- Container storage area;
- Waste handling area;
- Transfer station; and
- Waste recycling operations.

J-1a ▶ ▶ ▶ Characterize the Solid Waste Management Unit

For each solid waste management unit, submit the following information:

- Type of each unit;
- Location of each existing or closed unit on the topographic map. See comment B-2;
- Engineering drawings for each unit, if available;
- Dimensions and materials of construction of each unit;
- Dates when the unit was in operation;

- Description of the wastes placed in each unit; and
- Quantity or volume of waste, if known.

J-1(b) ▶ No Solid Waste Management Units:

Describe the methodology used to determine that no existing or former solid waste management units exist at the facility (e.g., review of previous permits, blueprints, aerial photographs).

J-2 ▶ Releases

Provide all information available, including releases reported under CERCLA §103, for any release that has occurred from any of the solid waste management units at the facility. Reasonable efforts to identify releases must be made, even if releases have not been verified. A release may include spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment. It does not include releases otherwise permitted or authorized under law or discharges into the injection zone of a UIC permitted class I injection well, unless the release or discharge exceeded its allowable limit.

J-2a ▶ ▶ ▶ Characterize Releases

Information on releases must include the following types of available information concerning prior and/or current releases:

- Date of the release;
- Type of waste of constituent released;
- Quantity or volume released;
- Nature of the release;
  - spill,
  - overflow,
  - ruptured pipe or tank,
  - result of the unit's construction (e.g., unlined surface impoundment, leaky tank),
  - other.
- Groundwater monitoring and other analytical data available to describe nature and extent of release – refer to checklist module E. If other than groundwater monitoring data, provide:
  - Physical evidence of distressed vegetation or soil contamination;
  - Historical evidence of releases such as tanker truck accidents;
  - Any state, local or federal enforcement action that may address releases;
  - Any public citizen complaints about the facility that could indicate a release; and
  - Any information showing the migration of the release.

J-2b ▶ No Releases

Describe the methodology used to determine that releases from solid waste management units are not present or were adequately addressed. Provide conclusive soil boring and/or groundwater monitoring data.