

US EPA ARCHIVE DOCUMENT

**CONTAINMENT BUILDING STORING HAZARDOUS WASTE
CHECKLIST FOR DOCUMENTS THAT MUST BE KEPT ON-SITE AT FACILITY**

According to the “Standardized Permit Rule,” you must keep the information listed below on site at your facility for the duration of your permit. The specific information that you must keep at your facility is based on the requirements found in 40 CFR § 267.1101 - 267.1108. You must keep this information on site and make it available for review by agency inspectors and the public. We expect that you would consolidate the information in one area at the facility, to the extent practicable, to facilitate access. Your containment buildings must comply with the design and operating standards in this section. EPA will consider standards established by professional organizations generally recognized by the industry such as the American Concrete Institute (ACI) and the American Society of Testing Materials (ASTM) in judging the structural integrity requirements of this section.

Please note that this checklist only contains those requirements relating directly to Containment Buildings. To ensure that you are maintaining all required on-site documentation, please refer to EPA checklists developed for the requirements of 40 CFR § 270.290 for general facility standards and, if relevant, RCRA-regulated tanks and container storage areas.

Requirement	Description	Check box
<i>1. Complete Enclosure of Containment Building § 267.1101 (a)</i>	Provide documentation that your containment building(s) is completely enclosed with a floor, walls, and a roof to prevent hazardous wastes from being exposed to the elements (e.g., rain, wind, run-on), and ensure that all wastes managed at the unit are contained.	“

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<p>2. Strength and Thickness of Floors and Containment Walls § 267.1101 (b)(1-2)</p>	<p>Provide detailed plans and description of the floor and containment walls of the containment building(s) at your facility, including the secondary containment system, to demonstrate they can:</p> <ul style="list-style-type: none"> (1) Support themselves, the waste contents, and any personnel and heavy equipment that operates within the unit. (2) Prevent failure due to: (i) Pressure gradients, settlement, compression, or uplift. (ii) Physical contact with the hazardous wastes to which they are exposed (iii) Climatic conditions. (iv) Stresses of daily operation, including the movement of heavy equipment within the unit and contact of such equipment with containment walls. (v) Collapse or other failure. 	<p>“</p>
<p>3. Management of Wastes § 267.1101 (c)</p>	<p>Provide detailed plans and a description to show that all surfaces in your facility’s containment building that will be in contact with hazardous wastes will be chemically compatible with those wastes.</p>	<p>“</p>
<p>4. Management of Incompatible Wastes § 267.1101 (d)</p>	<p>Provide detailed plans and a description demonstrating that you will not place incompatible hazardous wastes or treatment reagents in the unit or its secondary containment system if they could cause the unit or secondary containment system to leak, corrode, or otherwise fail.</p>	<p>“</p>
<p>5. Design and Construction of a Primary Barrier § 267.1101 (e)</p>	<p>Provide a detailed description of how the primary barrier in your facility’s containment building(s) is designed to withstand the movement of personnel, waste, and handling equipment in the unit during the operating life of the unit and appropriate for the physical and chemical characteristics of the waste to be managed.</p>	<p>“</p>
<p>6. Exception to the Structural Strength Requirement § 267.1101 (f)(1-2)</p>	<p>If you have a structural strength exception for light- weight doors and windows, you must provide a detailed description demonstrating they meet the following criteria:</p> <ul style="list-style-type: none"> (1) They provide an effective barrier against fugitive dust emissions under Sec. 267.1102(d). (2) The unit is designed and operated in a fashion that assures that wastes will not actually come in contact with these openings. 	<p>“</p>

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<p>7. Maintain Facility's Operating Records § 267.1101 (g)</p>	<p>Provide evidence that you have inspected and recorded in the facility's operating record, at least once every seven days, data to detect signs of releases of hazardous waste. Inspections should include monitoring equipment, leak detection equipment, the containment building(s) itself, and the area immediately surrounding the containment building.</p>	<p align="center">"</p>
<p>8. Certification of Written Assessment § 267.1101 (h)</p>	<p>Provide a certification by a qualified, registered professional engineer that the containment building(s) design meets the requirements of Secs. 267.1102, 267.1103, and paragraphs (a) through (f) of section 267.1101.</p>	<p align="center">"</p>
<p>9. Controls and Practices to Ensure Containment of Hazardous Waste § 267.1102 (a - d)</p>	<p>Provide a detailed description of how you use controls and practices to ensure containment of the hazardous waste within the unit. You must, at a minimum:</p> <ul style="list-style-type: none"> (a) Maintain the primary barrier so it is free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier. (b) Maintain the level of the stored/treated hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded. (c) Take measures to prevent personnel or by equipment used in handling the waste from tracking hazardous waste out of the unit (You must designate an area to decontaminate equipment and collect and properly manage any rinsate). (d) Take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions. 	<p align="center">"</p>
<p>10. Management of Hazardous Wastes Containing Free Liquids § 267.1103</p>	<p>If your containment building(s) will be used to manage hazardous wastes containing free liquids or treated with free liquids, you must document how you will prevent the migration of hazardous waste into the primary barrier of the containment building and to minimize (and collect) accumulation of liquids.:</p>	<p align="center">"</p>

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Design of Primary Barrier § 267.1103(a)	Provide a description of the primary barrier at your facility's containment building(s) including how the design and construction materials will prevent the migration of hazardous constituents into the barrier.	""
Liquid Collection and Removal System § 267.1103(b)	Provide a description the liquid collection and removal system at your facility's containment building(s) that will minimize the accumulation of liquid on the primary barrier of the containment building.	""
Secondary Containment System § 267.1103(c)(1-3)	Provide a description of the secondary containment system at your facility's containment building(s), including a secondary barrier designed and constructed to prevent migration of hazardous constituents into the barrier, and a leak detection system capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practical time. (1) You may meet the requirements for the leak detection component of secondary containment system by providing a demonstration that the system is constructed with a bottom slope of 1% or more; and constructed of a granular drainage material with a hydraulic conductivity of 1×10^{-2} cm/sec or more, and a thickness of 12" (35 cm) or more, or constructed of synthetic or geonet drainage material w/a transmissivity of 3×10^{-5} m ² /sec or more. (2) If you are conducting treatment in your facility's containment building, you must provide documentation that the area where the treatment will be conducted is designed to prevent the release of liquids, wet materials, or liquid aerosols to other portions of the building. (3) You must provide documentation that the secondary containment system is constructed with materials that are chemically resistant to the waste and liquids managed in the building and are sufficiently strong and thick to prevent collapse.	""