

US EPA ARCHIVE DOCUMENT

**CONTAINER STORAGE AREAS
 APPLICANT CHECKLIST FOR ITEMS THAT MUST BE KEPT AT FACILITY**

According to the “Standardized Permit Rule,” information that would normally be submitted to the permitting agency in a Part B permit application will now be kept at your facility. The specific information that you will keep at your facility would be based on the requirements found in 40 CFR § 270.290, § 270.300, and § 267, Subpart I. You should keep this information at the facility (and make it available for review by agency inspectors and the public) instead of submitting it to the permitting agency. We expect that you will consolidate the information in one area at the facility if practicable to facilitate access. Your container storage areas 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 Society of Testing Materials (ASTM) in judging the structural integrity requirements of this section. The following is a list of required documentation that the applicant must keep at the facility, when storing hazardous waste in tank systems.

Please note that this checklist only contains those requirements relating directly to container storage areas. To ensure that you are maintaining all required on-site documentation, please refer to EPA checklists developed for general facility standards and, if relevant, RCRA-regulated containment buildings and tank systems.

Requirement	Description	Check Box
<i>(A) Design and Operating Requirements for a Containment System § 270.300(a); § 267.173(a, b, and d)</i>	Provide a description of the containment system at each container storage area at your facility to demonstrate that your facility complies with the requirements of 267.173 (a, b, and d), which address containers holding free liquids, and all containers holding F020, F021, F022, F023, F026, and F027 wastes, even if the wastes do not contain free liquids.	“
Base Requirements to Contain Liquids § 270.300(a)(1); § 267.173(b)(1)	Provide a description, including design parameters, dimensions, and materials of construction, showing that the base underlying the containers 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.	“

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<p>Containment System Drainage § 270.300(a)(2); 267.173(b)(2)</p>	<p>Provide a description, including design parameters, dimensions, and materials of construction, showing that the slope or the containment system is designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation; unless the containers are elevated or are otherwise protected from contact with accumulated liquids.</p>	<p>“</p>
<p>Capacity of the Containment System § 270.300(a)(3); 267.173(b)(3)</p>	<p>Provide a description of the capacity of the containment system, including calculations showing that the containment system has sufficient capacity to contain either 10% of the volume of containers or the volume of the largest container, whichever is greater.</p>	<p>“</p>
<p>Provisions for Preventing or Managing Run-On § 270.300(a)(4); § 267.173(b)(4)</p>	<p>Provide a description of the provisions for preventing run-on into the containment system, unless the collection system has sufficient excess capacity, in addition to that required in paragraph (b)(3) of this section, to contain the liquid.</p>	<p>“</p>
<p>Removal of Liquids from Containment System to Prevent Overflow § 270.300(a)(5); § 267.173(b)(5)</p>	<p>Provide a description of the provisions for promptly removing any spilled or leaked waste and accumulated precipitation from the sump or collection area to prevent overflow of the collection system.</p>	<p>“</p>
<p>Containment System for F020, F021, F022, F023, F026, and F027 Wastes, Even if the Wastes Do Not Contain Free Liquids. § 267.173(d)</p>	<p>Note that you must have a containment system defined by § 267.173 for storage areas that store containers holding F020, F021, F022, F023, F026, and F027 wastes, even if the wastes do not contain free liquids. Provide a description of the containment system for any container storage area holding these wastes, even if the wastes do not contain free liquids.</p>	<p>“</p>

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<p><i>(B) For Storage Areas that Store Containers Holding Wastes that Do NOT contain Free Liquids</i> § 270.300(b); § 267.173(c)</p>	<p>You do not need a containment system as defined in § 267.173(b) – which are the design and operating requirements for a containment system – for storage areas that store containers holding only wastes with no free liquids. However, for each storage area at your facility which stores containers holding only wastes that do NOT contain free liquids, you must provide documentation that demonstrates that your container storage area meets the requirements of § 267.173(c).</p>	
<p>Test Procedures for Free Liquids § 270.300(b)(1)</p>	<p>Provide test procedures and results or other documentation or information to show that the wastes do not contain free liquids.</p>	<p>“</p>
<p>Containment System Drainage § 270.300(b)(2); § 267.173(c)(1-2)</p>	<p>Provide a description of how the storage area is designed to drain and remove liquids or how containers are kept from contact with standing liquids. Include design drawings or layouts. At a minimum, to meet the requirements of § 267.173(c)(1-2) you should describe how</p> <p>(1) The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation, or</p> <p>(2) The containers are elevated or are otherwise protected from contact with accumulated liquid.</p>	<p>“</p>
<p><i>(C) Ignitable or Reactive Wastes</i> § 270.300(c); § 267.174; § 267.175(c)</p>	<p>Provide documentation that your facility demonstrating compliance with § 267.174 (location of buffer zone and containers holding ignitable or reactive wastes) and § 267.175(c) (location of incompatible wastes in relation to each other)</p>	
<p>Location of Buffer Zone and Containers Holding Ignitable or Reactive Wastes § 270.300(c); § 267.174</p>	<p>Provide sketches, drawings, or data demonstrating that there is a buffer zone of at least 15m or 50ft from containers holding ignitable or reactive wastes to the property line of your facility. In addition, you must demonstrate how your facility complies with the general facility operating requirements for managing ignitable or reactive wastes required under § 267.17(a).</p>	<p>“</p>

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Separation of Storage Containers Managing Incompatible Wastes § 270.300(c); § 267.175(c)	Provide sketches, drawings, or data demonstrating that you separate storage containers managing a hazardous waste that is incompatible with any waste or other material stored nearby in other containers, piles, open tanks or surface impoundments from the other materials, or protect the containers by means of a dike, berm, wall, or other device.	"
(D) Incompatible Wastes § 270.300(d); 267.175(b-c); 267.17(b)	Describe how your facility will manage containers storing or managing incompatible wastes to meet the requirements of § 267.175(a). In addition, you must demonstrate how your facility complies with the general facility operating requirements for managing ignitable or reactive wastes required under § 267.17(b-c).	"
Management of Incompatible Wastes in Containers § 267.175(a)	Provide a description of the procedures showing you will not place incompatible wastes or incompatible wastes and materials (see appendix V to 40 CFR part 264 for examples) in the same container, unless you comply with § 267.17(b).	"
Procedures for Not Placing Incompatible Waste in an Unwashed Container § 267.175(b)	Provide a description of the procedures for how you will prevent hazardous wastes from being placed in an unwashed container that previously held an incompatible waste or material.	"
(e) Air Emission Standards § 270.315(b); 267.177	If your facility's container storage area(s) has air emission control equipment that must meet the requirements of 40 CFR 264, subpart CC (§ 264.1086), you must provide information that identifies each container storage area and certifies that the requirements of 40 CFR 264 are met.	"
Enclosures to Control Air Pollution § 270.315(c); § 267.1084(d)(5); § 267.1084(e)(1)(ii)	For each enclosure used at your facility to control air pollution emissions from containers, provide the most recent set of calculations that you performed to verify that the enclosure meets the criteria of a permanent total enclosure as verified under 40 CFR 51.741	"

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Closed Vent Systems § 270.315(e); § 270.24(c-d); § 267.1087	Provide documentation for each closed-vent system and control device installed at your facility's container storage area(s) under the requirements of § 267.1087 at your facility. This information should include the design and performance information required under § 270.24(c-d).	"
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