

US EPA ARCHIVE DOCUMENT

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS**SECTION D. PROCESS INFORMATION - BOILERS/INDUSTRIAL FURNACES**

| Section and Requirement | Federal Regulation | Review Consideration ^a | Location in Application ^b | See Attached Comment Number ^c |
|---|---|--|--------------------------------------|--|
| D-9 Boilers and Industrial Furnaces (BIF) | | | | |
| D-9a Waivers/Exemptions | 270.22(a)(2)(i); 266.104(a)(4); 266.110 | If applying for waiver or exemption, provide information demonstrating compliance with requirements outlined in this section. | | |
| D-9a(1) Waiver of Destruction and Removal Efficiency (DRE) Trial Burn for Boilers | 270.22(a)(2)(i); 266.104(a)(4); 266.110 | | | |
| D-9a(2) Low Risk Waste Exemption | 270.22(a)(2)(ii); 266.104(a)(5); 266.109(a) | The DRE standard for a BIF may be waived provided certain criteria listed in regulatory citation are met and documented. | | |
| D-9a(3) Waiver of Particulate Matter Standard | 270.22(a)(4); 266.109(b) | The particulate matter standard of 266.105 and trial burn for particulate matter may be waived if: the BIF complies with Tier I or Adjusted Tier I metals feed rate screening limits under 266.106(b) or (e) and submits documentation showing conformance with trial burn waiver under checklist Section D-9a(4) below; and BIF meets requirements of low risk waste exemption under checklist Section D-9a(2) above. | | |
| D-9a(4) Waiver of Trial Burn for Metals | 270.22(a)(3); 266.106(b),(e) | | | |
| D-9a(5) Waiver of Trial Burn for Hydrogen Chloride (HCl)/Cl ₂ | 270.22(a)(5); 266.107(b),(e) | | | |

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| D-9b Pretrial Burn Requirements for New BIFs | 270.66(b)(1); 266.102(d)(4)(i); 266.102(e) | Time required to bring new BIF to point of operational readiness for trial burn must be minimum necessary and cannot exceed 720 hours, or up to 1,440 hours if applicant shows good cause for requiring an extension. | | |
| D-9b(1) Pretrial Burn Requirements for New BIFs - Organic Emission Standards | 270.66(b)(1)(i); 266.102(e)(2); 266.104(d),(e) | | | |
| D-9b(2) Pretrial Burn Requirements for New BIFs - Particle Matter Emissions Standards | 270.66(b)(1)(i); 266.105 | | | |
| D-9b(3) Pretrial Burn Requirements for New BIFs - Metal Emissions Standards | 270.66(b)(1)(i); 266.102(e)(4)(i), (ii); 266.106 | | | |
| D-9b(4) Pretrial Burn Requirements for New BIFs - Alternative Metals Approach | 270.66(b); 266.102(e)(4)(iii); 266.106(f) | For conformance with alternative metals approach, description of operating conditions must: describe approach that will be used to comply; specify how approach ensures compliance with metals emissions standards of 266.106(c) and (d); specify how approach can be effectively implemented and monitored; and provide such other information as necessary to ensure that the standards of 266.106(c) or (d) are met. | | |
| D-9b(5) Pretrial Burn Requirements for New BIFs - Hydrogen | 270.66(b)(1)(i); 266.102(e)(5)(i); | | | |

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| | Chloride/Chlorine Emission Standards | 266.107 | | |
| D-9b(6) | Pretrial Burn Requirements for New BIFs - Fugitive Emissions | 270.66(b)(1)(i); 266.102(e)(7)(i) | Description of operating conditions must thoroughly describe method by which fugitive emissions will be controlled. | |
| D-9b(7) | Pretrial Burn Requirements for New BIFs - Automatic Waste Feed Cutoff | 270.66(b)(1)(i); 266.102(e)(7)(ii), (iii) | | |
| D-9b(8) | Pretrial Burn Requirements for New BIFs - Monitoring Requirements | 270.66(b)(1)(i); 266.102(e)(8),(10) | | |
| D-9c | Trial Burn Plan Requirements for All BIFs | 270.66(b)(2),(c), (e); 266.102(d)(4)(ii) | | |
| D-9d | Trial Burn Results | 270.22(a)(6); 270.66(d),(f) | Results of trial burn, as specified in regulatory citation, must be submitted within 90 days of completing trial burn. The submittal must be certified on behalf of applicant by signature of a person authorized to sign a permit application or a report under 270.11. | |
| D-9e | Post-Trial Burn Requirements for New BIFs | 270.66(b)(3)(ii); 266.102(d)(4)(iii),(e)) | Post-trial burn requirements for new BIFs are the same as pretrial burn requirements for new BIFs with the following exceptions: <ul style="list-style-type: none"> No documentation of total burn hours is required; no limit to length of time for burning. | |

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| | | <ul style="list-style-type: none"> • Must submit statement identifying conditions necessary to operate in compliance. • Must submit statement specifying that BIF will stop burning when changes in combustion properties or feed rates or BIF design or operating conditions deviate from approved post-trial burn period. | | |
| D-9f Data in Lieu of Trial Burn | 270.22(a)(6); 270.66(c)(3) | A BIF may seek exemption from trial burn requirements by submitting information provided by previous compliance testing of same device, or from compliance testing or trial or operational burns of similar BIFs burning similar hazardous waste under similar conditions. | | |
| D-9g Alternative Hydrocarbons (HC) Limit for Industrial Furnaces with Organic Matter in Raw Materials | 270.22(b); 266.104(f) | | | |
| D-9h Alternative Metals Implementation Approach | 270.22(c); 266.106(f) | <p>For conformance with an alternative metals implementation approach, the information must:</p> <ul style="list-style-type: none"> • Describe approach that will be used to comply. • Specify how approach ensures compliance with the metals emissions standards of 266.106(c) and (d). | | |

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| D-9i Monitoring Requirements | 270.22; 266.102(e)(6),(8) | <ul style="list-style-type: none"> Specify how approach can be effectively implemented and monitored. Provide such other information as necessary to ensure that standards are met. <p>Various parameters must be continuously monitored per 266.102(e)(6) while burning hazardous waste. Data must be maintained in operating record until closure of facility.</p> | | |
| D-9j Automatic Waste Feed Cutoff System | 270.22(d); 266.102(e)(7)(ii) | All facilities must submit description of automatic waste feed cutoff system, including any pre-alarm systems that may be used. | | |
| D-9k Direct Transfer Standards | 270.22(e); 266.111; Part 264 Subparts I and J | BIFs that directly feed hazardous waste from a transport vehicle to a BIF without use of a storage unit must submit a description of the direct transfer procedures that will be used, along with other information as specified in regulatory citation. | | |
| D-9k(1) Direct Transfer Standards - Containment System | 270.22(e); 264.175 | In areas where direct transfer vehicles are located, a complete description of containment system must be provided. | | |
| D-9k(2) Direct Transfer Standards - Condition of Containers | 270.22(e); 264.171 | | | |
| D-9k(3) Direct Transfer Standards - | 270.22(e); 264.172 | | | |

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| | Compatibility of Waste with Container | | | | |
| D-9k(4) | Direct Transfer Standards - Management of Containers | 270.22(e); 264.173 | | | |
| D-9k(5) | Direct Transfer Standards - Special Requirements of Ignitable or Reactive Waste | 270.22(e); 264.176 | Provide documentation of location of all containers holding ignitable/reactive waste. | | |
| D-9k(6) | Direct Transfer Standards - Special Requirements of Incompatible Wastes | 270.22(e); 264.177 | Provide statement and description of procedures to ensure compliance with management standards for incompatible waste. | | |
| D-9k(7) | Direct Transfer Standards - Closure | 270.22(e); 264.178 | Describe how all hazardous waste and hazardous waste residues will be removed from containment system at closure. | | |
| D-9k(8) | Direct Transfer Standards - Secondary Containment Requirements | 270.22(e); 266.111(e) | Owners/operators must submit documentation demonstrating conformance with secondary containment requirements of 265.193(b),(c), and (f) - (h). | | |
| D-9L | Bevill Residues | 270.22(f); 266.112; Part 266 Appendices VII | | | |

Notes:

^a Considerations in addition to the requirements presented in the regulations.

^b For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.

RCRA I.D. No.: _____

Facility Name: _____

^c If application is deficient in an area, prepare a comment describing the deficiency, attach it to the checklist, and reference the comment in this column.