

US EPA ARCHIVE DOCUMENT

**HAZARDOUS WASTE STORAGE FACILITIES – GENERAL FACILITY INFORMATION
CHECKLIST FOR DOCUMENTS THAT MUST BE KEPT ON-SITE AT FACILITY**

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

Requirement	Description	Check Box
<i>General Description</i> § 270.290(a)	Provide a general description of the facility.	"
<i>Chemical and Physical Analyses</i> § 270.290(b); § 267.13(a)	Document the chemical and physical analyses of the hazardous waste and hazardous debris you will handle at your facility. At a minimum, the analyses meet the requirements of § 267.13(a).	"

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<p>Chemical and Physical Analyses § 267.13(a) (1-2)</p>	<p>You must obtain and maintain a detailed chemical and physical analyses of a representative sample of the wastes you will manage at your facility. At a minimum, the analysis must contain all of the information you need to treat or store the waste to comply with all requirements of 40 CFR 267 and 268.</p> <p>(1) You may include data in the analysis that was developed under 40 CFR Part 261, and published or documented data on the hazardous waste or on hazardous waste generated from similar processes.</p> <p>(2) You must repeat the analysis as necessary to ensure that it is accurate and up to date. At a minimum, you must repeat the analysis if the process or operation generating the hazardous wastes has changed, and document the repeat analysis.</p>	<p>“</p>
<p><i>Waste Analysis Plan</i> § 270.290(c); § 267.13(b)</p>	<p>Provide a copy of a waste analysis plan required by § 267.13(b). At a minimum, this plan must include all of the following:</p>	<p>“</p>
<p>Selection and Rationale of Parameters § 267.13(b)(1)</p>	<p>Describe your hazardous waste parameters and provide a rationale for selecting these parameters (that is, how analysis for these parameters will provide sufficient information on the waste's properties to comply with paragraph (a) of this section).</p>	<p>“</p>
<p>Test Methods § 267.13(b)(2)</p>	<p>Provide a copy of the test methods you will use to test your hazardous waste parameters.</p>	<p>“</p>
<p>Sampling Method § 267.13(b)(3)</p>	<p>Provide a copy of the sampling method you will use to obtain a representative sample of the waste to be analyzed. You may obtain a representative sample using either one of the sampling methods described in appendix I of 40 CFR part 261 or an equivalent sampling method.</p>	<p>“</p>
<p>Frequency of Analysis § 267.13(b)(4)</p>	<p>Provide a plan that will show how frequently you will review or repeat the initial analysis of the waste to ensure that the analysis is accurate and up-to-date.</p>	<p>“</p>

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Analytical Methods § 267.13(b)(5)	Where applicable, provide a copy of the methods you will use to meet the additional waste analysis requirements for specific waste management methods as specified in 40 CFR 264.17, 264.1034(d), 264.1063(d), and 264.1083.	"
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<p><i>Security Procedures and Equipment § 270.290(d); § 267.14(c-d)</i></p>	<p>Provide a description of the security procedures and equipment for the facility required under § 267.14(c-d). At a minimum, include all of the following:</p>	
<p>Means to Control Entry § 267.14(c) (1-3)</p>	<p>You must provide a description of the means to prevent livestock and unauthorized people from entering the active portion of your facility, by one or more of the following:</p> <ul style="list-style-type: none"> (1) Describe or provide evidence of a 24-hour surveillance system (for example, television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility. (2) If a 24-hour surveillance system is not feasible, document provide a plan for your artificial or natural barrier (for example, a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility. (3) If a 24-hour surveillance system is not feasible, provide a plan which outlines a means to control entry, at all times, through the gates or other entrances to the active portion of the facility (for example, an attendant, television monitors, locked entrance, or controlled roadway access to the facility. 	<p>“</p>
<p>Warning Signs § 267.14(d)</p>	<p>Provide evidence of a sign posted at each entrance to the active portion of a facility, and at other prominent locations, in sufficient numbers to be seen from any approach to this active portion. The sign must bear the legend “Danger-Unauthorized Personnel Keep Out.”</p>	<p>“</p>

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General Inspection Requirements § 270.290(e); § 267.15(b)	Provide a copy the general inspection schedule for your facility as required by § 267.15(b)	"
Inspection Schedule § 267.15(b); § 267.15(b)(1)	Provide a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards. The written inspection schedule must include:	"
Items/Issues to be Inspected § 267.15(b)(2)	A description of the equipment and devices you will inspect and what problems you look for, such as malfunctions or deterioration of equipment (for example, inoperative sump pump, leaking fitting, etc).	"
Frequency of Inspections § 267.15(b)(3)	A description of the frequency of your inspections. At a minimum, include the items and frequencies required in § 267.174, 267.193, 267.195, 267.1103, and 40 CFR 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089, where applicable.	"
Maintaining Inspection Records § 267.15(d)	Provide records of all inspections. You must keep these records for at least three years from the date of inspection. At a minimum, you must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.	"
Preparedness and Prevention § 270.290(f)	If relevant, you must provide a justification for any modification of the preparedness and prevention requirements required by 40 CFR 267.30, subpart C.	"

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<i>Contingency Plan</i> § 270.290(g); § 267, <i>Subpart D</i>	Provide a copy of the contingency plan, and all revisions/modifications, as required in 40 CFR 267, Subpart D.	“
Contingency Plan § 267.51(a)	Provide a detailed copy of the contingency plans that show the minimization of hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. You must include the following information in the contingency plan.	
Control Procedures § 267.52(a)(1)	A description of the actions facility personnel will take to comply with §§ 267.51 and 267.56 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.	“
Agreed upon Arrangements § 267.52(a)(2)	A description of all arrangements agreed upon under § 267.36 by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services.	“
Emergency Coordinator § 267.52(a)(3)	A list of names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see § 267.55), and keep the list up-to-date.	“
Emergency Equipment § 267.52(a)(4)	A current list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. In addition, you must include the location and a physical description of each item on the list, and a brief outline of its capabilities.	“
Evacuation Plan § 267.52(a)(5)	Provide a written evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. You must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (for cases where the primary routes could be blocked by releases of hazardous waste or fires).	“

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Spill Prevention, Control, and Countermeasures (SPCC) Plan § 267.52(b)	If you have already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan under 40 CFR Part 112, or Part 1510 of Chapter V, or some other emergency or contingency plan, you need only amend that plan to incorporate hazardous waste management provisions that will comply with the requirements of this part. Provide a copy if applicable.	"
Maintenance of Contingency Plan § 267.53(a)	Maintain a copy of the plan with all revisions at the facility.	"
Amending Contingency Plan § 267.54	Provide a copy of all amendments to the contingency plan.	"
Role of Emergency Coordinator § 267.55	Provide evidence that at least one employee is either on the facility premises or on call at all times (that is, available to respond to an emergency by reaching the facility within a short period of time) to serve as the emergency coordinator.	"
Emergency Procedures for Emergency Coordinator § 267.56(a)	Provide a plan that shows whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) will immediately: (1) Activate internal facility alarm or communication systems, where applicable, to notify all facility personnel; and (2) Notify appropriate State or local agencies with designated response roles if their help is needed (for example, show S.O.P.'s)	"

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Emergency Procedures for Emergency Coordinator § 267.56(b)	Provide a plan that shows that whenever there is a release, fire, or explosion, the emergency coordinator will: (1) Immediately identify the character, exact source, amount, and areal extent of any released materials; and (2) Assess possible hazards to human health or the environment that may result from the release, a fire, or an explosion.	“
<i>Procedures, Structures, or Equipment to Prevent Hazards</i> § 270.290(h)	Provide a detailed description of procedures, equipment and structures used at your facility to prevent hazards. At a minimum, this description must include each of the items described in § 270.290(h)(1-6), listed below.	“
Prevent Hazards in Unloading Operations § 270.290(h)(1)	Provide a detailed description of procedures used to prevent hazards in unloading operations (for example, using ramps or special forklifts). These procedures should include the identification of possible loading and unloading hazards and document steps taken to minimize or eliminate risks associated with these hazards.	“
Prevent Runoff § 270.290(h)(2)	Provide a detailed description of procedures used to prevent runoff from hazardous waste handling areas to other areas of the facility or environment (for example, with berms, dikes, trenches).	“
Prevent Contamination of Water Supplies § 270.290(h)(3)	Provide a detailed description of procedures, structures and equipment used to prevent contamination of water supplies.	“

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Mitigate Effects of Equipment Failure and Power Outages § 270.290(h)(4)	Provide a detailed description of procedures, structures and equipment used to mitigate the effects of equipment failure and power outages.	“
Prevent Undue Exposure of Personnel to Hazardous Waste § 270.290(h)(5)	Provide a detailed description of procedures, structures and equipment used to prevent contamination of personnel to hazardous waste (for example, requiring protective clothing).	“
Prevent Releases to Atmosphere § 270.290(h)(6)	Provide a detailed description of procedures, structures and equipment used to prevent hazardous waste releases to the atmosphere.	“
<i>Precautions to Prevent Accidental Ignition or Reaction of Ignitable, Reactive, or Incompatible Wastes</i> §270.290(i); § 267.17	Provide a description of the precautions you will take (are taking) at your facility to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes as required by §267.17.	“

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<p>Precautions to Prevent Accidental Ignition or Reaction § 267.17(a)(1-3)</p>	<p>Provide a description of the precautions used to prevent accidental ignition or reaction of ignitable or reactive waste. Include the following items in your description:</p> <ul style="list-style-type: none"> (1) A description of the procedures for separating and protecting these wastes from sources of ignition or reaction such as: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (for example, from heat-producing chemical reactions), and radiant heat; (2) An identification of designated safe areas for smoking and open flames and not near handling areas for ignitable or reactive waste; and (3) A description of the location of signs conspicuously placed in areas where there is a hazard from ignitable or reactive waste. 	<p>“</p>
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<p>General Precautions for Handling Ignitable or Reactive Waste, or Mix Incompatible Waste or Incompatible Wastes and Other Materials § 267.17(b)(1-5)</p>	<p>Provide plans and a description of procedures and precautions used to prevent reactions that:</p> <ul style="list-style-type: none"> (1) Generate extreme heat or pressure, fire or explosions, or violent reactions (2) Produce uncontrolled toxic mists, 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; and (5) Threaten human health or the environment in any similar way. Refer to 267.175 for specific requirements on management of incompatible wastes in containers. 	<p align="center">"</p>
<p>Documentation of Compliance with Procedures § 267.17(c)</p>	<p>Provide documentation that demonstrates how your facility complies with the requirements under § 267.17(a-b) for ignitable, reactive, and incompatible wastes. This documentation can include references to published scientific or engineering literature, data from trial tests (for example bench scale or pilot scale tests), waste analyses (as specified in § 267.13), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.</p>	<p align="center">"</p>

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<p><i>(j) Traffic Pattern, Volume and Control</i> § 270.290(j)</p>	<p>Provide drawings or descriptions of the following:</p> <ul style="list-style-type: none"> (1) Traffic pattern; (2) Estimated volume (number and types of vehicles); and (3) Control (for example, show turns across traffic lanes and stacking lanes; describe access road surfacing and load bearing capacity; and show traffic control signals). 	<p>“</p>
<p><i>Training Program</i> § 270.290(l); § 267.16</p>	<p>Provide an outline of the introductory and continuing training programs you will use to prepare employees to operate or maintain your facility safely as required by § 267.16</p>	<p>“</p>
<p>Outline of Introductory and Continuing Training Programs § 267.16(a)</p>	<p>Provide an outline of both the class-room and on-the-job training programs available to your facility personnel. The outline must demonstrate how the classroom instruction or on-the-job training teaches facility personnel to perform their duties in a way that ensures the facility's compliance with the requirements of § 267.16.</p>	

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Description of How Training will be Designed to Meet Actual Job Tasks § 267.16(a)(3)

Jeff – Please note there is no 267.16(a)(3) in the currently published draft rule. If you look at 267.16(a)(2)(i-vi) you get a listing of job tasks – which should be included in the description/outline of the training program, as they designate safety response. If it’s just a wrong cite, I’d suggest the following language:

Provide documentation that the training programs are designed to ensure that the people at your facility are able to respond effectively to emergencies. At a minimum, the training program should include instruction on emergency procedures, emergency equipment, and emergency systems, including:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment*
- Key parameters for automatic waste feel cut-of systems*
- Communications or alarm systems*
- Respons to fires or explosions*
- Response to ground water contamination incidents*
- Shutdown of operations*

Please advise.

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<p>Maintenance of Training Records and Documents § 267.16(d)(1-4)</p>	<p>You must develop and maintain the following training documents and records at your facility:</p> <ul style="list-style-type: none"> (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job (2) A written job description for each position. This description must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position (3) Written description of the type and amount of both introductory and continuing training that will be given to each person filling a position (4) Records that document that facility personnel have received and completed the training or job experience required under paragraphs (a), (b), and (c) of § 267.16. Note that § 267.16.(b) requires such training to be completed with six months of employment or transfer to a new position. 	<p style="text-align: center;">"</p>
<p>Current Personnel Training Records § 267.16(e)</p>	<p>You must keep training records on current personnel until your facility closes. For former employees, you must maintain their training records for at least three years from the date the employee last worked at your facility. Personnel training records may accompany personnel transferred within your company.</p>	<p style="text-align: center;">"</p>
<p><i>Liability Requirements</i> § 270.290(q); § 267.147</p>	<p>Provide a copy of the insurance policy or other documentation that complies with the liability requirements in § 267.147.</p>	<p style="text-align: center;">"</p>
<p>New Facility § 267.147(a)</p>	<p>For a new facility, provide documentation showing the amount of insurance meeting the specification of 267.147(a) that you plan to have in effect before initial receipt of hazardous waste for treatment or storage.</p>	<p style="text-align: center;">"</p>

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<p><i>State Financial Mechanism</i> § 270.290(r); § 267.149; § 267.150</p>	<p>Provide proof of coverage by a state financial mechanism where appropriate as required by § 267.149 or 267.150.</p>	<p align="center">"</p>
<p><i>Topographic Map</i> § 270.290(s)</p>	<p>Provide a topographic map of the facility that includes a distance of 1000 feet around your facility at a scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 feet). The map must show elevation contours, that show the pattern of surface water flow in the vicinity of and from each operational unit. In addition, your facility topographic map should show the following:</p> <ol style="list-style-type: none"> (1) Map scale and date (2) 100-year floodplain area (3) Surface waters including intermittent streams (4) Surrounding land uses (residential, commercial, agricultural, recreational) (5) A wind rose showing the prevailing wind-speed and direction (6) Orientation of the map via a north arrow (7) Legal boundaries of your facility (8) Access control measures including fences and gates. (9) Injection and withdrawal wells both on-site and off-site (10) Buildings; treatment, storage, or disposal operations ;or other structures (11) Barriers for drainage or flood control (12) Location of operational units where hazardous waste is treated or stored, including equipment cleanup areas. 	<p align="center">"</p>

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<p><i>(K) Air Emission Control Equipment</i> § 270.315</p>	<p>If your facility has air emission control equipment that must meet the requirements of 40 CFR 264, subpart CC (§ 264.1086), you must keep the following information on-site at your facility.</p>	<p>“</p>
<p>Floating Roof Cover Design § 270.315(a); § 267.1084(d)(1-2); § 267.1084(e)(1); § 267.1084(f)(1)</p>	<p>For each floating roof cover installed on any tank at your facility (fixed-roof tank equipped with an internal floating roof and any tank equipped with an external floating roof) according to § 267.1084(d)(1-2), please provide the following information:</p> <ul style="list-style-type: none"> • Documentation, prepared by you or by the cover manufacturer/vendor, that describes the roof’s cover design. • Your certification that the cover(s) meet the design specifications listed in § 267.1084(e)(1); § 267.1084(f)(1) 	<p>“</p>
<p>Identification and Certification of Container Areas § 270.315(b)</p>	<p>Provide information that identifies each container storage area at your facility, and certifies that the requirements of 40 CFR 264, subpart CC are met.</p>	<p>“</p>
<p>Enclosures to Control Air Pollution § 270.315(c); § 267.1084(d)(5); § 267.1084(e)(1)(ii)</p>	<p>For each enclosure used at your facility to control air pollution emissions from tanks or 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</p>	<p>“</p>

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<p>Closed Vent Systems § 270.315(e); § 270.24(c-d); § 267.1087</p>	<p>Provide documentation for each closed-vent system and control device installed at your facility installed under under the requirements of § 267.1087 at your facility. This information should include the design and performance information required under § 270.24(c-d)</p>	<p>“</p>
<p>Emissions Monitoring Plan § 270.315(f); Method 21 40 CFR Part 60, Appendix A</p>	<p>Provide an air emissions monitoring plan for the tank system(s) at your facility. The plan must address both Method 21 40 CFR Part 60, Appendix A and control device monitoring methods.</p> <p>Your plan must include the following information:</p> <ul style="list-style-type: none"> • Monitoring points, • Monitoring methods for control devices, • Monitoring frequency, • Procedures for documenting exceedences, and • Procedures for mitigating noncompliances. 	<p>“</p>

