

US EPA ARCHIVE DOCUMENT

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Note: This checklist may be used for review of a permit application for a postclosure facility with no active hazardous waste management units. It provides a guideline to the basic requirements of a Part B postclosure permit application. Optional elements (contingency plan and personnel training) are indicated by italics. If a postclosure unit is present at a facility seeking a permit for active hazardous waste management units, the postclosure unit must be incorporated in the permit application like an operating unit in all appropriate sections. For elements that may repeat for both operating units and postclosure units, this checklist references elements of the general checklist in parenthesis.

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS

SECTION P. POST-CLOSURE FACILITY REQUIREMENTS

Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-1 General Part A Information Requirements		(Section A)		
P-1a Description of Activities Conducted which Require Facility to Obtain a Permit under the Resource Conservation and Recovery Act (RCRA) and Brief Description of Nature of the Business	270.13(a),(m)	(A-1)		
P-1b Name, Mailing Address, and Location of Facility for which the Application is Submitted, including a Topographic Map	270.13(b),(l)	(A-2)		
P-1c Up to four Standard Industrial Classification Codes which Best Reflect the Products or Services Provided by the Facility	270.13(c)	(A-3)		
P-1d Operator/Owner's Name, Address, Telephone Number, and Ownership Status	270.13(d),(e)	(A-4) Ownership status must include status as federal, state, private, public, or other entity.		

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CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
P-1e Facility is New, Existing, or Located on Indian Lands	270.13(f),(g)	(A-5) Description must include information on whether this is a first or revised application with date of last signed permit application.		
P-1f Description of Processes to be Used for Treating, Storing, and Disposing of Hazardous Waste	270.13(i)	(A-6) Description must include design capacity for these items.		
P-1g Specification of the Hazardous Wastes Listed or Designated Under 261	270.13(j)	(A-7) Specifications must include estimate on quantity of waste to be treated, stored, or disposed of.		
P-1h Listing of all Permits or Construction Approvals Received or Applied for	270.13(k)	(A-8) Permits include the following programs: Hazardous Waste Management under RCRA; Underground Injection Control under Solid Waste Disposal Act; Prevention of Significant Deterioration, Nonattainment Program, and National Emissions Standards for Hazardous Pollutants under the Clean Air Act; ocean dumping permits under the Marine Protection Research and Sanctuaries Act; dredge and fill permits under Section 404 of the Clean Water Act; or other relevant environmental permits including state permits.		
P-2 Part B General Description	270.14(b)(1)	(Section B)		
P-3 General Requirements	270.14	(B-1)		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-3a Topographic Map	270.14(b)(19)	(B-2a) Show distance of 1,000 feet around unit at a scale of 1 inch to not more than 200 feet (multiple maps may be submitted at this scale), and should be similar to Part A topographic map.		
Scale and Date	270.14(b)(19)(i)	Other scales may be used if justified.		
The 100-Year Flood Plain Area	270.14(b)(19)(ii)			
Surface Waters	270.14(b)(19)(iii)			
Surrounding Land Use	270.14(b)(19)(iv)			
Wind Rose	270.14(b)(19)(v)			
Map Orientation	270.14(b)(19)(vi)			
Legal Boundaries	270.14(b)(19)(vii)			
Access Control	270.14(b)(19)(viii)			
Injection and Withdrawal Wells (on site and off site)	270.14(b)(19)(ix)			
Buildings and Other Structures	270.14(b)(19)(x)			
Drainage and Flood Control Barriers	270.14(b)(19)(xi)			
P-3b Additional Information on the Topographic Map for Land Disposal Facilities	270.14(c)(3)	(B-2b)		
Uppermost Aquifer and Hydraulically Connected Aquifers Beneath Facility Property	270.14(c)(2)			

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
Groundwater Flow Direction	270.14(c)(2)			
Waste Management Areas	270.14(c)(3)			
Property Boundaries	270.14(c)(3)			
Location of Groundwater Monitoring Wells	270.14(c)(3); 264.97			
Extent of any Groundwater Contaminant Plume	270.14(c)(4)(i)			
P-3c Facility Location Information	270.14(b)(11); 264.18	(B-3)		
P-3c(1) Political Jurisdiction in which Facility is Located	270.14(b)(11)(i)	(B-3a)		
P-3c(2) Flood Plain Requirements	270.14(b)(11)(iii), (iv); 264.18(b)	(B-3b) Flood plain requirements applicable if facility is located in 100-year flood plain.		
Copy of Federal Insurance Administration or other Flood Map	270.14(b)(11)(iii)	Reference source used to determine whether facility is located in 100-year flood plain.		
Concentration of Hazardous Constituents Remaining in the Unit that Would Potentially Affect Surface Waters as a Result of Washout	270.14(b)(11); 264.18(b)(ii)(B)	Flood plain requirements applicable if facility is located in 100-year flood plain.		
Impact of such Concentration on Current or Potential uses of, and Water Quality Standards Established for, the Affected Surface Waters	270.14(b)(11); 264.18(b)(ii)(C)	Flood plain requirements applicable if facility is located in 100-year flood plain.		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
Impact of Hazardous Constituents on the Sediments of Affected Surface Waters, or the Soils of the 100-Year Flood Plain, that could Result from Washout	270.14(b)(11); 264.18(b)(ii)(D)	Flood plain requirements applicable if facility is located in 100-year flood plain.		
Plan and Schedule for Future Compliance	270.14(b)(11)(v)	Flood plain requirements applicable if facility is located in 100-year flood plain and not in compliance with 264.18(b).		
P-4a Chemical and Physical Analyses	270.14(b)(2); 264.13(a)	(C-1) Data generated by testing the waste, published data on the waste, or data gathered from similar processes may be used.		
P-4b Waste Analysis Plan	270.14(b)(3); 264.13(b),(c) 266.102(a)(2)(ii); 266.104(a); (2), 268.7	(C-2) Address how for closed units/facilities, a waste analysis plan is not applicable. Discuss previous waste stream and/or current management of the waste, if applicable. Discuss whether or not leachate or runoff collection and analysis are necessary.		
P-5 General Hydrogeologic Information	270.14(c)(2)	(E-3) Include description of the regional and site-specific geologic and hydrogeological setting.		
P-5a Topographic Map Requirements	270.14(c)(2), (3), (4)(i)	(E-4)		
P-5b Contaminant Plume Description	270.14(c)(2), (4), (7); Part 261,	(E-5) In some cases, contaminant plumes may be defined under groundwater quality		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
	Appendix VIII	assessment programs carried out during the interim status period which may not address the complete list of Appendix VIII constituents as required under 270.14(c)(4). Additional monitoring may be required to identify the concentration of each Appendix VIII constituent in the plume.		
P-5c General Monitoring Program Requirements	270.14(c)(5); 264.90(b)(4); 264.97	(E-6) Describe the monitoring to be conducted during the post-closure care period, including as applicable, the procedures for conducting the following operations and evaluating the data gathered: groundwater monitoring; and leachate collection/detection and removal.		
P-5d Description of Wells	270.14(c)(6)(ii); 264.97(a), (b), (c)	(E-6a) Identify the number, location, and depth of each well, and describe the well construction materials to be used.		
P-5e Proposed Sampling and Statistical Analysis Procedures for Groundwater Data	270.14(c)(7)(vi); 264.97(d), (e), (f); 264.99(c) - (g)	(E-6b)		
P-5f Corrective Action Program	270.14(c)(8); 264.99(j); 264.100	(E-a) If hazardous constituents have been detected in the groundwater, an owner or operator must submit sufficient information, supporting data, etc., to establish a corrective action program that meets the requirements of 264.100.		

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Section and Requirement		Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-5g	Characterization of Contaminated Groundwater	270.14(c)(8)(i)	(E-9a) For each well at point of compliance and for each background well, provide concentrations of each constituent in 261 Appendix VIII, major cations and anions, and constituents listed in Table 1 of 264.94, if not already determined by the above.		
P-5h	Concentration Limits	270.14(c)(8)(ii); 264.94; 264.100(a)(2)	(E-9b) Specify the proposed concentration limits for each hazardous constituent in groundwater.		
P-5i	Alternate Concentration Limits	270.14(c)(8)(ii); 264.94(b); 264.100(a)(2)	(E-9c) Provide a justification for establishing alternate concentration limits. This justification must address each of the following two factors.		
P-5j	Corrective Action Plan	270.14(c)(8)(iii); 264.100(b); 264.101	(E-9d) Provide detailed plans on the corrective actions proposed for the facility, including maps of engineered structures, construction details, plans for removing waste, description of treatment technologies, effectiveness of correction program, operation and maintenance plans, closure and post-closure plans, and a schedule for corrective action requirements. Also, include plan for corrective action at solid waste management units (SWMU).		
P-6	Security	270.14(b)(4);	(F-1) Indicate whether hazardous waste		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
	264.14	remains exposed after completion of partial or final closure or access by the public or domestic livestock may pose a hazard to human health. Demonstrate that this type of property post-closure use must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the facility's monitoring system.		
P-6a Security Procedures and Equipment	270.14(b)(4); 264.14	(F-1a) Unless waiver is granted, facility must have surveillance system or barrier or other means to control entry.		
P-6a(1) Warning Signs	270.14(b)(4); 264.14(c)	(F-1a(3)) Signs in English must be posted at each entrance, and be legible from 25 feet.		
P-6b Inspection Schedule	270.14(b)(5); 264.15	(F-2) Include where applicable, as part of the post-closure inspection schedule, specific requirements for each type of treatment, storage, and disposal facility. These specific requirements and the schedule should be included as part of the post-closure plan.		
P-6b(1) General Inspection Requirements	270.14(b)(5); 264.15(a), (b); 264.33	(F-2a) Describe the inspections to be conducted during the post-closure care period, their frequency, the inspection procedure, and the logs to be kept. Inspection is required for monitoring		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
		equipment, safety emergency equipment, communication and alarm systems, decontamination equipment, security devices, and operating and structural equipment. Should be included as part of post-closure plan.		
Types of Problems	270.14(b)(5); 264.15(b)(3)	Inspection checklist should be included as part of post-closure plan and must identify types of problem.		
Frequency of Inspections	270.14(b)(5); 264.15(b)(4)	The rationale for determining the length of time between inspections should be provided as part of the post-closure plan.		
Schedule of Remedial Action	264.15(c)	Owner/operator must immediately remedy any deterioration or malfunction of equipment or structures to ensure problem does not lead to environmental or human health hazard.		
Inspection Log	264.15(d)	Provide example log or summary. Should be included as part of the post-closure plan.		
P-7a Waiver or Documentation of Preparedness and Prevention Requirements	270.14(b)(6) 264.32(a) - (d)	(F-3) Facility must submit justification for any waiver to requirements of this section.		
P-7b Emergency Equipment	270.14(a); 264.32(c)	(F-3(a)(3)) Demonstrate that portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment are available.		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-7c Water and Fire Control	270.14(a); 264.32(d)	(F-3(a)(4)) Demonstrate facility has adequate fire control systems, water volume and pressure, foaming equipment, automatic sprinklers, etc.		
P-7d Testing and Maintenance of Equipment	270.14(a); 264.33	(F-3(a)(5)) Demonstrate communication, alarm, fire control equipment, spill control equipment, and decontamination equipment are tested and maintained.		
P-7e Documentation of Arrangements with Emergency Agencies	270.14(a); 264.37	(F-3(c)) Owner/operator must make arrangements, as appropriate, with type of waste and hazard potential, for the potential need for services.		
P-7f Document Agreement Refusal	270.14(a); 264.37(b)	(F-3(c)(4)) Document refusal to enter into a coordination agreement.		
P-7g Equipment and Power Failure	270.14(b)(8) (iv)	(F-4(d)) Describe procedure used to mitigate the effects of equipment failure and power outages.		
P-8 Contingency Plan General Information	270.14(b)(7); 264.52	(G-1) Provide facility name and location, operator, site plan, and describe facility operations.		
Actions to Take in Case of Emergency	270.14(b)(7); 264.52(a)	(G-4(d)) Describe actions to be taken in response to any unplanned release of hazardous waste to air, soil, or surface water.		
P-8a Emergency Coordinators	270.14(b)(7); 264.52(d);	(G-2) There must at least be one primary emergency coordinator available at all		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
	264.55	times.		
P-8b Implementation	270.14(b)(7); 264.52(a); 264.56(d)	(G-3) Emergency coordinator to determine that facility has had a release, fire, or explosion that could threaten human health or the environment outside facility.		
P-8c Emergency Actions	270.14(b)(7); 264.56	(G-4)		
P-8c(1) Notification	270.14(b)(7); 264.56(a)	(G-4a) Describe the method for immediate notification of facility personnel and necessary state and local agencies.		
P-8c(2) Identification of Hazardous Materials	270.14(b)(7); 264.56(b)	(G-4b) Observation, records or manifest, or chemical analysis may be used by emergency coordinator.		
P-8c(3) Assessment	270.14(b)(7); 264.56(c), (d)	(G-4c) Direct and indirect effects must be considered.		
P-8c(4) Control Procedures	270.14(b)(7); 264.52(a)	(G-4d) Contingency plan must describe actions facility personnel must take in response to fires, explosions, or any unplanned release of hazardous waste to air, soil, or surface water.		
P-8c(5) Storage, Treatment, and Disposal of Released Material	270.14(b)(7); 264.56(g)	(G-4f) After emergency, emergency coordinator must provide for treating, storing, and disposing of recovered waste.		
P-8c(6) Incompatible Waste	270.14(b)(7); 264.56(h)(1)	(G-4g) Until cleanup is complete, assure that incompatible waste is not stored together.		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-8c(7) <i>Post-Emergency Equipment Management</i>	270.14(b)(7); 264.56(h)(2)	(G-4h) Decontamination is required for emergency equipment.		
P-8d <i>Evacuation Plan for Facility Personnel</i>	270.14(b)(7); 264.52(f)	Evacuation plans must include evacuation signals and primary and alternate evacuation routes.		
P-8e <i>Notification of federal, State and Local Authorities before Resuming Post-Closure Care</i>	270.14(b)(7); 264.56(i)	Federal or state authorities must be notified within 15 days of occurrence.		
P-8f <i>Notification Reports</i>	270.14(b)(7); 264.196(d)	Demonstrate that any release to the environment will be reported to regional administrator within 24 hours of detection.		
P-9 <i>Outline of Introductory and Continuing Training Programs</i>	270.14(b)(12); 264.16(a)(1)	(H-1) Facility personnel must successfully complete classroom or on-the-job training which will allow them to responsibly perform in their positions for post-closure care. The training program is limited to post-closure activities.		
P-9a <i>Job Title/Job Description</i>	270.14(b)(12); 264.16(d)1), (d)(2)	(H-1a) Owner or operator must maintain records of job titles, names of employees, job descriptions, and types and amounts of training given to employees.		
P-9b <i>Description of How Training will be Designed to Meet Actual Job Tasks</i>	270.14(b)(12); 264.16(c),(d) (3)	(H-1b) Training must be conducted by a qualified person; there must also be an annual review of the training.		
P-9c <i>Training Director</i>	270.14(b)(12); 264.16(a)(2)	(H-1c) Program must be directed by person trained in hazardous waste procedures.		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
P-9d <i>Relevance of Training to Job Position</i>	270.14(b)(12); 264.16(a)(2)	(H-1d) Training must include instruction on hazardous waste procedures relevant to each employee's position.		
P-9e <i>Training for Emergency Response</i>	270.14(b)(12); 264.16(a)(3)	(H-1e) Personnel must minimally be familiar with emergency procedures, emergency equipment, and emergency systems.		
P-9f <i>Maintenance of Training Records/Copy of Personnel Training Documents</i>	270.14(b)(12); 264.16(b),(d) (4),(e)	(H-1f) Training records on current personnel must be kept until the post-closure care period is completed. Training must be completed within 6 months after date of employment or assignment to the facility, whichever is later.		
P-10 <i>Closure Plans</i>	270.14(b)(13); 264.112(a)(1),(2)	(I-1) Include an approved closure plan consistent with the requirements of 264.112. This plan is included for post-closure facilities as a description of how the facility was closed.		
P-11 <i>Post-Closure Plan</i>	270.14(b)(13)	(I-2) Submit a copy of the approved post-closure plan.		
P-11a <i>Post-Closure Care Contact</i>	270.14(b)(13); 264.118(b)(3)	(I-2g) Provide the name, address, and phone number of the person or office to contact about the hazardous waste disposal unit or facility during the post-closure care period.		
P-12 <i>Notices Required for Disposal Facilities</i>	270.14(b)(14)	(I-3a through d) Provide a certification of closure, a survey plat, and a post-closure		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
		certification. Also include a statement that the post-closure notices required by 270.149(b)(14) will be filed and submitted appropriately.		
P-13 Post-Closure Cost Estimate	270.14(b)(16) 264.144	(I-6) Provide a copy of the most recent post-closure cost estimate, calculated to cover the cost, in current dollars, of post-closure monitoring and maintenance of the facility in accordance with the applicable post-closure plan. Estimate must be based on third party performing the post-closure activities. The cost estimate must be adjusted annually for inflation pursuant to 264.144(b).		
P-14 Financial Assurance Mechanism for Post-Closure Care	270.14(b)(16); 264.145; 264.151	(I-7) Provide a copy of the established financial assurance mechanism for post-closure care of the facility. The mechanism must be one of the following: • trust fund • surety bond • letter of credit • insurance • financial test and corporate guarantee for post-closure care • use of multiple financial mechanisms • use of financial mechanism for multiple facilities.		
P-15 Use of State Required Mechanisms	270.14(b)(18);	(I-9) When state has regulations equivalent		

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Section and Requirement	Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
	264.149	or greater liability requirements for financial assurance for closure post-closure submit copy of state-required financial mechanism.		
P-16 State Assumption of Responsibility	270.14(b)(18); 264.150	(I-9b) If state assumes legal responsibility for compliance with closure, post-closure, or liability requirements there must be a letter submitted from state specifying assumption of responsibilities and amounts of liability coverage assured by state.		
P-17 SWMUs	270.14(d)(1); 264.101	(J-1) Identify all SWMUs at the facility including hazardous and nonhazardous waste units, as well as active and inactive units, if known.		
P-17a Characterize the SWMU	270.14(d)(1)	(J-1) Submit SWMU information including: type of each unit; location on a topographic map; engineering drawings, if available, dimensions; dates of operation; description of wastes in each unit; and quantity or volume of waste, if known.		
P-17b No SWMUs		(J-1) Describe methodology used to determine that no existing or former SWMUs exist at the facility.		
P-17c Releases	270.14(d)(2)	(J-2)		
P-17c(1) Characterize Releases	270.14(d)(3)	(J-2) Provide following information concerning releases: date of release; type, quantity, and nature of release;		

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		groundwater monitoring and other analytical data; physical evidence of stressed vegetation; historical evidence of releases; any state, local, or federal enforcement action that may address releases; any public citizen complaints that indicate a release; and any other information showing the migration of the release.		
P-17c(2) No Releases		(J-1) Describe methodology used to determine that releases from SWMUs are not present.		
P-18 Part B Certification	270.11	(L-1)		
P-19 Information on the Potential for the Public to be Exposed to Releases. At a Minimum, this must include: - reasonably foreseeable potential releases - potential pathways of human exposure - potential magnitude and nature of exposure	270.10(j)	(Q-1) The federal requirement is for surface impoundments and land disposal units.		

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- 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.
- 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.