

US EPA ARCHIVE DOCUMENT

# RCRA REVISION CHECKLIST 61

Changes to Interim Status Facilities for Hazardous Waste Management;  
 Modification of Hazardous Waste Management Permits;  
 Procedures for Post-Closure Permitting  
 54 FR 9596-9609  
 March 7, 1989  
 (Non-HSWA Cluster V)

Note: This rule does not impose a requirement or prohibition pursuant to HSWA. However, portions of the Federal requirements may be necessary to implement HSWA. These necessary rules will be immediately effective and administered by EPA in all States pursuant to RCRA Section 3006(g). For example, use of a Class I modification to add waste codes and/or narrative descriptions of treatment residues to RCRA permits may be necessary in appropriate situations to effectively implement the treatment requirements and prohibitions of the HSWA land disposal restrictions program. Other examples involve a change in interim status needed to comply with an EPA-issued Section 3008(h) corrective action order to comply with the minimum technology requirements of HSWA Section 3004(b).

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

## PART 124 - PROCEDURES FOR DECISIONMAKING

### SUBPART A - GENERAL PROGRAM REQUIREMENTS

†	PURPOSE AND SCOPE	
	add sentence to end on denial of a permit under 270.29	124.1(a)
†	ISSUANCE AND EFFECTIVE DATE OF PERMIT	
	add parenthetical clause on denial of permit under 270.29	124.15(a)
	add parenthetical clause on denial of permit under 270.29	124.15(b)
†	APPEAL OF RCRA, UIC, AND PSD PERMITS	
	add parenthetical clause on denial of permit under 270.29	124.19(a)

### PART 270 - EPA-ADMINISTERED PERMIT PROGRAMS: THE HAZARDOUS WASTE PERMIT PROGRAM

#### SUBPART A - GENERAL INFORMATION

RCRA REVISION CHECKLIST 61: Changes to Interim Status Facilities for  
Hazardous Waste Management; Modification of Hazardous Waste Management  
Permits; Procedures for Post-Closure Permitting (cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

† PURPOSE AND SCOPE OF THESE REGULATIONS

add sentence to end  
on effect of permit  
denial on post-closure  
permit requirements

270.1(c)

SUBPART B - PERMIT APPLICATION

† GENERAL REQUIREMENTS

add sentence to end--  
Director may deny a  
permit for active life  
without a complete  
permit application

270.10(c)

† PERMIT DENIAL

director denial of entire  
permit application or  
active life of hazardous  
waste facility or unit

270.29

SUBPART D - CHANGES TO PERMIT

† PERMIT MODIFICATION AT THE REQUEST OF THE PERMITTEE

make the listed  
changes as  
shown below

270.42,  
Appendix I

Amend items F(1)(a), F(1)(b), F(3), G(1)(a), G(1)(b), (G)(5)(a) and G(5)(b); add items F(1)(c), F(4)(a), F(4)(b), G(1)(e), G(5)(c), G(5)(d), H(5)(c), H(5)(d), J(6)(c) & J(6)(d) as is shown below.

RCRA REVISION CHECKLIST 61: Changes to Interim Status Facilities for  
Hazardous Waste Management; Modification of Hazardous Waste Management  
Permits; Procedures for Post-Closure Permitting (cont'd)

FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE

SUBPART G - INTERIM STATUS

† CHANGES DURING INTERIM STATUS

add introductory  
paragraph addressing  
changes during interim  
status

270.72(a)

redesignate former  
270.72(a) as  
270.72(a)(1); reword  
and include wording  
on newly listed or  
identified wastes  
regarding units used to  
handle such waste

270.72(a)(1)

redesignate former  
270.72(b) as  
270.72(a)(2); slightly  
reword and reorganize

270.72(a)(2)

redesignate this portion  
of former 270.72(b)  
regarding lack of  
capacity and reword  
slightly

270.72(a)(2)(i)

add subsection regard-  
ing compliance with  
Federal, State, or local  
requirements

270.72(a)(2)(ii)

redesignate former  
270.72(c) as  
270.72(a)(3); remove  
"may be made at a  
facility" after  
"hazardous waste"

270.72(a)(3)

redesignate former  
270.72(c)(1) as  
270.72(a)(3)(i); replace  
"it is" with "the  
change."

270.72(a)(3)(i)

redesignate former  
270.72(c)(2) as  
270.72(a)(3)(ii);  
replace "It is" with  
"The change"; remove  
parenthetical statement  
and "regulations";

RCRA REVISION CHECKLIST 61: Changes to Interim Status Facilities for  
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FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE ANALOG IS:			
		ANALOGOUS STATE CITATION	EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
replace "local laws" with "local requirement"	270.72(a)(3)(ii)				
redesignate former 270.72(d) as 270.72(a)(4); remove "may be made" after "facility"; remove "ownership or" before "operational control"	270.72(a)(4)				
add new section allowing changes made in accordance with a corrective action order or a court order; limited to the TS or D of releases originating within facility's boundaries	270.72(a)(5)				
redesignate former 270.72(e) as 270.72(b); revise first sentence; replace last sentence with list of changes that can be made if they amount to reconstruction:	270.72(b)				
changes solely to comply with 265.193	270.72(b)(1)				
changes necessary to satisfy standards of 3004(o) because of Federal, State or local requirements	270.72(b)(2)				
changes necessary to allow continuing treat- ment of newly listed or identified wastes TSD'd prior to rule's effective date	270.72(b)(3)				
changes during closure in accordance with approved closure plan	270.72(b)(4)				
changes necessary to comply with interim status corrective action order or court order; changes limited to					

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FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	STATE ANALOG IS:		
			EQUIV- ALENT	MORE STRINGENT	BROADER IN SCOPE
TS or D of waste originated within boundary of facility	270.72(b)(5)				
changes to treat or store, in tanks or containers, wastes subject to 268 or RCRA Section 3004 disposal restriction, if solely made for compliance with these requirements	270.72(b)(6)				
redesignate and revise as 270.72(a)(3)	270.72(c)				
redesignate and revise as 270.72(a)(4)	270.72(d)				
redesignate and revise as 270.72(b)	270.72(e)				
† TERMINATION OF INTERIM STATUS					
redesignate former 270.73(e) as 270.73(f); add new paragraph on termination 12 months after effective date for land disposal units operating under 270.72(a)(1), (2) or (3)	270.73(e)				
redesignate former 270.73(e) as 270.73(f)	270.73(f)				
redesignate former 270.73(f) as 270.73(g)	270.73(g)				

