

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION G. CONTINGENCY PLAN**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
G-1 Contingency Plan	270.14(b)(7)			
G-2 Emergency Coordinators	270.14(b)(7); 264.52(d); 264.55	There must at least be one primary emergency coordinator available at all times.		
G-3 Implementation	270.14(b)(7); 264.52(a); 264.56(d); 264a.56	Emergency coordinator to determine that facility has had a release, fire, or explosion that could threaten human health or the environment outside facility.		
G-4 Emergency Actions	270.14(b)(7); 264.56; 264a.56			
G-4a Notification	270.14(b)(7); 264.56(a); 264a.56	Describe the method for immediate notification of facility personnel and necessary state and local agencies.		
G-4b Identification of Hazardous Materials	270.14(b)(7); 264.56(b)	Observation, records or manifest, or chemical analysis may be used by emergency coordinator.		
G-4c Assessment	270.14(b)(7); 264.56(c),(d); 264a.56	Direct and indirect effects must be considered.		
G-4d Control Procedures	270.14(b)(7); 264.52(a)	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.		
G-4e Prevention of Recurrence of Spread of Fires, Explosions, or Releases	270.14(b)(7); 264.56(e)	Measures must include stopping processes and operations, collecting and containing release of waste, and removing or isolating containers.		

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G-4e(1) Monitor for Leaks, Pressure Buildup, Gas Generation or Ruptures of Released Material	270.14(b)(7); 264.56(f)	This item applies if facility stops operations.		
G-4f Storage, Treatment, and Disposal of Released Material	270.14(b)(7); 264.56(g)	After emergency, emergency coordinator must provide for treating, storing, and disposing of recovered waste.		
G-4g Incompatible Waste	270.14(b)(7); 264.56(h)(1)	Until cleanup is complete, assure that incompatible waste is not stored together.		
G-4h Post-Emergency Equipment Management	270.14(b)(7); 264.56(h)(2)	Decontamination is required for emergency equipment.		
G-4h(1) Notification of Federal, State and Local Authorities before Resuming Operations	270.14(b)(7); 264.56(i)	Federal or state authorities must be notified within 15 days of occurrence.		
G-4i Container Spills and Leakage	270.14(b)(7); 264.52;264.71	Specify procedures to be used when responding to container spills and leakage.		
G-4j Tank Spills and Leakage		For a tank or containment system from which there has been a leak or spill:		
G-4j(1) Stopping Waste Addition	270.14(b)(7); 264.196(a)	Document that the owner/operator will immediately stop the flow of hazardous waste.		
G-4j(2) Removing Waste	270.14(b)(7); 264.196(b)	Owner/operator will, within 24 hours after leak detected, remove waste and allow inspection and repair of the tank system to be performed.		
G-4j(3) Containment of Visible Releases	270.14(b)(7); 264.196(c)	Specify that a visual inspection of a release will be conducted, demonstrate further mitigation of leak will be prevented, and visible contamination will be removed and disposed of properly.		

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G-4j(4) Notification Reports	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.		
G-4j(5) Provisions of Secondary Containment, Repair, or Closure	270.14(b)(7); 264.196(e)	Provision of secondary containment repair, otherwise closure is required.		
G4-k Surface Impoundment Spills and Leakage	270.14(b)(7); 264.227	Surface impoundments must be removed from service when:		
G4-k(1) Emergency Repairs	270.14(b)(7); 264.227	Describe procedures for removing surface impoundments from service.		
G4-k(1)(a) Stopping Waste Addition	270.14(b)(7); 264.227(b)(1)	Procedures for stopping waste addition to the impoundment.		
G4-k(1)(b) Containing Leaks	270.14(b)(7); 264.227(b)(2)	Procedures for containing leak.		
G4-k(1)(c) Stopping Leaks	270.14(b)(7); 264.227(b)(3)	Procedures for stopping leak.		
G4-k(1)(d) Preventing Catastrophic Failure	270.14(b)(7); 264.227(b)(4)	Procedures to stop or prevent catastrophic failure.		
G4-k(1)(e) Emptying the Impoundment	270.14(b)(7); 264.227(b)(5)	Procedures for emptying impoundment, if necessary.		
G4-k(2) Certification	270.14(b)(7); 264.226 (c); 264.227(d)(1)	Procedures for recertifying a dike's structural integrity if impoundment is removed from service due to actual or imminent failure.		
G4-k(3) Repairs as a Result of Sudden Drop	270.14(b)(7); 264.227(d)(2)	Procedures to follow if impoundment is removed from service due to sudden drop in liquid level of the following:		

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G4-k(3)(a) Existing Portions of Surface Impoundment	270.14(b)(7); 264.227(d)(2)(i)	Installation of liner for any existing portion of impoundment.		
G4-k(3)(b) Other Portions of the Surface Impoundment	270.14(b)(7); 264.227(d)(2)(ii)	Certification by qualified engineer for other than existing portions of the impoundment.		
G4-l Containment Building Leaks	270.14(b)(7); 264.1101(c)(3)	Through active life of building if owner/operator detects condition that could lead to release of hazardous waste.		
G-4l(1) Repair of Containment Building	270.14(b)(7); 264.1101(c)(3)	Within 7 days of detection, owner/operator must contact regional administrator. Enter record of discovery, remove contaminated portion of building from service, determine repair steps, and establish schedule for repair.		
G-4l(2) Certification Following Repair	270.14(b)(7); 264.1101(c)(3)(iii)	Upon completion of repairs owner/operator must notify regional administrator.		
G-4m Drip Pad Spills and Leakage	270.14(b)(7); 264.573(m)	Throughout the active life of the drip pad, if a condition is detected that may have or has caused a release of hazardous waste, it must be repaired within a reasonably prompt period of time.		
G-4m(1) Stopping Waste Addition	270.14(b)(7); 264.573(m)(1)(ii)	Upon detection of leakage in the leak detection system, immediately remove the affected portion of the drip pad from service.		
G-4m(2) Determine Appropriate Cleanup and Repair	270.14(b)(7); 264.573(m)(1)(iii)	Establish a schedule for accomplishing the repairs.		

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G-4m(3) Notification	270.14(b)(7); 264.573(m)(1)(iv)	Within 24 hours after discovery of the condition, notify the Regional Administrator or state director. Within 10 working days, provide written notice and a description of the repairs to be made to the drip pad.		
G-4m(4) Certification	270.14(b)(7); 264.573(m)(3)	Upon completing all repairs and clean up, provide certification signed by an independent, qualified registered PE.		
G-5 Emergency Equipment	270.14(b)(7); 264.52(e)			
G-6 Arrangements with Local Authorities	270.14(b)(7); 264.37; 264.52(c)	Police and fire departments, hospitals, and emergency response teams must be notified by owner/operator. Document refusal to enter into a coordination agreement.		
G-7 Evacuation Plan for Facility Personnel	270.14(b)(7); 264.52(f)	Evacuation plans must include evacuation signals and primary and alternate evacuation routes.		
G-8 Required Report Procedures for Recordkeeping and Reporting to Federal Authority	270.14(b)(7); 264.56(j)	Owner/operator must note on operation record the time, date and details of incidents which require implementation of contingency plan.		
G-9 Location and Distribution of Contingency Plan	270.14(b)(7); 264.53	Copy of contingency plan must be maintained at facility and submitted to local authorities.		

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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.
- 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.
- d Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 PA. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.

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**SECTION H. PERSONNEL TRAINING**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
H-1 Outline of Introductory and Continuing Training Programs	270.14(b)(12); 264.16(a)(1)	Facility personnel must successfully complete classroom or on-the-job training which will allow them to responsibly perform in their positions.		
H-1a Job Title/Job Description	270.14(b)(12); 264.16(d)1),(d)2 )	Owner or operator must maintain records of job titles, names of employees, job descriptions, and types and amounts of training given to employees.		
H-1b Description of How Training will be Designed to Meet Actual Job Tasks	270.14(b)(12); 264.16(c),(d)(3)	Training must be conducted by a qualified person; there must also be an annual review of the training.		
H-1c Training Director	270.14(b)(12); 264.16(a)(2)	Program must be directed by person trained in hazardous waste procedures.		
H-1d Relevance of Training to Job Position	270.14(b)(12); 264.16(a)(2)	Training must include instruction on hazardous waste procedures relevant to each employee's position.		
H-1e Training for Emergency Response	270.14(b)(12); 264.16(a)(3)	Personnel must minimally be familiar with emergency procedures, emergency equipment, and emergency systems.		
H-2 Maintenance of Training Records/Copy of Personnel Training Documents	270.14(b)(12); 264.16(b),(d) (4),(e)	Training records on current personnel must be kept until closure of facility. Training must be completed within 6 months after date of employment.		

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**SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

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I-1	270.14(b)(13)			
I-1a	270.14(b)(13); 264.111	Describe how closure: minimizes the need for further maintenance; controls, minimizes, or eliminates the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and complies with the closure requirements of Subpart G and unit-specific closure requirements.		
I-1b	270.14(b)(13); 264.112(b)(1) through 264.112(b)(7)	Describe the time and all activities required for: partial closure, if applicable; final closure; and maximum extent of operation that will be active during life of facility.		
I-1c	270.14(b)(13); 264.112(b)(3)			
I-1d	270.14(b)(13); 264.112(b)(6)			
I-1(d)(1)	270.14(b)(13); 264.112(b)(2); 264.113(a) and (b)			
I-1d(1)(a)	270.14(b)(13); 264.113(a) and (b)			

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I-1e Closure Procedures	270.14(b)(13); 264.112; 264.114			
I-1e(1) Inventory Removal	270.14(b)(13); 264.112(b)(3)	Discuss methods for removing, transporting, treating, storing, or disposing of all hazardous wastes and identify the type(s) of off-site hazardous waste management units to be used.		
I-1e(2) Disposal or Decontamination of Equipment, Structure, and Soils	270.14(b)(13); 264.112(b)(4); 264.114	Provide a detailed description of the steps needed to decontaminate or dispose of all facility equipment and structures. Demonstrate that any hazardous constituents (i.e., Appendix VII) left at the unit will not impact any environmental media in excess of Agency-established exposure levels and that direct contact will not pose a threat to human health and the environment.		
I-1e(3) Closure of Disposal Units/Contingent Closures	270.14(b)(13)			
I-1e(3)(a) Disposal Impoundments	270.14(b)(13); 264.228(a)(2)			
I-1e(3)(a)(i) Elimination of Liquids	270.14(b)(13)			
I-1e(3)(a)(ii) Waste Stabilization	270.14(b)(13); 264.228(a)(2)(ii)			
I-1e(3)(b) Cover Design	270.14(b)(13); 264.228(a)(2)(iii) 264.310(a)			

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I-1e(3)(c)    Minimization of Liquid Migration	270.14(b)(13); 264.228(a)(2)(iii) (A); 264.310(a)(1)	Draft RCRA Guidance Document entitled <u>Landfill (Design--Liner Systems and Final Cover)</u> (1982), suggests the following design for landfill cover systems (from top to bottom): a vegetated top cover, with a minimum of 24 inches of topsoil; a middle drainage layer (at least one foot thick with a saturated conductivity of not less than $1 \times 10^{-3}$ cm/sec) overlain by a geotextile filter fabric or graded granular filter; and a low permeability bottom layer consisting of two components: an upper component of at least a 20 mil synthetic membrane protected above and below by at least six inches of bedding material, a lower component of at least 24 inches of low permeability (maximum hydraulic conductivity of $1 \times 10^{-7}$ cm/sec) soil emplaced in lifts not exceeding six inches. For cover designs different than EPA-recommended designs, provide engineering calculations showing the proposed cover will provide long-term minimization of liquid migration through the cover.		
I-1e(3)(d)    Maintenance Needs	270.14(b)(13); 264.228(a)(2)(iii) (B); 264.310(a)(2)			

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I-1e(3)(e) Drainage and Erosion	270.14(b)(13); 264.228(a)(2)(iii) (C); 264.310(a)(3)	The following information should be provided: data demonstrating that the proposed final slopes will not cause significant cover erosion; description of drainage materials and their permeabilities; engineering calculations demonstrating free drainage of precipitation off of and out of the cover; and estimation of the potential for drainage-layer clogging.		
I-1e(3)(f) Settlement and Subsidence	270.14(b)(13); 264.228(a)(2)(iii) (D); 264.310(a)(4)	Include the following information: potential foundation compression; potential soil liner compression; and potential waste consolidation and compression resulting from waste dewatering, biological oxidation and chemical conversion of solids to liquids.		
I-1e(3)(g) Cover Permeability	270.14(b)(13); 264.228(a)(2)(iii) (E); 264.310(a)(5)			
I-1e(3)(h) Freeze/Thaw Effects	270.14(b)(13); 264.228(a)(2)(iii) 264.310(a)	Identify the average depth of frost penetration and describe the effects of freeze/thaw cycles on the cover.		
I-1e(4) Closure of Containers	270.14(b)(13); 264.178; 264.112(b)(3); 270.14(b)(13)	Address the following: hazardous waste removal and disposal; container decontamination and disposal; site decontamination and disposal including linings, soil, and washes; maximum inventory.		

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I-1e(5) Closure of Tanks	270.14(b)(13); 264.197; 264.112(b)(3)	The description should address the following: waste removal from tanks and equipment; decontamination of all components; verification of decontamination; disposal of wastes and residues; and maximum inventory.		
I-1e(6) Closure of Waste Piles	270.14(b)(13); 270.18(h); 264.258	The description must address the following: procedure and criteria for determining whether or not decontamination has been successful; and sampling and analytical techniques.		
I-1e(7) Closure of Surface Impoundments	270.14(b)(13); 270.17(f); 264.228(a)(1),(2) , and (b)	Surface impoundments without liners or with liners that do not meet the requirements must also provide contingent plans for closure in place and a contingent post-closure plan, except for impoundments requesting a liner exemption in accordance with D-4b.		
I-1e(8) Closure of Incinerators	270.14(b)(13); 264.351	Describe how, at closure, all hazardous waste and hazardous waste residues (including, but not limited to, ash, scrubber waters, and scrubber sludges) will be removed from the incinerator, associated ductwork, piping, air pollution control equipment, sumps, and any other structures or operating equipment such as pumps, valves, etc., that have come into contact with the hazardous waste. Alternatively, describe how the incinerator and associated units and equipment will be dismantled and disposed of as a hazardous waste.		

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I-1e(9) Closure of Landfills	270.14(b)(13); 270.21(e); 264.310(a)	Provide detailed plans and engineering report that describes the final cover components in detail. Cover installation and construction quality assurance procedures should be thoroughly described.		
I-1e(10) Closure of Land Treatment Facilities	270.14(b)(13); 264.280(a); 270.20(f)			
I-1e(10)(a) Continuance of Treatment	270.14(b)(13); 264.280(a)(1) through (7)			
I-1e(10)(b) Vegetative Cover	270.14(b)(13); 270.20(f); 264.280(a)(8)			
I-1e(11) Closure of Miscellaneous Units	270.14(b)(13); 270.23(a)(2)			

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I-1e(12) Closure of Boilers and Industrial Furnaces	270.14(b)(13); 266.102(a)(2)(vii)	Describe how, at closure, all hazardous waste and hazardous waste residues (including, but not limited to, ash, scrubber waters, and scrubber sludges) will be removed from the BIF unit, associated ductwork, piping, air pollution control equipment, sumps and any other structures or operating equipment such as pumps, valves, etc., that have come into contact with hazardous wastes. Alternatively, describe how the BIF and associated equipment will be dismantled and disposed of. If any wastes, waste residues, contaminated components, subsoils, structures or equipment remain after closure, provide plans for closing the BIF unit as a landfill and provide a post-closure care plan.		
I-1e(13) Closure of Containment Buildings	270.14(b)(13); 264.1102	Show that at closure all hazardous waste, hazardous waste residues, contaminated containment system, contaminated subsoils, and all structures and equipment contaminated with waste and leachate will be removed. If any wastes, waste residues, contaminated components, subsoils, structures or equipment remain after closure, provide plans for closing the containment building as a landfill and provide a post-closure care plan.		
I-2 Post-Closure Plans	270.14(b)(13)			

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I-2a Inspection Plan	270.14(b)(13); 264.118(a); 264.197(b); 264.197(c)(2); 264.226(d)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258 (c)(1)(ii); 264.303(c); 264.310(b)	Rationale for determining the length of time between inspections should be provided.		
I-2b Monitoring Plan	270.14(b)(13); 264.118(b)(1); 264.197(b); 264.197(c)(2); 264.226(d)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258 (c)(1)(ii); 264.303(c); 264.310(b)			



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I-2c Maintenance Plan	270.14(b)(13); 264.118(b)(2); 264.197(b); 264.197(c)(2); 264.228(b); 264.228(c)(1)(ii); 264.258(b); 264.258(c)(1)(ii); 264.310(b)	Describe the preventative and corrective maintenance procedures, equipment procedures, equipment requirements and material needs.		
I-2d Land Treatment	270.14(b)(13); 264.280(c)	Describe the operation, inspection, and maintenance programs to be used at the closed facility.		
I-2e Post-Closure Care for Miscellaneous Units	270.14(b)(13); 270.23(a)(3); 264.603			
I-2f Post-Closure Security	270.14(b)(13); 264.117(b) and (c)	Demonstrate that for property where hazardous wastes remain after partial or final closure, 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.		
I-2g Post-Closure Contact	270.14(b)(13); 264.118(b)(3)			
I-3 Notices Required for Disposal Facilities	270.14(b)(13)			

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I-3a Certification of Closure	270.14(b)(13); 264.115; 264.280; 264a.115			
I-3b Survey Plat	270.14(b)(13); 264.116			
I-3c Post-Closure Certification	270.14(b)(13); 264.120; 264a.120			
I-3d Post-Closure Notices	270.14(b)(13); 270.14(b)(14); 264.119			
I-4 Closure Cost Estimate	270.14(b)(15); 264.142	Estimate must equal final cost estimate. Estimate must be based on third party closing facility and may use on-site disposal if capacity will exist over life of facility. Estimate must be adjusted for annual inflation as stated in 264.142(b). Estimates may not assume zero cost for hazardous waste handling, and may not incorporate salvage value, facility structures/equipment, land, or other facility assets as offsets.		
I-5 Financial Assurance for Closure	270.14(b)(15); 264a.143			
I-5a Closure Trust Fund	270.14(b)(15)	Provide copy of fund agreement.		
I-5b Surety Bond	270.14(b)(15)			

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**SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-5b(1) Surety Bond Guaranteeing Payment into a Closure Trust Fund	270.14(b)(15)	Must provide bond or standby trust agreement. Bond must guarantee owner/operator will fund standby trust fund or provide financial assurance equal to penal sum.		
I-5b(2) Surety Bond Guaranteeing Performance of Closure	270.14(b)(15)	Guarantee owner/operator will perform closure required as worded in 246.151(c) and Subpart G.		
I-5(c) Closure Letter of Credit	270.14(b)(15)	Requires letter of credit for 1 year equal to amount of closure.		
I-5(d) Closure Insurance	270.14(b)(15)	Provide copy of certificate of insurance, wording requirement found in 264.151(e).		
I-5(e) Financial Test and Corporate Guarantee for Closure	270.14(b)(15); 264.143(f);	Signed letter by owner/operator or chief financial officer as specified in 264.151(f),(h) of applicant financial statement. If a parent corporation is guaranteeing closure care, corporate guarantee must accompany. See Form 2510-FM-LRWM0079A relating to Hazardous Waste Site Closure or Post-Closure Corporate Guarantee Bond.		
I-5(f) Use of Multiple Financial Mechanism	270.14(b)(15);	Financial assurance instruments must meet requirements stated in 264.143 (a),(b),(c),(d) or (e) that include trust funds, surety bonds, letter of credit, and insurance, respectively.		
I-5(g) Use of Multiple Financial Mechanism for Multiple Facilities	270.14(b)(15)	Provide financial assurance mechanism showing amount of funds assured.		

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-6 Post-Closure Cost Estimate	270.14(b)(16); 264.144	Estimate must be based on third party closing facility and may use on-site disposal if capacity will exist over life of facility. Estimate must be adjusted for annual inflation as stated in 264.142(b).		
I-7 Financial Assurance Mechanism for Post Closure Care	270.14(b)(16); 264a.145			
I-7a Post-Closure Trust Fund	270.14(b)(16)	Provide copy of post-closure fund agreement. Wording requirements outlined in 264.151(a)(1).		
I-7b Surety Bond	270.14(b)(16);	264.145(b),(c) spells out requests for owner/operator for adjusting estimates, inflation, and reporting to regional administrator. 264.151(b),(c) outlines wording for bond agreement.		
I-7b(1) Surety Bond Guaranteeing Payment into a Post-Closure Trust Fund	270.14(b)(16)	Must provide bond or standby trust agreement before beginning final closure of the facility. Bond must guarantee owner/operator will fund a standby trust fund or provide financial assurance equal to penal sum.		
I-7b(2) Surety Bond Guaranteeing Performance of Closure	270.14(b)(16)	Guarantee owner/operator will perform closure required as stated in 264.151(c) and Subpart H.		
I-7(c) Post-Closure Letter of Credit	270.14(b)(16)	Requires letter of credit for 1 year equal to amount of post-closure cost.		
I-7(d) Post-Closure Insurance	270.14(b)(16)	Provide copy of certificate of insurance, wording requirement found in 264.151(e).		

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-7(e) Financial Test and Corporate Guarantee for Post-Closure Care	270.14(b)(16)	Signed letter by owner/operator or chief financial officer as specified in 264.151(f),(h) of applicant financial statement. If parent corporation is guaranteeing post-closure care, corporate guarantee must accompany. See Form 2510-FM-BWM0079A relating to Hazardous Waste Site Closure or Post-Closure Corporate Guarantee Bond.		
I-7(f) Use of Multiple Financial Mechanism	270.14(b)(16)	Provide copy of financial assurance mechanisms. Combined financial assurance must be at least equal to post-closure cost estimate.		
I-7(g) Use of Multiple Financial Mechanism for Multiple Facilities	270.14(b)(16)	Provide copy of financial assurance mechanisms for more than one facility. Amount must be no less than sum of funds that would be available if separate mechanism had been established and maintained for each facility.		
I-8 Liability Requirements	270.14(b)(17); 264.147; 264a.147			
I-8a Coverage for Sudden Accidental Occurrences	270.14(b)(17); 264.147(a)	Coverage must be maintained for sudden accidental occurrences in the amount of \$1 million per occurrence with an annual agreement of at least \$2 million.		

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-8a(1) Endorsement of Certification	270.14(b)(17); 264.147(a)(1)	Submit original Hazardous Waste Facility Liability Endorsement wording pursuant to 264.151(i), or Certificate of Liability wording pursuant to 264.151(j). See Form 2510-FM-BWM0078 relating to Hazardous Waste Facility Certificate of Liability Insurance.		
I-8a(2) Financial Test and Corporate Guarantee for Liability Coverage	270.14(b)(17); 264.147(a)(2),(f), (g)	Requires signed letter by owner or chief financial officer worded as outlined in 264.151(g) outlining applicant financial statement. 264.151(g) used if applicant is using financial test to cover cost for closure or post closure. Alternatively, owner/operator may submit corporate guarantee specified in 264.151(h)(2). See Form 2540-FM-BWM0101A relating to Corporate Guarantee Bond for a Waste Management Facility.		
I-8a(3) Use of Multiple Financial Mechanism	270.14(b)(17); 264.147(a)(3)	Submit items demonstrating liability coverage specified in I-8a(1) and I-8a(2). Amount of coverage must total at least minimum amount required by 264.147(a).		

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-8b Coverage for Nonsudden Accidental Occurrences	270.14(b)(17); 264.147(b)	For high risk storage facilities, surface impoundments, land disposal, land treatment facilities, liability coverage must be maintained in the amount of at least \$3 million per occurrence. Annual aggregate at least \$6 million.		
I-8b(1) Endorsement or Certification	270.14(b)(17); 264.147(b)(1)	Submit signed duplicate original of Hazardous Waste Facility Liability Endorsement.		
I-8b(2) Financial Test or Corporate Guarantee for Liability Coverage	270.14(b)(17); 264.147(b)(2)	Requires signed letter by owner or chief financial officer worded as outlined in 264.151(g) outlining applicant financial statement. 264.151(g) used if applicant is using financial test to cover cost for closure or post closure. Alternatively, owner/operator may submit corporate guarantee specified in 264.151(h)(2). See Form 2540-FM-BWM0101A relating to Corporate Guarantee Bond for a Waste Management Facility.		

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION I. CLOSURE POST-CLOSURE PLANS AND FINANCIAL REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
I-8b(3) Use of Multiple Insurance Mechanism	270.14(b)(17); 264.147(b)(3)	Submit items demonstrating liability coverage specified in I-8a(1) and I-8a(2). Amount of coverage must total at least minimum amount required by 264.147(b).		
I-8c Requests for Variance	270.14(b)(17); 264.147(c)	Request for adjusted level of required liability must be supported by information which demonstrates 264.147(a) or (b) are not consistent with degree and duration of risk associated with treatment, storage, or disposal at facility or group of facilities.		
I-9 Use of State Required Mechanisms	270.14(b)(18)			
I-9a Use of State Required Mechanisms	270.14(b)(18)	When state has regulations equivalent or greater liability requirements for financial assurance for closure post-closure submit copy of state-required financial mechanism.		
I-9b State Assumption of Responsibility	270.14(b)(18)	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.		

## 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.

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.

D Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 Pa. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.



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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION J. SOLID WASTE MANAGEMENT UNITS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
J-1 Characterize the Solid Waste Management Unit (SWMU)	270.14(d)(1)	Describe methodology used to determine that no existing or former SWMUs exist at facility if applicable.		
J-2 Releases	270.14(d)(2)	Provide following information concerning releases: date of release; type, quantity, and nature of release; 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. Describe methodology used to determine that releases from SWMUs are not		

Notes:

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- 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.
- d Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 Pa. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.

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**SECTION L. PART B CERTIFICATION**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
L-1 Part B Certification	270.11	See Form HW-B relating to Professional Certification - 2510-FM-BWM0227.		

Notes:

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- 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.
- d Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 Pa. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION M. SUBPART AA PROCESS VENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-1 Definition of Process Vent	270.14(a); 264.1030; 264.1031	A process vent is any open-ended pipe or stack that is vented to atmosphere either directly, through a vacuum-producing system, or through a tank.		
M-2 Applicability—Process Vents Associated with the Following Six Operations that Manage Hazardous Waste with Organic Concentrations of at Least 10 Parts per Million by Weight if these Operations are Conducted in; a Unit Subject to the Permitting Requirements of 270; a Unit (including a Hazardous Waste Recycling Unit) that is Not Exempt from Permitting Under 262.34(a) and is Located at a Hazardous Waste Management Facility Otherwise Subject to Permitting Requirements; and a Unit that is Exempt from Permitting Under 262.34(a)	270.14(a); 264.1030(b); 264.1031	Concentrations should be determined by a time-weighted average annually or when waste or process changes.		
M-2a Distillation—a Batch or Continuous Operation Which Separates One or More Feed Stream(s) into Two or More Exit Streams, Each Exit Stream Having Component Concentrations Different from Those in the Feed Stream(s)	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		

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**SECTION M. SUBPART AA PROCESS VENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-2b Fractionation—a Distillation Operation or Method Used to Separate a Mixture of Several Volatile Components of Different Boiling Points in Successive Stages	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		
M-2c Thin-Film Evaporation—a Distillation Operation that Employs a Heating Surface Consisting of a Large Diameter Tube that May be Either Straight or Tapered, Horizontal or Vertical	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		
M-2d Solvent Extraction—an Operation or Method of Separation in Which a Solid or Solution Contacts a Liquid Solvent (The Two Being Mutually Insoluble) to Preferentially Dissolve and Transfer One or More Components into the Solvent	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		
M-2e Air Stripping—a Desorption Operation Employed to Transfer One or More Volatile Components from a Liquid Mixture into a Gas (Air) Either with or Without the Application of Heat to the Liquid	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-2f Stream Stripping—a Distillation Operation in Which Vaporization of the Volatile Constituents of a Liquid Mixture Takes Place by the Introduction of Steam Directly into the Charge.	270.24(b)(3); 264.1030(b); 264.1031	Include process description.		
M-3a Reduce Total Organic Emission below 1.4 Kilogram per Hour (3 Pounds per Hour) and 2.8 Million Grams per Year (3.1 Tons per Year), <u>or</u>	270.24(b); 264.1032(a)(1),(c)	Engineering calculations or performance tests may be used to determine vent emissions and emissions reductions or total organic compound concentrations achieved by add-on control devices.		
M-3b Reduce Total Organic Emissions of 95 Percent by Weight with the Use of a Control Device	270.24(b); 264.1032(a)(2),(b)	Engineering calculations or performance tests may be used to determine vent emissions and emissions reductions or total organic compound concentrations achieved by add-on control devices.		
M-3c Reduce Emissions for Various Control Devices with Closed-vent Systems under the Following Operational Conditions:	270.24(b); 264.1032(a - b); 264.1033(b - j)	Closed-vent systems are optional devices, but shall comply with regulations if they are used.		
M-3c(1) Control Device Involving Vapor Recovery (Condenser or Adsorber) Shall Recover at Least 95 Percent by Weight of the Organic Vapors	270.24(b); 264.1032(a)(1),(b)	A less than 95 percent recovery is permissible if control devices meet emission limits set in 264.1032(a)(1).		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-3c(2) Enclosed Combustion Device (A Vapor Incinerator, Boiler, or Process Heater) Shall Recover at Least 95 Percent by Weight of Organic Emissions	270.24(d); 264.1033(c)	The device shall achieve 20 parts per million by weight or 1/2 second residence time at 760 °C.		
M-3c(3) A Flare Shall Operate under the Following Four Conditions: (1) No Visible Emissions, (2) a Flame Present at all Times, (3) an Acceptable Net Heating Value, and (4) Appropriate Exit Velocity	270.24(d); 264.1033(d)			
M-4 Inspection Readings Shall Be Conducted at Least Daily. Vent Stream Flow Information Shall be Provided at Least Hourly.	270.24(d); 264.1033(f)(1),(3)			
M-4a Continuous Monitoring for the Following Control Devices:	270.24(d); 264.1033(f)(2)			
M-4a(1) Thermal Vapor Incinerator (One Temperature Sensor).	270.24(d); 264.1033(f)(2)(i)	Sensor shall have accuracy of ± 1 percent °C or ± 0.5 °C, whichever is greater.		
M-4a(2) Catalytic Vapor Incinerator (Two Temperature Sensor)	270.24(d); 264.1033(f)(2)(i)	Sensor shall have accuracy of ± 1 percent °C or ± 0.5 °C, whichever is greater.		
M-4a(3) Flare (Heat Sensing Device)	264.1033(f)(2)(iii)			
M-4a(4) Boiler or Process Heater with Heater Input Capacity Equal or Greater than 44 Megawatts (Recorder Which Indicates Good Combustion Practices)	270.24(d); 264.1033(f)(2)(v)			

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-4a(5) Condenser (Device with Recorder to Measure the Concentration of Organic Compounds in the Condenser Exhaust Vent Stream or Temperature Monitoring Device Equipped with Recorder to Measure Temperature in the Condenser Exhaust Vent Stream)	270.24(d); 264.1033(f)(2)(vi)	Sensor shall have accuracy of $\pm 1$ percent $^{\circ}\text{C}$ or $\pm 0.5$ $^{\circ}\text{C}$ , whichever is greater.		
M-4a(6) Carbon Adsorption System (Device to Measure Organic Vapors or a Recorder that Verifies Predetermined Regeneration Cycle)	270.24(d); 264.1033(f)(2)(vii)			
M-4b Alternate Monitoring of Control Device	270.24(c); 264.1033(i)	Describe measurement of applicable monitoring parameters.		
M-4c Inspection of the Following Control Devices:	270.24(d); 264.1033(g - h)			
M-4c(1) Regenerable Carbon Adsorption System	270.24(d); 264.1033(g)	Carbon replacement schedule must be acceptable.		
M-4c(2) Nonregenerable Carbon Adsorption System	270.24(d); 264.1033(h)	Carbon shall be replaced when breakthrough is observed or on an acceptable schedule.		
M-5 Basic Design and Operation				
M-5a The Closed-Vent System Shall be Designed to Operate According to Either of the Following:	270.24(d); 264.1033(k)			

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**SECTION M. SUBPART AA PROCESS VENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-5a(1) With No Detectable Emissions	270.24(d); 264.1033(k)(1)	Emissions shall be less than 500 parts per million above backgrounds.		
M-5a(2) At a Pressure below Atmospheric Pressure	270.24(d); 264.1033(k)(2)	System shall be equipped with at least one pressure gauge or other measurement device that can be read from a readily accessible location to verify negative pressure is being maintained in system during operation.		
M-5b Owner/operator Shall Monitor and Inspect Each System	270.24(d); 264.1033(1)	The monitoring and inspection shall be done: (1) by date the system is subject to regulation, (2) annually, and (3) other times requested by the U.S. Environmental Protection Agency regional administrator. Various inspection and monitoring requirements apply depending upon the type of closed-vent system employed. All detected defects shall be repaired according to the schedule prescribed in 264.1033(1)(3).		
M-5c Closed-Vent System Shall be Operated at all Times When Emissions May be Vented to Them.	270.24(d); 264.1033(m)			



**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION M. SUBPART AA PROCESS VENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-5d Carbon Adsorption System Used to Control Air Pollutant Emissions	270.24(d); 264.1033(n)	Owner/operator must document that all carbon that is a hazardous waste and removed from the control device is managed in one of these approved manners: 264.1033(n)(1), (2), or (3).		
M-6 Any Components of a Closed-Vent System that are Designated as Unsafe to Monitor are Exempt from the Monitoring Requirements of 1033(l)(1)(i)(B) if Certain Conditions are Met.	270.24(d); 264.1033(o)	Applies to system if its components are unsafe to monitor and it adheres to written plan that requires monitoring using the procedures in 264.1033(l)(1)(ii)(B) as frequently as practicable during safe-to-monitor times.		
M-7a Owner/operator Complies with Record Keeping Requirements	270.24(d); 264.1033; 264.1035	Depending on the type of control devices and closed vent systems used, various records must be maintained in the facility operating record.		
M-7b Semiannual Report is Submitted According to Subpart AA Requirements	270.14(a); 264.1036	A semiannual report is only required if a control device operates outside the design specifications.		
M-7c Implementation Schedule is Provided	270.24(a); 264.1033(a)(2)	A schedule shall be provided when facilities cannot install a closed-vent system and control device to comply with Part 264 on date facility is subject to requirements.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
M-7d Performance Test Plan is Provided	270.24(c); 264.1035(b)(3)	A performance test plan shall be provided where owner/operator applies for permission to use control device other than thermal vapor incinerator, catalytic vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system, and chooses to use test data to determine organic removal efficiency achieved by control device.		

Notes:

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-1a Applicability	270.14(a); 270.25; 264.1050(b),(d)	Except as otherwise specified, this subpart applies to equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in one of the following: if these operations are conducted in; a unit subject to the permitting requirements of 270; a unit (including a hazardous waste recycling unit) that is not exempt from permitting under 262.34(a) and is located at a hazardous waste management facility otherwise subject to permitting requirements; and a unit that is exempt from permitting under 262.34(a) such as a 90-day tank or container.		
N-1b Definition of Equipment	270.14(a); 270.25; 264.1031; 264.1051	Examples include: valve, pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, or flange.		
N-1c Equipment in a Vacuum or Equipment that Contains or Contacts Hazardous Waste with an Organic Concentration of at Least 10 Percent by Weight for a Period of Less than 300 Hours per Calendar Year is Excluded from Requirements at 264.1052 to 264.1060.	270.14(a); 270.25; 264.1050(f)	Equipment shall be identified in a log in facility's operating record as required by 264.1064(g) in order to qualify for exclusion.		

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Facility Name: \_\_\_\_\_

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-2a Monthly Monitoring for Leaks	270.25(d); 264.1052(a)(1)			
N-2b Visual Inspection for Pump Seal Leakage on a Weekly Basis	270.25(d); 264.1052(a)(2)			
N-2c Leak Detection	270.25(d); 264.1052(b); 264.1063	Leak detected if: (1) leak detection instrument reads 10,000 parts per million (ppm) or greater, or (2) there are indications of liquid dripping from the pump seal.		
N-2d Leak Repair as Soon as Practicable	270.25(d); 264.1052(c); 264.1059	Repairs are to be made within 15 calendar days after detection. Repair extensions are allowed under conditions specified in 264.1059.		
N-2e Specific Exceptions to these Standards	270.25(d); 264.1052(d - f)	Exceptions to these standards are dual mechanical seal systems or no detectable emissions.		
N-3a Barrier Fluid Pressure Greater than the Compressor Stuffing Box Pressure	270.25(d); 264.1053(b)(1)			
N-3b Barrier Fluid System Connected by a Closed-Vent System to a Control Device as Described in Subpart AA	270.25(d); 264.1053(b)(2)			
N-3c No Detectable Atmospheric Emissions of Hazardous Contaminants from the Barrier System	270.25(d); 264.1053(b)(3)			

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-3d Sensors Checked Daily or an Audible Alarm Checked Monthly	270.25(d); 264.1053(d - c)			
N-3e Leak Detection	270.25(d); 264.1053(f)	A leak is detected if sensor indicates failure of: (1) seal system, or (2) barrier fluid system.		
N-3f Leak Repair as Soon as Practicable	270.25(d); 264.1053(g)(1); 264.1059	Repairs are to be made within 15 calendar days after detection. Repair extensions are allowed under conditions specified in 264.1059.		
N-3g Specific Exceptions to these Standards	270.25(d); 264.1053(h - i)	Exceptions to these standards are certain closed vent systems or no detectable emissions.		
N-4a Except During Pressure Releases, No Pressure Relief Device Shall Release Detectable Emissions	270.25(d); 264.1054(a)	Emissions shall be less than 500 ppm above background levels.		
N-4b Within 5 Calendar Days after a Pressure Release, No Detectable Emissions Shall Emanate from Pressure Released Device	270.25(d); 264.1054(b)	Emissions shall be less than 500 ppm above background levels.		
N-4c Specific Exceptions to These Standards	270.25(d); 264.1054(c)	Exceptions to these standards are certain closed vent systems.		

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-5a Each Sampling Connecting System Shall Be Equipped with a Closed-Purge, Closed Loop, or Closed-Vent System. Closed-Vent Systems and Control Devices are also Subject to 264.1033	270.25(d); 264.1055(a - b); 264.1060	Each closed-purge, closed-loop, or closed-vent system shall either: (1) return purged process fluid directly to process line, (2) collect and recycle purged process liquid, or (3) be designed and operated to capture and transport all purged process fluid to a waste management unit or control device that satisfies applicable requirements.		
N-5b Exemption for Qualified Sampling Systems	270.25(d); 264.1055(c)	In situ sampling systems and sampling systems without purges are exempt from requirements of 264.1055(a),(b).		
N-6a Open-Ended Valve or Line	270.25(d); 264.1056(a), (c)	A double block or bleed system must comply with the open-ended valve or line requirements.		
N-6b Second Valve	270.25(d); 264.1056(b)	A second valve shall be operated such that primary valve shall be closed before second valve is opened.		
N-7 Monitoring Schedule Based on Detection of Leaks and Predetermined Schedule	270.25(d); 264.1057(a - e)	A reading of 10,000 ppm denotes a detected leak.		
N-7d Specific Exceptions to the Monitoring Schedule	270.25(d); 264.1057(f - h); 264.1061; 264.1062	Exceptions to schedule include unsafe-to-monitor valves, no detectable emissions, and difficult-to-monitor valves.		

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-8a Monitoring	270.25(d); 264.1058(a); 264.1063(b)	Monitoring is required within 5 days after leak is found by sight, sound, smell, or other detection method.		
N-8b Leak Detection	270.25(d); 264.1058(b)	A leak is detected if a leak detection instrument reads 10,000 ppm or greater.		
N-8c Leak Repair as Soon as Practicable	270.25(d); 264.1058(c); 264.1059	Repairs are to be made within 15 calendar days after detection. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. Repair extensions are allowed under conditions specified in 264.1059.		
N-8d Any Connector that is Inaccessible or is Ceramic or Ceramic-Lined is Exempt from the Monitoring Requirements of 264.1058(a) and 264.1064	270.25(d); 264.1058(e)	Examples of ceramic-lined connectors include porcelain, glass, or glass-lined connectors.		
N-9 Specific Allowances for Delay of Repair for Various Types of Equipment	270.25(d); 264.1059			
N-10 When Closed-Vent Systems and Control Devices are Used, they Must Comply with the Requirements in Subpart AA	270.25(e); 264.1033; 264.1060			
N-11 An Owner/Operator may Elect to Comply with this Alternative Monitoring Program	270.25(e); 264.1061	No greater than 2 percent of the valves are allowed to leak per monitoring period.		

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION N. SUBPART BB EQUIPMENT LEAKS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
N-12 An Owner/Operator may Elect to Comply with this Alternative Work Practice	270.25(e); 264.1062	Relief of monitoring frequency is allowed if less than 2 percent of the valves are leaking.		
N-13 Owner Complies with Recordkeeping Requirements	270.25(a); 264.1064	Depending on the type of requirement, various records must be maintained in the facility operating record.		
N-13a Semiannual Report	270.25(a); 264.1065	A semiannual report is only required if leaks from equipment have gone unrepaired or a control device operates outside the design specifications.		
N-13b Implementation Schedule	270.25(b)	An implementation schedule shall be provided if facility cannot install closed-vent system and control device to comply with provisions of Part 264, Subpart BB on the effective date that facility becomes subject to provisions of Parts 264 and 265.		
N-13c Performance Test Plan	270.25(c)	A performance test plan shall be provided if the owner/operator applies for permission to use a control device for other than a thermal vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system and chooses to use test data to determine the organic removal efficiency achieved by the control device.		



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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.
- 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.
- d Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 Pa. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-1 Standards Apply to All Facilities That Treat, Store, or Dispose of Hazardous Waste in Tanks, Surface Impoundments, or Containers Subject to 264, Subparts I, J, or K, Except as Provided Otherwise	270.14(a); 270.27; 264.1080(a) - (d)	Exclusions from 264.1080(a) are listed at 264.1080(b) (e.g., a container that has a design capacity less than or equal to 0.1 cubic meters [m <sup>3</sup> ]).		
O-2 Following is a List of Units that are Exempt from the 264.1084-264.1087 Standards:	270.14(a); 270.27; 264.1082(c)			
O-2a A Tank, Surface Impoundment, or Container for Which All Hazardous Waste Entering the Unit Has an Average Volatile Organic Concentration at the Point of Waste Origination of less than 500 Parts per Million by Weight (ppmw)	270.14(a); 270.27; 264.1082(c)(1)	Waste determination procedures are specified at 264.1083.		
O-2b A Tank, Surface Impoundment, or Container for Which the Organic Content of all the Hazardous Waste Entering the Waste Management Unit has been Reduced by an Organic Destruction or Removal Process that Achieves Specified Criteria	270.14(a); 270.27; 264.1082(c)(2)	Waste determination procedures are specified at 265.1084(b)(2)-(b)(9).		

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-2c A Tank Used for Biological Treatment of Hazardous Waste that Destroys or Degrades the Organics Contained in the Hazardous Waste such that the Requirements of 264.1082(c)(2)(iv) are Met	270.14(a); 270.27; 264.1082(c)(3)	Waste determination procedures are specified at 264.1083(b) and 264.1083(a).		
O-2d A Tank, Surface Impoundment or Container for Which all Hazardous Waste Placed in the Unit Meets Applicable Organic Concentration Limits or has been Treated by Appropriate Treatment Technology	270.14(a); 270.27; 264.1082(c)(4)	Waste determination procedures are specified at Part 268.		
O-2e A Tank Located Inside an Enclosure Vented to a Control Device that is Used for Bulk Feed of Hazardous Waste to a Waste Incinerator that Meets Specified Criteria	270.14(a); 270.27; 264.1082(c)(5)	Design and operation of the control device and enclosure shall satisfy Part 61, Subpart FF; 52.741, Appendix B; and other conditions as specified.		
O-3 Several Waste Determination Procedures are Explained in Detail and Must be Followed in Order to Demonstrate the Various Subpart CC Exemptions and/or Control Requirements	270.14(a); 270.27; 264.1083; 265.1084	In general, an owner or operator need <u>not</u> undergo waste determination procedures unless they are pursuing an exemption from the Subpart CC regulations.		

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**SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-4 Tanks that Satisfy the Conditions at 264.1084(b)(1)(i-iii) Can Use Tank Level 1 or Tank Level 2 Controls. Tanks that do not Satisfy Conditions Shall Use Tank Level 2 Controls	270.14(a); 270.27; 264.1084(b)(1), (2)			
O-5a The Conditions at 264.108(b)(1)(i-iii) Provide that Hazardous Waste in the Tank Shall:	270.14(a); 270.27; 264.1084(b)(1)			
O-5a(1) Have Maximum Organic Vapor Pressure Which is less than Maximum Organic Vapor Pressure Limit for Tank's Design Capacity Category	270.14(a); 270.27; 264.1084(b)(1) (i)			
O-5a(2) Not be Heated to Temperature Greater than Temperature at Which Maximum Organic Vapor Pressure of Waste is Determined for Purposes of Compliance	270.14(a); 270.27; 264.1084(b)(1) (ii)			
O-5a(3) Not be Treated Using a Waste Stabilization Process, as Defined in 265.1081	270.14(a); 270.27; 264.1084(b)(1) (iii)	A waste stabilization process includes mixing hazardous waste with binders or other materials, and curing resulting hazardous waste and binder mixture.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-5b Maximum Organic Vapor Pressure Determination	270.14(a); 270.27; 264.1084(c) (1)	Must be determined before first time waste placed in tank, and retested whenever changes could cause it to increase above the maximum vapor pressure limit [264.1084(b)(1)(i)].		
O-5b(1) Tank Level 1. Owner/Operator Shall Equip Tanks with Fixed Roof and Closure Devices as Needed	270.14(a); 270.27; 264.1084(c)(2), (3)	Fixed roof/closure devices shall form continuous barrier over entire waste in tank; contain no visible open spaces between roof section joints or between interface of roof edge and tank wall; contain openings with closure devices or closed-vent system; and be made of suitable materials.		
O-5b(2) Tank Level 2. Owner/Operator Shall Use One of the Following Tanks:	270.14(a); 270.27; 264.1084(d)			
O-5b(2)(i) Fixed Roof Tank Equipped with Internal Floating Roof	270.27(a)(1); 264.1084(d)(1) (e)	Internal floating roof shall be designed to float on liquid surface, except when supported by leg supports; be equipped with continuous seal between tank wall and floating roof edge; and meet other design specifications.		
O-5b(2)(ii) Tank Equipped with an External Floating Roof	270.27(a)(1); 264.1084(d)(2), (f)	External floating roof shall be designed to float on all liquid surface, except when supported by leg supports; be equipped with two continuous seals; and meet other design specifications.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-5b(3) Tank Vented Through Closed-Vent System to a Control Device	270.14(a); 270.27; 264.1084(d)(3), (g)	Fixed roof/closure devices shall form continuous barrier over entire liquid surface; be made of suitable materials; and satisfy 264.1087 standards.		
O-5c Pressure Tank	270.14(a); 270.27; 264.1084(d)(4), (h)	Tank shall be designed not to bend to atmosphere as result of compression of vapor headspace in tank, and be equipped with closure devices as needed.		
O-5d Tank Located Inside an Enclosure that is Vented Through a Closed-Vent System to an Enclosed Combustion Control Device	270.14(a); 270.27; 264.1084(d)(5), (1)	Tank shall be located in enclosure that is vented through closed vent system to enclosed combustion device, and enclosure shall be equipped with safety devices as needed.		
O-5e Tank Level 1. Owner/Operator Shall:	270.14(a); 270.27; 264.1084(c)(1), (3)			
O-5e(1) Determine Maximum Organic Vapor Pressure for Hazardous Waste Initially and Whenever Changes could Cause the Vapor Pressure to Increase Above the Maximum Organic Vapor Pressure Limit	270.14(a); 270.27; 264.1084(c)(1)	Maximum organic vapor pressure shall be determined using 264.1083(c) procedures.		

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**SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-5e(2) Ensure that, Whenever Hazardous Waste is in Tank, the Fixed Roof is Installed with Each Closure Device Secured in Closed Position		Exceptions are listed at 264.1084(c)(3)(i-iii).		
O-5e(3) Inspect the Air Emission Control Equipment	270.14(a); 270.27; 264.1084(c)(4)			
O-5f Tank Level 2. Owner/Operators Shall Adhere to the Following Operating Procedures for Each Unit Type:	270.14(a); 270.27; 264.1084(e)(i)			
O-5f(1) Fixed Roof Tank Equipped with Internal Floating Roof	270.14(a); 270.27; 264.1084(e) (2), (3)	When floating roof is resting on leg supports, filling, emptying, or refilling shall be continuous and completed as soon as practical; when roof is floating, automatic bleeder vents shall be set closed; and prior to filling, openings in roof shall be secured. Inspect the floating roof.		
O-5f(2) Tank Equipped with an External Floating Roof	270.14(a); 270.27; 264.1084(f)(2), (3)	When floating roof is resting on leg supports, filling, emptying, or refilling shall be continuous and completed as soon as practical; when closure device is open for access, equipment and devices shall be closed and secured as specified; and seals shall provide a continuous and complete cover as specified. Inspect the floating roof.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-5f(3) Tank Vented Through Closed-Vent System to a Control Device	270.14(a); 270.27; 264.1084(g)(2), (3)	When hazardous waste is in tank, fixed roof shall be installed with closure devices secured in closed position and vapor headspace underneath fixed roof vented to control device, except as specified. Inspect and monitor the air emission control equipment.		
O-5f(4) Pressure Tank	270.14(a); 270.27; 264.1084(h)(2), (3)	When hazardous waste is in tank, it shall be operated as closed system that does not vent to atmosphere, except to avoid an unsafe condition.		
O-5f(5) Tank Located Inside an Enclosure that is Vented Through a Closed-Vent System to an Enclosed Combustion Control Device	270.27(a)(3), 264.1084(i)	Enclosure shall be operated in accordance with 52.741, Appendix B, and comply with applicable closed-vent requirements. Safety devices may be operated as needed. Inspect and monitor the system and control device.		
O-5f(6) Shall be Conducted Using Continuous Hard-Piping or Another Closed System that Does Not Allow Exposure of Hazardous Waste to Environment	270.14(a); 270.27; 264.1084(j)(1)	Requirements do not apply under the conditions specified at 264.1084(j)(2).		
O-6a Owner/Operators Shall Install Either of the Following Controls:	270.14(a); 270.27; 264.1085(b)(d)			



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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-6a(1) Floating Membrane Cover	270.27(a)(4); 264.1085(b)(1), (c)(1)	Floating membrane cover shall float on liquid surface and form continuous barrier over entire liquid; be made of synthetic membrane material; contain no visible open spaces; and be equipped with closure devices and cover drains as needed.		
O-6a(2) Cover That Is Vented Through a Closed-Vent System to a Control Device	270.14(a); 270.27; 264.1085(b)(2) and (d)(2)	Cover/closure devices shall form continuous barrier over entire liquid surface; be equipped with closure device; be made of suitable material; and be designed in compliance with 264.1087.		
O-6b Owner/Operators Shall Adhere to the Following Operating Procedures for Each Control Type:	270.14(a); 270.27; 264.1085(c), (d)			
O-6b(1) Floating Membrane Cover	270.14(a); 270.27; 264.1085(c)(2), (3)	When hazardous waste is in surface impoundment, floating membrane cover shall float on liquid, and each closure device shall be secured in closed position, except as specified. Inspect the cover.		
O-6b(2) Cover that is Vented Through a Closed-Vent System to a Control Device	270.14(a); 270.27; 264.1085(d) (2), (3)	When hazardous waste is in surface impoundment, cover shall be installed with each closure device secured in closed position and vapor headspace underneath the cover vented to control device, except as specified. Closed-vent system and control device shall be operated in accordance with 264.1087. Inspect and monitor the control device.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-7 Shall be Conducted Using Continuous Hard-Piping or Another Closed System	270.14(a); 270.27; 264.1085(c)(1)	Requirements do not apply under conditions specified at 264.1085(e)(2).		
O-8a Container Level 1 Standards Apply to:	270.14(a); 270.27; 264.1086(b)(1)			
O-8a(1) Container with Design Capacity Greater than 0.1 m <sup>3</sup> and less than or Equal to 0.46 m <sup>3</sup>	270.14(a); 270.27; 264.1086(b)(1) (i)			
O-8a(2) Container with Design Capacity Greater than 0.46 m <sup>3</sup> that is not in Light Material Service	270.14(a); 270.27; 264.1086(b)(1) (ii)			
O-8ab Container Level 2 Standards Apply to Container with a Design Capacity Greater than 0.46 m <sup>3</sup> that is in Light Material Service	270.14(a); 270.27; 264.1086(b)(1) (iii)			
O-8c Container Level 3 Standards Apply to Container with Design Capacity Greater than 0.1 m <sup>3</sup> that is Used for Stabilization	270.14(a); 270.27; 264.1086(b)(2)	Level 3 standards apply at those times during waste stabilization process when hazardous waste in container is exposed to atmosphere.		
O-9 Identify Each Container Area Subject to Subpart CC	270.27(a)(2)			

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**SECTION O. SUBPART CC AIR EMISSION STANDARDS**

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O-9a Container Level 1. A Container Using Level 1 Controls is Defined as One of the Following:	270.27(a)(2); 264.1086(c)(1)			
O-9a(1) Container that Meets Department of Transportation Regulations on Packaging	270.27(a)(2); 264.1086(c)(1)(i),(f)	Container shall meet Part 178 or Part 179 and be managed in accordance with Parts 107, 172, 173, and 180.		
O-9a(2) Container Equipped with Cover and Closure Devices	270.27(a)(2); 264.1086(c)(1)(ii),(2)	Container shall be equipped with covers and closure devices, as needed.		
O-9a(3) Open-Top Container Equipped with Organic-Vapor Suppressing Barrier	270.27(a)(2); 264.1086(c)(1)(iii),(2)	Container shall be equipped with covers and closure devices, as needed.		
O-9b Container Level 2. A Container Using Level 2 Controls is Defined as One of the Following:	270.27(a)(2); 264.1086(d)(1)(f), (g)			
O-9b(1) Container that Needs Department of Transportation (DOT) Regulations on Packaging	270.27(a)(2); 264.1086(d)(1)(i),(f)	Containers shall meet Part 178 or Part 179, and be managed in accordance with Parts 107, 172, 173, and 180.		
O-9b(2) Container that Operates with No Detectable Organic Emissions	270.27(a)(2); 264.1086(d)(1)(ii),(g)	Owner/operator shall follow the procedures at 264.1086(g) and 265.1084(d) to determine no detectable organic emissions.		
O-9b(3) Container that has been Demonstrated Within the Preceding 12 Months to be Vapor-Tight	270.27(a)(2); 264.1086(d)(1)(iii) and (h)	Owner/operator shall follow procedures at 264.1086(h) and Part 60, Appendix A, Method 27 to demonstrate container is vapor-tight.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-9c	Container Level 3. A Container Using Level 3 Controls is Defined as One of the Following:	270.27(a)(2); 264.1086(e)(1), (2)		
O-9c(1)	Container that is Vented Directly Through a Closed-Vent System to a Control Device	270.27(a)(2); 264.1086(e)(1)(i)	The closed-vent system and control device shall be designed in accordance with 264.1087. Safety devices may be installed as needed.	
O-9c(2)	Container that is Vented Inside an Enclosure Which is Exhausted Through a Closed-Vent System to a Control Device	270.27(a)(2); 270.27(a)(3); 264.1086(e)(1)(ii)	The container/enclosure must be designed in accordance with 52.741, Appendix B and 264.1087. Safety devices may be installed as needed.	
O-10a	Container Level 1. Owner/Operators Shall Install Covers and Closure Devices for the Container and Secure and Maintain Each Closure Device in Closed Position, Except as Specified	270.14(a); 270.27; 264.1086(c)(3), (4)	The closure device or cover may be opened for the purpose of adding or removing hazardous waste or for maintenance or to avoid unsafe conditions.	
O-10b	Container Level 2. Owner/Operator Shall Install All Covers and Closure Devices for the Container and Maintain and Secure Each Closure Device in Closed Position, Except as Specified	270.14(a); 270.27; 264.1086(d)(2), (3)	Transfer of hazardous waste in or out of container shall be conducted in such a manner as to minimize exposure to atmosphere, as practical. The closure device or cover may be opened for the purpose of adding or removing hazardous waste or for maintenance or to avoid unsafe conditions.	
O-10c	Container Level 3. Owner/Operators Shall Operate the System in Accordance with 52.741, Appendix B; 264.1087; and 265.1081, as Needed	270.14(a); 270.27; 264.1086(e)(3), (4), (5)		

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-11a Standards Apply to Each Closed-Vent System and Control Device Used to Control Air Emissions under Part 264; Subpart CC	270.14(a); 270.27; 264.1087(a)			
O-11(b) Closed-Vent Systems Shall:	270.27(a)(5); 264.1087(b)			
O-11b(1) Route Gases, Vapors, and Fumes to Control Device	270.27(a); 264.1087(b)(1)			
O-11b(2) Be Designed and Operated in Accordance with 264.1033(k)	270.27(a); 264.1087(b)(2)	The Subpart AA standards for closed-vent systems must be satisfied.		
O-11b(3) Meet the Requirements for Bypass Devices, if Applicable	270.27(a); 264.1087(b)(3)	Each bypass device shall be equipped with either a flow indicator or a seal or locking device.		
O-12a The Control Device Shall be One of the Following:	270.27(a)(5); 264.1087(c)(1)			
O-12a(1) A Control Device Designed and Operated to Reduce Total Organic Content on Inlet Vapor Stream Vented to the Control Device by at Least 95 Percent by Weight	270.27(a)(5); 264.1087(c)(1)(i)	Owner/operator shall demonstrate compliance using either performance test or design analysis, except as specified.		
O-12a(2) An Enclosed Combustion Device	270.27(a)(5); 264.1087(c)(1)(ii)	Owner/operator shall demonstrate compliance using either performance test or design analysis, except as specified. Control device shall be designed and operated in accordance with 264.1033(c).		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-12a(3) A Flare	270.27(a)(5); 264.1087(c)(1) (iii)	Owner/operator shall demonstrate compliance using either performance test or design analysis, except as specified.		
O-12b Each Closed-Vent System and Control Device Shall Comply with the Operating Requirements of 264.1087(c)(2)	270.27(a)(5); 264.1087(c)(2)	Planned routine maintenance of control device shall not exceed 240 hours per year; system malfunctions shall be corrected as soon as practicable; and system shall be operated such that gases, vapors, or fumes are not actively vented to control device during planned maintenance or system malfunction, except as specified.		
O-12c A Carbon Adsorption System	270.27(a)(5); 264.1087(c)(3)	Carbon replacement and removal shall follow prescribed requirements in 264.1033(g), (h), and (n).		
O-12d Each Control Device Shall be Operated and Maintained in Accordance with 264.1033(j), Except for Certain Devices Identified (e.g., Flare)	270.27(a)(5); 264.1087(c)(4)	264.1033(j) requires the owner/operator to prepare documentation describing the control device's operation and to identify the process parameter(s) that indicate its proper operation and maintenance.		
O-12e The Owner/Operator Shall Demonstrate that a Control Device Achieves the Performance Requirements Using a Performance Test or Design Analysis, Except for Specific Devices Identified (e.g., flare)	270.27(a)(5); 264.1087(c)(5)	For performance test, owner/operator shall use the test specified at 264.103(c). For design analysis, owner/operator shall use an analysis that meets requirements specified at 264.1035(b)(4)(iii). In addition, the U.S. Environmental Protection Agency (EPA) prescribes unit-specific performance demonstration requirements for certain unit types at 264.1087(c)(5).		

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**SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-12f If Design Analysis is Not Sufficient, then a Performance Test is Required	270.27(a)(5); 264.1087(c) (6)	The EPA regional administrator shall determine if a performance test is required to demonstrate control device's performance.		
O-12h Inspect and Monitor the Control Device	270.27(a)(5); 264.1087(c) (7)	Control devices shall be inspected and monitored at least once a day.		
O-13 Each Tank, Surface Impoundment and Container Shall be Inspected, Monitored, and Repaired in Accordance with the 264 Subpart CC Requirements	270.27; 264.1088	Inspection, monitoring and repair requirements specific to each unit are located in the standards sections of the regulation 264.1084 through 264.1087. Owner/operator shall develop and implement written plan and schedule to perform inspections and monitoring required. The plan and schedule shall be incorporated into facility's inspection plan.		
O-14 Each Owner/Operator Shall Comply with the Recordkeeping Requirements Specified at 264.1089	270.27; 264.1089	Except as specified, records shall be maintained in facility's operating record for a minimum of 3 years. Various records are required depending on the type of unit and control device.		
O-14a Each of the Following Owner/Operators Shall Comply with the Reporting Requirements at 264.1090:	270.27; 264.1090			

**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS****SECTION O. SUBPART CC AIR EMISSION STANDARDS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
O-14a(1) Each Owner/Operator Managing Hazardous Waste in a Tank, Surface Impoundment, or Container Exempted from Using Air Emission Controls under 264.1082(c)	270.27; 264.1090(a)	Owner/operator shall report to EPA each noncompliance identified under 264.1082(c).		
O-14a(2) Each Owner/operator Using Air Emission Controls on a Tank in Accordance with 264.1084(c)	270.27; 264.1090(b)	Owner/operator shall report to EPA each noncompliance identified under 264.1084(B).		
O-14a(3) Each Owner/operator Using a Control Device in Accordance with 264.1087	270.27; 264.1090(c),(d)	Owner/operator shall submit semiannual written report to EPA, except as specified.		
O-14b Each Owner/Operator shall Provide an Emission Monitoring Plan	270.27(a)(6)	Applies to Method 21 and control device monitoring methods.		
O-14c Subpart CC Implementation Plan	270.27(a)(7)	Required when facility cannot comply with Subpart CC by date of permit issuance.		

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 RCRA PART B PERMIT APPLICATIONS****SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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.	
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.	

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**CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS**

**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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.		
Complying with siting criteria in Chapter 269a (relating to siting)	270a.13			
P-2 Part B General Description	270.14(b)(1)	(Section B)		
P-3 General Requirements	270.14	(B-1)		
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)			

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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)			
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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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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); 264a.13	(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, Appendix VIII	(E-5) In some cases, contaminant plumes may be defined under groundwater quality 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.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
P-5c General Monitoring Program Requirements	270.14(c)(5); 264.90(b)(4); 264.97;264a.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); 264a.97	(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.		
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.		

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Section and Requirement	Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-5j Corrective Action Plan	270.14(c)(8)(iii); 264.100(b); 264.101; 264a.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); 264.14	(F-1) Indicate whether hazardous waste 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; 264a.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.		

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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
P-6b(1) General Inspection Requirements	270.14(b)(5); 264.15(a), (b); 264.33; 264a.15	(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 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.		
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.		

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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); 264.55	(G-2) There must at least be one primary emergency coordinator available at all times.		
P-8b Implementation	270.14(b)(7); 264.52(a); 264.56(d); 264a.56	(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; 264a.56	(G-4)		
P-8c(1) Notification	270.14(b)(7); 264.56(a); 264a.56	(G-4a) Describe the method for immediate notification of facility personnel and necessary state and local agencies.		



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<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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); 264a.56	(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.		
P-8c(7) Post-Emergency Equipment Management	270.14(b)(7); 264.56(h)(2)	(G-4h) Decontamination is required for emergency equipment.		
P-8d Evacuation Plan for Facility Personnel	270.14(b)(7); 264.52(f)	Evacuation plans must include evacuation signals and primary and alternate evacuation routes.		
P-8e Notification of federal, State and Local Authorities before Resuming Post-Closure Care	270.14(b)(7); 264.56(i); 264a.56	Federal or state authorities must be notified within 15 days of occurrence.		
P-8f Notification Reports	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.		

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Section and Requirement	Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-9 Outline of Introductory and Continuing Training Programs	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 Job Title/Job Description	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 Description of How Training will be Designed to Meet Actual Job Tasks	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 Training Director	270.14(b)(12); 264.16(a)(2)	(H-1c) Program must be directed by person trained in hazardous waste procedures.		
P-9d Relevance of Training to Job Position	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 Training for Emergency Response	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 Maintenance of Training Records/Copy of Personnel Training Documents	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.		

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
P-10 Closure Plans	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 Post-Closure Plan	270.14(b)(13)	(I-2) Submit a copy of the approved post-closure plan.		
P-11a Post-Closure Care Contact	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 Notices Required for Disposal Facilities	270.14(b)(14)	(I-3a through d) Provide a certification of closure, a survey plat, and a post-closure 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).		

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

Section and Requirement	Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation	Review Consideration <sup>a</sup>	Location in Application <sup>b</sup>	See Attached Comment Number <sup>c</sup>
P-14 Financial Assurance Mechanism for Post-Closure Care	270.14(b)(16)	<ul style="list-style-type: none"> <li>(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.</li> </ul>		
P-15 Use of State Required Mechanisms	270.14(b)(18)	(I-9) When state has regulations equivalent 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)	(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; 264a.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.		

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**SECTION P. POST-CLOSURE FACILITY REQUIREMENTS**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
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; 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)		

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<b>CHECKLIST FOR REVIEW OF RCRA PART B PERMIT APPLICATIONS</b>				
<b>SECTION P. POST-CLOSURE FACILITY REQUIREMENTS</b>				
<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
<p>P-19 Information on the Potential for the Public to be Exposed to Releases. At a Minimum, this must include:</p> <ul style="list-style-type: none"> <li>• reasonably foreseeable potential releases</li> <li>• potential pathways of human exposure</li> <li>• potential magnitude and nature of exposure</li> </ul>	270.10(j)	(Q-1) The federal requirement is for surface impoundments and land disposal units.		

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.
- 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.
- d Listed Federal regulatory citations refer to provisions of Title 40 of the Code of Federal Regulations (40CFR) that have been incorporated by reference into Title 25 of the Pennsylvania Code (25 Pa. Code). Citations containing a small letter "a" refer to provisions of 25 Pa. Code that contain additions to, deletions from, or modifications of the Federal regulations that have been incorporated.

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**SECTION Q. EXPOSURE INFORMATION**

<b>Section and Requirement</b>	<b>Pennsylvania (25 Pa. Code) or Incorporated Federal (40 CFR) Regulation</b>	<b>Review Consideration<sup>a</sup></b>	<b>Location in Application<sup>b</sup></b>	<b>See Attached Comment Number<sup>c</sup></b>
<p>Q Information on the Potential for the Public to be Exposed to Releases. At a Minimum, this must include:</p> <ul style="list-style-type: none"> <li>• reasonably foreseeable potential releases</li> <li>• potential pathways of human exposure</li> <li>• potential magnitude and nature of exposure</li> </ul>	<p>270.10(j)</p>	<p>The federal requirement is for surface impoundments and land disposal units.</p>		

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.
- 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.
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