



COMPLETENESS/TECHNICAL CHECKLIST FOR CORRECTIVE ACTION ONLY PERMITS

40 CFR 264.1(j) – General Requirements for Corrective Action Only Permits

[\(click here for link\)](#)

“The requirements of subparts B, C, and D of this part and §264.101 do not apply to remediation waste management sites. (However, some remediation waste management sites may be a part of a facility that is subject to a traditional RCRA permit because the facility is also treating, storing or disposing of hazardous wastes that are not remediation wastes. In these cases, Subparts B, C, and D of this part, and §264.101 do apply to the facility subject to the traditional RCRA permit.) Instead of the requirements of subparts B, C, and D of this part, owners or operators of remediation waste management sites must:” address items (1) through (13) of 40 CFR 264.1(j).

(Federal Regulations for [Part B Permit Application](#) can be found in 40 CFR 270.10-270.29)

(Applicable State Regulation can be found [10 CSR 25](#))

[“Introduction to Treatment, Storage and Disposal Facilities”](#) (EPA) 530-K-05-017

**Please Note: All underlined words in blue are internet hyperlinks*

40 CFR 270.3 - Considerations Under Federal Law [40 CFR 270.3]: [\(click here for link\)](#)

(Section _____ of permit, pg# _____)

_____ Applicable information under the:

Wild and Scenic Rivers Act; <http://www.rivers.gov/wildriverslist.html>

National Historic Preservation Act; <http://www.dnr.mo.gov/shpo/>,
<http://www.dnr.mo.gov/shpo/MNRList.htm>

Endangered Species Act; <http://mdcgis.mdc.mo.gov/heritage/newheritage/heritage.htm>

<http://www.fws.gov/endangered/listing/index.html>, and
http://ecos.fws.gov/tess_public/pub/stateListingIndividual.jsp?state=MO&stat
[us=listed](#)

Coastal Zone Management Act (Not Applicable in Missouri); and

Fish and Wildlife Coordination Act. **(only applicable if facility plans to modify waterways)*

40 CFR 264.1 - Corrective Action Only: General Requirements: [\(click here for link\)](#)

_____ Obtain an EPA identification number [\(use EPA form 8700-12\)](#) . [40 CFR 264.1(j)(1)]

_____ Chemical Analysis of hazardous remediation waste [40 CFR 264.1(j)(2)]

(i.e., Investigation derived waste, waste characterization or disposal procedures, discussion of disposal method for purged water.)

- _____ Description of Security [40 CFR 264.1(j)(3)] (3)
(Methods to prevent unauthorized persons or livestock from entering the remediation waste management site, or demonstration that physical contact with waste, structures or equipment will not injure people or livestock)
- _____ Inspection schedule and procedures for remediation waste management site. [40 CFR 264.1(j)(4)] **see [40 CFR 264.15](#) for background*
- _____ Personnel Training Requirements [40 CFR 264.1(j)(5)]
(i.e, 40-hour OSHA training and current 8-hour refresher certification, training necessary to operate remediation system)
- _____ Precautions to prevent accidental ignition or reaction of ignitable or reactive waste, and prevent threats to human health and the environment from ignitable, reactive and incompatible waste or demonstrate that these materials will not be managed at the remediation waste management site. [40 CFR 264.1(j)(6)]
- _____ Remediation waste management sites subject to regulation as a tank system, surface impoundment, waste pile, land treatment unit, landfill, incinerator, or miscellaneous unit must meet floodplain standards of [40 CFR 264.18\(b\)](#) & [10 CSR 25-7.270.14\(2\)\(B\)\(4\)](#). [40 CFR 264.1(j)(7)]
- _____ Not place any non-containerized or bulk liquid hazardous waste in any salt dome formation, salt bed formation, underground mine or cave [40 CFR 264.1(j)(8)]
- _____ Develop and maintain a construction quality assurance program for all surface impoundments, waste piles, and landfill units at the remediation waste management site or demonstrate that these types of units will not be part of the remediation waste management site. [40 CFR 264.1(j)(10)]

[Construction Quality Assurance Program \(Ohio EPA example\)](#)
- _____ Develop and maintain procedures to prevent accidents and a contingency plan to control accidents that may occur. [40 CFR 264.1(j)(10)]
(i.e, Maintain a Health and Safety Plan on-site.)
- _____ Designate an emergency contact/coordinator. [40 CFR 264.1(j)(11)]
- _____ Develop, maintain and implement a plan to meet the requirements in paragraphs (j)(2) through (j)(6) and (j)(9) through (j)(10). [40 CFR 264.1(j)(12)]
- _____ Maintain records documenting compliance with all applicable portions of 40 CFR 264.1(j)(1) - 264.1(j)(12) [40 CFR 264.1(j)(13)]

40 CFR 270.14 - Contents of Part B: General Requirement for Groundwater Protection of Regulated Land Based Units at Active\Post-Closure Hazardous Waste Facilities : [40 CFR 270.14(c)] [\(click here for link\)](#)

(Section _____ of permit, pg# _____)

- _____ Summary of Interim Status Groundwater Monitoring Data [40 CFR 270.14(c)(1)]
- _____ Aquifer Identification [40 CFR 270.14(c)(2)]
- _____ Proposed Compliance Point [40 CFR 270.14(c)(3)]
- _____ Description of Any Contaminant Plume [40 CFR 270.14(c)(4)]
- _____ Detailed Plans and an Engineering Report Describing the Proposed Ground Water Monitoring Program to be Implemented [40 CFR 270.14(c)(5)]
- _____ Valid Groundwater Detection Monitoring Program [40 CFR 270.14(c)(6)]
- _____ Valid Groundwater Compliance Monitoring Program [40 CFR 270.14(c)(7)]
- _____ Valid Groundwater Corrective Action Program [40 CFR 270.14(c)(8)]

40 CFR 270.14 - Contents of Part B: General Requirement for Solid Waste Management Units : [40 CFR 270.14(d)] [\(click here for link\)](#)

(Section _____ of permit, pg# _____)

Please use the SWMU Form (separate form)

- _____ Identify all SWMU's and AOC with: [40 CFR 270.14(d)1]
 - The location of the each unit on the topographic map with:
 - Designation of type of unit;
 - General dimensions and structural description;
 - When the unit was operated; &
 - Specification of all wastes that have been managed at the unit
- _____ Submit all available information pertaining to any release of hazardous wastes or or hazardous constituents from such unit or units [40 CFR 270.14(d)2]
- _____ The owner/operator must conduct and provide the results of sampling and analysis of groundwater, land surface, and subsurface strata, surface water, or air, which may include the installation of wells. [40 CFR 270.14(d)3]

Other Requirements:

[\(click here for 10 CSR 25\)](#) [\(click here for Chapter 260 RSMo.\)](#)

- _____ Missouri Application Form with Attachments and Certification
[Section 260.395.7(1) RSMo., 10 CSR 25-7.270(2)(B)1.] [\(click here for application\).](#)
- _____ Justification for Requests for Confidentiality [Section 260.430 RSMo., 10 CSR 25-7.270(2)(B)2.]
- _____ Seismic info [10 CSR 25-7.270(2)(B)4.]
- _____ Topographic Map [10 CSR 25-7.270(2)(B)3 & 10 CSR 25-7.270(2)(B)5.]
- _____ All Engineering plans sealed by engineer registered in Missouri [10 CSR 25-7.270(2)(B)6.]
- _____ Permit Application Fee (\$1000) [10 CSR 25-7.270(2)(B)8.]
- _____ Names and addresses (including labels) for adjacent landowners (one mile radius for disposal facilities) [10 CSR 25-7.270(2)(B)10.A and 10 CSR 25-8.124(1)(A)10.C.(I)(c).III]
- _____ Names and addresses of local, state, and federal elected officials [10 CSR 25-8.124(1)(A)10.C.(I)(d.)]
- _____ Name, address and telephone number for the closest public library [10 CSR 25-8.124(1)(A)10.C.(I)(e.)]

- _____ EPA RCRA Hazardous Waste Part A Permit Application, [\(click here for Form 8700-23\)](#).
Are the units and waste codes correctly filled out, topographic map requirements included, form properly signed and dated, and facility unit photos included (*if it is a renewal*).
- _____ Is the facility required to have an environmental covenant under Missouri Environmental Covenant Act (MoECA) under [RSMo. 260.1000 - 260.1039](#).
- _____ Are there possible environmental justice (EJ) issues?
[\(click EPA EJ homepage\)](#) [\(click EJ Toolkit\)](#)

** If other sections are applicable please continue to pages below, otherwise checklist ends here*

(Additional information if applicable as stated in 40 CFR 270.28)

**Sections 40 CFR 270.14, 270.16, 270.17, 270.18, 270.20 or 270.21)*

Also adding 40 CFR 270.23, 270.24, 270.25, 270.26

40 CFR 270.14 - Contents of Part B: General Requirements (not listed above):

[\(click here for link\)](#)

_____ Facility meets all applicable requirements per Container Storage Technical Checklist

(Use Container Storage Technical Checklist (separate checklist))

**Please note the as-built drawings and final certifications for unit must be submitted prior to inspection per 40 CFR 270.30(l)(2), as incorporated in 10 CSR 25-7.270(2)(C)1.B.*

40 CFR 270.16 - Specific Part B Requirements for Tanks: [\(click here for link\)](#)

_____ Facility meets all applicable requirements per Tank Technical Checklist

(Use Tank Technical Checklist (separate checklist))

**Please note the as-built drawings and final certifications for unit must be submitted prior to inspection per 40 CFR 270.30(l)(2), as incorporated in 10 CSR 25-7.270(2)(C)1.B.*

40 CFR 270.17 - Specific Part B Requirements for Surface Impoundments:

[\(click here for link\)](#)

Applicable Federal TSD Section: [40 CFR 264.220-232](#) (Subpart K)

Applicable State TSD Section: [10 CSR 25-7.264\(2\)\(K\)](#)

(Section _____ of permit, pg# _____)

_____ Engineering Plans and Reports Showing a Double Liner or a Request (With Justification) for Exemption [40 CFR 270.17(b)]

_____ Procedures for Removal from Service for Repairs [40 CFR 270.17(e)]

_____ Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]

_____ Treatment Standards [40 CFR 268.40]

40 CFR 270.18 - Specific Part B Requirements for Waste Piles: [\(click here for link\)](#)

Applicable Federal TSD Section: [40 CFR 264.250-259](#) (Subpart L)

Applicable State TSD Section: [10 CSR 25-7.264\(2\)\(L\)](#)

(Section _____ of permit, pg# _____)

_____ Liner [40 CFR 270.18(c)]

_____ Design and Operating Requirements [40 CFR 264.251]

- _____ Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]
- _____ Treatment Standards [40 CFR 268.40]

40 CFR 270.20 - Specific Part B Requirements for Land Treatment:

[\(click here for link\)](#)

Applicable State TSD Section: 10 CSR 25-7.264(2)(M) *Reserved*

(Section _____ of permit, pg# _____)

- _____ Treatment Demonstration [40 CFR 270.20(a)]
- _____ Unsaturated Zone Monitoring [40 CFR 270.20(b)(3)]
- _____ Site Suitability Demonstration [40 CFR 270.20(a)]
- _____ 500 Geodesic Feet from Water Supplies [10 CSR 25-7.264(2)(M)1.A(III)]
- _____ Discussion of Food Chain Crops [40 CFR 270.20(d)(e)]
- _____ Run-off Management [40 CFR 270.20(c)]
- _____ Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]
- _____ Treatment Standards [40 CFR 268.40]

40 CFR 270.21 - Specific Part B Requirements for Landfills: [\(click here for link\)](#)

Applicable Federal TSD Section: [40 CFR 264.300-317](#) (Subpart N)

Applicable State TSD Section: [10 CSR 25-7.264\(2\)\(N\)](#)

(Section _____ of permit, pg# _____)

- _____ List of Hazardous Wastes to be Placed in Landfill [40 CFR 270.21(a)]
- _____ Description of Liner System [40 CFR 270.21(b)(1)]
- _____ Description of Leachate Collection and Removal System [40 CFR 270.21(b)(1)]
- _____ Description of Run-on Control System [40 CFR 270.21(b)(2)]
- _____ Description of Run-off Control System [40 CFR 270.21(b)(3)]
- _____ Description of Management Practices for Run-on and Run-off Control Systems [40 CFR 270.21(b)(4)]
- _____ Description of Wind Dispersal Control System [40 CFR 270.21(b)(5)]
- _____ 300 Feet Buffer Zone [10 CSR 25-7.264(2)(N)2.D.]
- _____ Description of Inspection Plan [40 CFR 270.21(d)]
- _____ Description of Final Cover at Closure and Maintenance After Closure [40 CFR 270.21(e)]

- _____ Landfilling of Incompatible Wastes [40 CFR 270.21(g)]
- _____ Landfilling of Containers of Hazardous Wastes [40 CFR 270.21(i)]
- _____ Description of Landfill Design for Waste Nos. F020, F021, F022, F026, and F027 [40 CFR 270.21(j)]
- _____ Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]
- _____ Treatment Standards [40 CFR 268.40]
- _____ Post-Closure Care [40 CFR 264.603]

40 CFR 270.23 - Specific Part B Requirements for Miscellaneous

Units: [\(click here for link\)](#)

- _____ Facility meets all applicable requirements per Misc. Unit Technical Checklist

(Use Misc. Unit Technical Checklist (separate checklist))

**Please note the as-built drawings and final certifications for unit must be submitted prior to inspection per 40 CFR 270.30(l)(2), as incorporated in 10 CSR 25-7.270(2)(C)1.B.*

40 CFR 270.24 - Specific Part B Requirements for Process Vents:

(Subpart AA) [\(click here for link\)](#)

(Section _____ of permit, pg# _____)

- _____ Applicability [40 CFR 264.1030]

40 CFR 270.25 - Specific Part B Requirements for Equipment Leaks: (Subpart BB)

[\(click here for link\)](#)

(Section _____ of permit, pg# _____)

- _____ Applicability [40CFR 264.1050]

40 CFR 270.27 - Specific Part B Requirements for Tanks, Surface

Impoundments, and Containers: (Subpart CC) [\(click here for link\)](#)

(Section _____ of permit, pg# _____)

- _____ Applicability [40 CFR 264.1080]