

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS**SECTION D. PROCESS INFORMATION - CONTAINERS**

Section and Requirement		Federal Regulation	Review Consideration ^a	Location in Application ^b	See Attached Comment Number ^c
D-1	Containers	270.15; 264.170			
D-1a	Containers with Free Liquids	270.15; 264.175(a),(b)	Containers storing waste with free liquids must meet secondary containment requirements of 264.175(b).		
D-1a(1)	Description of Containers	270.14(b)(1); 264.171,172	Specify numbers of containers, sizes, and specifications.		
D-1a(2)	Container Management Practices	270.14(a); 264.173	Containers must be kept closed and must not be handled in any manner which could cause them to rupture or leak. Specify aisle space and stacking height.		
D-1a(3)	Secondary Containment System Design and Operation	270.15(a)(1); 264.175(a),(d)	Provide detailed design and profile drawings showing container storage areas.		
D-1a(3)(a)	Requirement for the Base or Liner to Contain Liquids	270.15; 264.175(b)(1)	Demonstrate that base is impervious to waste stored and precipitation.		
D-1a(3)(b)	Containment System Drainage	270.15(a)(2); 264.175(b)(2)	Containment system must be designed and operated to remove liquids resulting from leaks, spills, or precipitation.		
D-1a(3)(c)	Containment System Capacity	270.15(a)(3); 264.175(b)(3)	Containment system must have capacity to hold 10 percent of container volume or volume of the largest container, whichever is greater.		
D-1a(3)(d)	Control of Runon	270.15(a)(4); 264.175(b)(4)	Runon from storm water must be prevented unless containment system has sufficient excess capacity.		
D-1a(3)(e)	Removal of Liquids from Containment System	270.15(a)(5); 264.175(b)(5)	Accumulated liquids must be removed in timely manner to prevent containment system from overflowing.		

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D-1b Containers without Free Liquids				
D-1b(1) Test for Free Liquids	270.15(b)(1)	Documentation that waste does not contain free liquids must be provided by test results or other information.		
D-1b(2) Description of Containers	270.14(a); 264.171; 264.172	Describe numbers, sizes, and specifications of containers.		
D-1b(3) Container Management Practices	270.14(a); 264.173	Same comment as D-1a(2).		
D-1b(4) Container Storage Area Drainage	270.15(b)(2); 264.175(c)	Same comment as D-1a(3)(b).		

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.