

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

<b>Section and Requirement</b>	<b>Federal 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>
D-8 Miscellaneous Units	270.23; 264.601	Identify all miscellaneous units that treat, store, or dispose of hazardous waste at facility, but do not fit current definition of container, tank, surface impoundment, etc. These units may include: <ul style="list-style-type: none"> <li>• geologic repositories</li> <li>• deactivated missile silos</li> <li>• thermal treatment units other than incinerators, boilers, or industrial furnaces</li> <li>• units open burning and open detonating explosive waste</li> <li>• certain chemical/physical/biological treatment units.</li> </ul>		
D-8a Description of Miscellaneous Units	270.23(a)			
D-8b Waste Characterization	270.23; 264.601(a)(1), (b)(1), (c)(1)	Provide information on volume and concentration of waste in order to determine release potential.		
D-8c Treatment Effectiveness	270.23(d)			
D-8d Environmental Performance Standards for Miscellaneous Units		Environmental performance standards must be established and maintained to protect human health and environment.		
D-8d(1) Protection of Groundwater and Subsurface Environment	270.23(b),(c); 264.601(a)			
D-8d(1)(a) Environmental Assessment	270.23(b),(c); 264.601(a)	Applicant must conduct assessment of potential for releases to groundwater or the		

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		subsurface environment. Both saturated and unsaturated zones must be considered in evaluating potential for subsurface migration.		
D-8d(1)(b) Performance Standards	270.23(b); 264.601	Based on assessments, performance standards must be developed and maintained.		
D-8d(2) Protection of Surface Water, Wetlands, and Soil Surfaces	270.23(b),(c); 264.601(b)			
D-8d(2)(a) Environmental Assessment	270.23(b),(c); 264.601(b)	Applicant must conduct assessment of potential for releases to surface water, wetlands, or soil surface.		
D-8d(2)(b) Performance Standards	270.23; 264.601	Based on assessments, performance standards must be developed and maintained.		
D-8d(3) Protection of the Atmosphere	270.23(b),(c); 264.601			
D-8d(3)(a) Environmental Assessment	270.23(b),(c); 264.601(c)	Applicant must conduct assessment of potential for release to air.		
D-8d(3)(b) Performance Standards	270.23; 264.601	Based on assessments, performance standards must be developed and maintained.		
D-8e Monitoring, Analysis, Inspection, Response, Reporting, and Corrective Action	270.23(a); 264.602			
D-8e(1) Elements of a Monitoring	270.23(a); 264.602	Monitoring program must include		

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Program		procedures for sampling, analysis, and evaluation of data, suitable response procedures, and a regular inspection schedule.		
D-8e(2) Air Monitoring Alternatives	270.23(a); 264.602	For situations in which ambient air monitoring would be unsafe or impractical, possible alternatives may include analysis of waste, emissions measurements, and periodic monitoring with portable detectors.		

## Notes:

<sup>a</sup> Considerations in addition to the requirements presented in the regulations.

<sup>b</sup> 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.

<sup>c</sup> 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.